

December 2022

## **Background: What is On-the-Job Training?**

On-the-Job Training (OJT) is a proven, evidence-based strategy under the Workforce Innovation and Opportunity Act (WIOA) that provides reimbursements to businesses to help compensate for the costs associated with skills upgrading and loss of production for the training of newly hired employees. This work-based opportunity that provides full-time employment is available to adults, dislocated workers, and youth customers 18 years of age or older. OJT placements should be considered in the context of in-demand occupations or industries where career pathways exist with employer partners who have a documented plan to add jobs.

OJT, as defined in Section 3(44) of WIOA, is training by an employer that is provided to a paid participant while engaged in productive work in a job that:

- a) provides knowledge or skills essential to the full and adequate performance of the job;
- b) is made available through a program that provides reimbursement to the employer of up to 50% of the wage rate of the participant, except as provided in Section 134 (c)(3)(H) of WIOA, (***see note below***) for the extraordinary costs of providing the training and additional supervision related to the training; and
- c) is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate.

**Note:** Per Sections 3(44) and 134 (c)(3)(H) of WIOA, the amount of reimbursement may be increased to up to 75% of the wage rate of the participant if the increased rate of reimbursement is warranted after taking the following factors into account:

- 1) attributes of the participant with special emphasis on whether the participant is an individual with barriers to employment as defined in Section 3 (24) of WIOA;
- 2) the size of the employer, with increased reimbursement available to employers with less than 251 employees;
- 3) the quality of employer-provided training and advancement opportunities; and
- 4) any other factors deemed appropriate by the Governor or the High Country Workforce Development Board, respectively, may be determined to be appropriate, which may include the number of employees participating in the training; wage and benefit levels of those employees (at present and anticipated upon completion of the training); and relation of the training to the competitiveness of the participant.

Standard reimbursement rate is 50 percent (50%). OJTs at the 75 percent (75%) reimbursement rate require prior approval from the HCWDB staff. Please contact HCWDB staff as early in the process as possible for a determination.

**NOTE:** *Small employers (consisting of 25 employees or fewer), served via American Rescue Plan Act (ARPA) funds, should be reimbursed at the 75 percent (75%) reimbursement rate for participant wages and does not require prior approval. Please refer to ARPA guidance related to ARPA activities.*

## **Background: Key Points and Requirements**

OJT is offered if a participant is eligible for training services provided through WIOA and encourages employers to provide occupational training (current skills vs. needed skills) that results in hiring unemployed, underemployed, or dislocated persons.

- Training is provided for the WIOA participant in exchange for reimbursement of up to 50% of the wage rate to compensate for the employer's costs for training a worker who has an identified skills gap.
- OJTs are contracted for a limited time for a participant to become proficient in the occupation for which the training is being provided.
- OJT contracts require that the wages paid to trainees be at least the prevailing entry wage for that occupation in the local labor market. If the employer operated under a collective bargaining agreement, the wage and benefits must be those specified in that union agreement and the job opening must be cleared with the appropriate union.
- The employer must comply with equal opportunity requirements of federally funded activities (WIOA Title I Section 188). The business shall not discriminate against any employee, applicant for employment, applicant or WIOA participant, subcontractor or potential beneficiaries of employment and training programs or projects because of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including English proficiency), age, disability, political affiliation or belief, or on the basis of an individual's citizenship status.
- Trainees hired under OJT will be subject to the same personnel policies, rules and regulations, afforded the same benefits, and compensated at the same rates as other employees of the company.
- Employers must carry Workers Compensation Insurance and make federal and state tax withholdings as required by law. In addition, the individual trainee payroll tax records must be maintained and available for review for a minimum period of three years after the end of the training period. No cash payments or personal checks are allowed.

