

**SUMMARY OF RESPONSES TO THE JUNE 24, 2015 WEBINAR/TELECONFERENCE
AND REVIEW SHEET COMMENTS**

DRAFT POLICIES:

- 5.2.1 – ON-THE-JOB TRAINING (OJT)**
- 5.2.1.3 – INCUMBENT WORKER TRAINING (IWT)**
- 5.2.2 – INDIVIDUAL TRAINING ACCOUNTS (ITAs), EXCEPTIONS AND WAIVERS**
- 5.2.3 – BRIDGE PROGRAMS AND CAREER PATHWAYS**
- 5.2.4 – CLASS SIZE TRAINING**
- 5.2.5 – WORK EXPERIENCE AND TRANSITIONAL EMPLOYMENT**
- 5.4 – SUPPORTIVE SERVICES**

The following summarizes comments and questions discussed in coordination with the June 24, 2015 webinar/teleconference regarding draft DCEO policies for Training Services. Training-related expenditures, reporting and pay-for-performance contracts will be addressed under separate communications.

DCEO will have considered the comments and discussion from this webinar prior to the issuance of the formal policy that is forthcoming.

In general, the draft policies refer to a Policy Manual, which is an electronic format for the new “Policy Manual for Local Workforce Programs Under WIOA.” The online policy manual will replace the traditional WIA policy letters. Additional input from local areas will be considered as this online manual is finalized. Not all policy drafts will be distributed for local comment, as some policies will have little to no changes.

POLICY 5.2.1 – ON-THE-JOB TRAINING (OJT)

Draft Policy Citation and Topic	DCEO Response to Questions or Comments
I.A.5 OJT location	One example of an OJT training that could occur at a different location than the employer could include training on specific machinery housed at another facility. In most instances, however, it is expected for the OJT will take place at the employer’s location.
I.A.7.a OJT reimbursement rate	WIOA allows for the Governor or the Local Board to increase the reimbursement rate from 50% to 75% of the participant’s wage rate <i>if the Governor approves the increase</i> with respect to the program funded by Statewide discretionary funds allocated to the local area (WIOA Section 134(c)(3)(H)). The draft policy is revised to say “Governor <i>or</i> Local Board.”
I.A.7.b Reimbursement	The Local Workforce Development Board (LWDB) is responsible for establishing a reimbursement rate on a sliding scale based on the size of the

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on a sliding scale	business entering into the OJT contract and other parameters stated in the current WIA OJT policy.
I.A.8.b.1 6-month limit	The policy draft limits training programs to no more than 1,040 full-time hours of actual training (the equivalent of six (6) months of full-time training). Use local discretion until further notice about whether the six-month limit still applies. Additional guidance could be forthcoming from the U.S. Department of Labor (DOL).
I.A.12 Self-sufficiency	Local areas will continue to have discretion in the definition of self-sufficiency. The assessment process must determine the need for OJT.
I.A.12.c ESL and ABE participants	Individuals in need of English as a Second Language (ESL) or Adult Basic Education (ABE) could qualify for OJT if they were already employed at the work location and need to upgrade their job skills (I.A.12.c).
Successful completion	While OJT typically does not result in credential obtainment, successful completion appears to be the only positive outcome based on guidance provided to date.
Date of OJT	OJT obligations made prior to June 30, 2015 will continue to be subject to WIA requirements and grandfathered under WIOA.
Youth	Youth may receive OJT under WIOA's expanded eligibility age range for youth.

5.2.1.3 – INCUMBENT WORKER TRAINING (IWT)

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Intent of IWT	Incumbent Worker Training is intended upgrade an existing employee's skills. The intent should not be to hire an employee with the intent of going directly into IWT. The employee should start the job with necessary skills and enter IWT if the job evolves and the employee needs new skills.
Layoff aversion	Incumbent worker training can be used to help avert potential layoffs of employees or to increase the skill levels of employees so they can be promoted within the company and create backfill opportunities for the employers, per Training and Employment Guidance Letter (TEGL) 03-15 . Attestation is used to ensure employees were hired after a certain date.

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	DCEO expects a revised definition of layoff aversion based on clarification by DOL. DCEO will provide additional language that should support local area interaction with affected employers.
Checklist	Local areas would like DCEO to provide a checklist of IWT program considerations to help local areas in obtaining DCEO approval for the programs. Similar checklists are needed for other types of training, as well (e.g., OJT, Class-size Training).
DCEO approval	DCEO will consider adding procedures to the policy to define at what point local areas need to seek DCEO approval of an IWT program.

5.2.2 – INDIVIDUAL TRAINING ACCOUNTS (ITAs), EXCEPTIONS AND WAIVERS

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Post-secondary credentials	The Interagency Work Group and four core program partners, as well as others, are discussing standards for post-secondary credentials.
Youth ITAs	Illinois’ waiver to provide training to youth through Individual Training Accounts (ITAs) is not active under WIOA. If local areas have youth ITAs authorized by the waiver under WIA, contact Chuck Dooley to discuss circumstances after 7/1/15, if needed. Youth ITAs obligated before 6/30/15 will continue to be under WIA guidance. Youth ITAs obligated after July 1, 2015 are subject to WIOA and limited to out-of-school youth ages 18 to 24.

5.2.3 – BRIDGE PROGRAMS AND CAREER PATHWAYS

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Credentials	Bridge programs do not result in credential obtainment. Bridge programs prepare participants for programs that do result in credential obtainment.
Bridge programs and ITAs	Bridge programs are a service strategy. An ITA may include a bridge program component.

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Funding source	If more than one funding source is paying for a bridge program, coordination will be needed to ensure payments are not duplicated.
I.A.2. Quality of bridge programs	While bridge programs do not have to be on the Eligible Training Provider List (ETPL) or linked to a demand occupation, local areas do need due diligence in considering the service provider’s experience and quality of programs.

5.2.1.2 – CLASS SIZE TRAINING

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I.A.4 Guidance on contracts	Local areas seek more guidance on how class size training contracts shall not limit consumer choice. Boilerplate contract language might be helpful.

5.2.5 – WORK EXPERIENCE AND TRANSITIONAL EMPLOYMENT

Draft Policy Citation and Topic	DCEO Response to Questions or Comments
I.C.1 Performance	The four core program partners are discussing within the Interagency Work Group performance criteria. DCEO will provide additional guidance on performance criteria for work experience and transitional employment when available. In the meantime, local areas must plan ahead and track who is completing the program.
Youth	Work experience and transitional employment can apply to youth participants. This and other policy drafts will clearly reflect whether the policies apply to youth, adults and dislocated workers.

5.4 – SUPPORTIVE SERVICES

Draft Policy Citation and Topic	DCEO Response to Questions or Comments
Needs-related	Needs-related payments (NRP) can be provided in addition to supportive

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payments	services. There are no changes in requirements for needs-related payments under WIOA. Local areas have discretion about whether to offer NRP.