



Customized Job Training Policy: Philadelphia Works, Inc.

Overview:

The purpose of this policy is to articulate how Customized Job Training (CJT) training funds are to be administered in Philadelphia county under the Workforce Innovation and Opportunity Act (WIOA), as well as any other state and federal funding distributed by Philadelphia Works. This policy applies to all Philadelphia county Adult and Dislocated Worker participants who will participate in a CJT as well as employers and/or training providers through which a CJT contract is established.

WIOA Definitions:

Customized Training

The term “customized training” means training:

(A) that is designed to meet the specific requirements of an employer (including a group of employers); (B) that is conducted with a commitment by the employer to employ an individual upon successful completion of the training; and (C) for which the employer pays—(i) a significant portion of the cost of training, as determined by the local board involved, taking into account the size of the employer and such other factors as the local board determines to be appropriate, which may include the number of employees participating in training, wage and benefit levels of those employees (at present and anticipated upon completion of the training), relation of the training to the competitiveness of a participant, and other employer-provided training and advancement opportunities; and (ii) in the case of customized training (as defined in subparagraphs (A) and (B)) involving an employer located in multiple local areas in the State, a significant portion of the cost of the training, as determined by the Governor of the State, taking into account the size of the employer and such other factors as the Governor determines to be appropriate.

Full Time Employment: minimum 32 hours per week, with a minimum \$17 hourly wage.

Employer Eligibility

Potentially eligible employers able to participate in CJT contracting include: private-for-profit businesses, private non-profit organizations, and public sector employers with verifiable openings for the positions through which the CJT is developed.

An employer will NOT be eligible to receive WIOA CJT reimbursements if:

- The employer has any other individual on layoff from the same or substantially equivalent position within 120 days of application.
- The CJT would infringe upon the promotion of or displacement of any currently employed worker or a reduction in their hours.



- The same or a substantially equivalent position is open due to a hiring freeze.
- The positions are for seasonal employment.
- The employer is a private for-profit employment agency, i.e. temporary employment agency, employee leasing firm or staffing agency.
- The position is not full time, i.e. less than 32 hours per week.

A note on Registered Apprenticeships: CJTs are available to employers or registered apprenticeship program sponsors in the public, private non-profit, or private sector. (For use of CJT contracts for apprenticeship programs see Philadelphia Works WIOA Apprenticeship Policy).

Trainee Eligibility:

Eligible participants must:

- Be determined eligible for and enrolled in either the PA CareerLink® Philadelphia county WIOA Adult or Dislocated Worker program.
- Have completed an assessment or evaluation to determine the need for training to find employment.
- Have signed an Individual Employment Plan* (IEP), wherein the participant's interests, abilities and needs are identified and recorded.

*The "individual employment plan" is an individualized career service that is developed jointly by the participant and the PA CareerLink partner when determined appropriate. The plan is an ongoing strategy to identify employment goals, achievement objectives, and an appropriate combination of services for the participant to achieve the employment goals.

Employed Worker Eligibility:

Customized training of an eligible employed individual may be provided for an employer or a group of employers when:

- The employee is not earning a self-sufficient wage or wages comparable to or higher than wages from previous employment, as determined by Philadelphia Works' policy;
- The requirements in §680.760 (see above under "WIOA Definition" for Customized Training) are met; and
- The customized training relates to the purposes described in § 680.710(c) which states: "The On-the-Job Training 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 Philadelphia Works.



Application Process:

Businesses, organizations, or training providers interested in Customized Job Training should connect with Philadelphia Work's Training Initiatives Team. This team will provide a general overview of the Customized Job Training program including eligibility, requirements, funding allowances, contracting, and reimbursement. Interested organizations should be prepared to discuss their goals and projected outcomes with the Training Initiatives team to ensure investment alignment. Please note that applications will be reviewed and awarded on a case-by-case basis.

Once the Training Initiatives team has discussed the training plan, confirmed eligibility, and timeline with the business or training provider, they will work with the organization to complete the application, provide necessary documents, and execute a contract.

Application Considerations:

- CJT contracts shall not be made with employers who have previously exhibited a pattern of failing to provide CJT participants with continued long-term employment with wages, benefits and working conditions that are equal to those provided to regular employees who have worked a similar length of time and are doing the same type of work.
- It is the expectation of Philadelphia Works that employers who receive CJT funding for whom a CJT is developed maintains a commitment to employ an individual full time, in High Priority Occupations with self-sustaining wages, upon successful completion of the training. Reference: WIOA, section 3, No. 14.
- Employers must be able to align hiring start dates with CJT contract processing timelines.
- WIOA funds may not be used in conjunction with the Pennsylvania Department of Education customized training program.
- CJT contracts will generally not be written for low-skill jobs that commonly would require little or no training.
- The duration of a CJT is a function of training needed and will take into consideration prior training and assessments that may require less or more training hours; however, the maximum time frame for a CJT is six months.
- Trainees must earn a minimum of \$17 an hour for at least 32 hours a week during and after the training period.

WIOA CJT Funding

Philadelphia Works can reimburse **up to \$7,000 per trainee, per role** under Customized Job Training. Employers who receive funds for CJT or participant in CJT through training provider partnerships are required to pay for a portion of the training costs - this requirement cannot be waived.

The non-Federal share can include the amount of the wages paid by the employer to a worker while the worker is attending a training program; the employer may provide the share in cash or in-kind. The non-Federal employer



share is based on the size of the workforce as follows:

- At least 10 percent of the cost for employers with 50 or fewer employees;
- At least 25 percent of the cost for employers with 51 to 100 employees; and
- At least 50 percent of the cost for employers with more than 100 employees

The employer size is determined by the number of employees currently employed at the local operation where training will occur. This size is determined by defining each employer based on the Federal Employment Identification Number (FEIN) and the number of employees that the FEIN employs within the city of Philadelphia. Employer size is also determined at the time of the incumbent worker training contract including employers with seasonal or intermittent employee size fluctuations. Employers must provide documentation to exhibit employer size. Philadelphia Works will consider the number of employees at each individual employer for CJT that is created for a group of employers.

Priority for CJT funding will be given to public assistance recipients, other low-income individuals and individuals who are basic skills deficient. Preference in funding will be given to employers who have already used PA CareerLink® or Philadelphia Works services.

Data Tracking and Reporting:

Employers will be required to submit to Philadelphia Works data and information on individuals who receive incumbent worker training, including employment status after training, wages after training, credential attainment, and measurable skill gain. Philadelphia Works may also collect additional employer data such as employer size, industry, and other information to evaluate the effectiveness of incumbent worker programs. The Commonwealth Workforce Development System (CWDS) is the system of record.

Such documentation may include:

- Employer data such as employer size, industry, and other information to evaluate the effectiveness of incumbent worker programs
- Documents for contracting which may include W-9s, Certificate of Insurance, and Certificate of Worker's Compensation
- Verification of trainee tenure
- Trainees Social Security Number and demographics collected for state and federal reporting requirements
- Training Provider information, training plans or curriculums, and connections to career pathways
- Verification of trainee wages/salary before and after training
- Training attendance, credential attainment, and measurable skill gain
- Post-training outcomes (i.e., retention and actual career progression)



Contact

Any questions about this program or process should be directed to the Philadelphia Works Manager of Training and Apprenticeship, Kaila Shannon, at kshannon@philaworks.org