- The business must meet the Fair Labor Standards Act (FLSA) requirements for an employer-employee relationship. The FLSA defines “employ” as the work that the employer directs or allows to take place. Workers who are economically dependent on the business of the employer and will receive a W-2 for tax filing purposes have an employer-employee relationship. NOTE: An individual who will receive a 1099 for tax filing purposes does not meet the employer-employee relationship. Therefore, employers that only utilize 1099 independent contractor/workers are not eligible.
- Conditions of employment and training will be in full accordance with all applicable federal, state, and local laws (including but not limited to health and safety laws) and be appropriate and reasonable with regards to the type of work undertaken and the proficiency of the trainee.
- The employer must certify that the trainee will not displace any regular employee of the employer and that no person was displaced as a result of the relocation of the current business within the previous 120 days of signing the OJT Contract Agreement.
- The OJT employer will agree to adhere to the High Country Workforce Development Board grievance process if a complaint arises in connection with the OJT training.
- Factors indicating an OJT should be placed on probation or terminated include the following:
  - the participant isn’t progressing effectively or isn’t receiving adequate training/supervision;
  - there are complaints from the employee or employer regarding concerns of safety or harassment or a hostile work environment; and/or
  - there are issues with documentation of required OJT paperwork.
- OJT trainees will not be employed to carry out the construction, operation, or maintenance of any part of a facility that is used or to be used for sectarian instruction or as a place for religious worship, or be required to participate in religious activities.
- No individual (neither new hire nor current employee) may enter an OJT position if a member of his/her family is engaged in an administrative capacity with the OJT employer, including a person with selection, hiring, placement, or supervision responsibilities for the OJT trainee.
- The OJT employer must certify that neither the employing company nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible, or excluded from participation by any federal department or agency. Check with the HCWDB Finance and Compliance Specialist for the Suspension of Funding List.
- The OJT employer will maintain and make available for review all time and attendance, payroll, and other records to support amounts reimbursed under OJT contracts.
- The OJT employer must be registered in NCWorks Online.

- A trainee may not be trained under an OJT contract at a particular employer if the following applies:
  - any other individual is on layoff from the same or substantially equivalent job;
  - the employer has terminated the employment of any regular, unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy so created with the WIOA trainee; or
  - the job is created in a promotional line that infringes in any way on the promotional opportunities of currently employed workers.
- The OJT must be conducted at the employer's place of business or a related location. An employer may not subcontract the OJT to another organization.
- OJT participants must uphold the standards of the Hatch Act. An OJT participant cannot participate in any activity that is considered a political activity during working hours. See the HCWDB Hatch Act Guidance.

## **WIOA Service Provider OJT Coordination**

In the High Country workforce development region, WIOA service providers employ both Business Services Representatives (BSR) and Career Advisors (also identified as career development facilitators or case managers.) Both have a role to play in OJT services.

Generally, the BSR conducts employer outreach/marketing and recruitment of OJT participants, negotiates the OJT contract (including development of training plan in conjunction with employer), and maintains employer contact for the duration of the OJT contract (including collection of invoices, time sheets, and monthly employee performance evaluations), and ensures that an employer file is maintained at the work site and is available for review.

The career advisor determines participant eligibility, maintains a relationship with the participant throughout and beyond the contract period, and maintains participant records. As appropriate, the career advisor may assist the participant with supportive services (refer to High Country Supportive Services Policy).

The BSR and career advisor collaborate on the selection of a suitable candidate for a specific OJT, coordinate contact with employer and participant throughout the contract period; and confer with one another to determine appropriate course of action when either identifies a potential problem. In addition, the WIOA supervisor conducts at least one formal on-site OJT monitoring review.

Each WIOA service provider is to maintain a written plan, for the specific delineation of duties to ensure proper coordination and non-duplication of services. Service providers

are responsible for appropriate outreach and recruitment of OJT participants as well as employer marketing strategies that best meets the needs of their service area.

### **Training Eligibility: What makes an individual suitable for OJT?**

OJT may be provided to eligible WIOA trainees who are assessed and found to need and suitable for training services in order to obtain and retain employment that leads to self-sufficiency. The trainees must demonstrate a need for training as recorded on the Individual Employment Plan (IEP) or Individual Service Strategy (ISS).

Prior to an OJT placement, the trainee must be determined eligible and enrolled in WIOA services. Only those individuals who meet the eligibility requirements for career services, who have received an assessment, and for whom an IEP/ISS has been developed may be considered for an OJT.

Consideration should be given to the skill requirements of the occupation, academic and occupational skill level of the trainee, prior work experience, and the trainee's IEP/ISS. The results of objective assessment, as documented on the individual's IEP/ISS, must indicate that the trainee is in need of, and can benefit from, the activity of OJT. During the enrollment process, staff should capture the customer's prior work history; assess any test results; consider skills the customer obtained from hobbies and volunteer experience; and the customer's education while identifying strengths and weaknesses to determine appropriate suitability such as maturity, commitment, and reliable transportation; and consider whether OJT training is more appropriate than classroom training for the customer's particular area of occupational interests and abilities. When developing the training plan, it should identify the new skills to be acquired and how deficiencies will be addressed with the training.

