



Title:	On-the-Job Training Policy	Effective Date:	1/27/2017
		Revised Date:	5/21/2025

Purpose

The purpose of this policy is to establish guidelines for the arrangement of an On-the-Job Training (OJT) opportunity, where an individual is able to learn an employment related skill or qualify for a particular occupation through demonstration and practice on-site at their place of employment.

References

- Workforce Innovation and Opportunity Act (WIOA) Public Law 113-128
- VBWD Policy 403-03, On-the-Job Training, Change 1
- VBWD Policy 401-04 Change 1 Provision of Training Services
- 20 CFR 680.700-750
- TEGL 19-16
- GRWDB Complaints & Grievances Policy

Policy

It is the policy of the Greater Roanoke Workforce Development Board (GRWDB) to allow as part of WIOA program participation, where applicable, eligible individuals to engage in OJT to successfully re-enter and/or remain a part of the workforce. During the OJT opportunity, a participant is employed and engaged in productive work in a job for which he or she is paid. A participant is considered employed if they are receiving work hours, pay and benefits similar to other employees in the same position at the employer. Employers must also have, or forecasts to have, sufficient work to provide long-term regular employment for OJT participants.

Procedure

Participant Eligibility

Eligible participants who are enrolled in the WIOA Title I Adult, Dislocated Worker, and/or Youth programs may enter an OJT opportunity under the following conditions:

1. Unemployed participants who, after assessment if applicable and in accordance with the Individual Employment Plan (IEP), have an identified skills gap and/or substantial need for OJT.
2. Employed participants when:
 - a. The employee is not earning a self-sufficient wage as determined by GRWDB policy.
 - b. The OJT relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes identified by the GRWDB.
 - c. The OJT is provided through a contract with an employer or Registered Apprenticeship program sponsor.
 - i. Participants of a Registered Apprenticeship can receive funding for the OJT portion of their work process. OJT funds can be used for the OJT portion only.



An ITA may be considered for use for the Related Technical Instruction aspect of the Registered Apprenticeship.

Employer Eligibility

Eligible employers may be in the public, non-profit, or private sector and must also meet the following requirements:

1. Must have adequate personnel to provide sufficient supervision and training to the OJT participant.
2. Must provide a minimum of 50% of the OJT participant's wages throughout the training.
3. Must provide benefits and working conditions at the same level and to the same extent as other trainees or employees working a similar length of time and doing the same type of work.
4. Must not have exhibited a pattern of failing to provide OJT participants with continued long-term employment with wages and employment benefits, including health benefits, and working conditions at the same level as other employees working a similar length of time and doing the same type of work. An employer will be considered to have exhibited a pattern if more than one instance of that activity has been documented.
5. Must not have relocated from any location in the United States within 120 days, if the relocation resulted in any employee losing his or her job at the original location.
6. Must not use OJT assignments to displace regular employees, or to replace any employee on permanent or temporary layoff status.
7. Must agree that the OJT contract is limited to the time needed for the participant to become proficient in the occupation for which training is provided.
8. Must provide a Federal Employer Identification number to demonstrate the business is a legitimate employer with full-time employees, and conducting trade or business at an appropriate worksite.
9. Must maintain workers' compensation insurance and provide a Certificate of Insurance issued by the company's insurance carrier.
10. The Employer must be the actual employer of record for all participant wages. A temporary or payroll agency may not serve as the employer of record.

Target Industries/Occupations for OJT Opportunities

All OJT opportunities will align with occupations or career pathways to occupations identified as high-demand in the regional labor market and determined to be of priority by the GRWDB in the current Local Plan.

Staff may request a waiver for participants that are interested in training outside of these target sectors and occupations. Waivers must be requested, with all required documentation, and approved by either the Executive Director or their designee prior to approving funding for the participant/employer. Waiver documentation must include, at a minimum:

- Justification within the participant's IEP identifying occupation interest and/or aptitude
- Barriers to employment and/or training in the target sectors and occupations



- Local labor market information including LMI data as well as at least 3 different current job openings paying a self-sufficient wage (as defined in GRWDB policy) for the occupation connected to the training

These items must be attached to the waiver request form to the Executive Director or their designee.

OJT Determination and Appeal Process

Any determination that an employer is ineligible to participate in an OJT opportunity will be made by the Executive Director, or their designee, by reviewing the eligibility requirements above and any and all applicable documentation that verifies the employer does not meet those requirements. Any employer that is deemed ineligible to participate in an OJT contract may file a complaint and/or grievance, as outlined in the GRWDB's Complaints and Grievances Policy.

Payments to Employers

Payments to employers are made on a reimbursement basis for documented wages from hours worked. Payments are deemed to be compensation for the extraordinary costs associated with training participants including additional supervision, additional training, and the costs associated with the lower productivity of the participants. Those extraordinary costs need not be documented by the employer. Payments shall not be in excess of 50% of the wage rate of the OJT participant.

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Reimbursement Amount

An OJT contract must be limited to the period required for a participant to become proficient in the job for which the training is designed. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the job, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employment plan.

Reimbursement to the employer shall be provided for 50% of the OJT participant's wages up to a maximum of \$5,000, minus any funds spent on other training methods (i.e.: Occupational Skills Training through an Individual Training Account (ITA), etc.). The length of time approved for the OJT will depend on the amount of training that the participant will require in the new position and the amount of funding allocated toward the reimbursement.

A comparison between the resume of the OJT participant and/or their current skills and the skills/requirements of the job per the job description provided by the employer will be completed to calculate the amount of reimbursement provided to the employer. For example, if the job description has ten (10) main functions that are required for an employee to be proficient in the job, and the employee possesses the skills to perform 8 out of 10 of those functions, then the participant will require training on 20% of the job. This percentage (20%) is the percentage of the maximum \$5,000 that can be paid out. Here, the person would have a maximum OJT expenditure of \$1000 (20% of the \$5,000 maximum).



OJT Contract

The job description provided by the employer shall be of the occupation as performed in the company. The GRWDB staff will work with the employer to develop a concise outline of the OJT opportunity, including tasks to be learned and the approximate hours of training required for each task. Once this information is provided/developed, GRWDB staff will determine the length of the training period and the total reimbursement and will finalize the OJT contract and other documentation. If the employer is agreeable to the length of training and the reimbursement amount, then the GRWDB and the employer will sign off on the contract. This contract must be in place prior to the start date of training/employment. The employer will be required to submit a timesheet and invoice for review and approval at a minimum of once a month. This invoice should be submitted to the GRWDB electronically, using the outlined process provided by the GRWDB, by the 15th of each month for the month's prior payroll/expenditures. GRWDB staff will review the invoice for accuracy and allowability per federal, state, and local policy. Once the invoice is reviewed and approved it will be submitted for payment and processing. The GRWDB will then reimburse the employer for training costs as outlined above, in line with the parameters and training plan detailed in the OJT contract. Copies of invoices, timesheets and payment processing documentation will be included in WIOA Title I participant case file.