
Customized Training

PURPOSE

The purpose of this policy is to provide guidance on customized training offered by Pacific Gateway Workforce Innovation Network (Pacific Gateway) for Adults and Dislocated Workers participating in Workforce Innovation and Opportunity Act (WIOA) programs and special projects.

BACKGROUND

Work-based training is employer-driven with the goal of unsubsidized employment after participation. Customized training is one type of work-based training that can be used to target specific job seeker and employer needs. It is an effective strategy that provides additional opportunities for participants and employers in both finding quality work and developing a quality workforce.

Customized training (CT) is defined in WIOA Section 3(14) as training designed to meet the special requirements of an employer (including a group of employers); is conducted with a commitment by the employer to employ an individual upon successful completion of the training; and requires the employer pay for a significant portion of the cost of training.

POLICY

Customized training is one of several types of allowable training offered through Pacific Gateway. Customized training is available to eligible participants enrolled in WIOA Adult, Dislocated Worker or special projects and grants.

Customized training should be considered when available training programs and/or curricula do not meet the specific training requirements of employer(s). The employer(s) can decide who will provide the training (i.e. external trainer, internal manager), what curriculum will be used, and which workers will be trained.

Participating employers must commit to employ or continue to employ participants after successful completion of the customized training.

A. Participant Eligibility

CT trainees must meet program eligibility requirements and be enrolled in a WIOA program or special project administered by Pacific Gateway. CT may be provided for enrolled participants who are either employed or unemployed. Training for an individual who is currently employed may be provided when: the employee is not earning a self-sufficient wage as determined by Pacific Gateway's Self-Sufficiency Standard Policy P-WIOA-SSS-1.A and the training relates to the introduction of new technologies, new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes.

B. Employer Eligibility

To qualify for an CT contract, the employer (or group of employers) must meet the following requirements:

- Has not previously exhibited a pattern of failing to provide CT trainees with continued long-term employment as a regular employee with wages, benefits, and working conditions at the same level of as other employees performing the same type of work for the same length of time.
- Has not displaced any currently employed worker or altered promotional opportunities for current employees. Nor has terminated any regular employee or reduced the workforce to hire CT trainees.
- Must comply with the non-discrimination and equal opportunity provisions of federal and state regulations.
- Must have available positions immediately following the training and commit to employ or continue to employ CT trainees upon satisfactory completion of training.
- The positions are not for seasonal employment and are permanent full-time positions (minimum of 32 hours a week).

C. Employer Contributions

Employers must contribute a significant portion of the cost of the training. The contribution may be in the form of cash and/or in-kind services and may not be less than 50 percent of the cost of training. Exceptions to the 50 percent employer contribution may be granted with approval from Pacific Gateway's Deputy Director.

The following factors should be taken into consideration when determining the employer contribution:

- The size of the employer;
- The number of training participants;
- Wage and benefit levels (at present and anticipated upon completion of training);
- Relation of the training to the competitiveness of the training; and
- Other employer training and advancement opportunities.

D. Training

Customized training is designed to ensure that training meets the unique needs of the job seekers and employers or group of employers. Several factors must be considered when customized training is used:

- Group of individuals that receive training would otherwise lack the necessary requirements of the industry to obtain employment, retain employment or be eligible for advancement in the industry to earn self-sufficient wages.
- The training should be in a demand occupation and aligned with industry or employer recognized skill standards.
- Industry-recognized credential or employer recognized skills will be attained upon completion of training.
- The training will not result in payments higher than \$7,500, per individual. Exceptions may be approved by Pacific Gateway's Deputy Director for a higher cost per individual with adequate justification.

The training may be conducted by the employer through in-house resources or the employer may select a third-party training provider, such as community college or private training institution.

CT methods include, but are not limited to:

- Classroom training through a traditional classroom setting with a group of trainees and a qualified instructor;
- Laboratory training with hand-on instruction or skill acquisition under direct guidance of a qualified trainer;
- Electronic or computer-based training delivered through a computer program at a pace set by the trainee or through video conferences that are live, interactive instruction with a trainer;
- Standard “off-the-shelf” training that meets the training needs of the employer; or
- Other training that is customized to the employers’ specific training needs.

For customized training, the training provider is not required to be on the State’s Eligible Training Provider List (ETPL). However, for third-party training providers the proper procurement procedures must be followed.

E. CT Allowable and Unallowable Costs

Allowable costs must be directly related to the training. Examples of allowable costs include, but are not limited to the following:

- Instructor’s training related wages
- Curriculum development
- Textbooks, manuals, instructional materials and supplies.
- Examination for certification (if a separate cost)
- Other necessary and reasonable costs directly related to training approved by Pacific Gateway’s Deputy Director or designee.

Unallowable costs include, but are not limited to the following:

- Employee/Trainee’s wages and fringe benefits
- Costs not directly related to the training
- Travel, food, lodging
- Purchase of capital equipment
- Compensation or consultant fees not directly related to the provision of training
- Costs incurred prior to the approval date of the application and contract.
- Capital improvements
- Membership fees and/or dues
- Conferences
- Purchase of training equipment

F. CT Application

Prospective employers must complete a Request for Preparation of Customized Training Project Agreement. The application shall be used to collect relevant information on the employer’s customized training and skills needs, determine the number of employees to be trained, the job description and qualifications for trainees, the dates of training, and the amount of funding requested. Pacific Gateway’s Deputy Director, prior to execution of a contract, must approve all CT providers and programs.

G. CT Contract

A Customized Training contract is required for every employer participating in the CT program. The contract must include a training outline identifying the specific skills and tasks to be learned or enhanced for the job, the number of employees to be trained, the required training hours, the length of time the training will be provided, the employer contribution and method of payment and the

appropriate assurances. Prior to the start of the training, a contract must be signed by the employer and Pacific Gateway.

H. CT Monitoring

CT contracts are required to be monitored by Pacific Gateway staff at the mid-point of the training. An on-site monitoring visit must be conducted and shall ensure that training objectives are being met in accordance with the training plan. Any issues or findings of non-compliance identified during the monitoring review must be addressed, resolved and documented within a timely manner.

REFERENCES

- WIOA (Public Law 113- 128) Section 3(44) and Section 134(c)(3)(H)
- Title 20 CFR “WIOA Final Rule” Sections 680.210, 680.320, 680.760 and 680.770
- Training and Employment Guidance Letter (TEGL) 19-16 “Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for implementation of the WIOA Final Rules.” (March 1, 2017)

INQUIRES

For questions or assistance related to this policy, please contact Pacific Gateway Workforce Innovation Network staff at (562) 570-3748.

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