In addition, please keep in mind the following:

- ✓ Select a field of training that is directly linked to employment in the local labor market area where the individual will be working;
- ✓ The individual should be unable to receive/obtain grant assistance from other sources to pay training costs;
- ✓ Priority is to be given to low-income individuals, recipients of public assistance, veterans and eligible spouses, and dislocated workers; and
- ✓ In cases where an individual is referred as a potential candidate for OJT by an employer (reverse referral), that individual may be considered for OJT with that employer only after the individual has met eligibility requirements for career services, has received an assessment, and for whom an IEP/ISS has been developed that indicates OJT is appropriate.



### **Currently Employed Adults**

If an adult is already employed, eligibility for OJT is limited to those customers where:

- WIOA requirements are met; **and**
- The OJT supports acquisition of new skills necessary for upgrading to a new job that requires substantially different higher-level skills and the current employee, as a result of successfully completing the OJT, is expected to receive an upgrade to a higher level position and an increase in pay. ***Please note: this instance is not to be confused with, or used instead of, an Incumbent Worker Training Grant.***

### **Reverse Referrals**

When an employer identifies a potential candidate for employment who lacks the skills the employer requires upfront and is in need of OJT, they must refer the individual to the Career Center for WIOA and OJT eligibility determination including eligibility requirements for career services, receiving an assessment, and for whom an IEP/ISS has been developed that indicates the OJT is appropriate. This must be done prior to the hiring selection or extending an offer of employment.

**NOTE: The employer cannot formally extend an “offer” of employment prior to the participant’s enrollment in WIOA.**

### **Employer Eligibility: Choosing the Right Employer**

The hiring and training may begin after the OJT Pre-Award Analysis form has been completed and the OJT Employer Agreement has been signed by all the parties. The trainee becomes an employee of the company on the day the OJT begins. Staff should give careful consideration when selecting a suitable employer for OJT.

The following factors are to be considered before completing the OJT Pre-Award Analysis form:

- General business practices in terms of working conditions (health and safety, supervised, good/non-hostile work environment);
- Has the employer demonstrated stability and successful employment opportunities.
- Is there a sustainable wage structure and the availability of health benefits;
- Does the turnover rate seem excessive in comparison to similar local businesses;
- Are adequate supervision, staff, equipment, and materials in place to carry out the training including but not limited to the ability to provide training effectively and adequate administrative capacity to comply with record keeping requirements in a timely manner;
- Prior to placing more than one participant at a single employer, the following should be considered:

- Are there other employers/worksites that would be appropriate to be considered;
- Has the current worksite had successful outcomes; and
- Will the additional placement represent a disproportionate share of the employer's workforce.
- Whether the employer is in compliance with federal, state, and local laws. Employers that have previously or are actively engaging in questionable activity (apparent or perceived) that could negatively impact the service provider or the participant are ineligible.
- Employers serving as an HCWDB member who have more than a ten percent (10%) ownership in a company are ineligible.

When considering an employer to participate as an OJT worksite, staff should carefully review and determine the nature of the employment to ensure the employment is ongoing and not temporary, probationary, or intermittent employment.

An OJT contract must be limited to the period of time required for a trainee to become proficient in the occupation for which training is being provided. In determining the appropriate length of the training, consideration must be given to the skill gaps that exist when comparing the skill requirements of the occupation and the academic and occupational skill level of the trainee, prior work experience, and the trainee's IEP/ISS.

**IMPORTANT: To the extent practical, OJT contracts should be made equitably among eligible local businesses. The goal should be serving as many employers in as many industries across the High Country as possible.**

Employers will have the final selection authority for individuals being hired.

### **OJT Employer Performance Expectations**

The goal of on-the-job training is that the employer retains the OJT trainee as a regular employee following the successful completion of training. If an employer has had previous OJT contracts, the service provider staff are expected to access the employer's past performance in training employees under OJT. The WIOA service provider will not develop an OJT contract with an employer who has repeatedly failed to meet performance standards. The employer must exhibit a history of long-term employment of trainees as regular employees with wages and similar working conditions at the same level.

**Employers that have not demonstrated success in training and retaining OJT participants and/or meeting the policy or the agreed upon expectations of the OJT should not be utilized.** However, special consideration of certain circumstances may be requested of the HCWDB staff and board.

## **Determining the Length of the Contract: Employer Agreement**

The *Specific Vocational Preparation* or *SVP* data found in the O\*NET Online database for that particular occupation will be used and will be adjusted to determine the length of training necessary to acquire the needed skills for each OJT participant. The SVP, published by the U.S. Department of Labor, provides guidance in calculating training time based on the type of occupation. The higher the SVP code, the higher skilled or more complex the occupation; therefore, a longer training time would be expected. **Under WIOA legislation, OJT contracts can be developed for occupations with SVP levels from 3 to 8.** Other occupations are excluded because the training is considered to be either too simple or too complex.

The following chart reflects the OJT time allowed for each Specific Vocational Preparation (SVP) Level:

<b>SVP Level</b>	<b>Hours of Training Permitted</b>
<b>3</b>	Over 1 month up to and including 3 months (3 months = 520 work hours)
<b>4</b>	Over 3 months up to and including 6 months (6 months = 1,040 work hours)
<b>5 - 8</b>	6 months (6 months = 1,040 work hours)

### **The OJT training period:**



**May not exceed 6 months/1,040 hours**  
**May not be written for a job below an SVP Level of 3**  
**May not be written for a job above an SVP Level of 8**  
**May not be for fewer than 240 hours.**

In every case, training hours are defined as time worked. Work time is to be recorded in the terms of hours.



## The following example illustrates the computation of maximum OJT costs:

Credit Clerk: DOT Code 205.367.022, SVP level - 4 has negotiated training time of 800 hours.

Starting wage rate - \$10.00

One-half starting wage rate per training.  $\$10.00 \times 800 \text{ hours} = \$8,000.00$

Divided by 2 = \$4,000.00

The SVP Chart shows that an SVP level of four has a maximum training time of 1040 hours. In this example, the employment representative accrued a savings of \$1,200.00 by negotiating the OJT contract for fewer than the maximum hours permitted. The employer got reasonable training time by negotiation, and the accrued savings can be used to help fund an OJT slot for another participant.

When determining the period of time needed for a WIOA OJT participant to acquire the necessary skills for the identified job tasks, consideration is to be given to recognized reference data including, but not limited to, the O\*NET Online Crosswalk Dictionary of Occupational Titles (DOT). In addition, a participant's IEP/ISS, education, skills (determined through assessment(s)), prior work experience, and relevant hobbies are all to be taken into consideration.

**NOTE:** Employer negotiations must include a reasonable amount of time for orientation, coaching, and counseling activities by WIOA staff since these activities are frequently critical to the success achieved by many participants. These sessions may be most reasonably conducted at the participant's worksite but are to be managed in such a way that maximizes confidentiality, that does not call undue attention to the participant's WIOA status and does not distract from productivity. Conducting these sessions during a scheduled break or immediately preceding or following scheduled work hours are good options.

## Eligible and Ineligible Occupations

OJT may only be offered in those occupations which provide opportunities not otherwise available, lead to economic self-sufficiency, and provide stable employment. Occupations that are eligible for WIOA funding include those which offer a reasonable expectation of continued employment in the occupation for which training is offered; are sufficiently skilled to require a training period of at least two hundred and forty (240) hours duration; that meet prevailing standards with respect to wage, hours, and conditions of employment; and those occupations on a promotional line that do not infringe in any way upon the promotional opportunities of currently employed individuals.

Occupations for which training **will not be approved** include, but are not limited to the following:

- Occupations that have not traditionally required specific occupational training as a requirement for employment.
- Occupations dependent on commission as the primary source of income. (This does not exclude those jobs which have a guaranteed base wage of at least the federal minimum wage in addition to commission pay and such guaranteed wage will continue after the training period.)
- Intermittent seasonal occupations.
- Occupations requiring less than 240 training hours or more than 1,040 reimbursable training hours.
- Part-time occupations. (For definition purposes, full-time employment is the 40-hour week, except where fewer hours are normal to the occupation, but in NO case less than thirty-two (32) hours per week).
- Occupations that are currently, or will be, included under an employee-leasing contract whereby job openings for a particular occupation at a business facility are filled by staff of the leasing contractor.
- Occupations where adequate supervision and/or monitoring are not available.

## **Participant Wages**

In no event will wages paid to WIOA OJT participants be less than the highest of the following:

- the federal minimum wage
- the state or local minimum wage
- prevailing wage rates provided to individuals in similar positions
- minimum entrance wage rate for inexperienced workers in the same occupation
- the wage rate required by applicable collective bargaining agreements
- prevailing rate established by the Davis-Bacon Act.

The HCWDB's minimum wage requirement is \$13.00/hour for OJT participants unless approved by HCWDB staff on a case-by-case basis.

OJTs are intended to assist career seekers in reaching and surpassing a self-sufficiency wage threshold. Employers engaging in OJTs for lower-wage jobs must demonstrate career pathways that lead to positions exceeding \$15.00/hour.

When an OJT participant works overtime, reimbursements are made to the employer at the regular hourly rate. **The additional half-time rate cannot be reimbursed.** The amount of the reimbursement is the total number of hours worked multiplied by the reimbursement rate.

For example, if a participant works 40 hours/week at \$10.00/hour, the reimbursement is \$200.00 (40 x \$10.00 divided by 2). If that participant works 60 hours in one week, the total reimbursement payment is still based on \$10.00/hour for 60 hours rather than \$10.00/hour for 40 hours plus \$15.00/hour for the additional 20 hours. The additional 20 hours of overtime work is calculated into the total number of training hours to be reimbursed.

### **OJT Contract/Employer Agreement Modifications**

A change or modification can be made to the OJT contract/employer agreement during the training period if necessary. A modification is necessary to increase the OJT contract amount, to change the contract closing date, or to increase the number of training slots. The WIOA service provider and the OJT employer must mutually agree upon the modification. Authorized signatures of both parties must be on the modification.

### **Skills Gap Analysis/Training Plan Development**

An individualized OJT Training Plan must be developed for the acquisition of the skills that the trainee does not already possess. Skills the trainee acquired from previous work or life experiences are transferrable and can be used in every occupation, regardless of the type of work. Transferrable skills are unlike job-related skills, which tend to be used only in one type of work. This plan will contain occupationally specific skills that the employer requires for competency in the OJT occupation. OJT funds should not be used for orientation to standard operating procedures of the employer. An analysis of the trainee's prior work history, transferrable work skills, and the job skills gained must be compared to the job skills/job description the employer requires in the OJT occupation. The resulting gap in skills will be the basis for the development of the Training Plan. The SVP data found in O\*NET for that particular occupation will be used and adjusted to determine the length of training necessary to acquire the needed skills. Each skill description should be concise, but comprehensive and the individual tasks should be measurable and observable. The specific types and sources of information used to identify the scope of the skills gap must be included in the trainee's case file.

There are several assessment tools available that may be used to conduct a skills gap analysis and provide adequate documentation of the process used to develop the Training Plan. These include Kenexa Prove It, an internet-based assessment tool used to determine an individual's level of skills in a particular occupation and to document skill deficiencies, as well as the O\*NET Online website and [www.myskillsmyfuture.org](http://www.myskillsmyfuture.org) which have both been developed by the US Department of Labor.

The training plan is used to assign an estimated length of time it will take to acquire the skill for each task. The total number of hours for each individual skill will total the negotiated length of the contract/employer agreement. The standard training hours and actual training hours per task may vary depending on the current skill level of the participant. The training plan will also identify the individual who will provide the training. The training plan is normally completed with the assistance of a representative of the company and **is always** reviewed with both the employer and participant before the contract is signed. The participant is to be given a copy of the training plan.

The trainee's progress under an OJT contract/employer agreement will be officially monitored at least once during the training period by the service provider's WIOA supervisor or designee who has not been involved in the development or implementation of the OJT.

### **Employer Agreement**

The Employer Agreement is completed following negotiation of contract terms. The agreements must contain the name, address, IRS number and phone number of the employer and must also include reimbursement amount, start date and termination date of the contract. The job description and training plan for each individual participant are to be attached to the contract/employer agreement (copies in both the employer and customer file).

### **Additional Service Provider Guidance**

The WIOA service provider is responsible for maintaining close contact with the trainee, the employer, and the person(s) assigned to train the participant to ensure that proper skills are being obtained as outlined in the training plan. Such contact is to occur **at least monthly** and must be documented in participant case notes.

It is the mutual responsibility of the WIOA service provider's business services representative and the participant's career advisor to maintain close coordination to identify any potential areas of concern regarding progress toward skill development and/or individual counseling/coaching services needed.

It is incumbent upon the WIOA service provider to be aware of any problems that arise during the training period and to assume primary responsibility for working with both the employer and the participant to resolve these issues. Problem-solving dialogue **must** include the WIOA Business Services Representative and/or career advisor and may include the WIOA supervisor. It is the WIOA service provider's responsibility to cultivate and maintain positive working relationships with both employer and participant and to ensure that both are following through on their responsibilities and doing their best to carry out the objectives of the plan.

## OJT Forms

Below is the list of forms that are the official documents to be used when conducting WIOA-funded OJT activities and are to be completed sequentially:

- Pre-Award Analysis
- Employer Agreement
- Training Plan
- Trainee Evaluation (Midpoint and Final)

All OJT forms must be thoroughly completed. The OJT packet/documentation should be maintained at the employer worksite and in NCWorks Online for each participant.

## OJT Invoices and Justification for Reimbursement Documentation

OJT invoices are used to document the number of hours and rate of reimbursement to the employer. OJT employers are expected to complete the timesheet and trainee evaluations on a monthly basis. The participant's immediate supervisor is expected to complete and sign the timesheet and the evaluation. Each monthly evaluation is to be discussed with the participant in order to communicate concerns and receive feedback. Only after the timesheet has been reviewed and the evaluation discussed, do the supervisor and employee sign the evaluation document.

The participant's career advisor is also expected to review each monthly employee evaluation and to discuss inadequate progress toward goals with the participant. Similar discussions are expected to be conducted with the participant's supervisor by designated service provider staff.

The service provider completes invoices for reimbursement **only after** receipt of all required employer documentation, as designated in the Employer Agreement (including verification of the participant being paid during the reimbursement time period). Each service provider must have a system for ensuring the receipt of OJT invoices and documentation from employers in a timely manner for processing by the service provider's finance office.

The service provider will submit OJT invoices with its respective monthly reimbursement invoice to the HCWDB. **All documentation verifying participant pay (timesheets, evaluation, payroll verification) must be included.** The HCWDB will review these invoices in the same manner in which all service provider reimbursements are reviewed prior to payment.



**Signed timesheets, invoices, payroll records and/or copies of pay stubs must be maintained and uploaded in NCWorks Online and made available for local and state monitoring. Electronic timesheets are acceptable with required signatures and may be printed and signed.**

### **NCWorks Online Keying Expectations**

- Keying Employer Services: Please make sure that the appropriate “E” codes are being entered into NCWorks in order to properly track services to employers. See the HCWDB Keying Employer Services in NCWorks.gov Policy.
- Participant Activities: Each customer participating in OJT should have the correct activity code added. Start and end dates of the activity should correspond to the OJT agreements and timesheets. When keying the activity, the employer should be listed as the Provider.
- Documentation: All aspects of the OJT should be keyed into NCWorks to include scanning of documents and up-to-date case notes tracking progress and completion.

### **OJT Performance Impact**

OJTs for adults and dislocated workers are tied to the Measurable Skills Gain (MSG) performance indicator. Participants engaged in OJT that have satisfactory or better progress towards established milestones from an employer should be keyed as a “Training Milestone” with documentation such as a mid-point or final evaluation in NCWorks Online.

***Please note that youth OJT does not count towards an MSG performance indicator; however, youth OJT contributes to the 20 percent (20%) expenditure requirement for the youth work-based learning funds requirement.***

Other performance indicators such as Employment Rate 2<sup>nd</sup>/4<sup>th</sup> quarter after exit and Median Earnings 2<sup>nd</sup> quarter after exit should also be considered. A successful OJT completion where the participant remains employed at the OJT worksite (or other employment) would equal positive performance. Those not employed 2<sup>nd</sup>/4<sup>th</sup> quarters after exit will have a negative impact on performance.

### **Official Monitoring Reviews**

The monitoring for OJT will at a minimum include the following: compliance with the training plan, participant’s eligibility checklist, comparison of time and attendance with invoices, comparison of contracted wage rate vs. wages paid, and actual start date compared to

contract/employer agreement start date. Other areas of monitoring may include Equal Opportunity issues, safety procedures, participant interview, and/or supervision.

When there are indications of problem areas such as layoffs or rumors of layoffs; decrease in hours of reported training time; complaints from the participant (either formal or verbal); complaints from the employer (either formal or verbal); rumors of an employer filing for bankruptcy, etc., the service provider should make every effort to ascertain the validity of the claims and proceed accordingly (which may or may not include contact with the HCWDB).

All monitoring reviews must be documented. Written monitoring documentation will become part of the annual documented monitoring. The report is to include the following: all areas of non-compliance with the contractual agreement; review of the eligibility of participant(s) enrolled under the contract; any corrective actions necessary; and the findings of any ineligible participants.

### **Attachments**

**Pre-Award Analysis**

**Employer Agreement**

**Training Plan**

**Trainee Evaluation**

### **References**

**[NCDWS Operational Guidance Number: OG 22-2021, Change 1](#)**

**High Country WDB Hatch Act Guidance**

**High Country WDB Keying Employer Services in NCWorks.gov**

**High Country Supportive Service Policy**