

**OJT NEG Grants Implementation Plan Narrative**

Name of State or Native American Tribe	Date Submitted	Grant Number

**Additional Information** will be provided to support implementation planning, including a listing of specific criteria for the review of the implementation plan and the OJT NEG TEGL. The new OJT Toolkit website is now live. This toolkit was designed with the substantial input from various stakeholders at the State and local level. It includes sample OJT policies and procedures, contracts, monitoring tools and other useful documents. Grantees may access this information via the following web link: <http://ojttoolkit.workforce3one.org/page/home>

**(A) STATEMENT OF NEED**

**(I) Geography**

Identify each local area that has been disproportionately impacted by the current economic downturn in which the project will operate. Provide a map highlighting these areas. Provide a brief description of each area according to the following key indicators: unemployment rate; poverty rate; number of dislocated workers; number or percent of the unemployed population whose period of unemployment is longer than the State’s average UI duration (i.e. prolonged unemployed); and other factors used in the selection of these areas.

**Prolonged Unemployed:** Individuals who are experiencing a period of unemployment longer than the State’s average Unemployment Insurance duration.

**(II) Labor Market Information (LMI) Analysis**

For each local area included, provide a brief LMI analysis, to the extent possible, with a description of:

- The occupations of local dislocated and prolonged unemployed workers.
- Industries experiencing high rates of job loss, (i.e. automotive, aerospace, textile, etc.).
- Projected growth occupations and sectors offering employment, and/or those that could hire re-skilled workers with OJT NEG assistance.
- Projected skills gaps between unemployed workers and the requirements of targeted occupations, including occupations for which there are known skills-shortages. (It is not anticipated that this will be known with any precision until individual assessments are completed, but what is expected and how does this correlate to the

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planned mix of services and to the estimated training duration as discussed in Section C.)

### **(B) TARGET POPULATION**

**Eligible Participants:** Persons who meet the Dislocated Worker definition at WIA section 101(9). Workers laid-off since January 1, 2008 may be considered as unlikely to return to their previous occupation for purposes of determining eligibility (See TEN 38-09). This helps clarify part A (iii) of the Dislocated Worker definition. To the extent possible, Grantees should develop program designs which incorporate dislocated workers who are experiencing prolonged unemployment.

#### **(I) Participant Identification and Outreach**

Describe the process to be used to identify participants for the OJT program, including any specialized outreach efforts. If a role for Community Based Organizations is planned for participant identification or outreach, please note briefly here and provide a more complete description in Section D.

#### **(II) Selection Criteria**

Describe the criteria to be used to select participants if the pool of potential participants is larger than the available employer slots. What special consideration will be granted to those individuals experiencing prolonged unemployment (i.e., a period of unemployment longer than the State's average Unemployment Insurance duration)? What percentage of OJTs do you expect to fill with individuals experiencing prolonged unemployment?

### **(C) PROJECT DESIGN**

#### **(I) Overall Project Design**

Provide an overview of your project design including:

- Your plan for using the OJT NEG resources to return to gainful employment workers with the greatest barriers to reemployment, including those experiencing prolonged unemployment. Describe the use of WIA core, intensive, training and other supportive services.
- The partners, resources, assets, and information that are being assembled to help you achieve the plan.
- How this service delivery strategy supports both employers and dislocated workers in the impacted area(s)?

#### **(II) Employer Recruitment and Selection**

Describe the information and process that will be used to identify and recruit employers who will be good potential candidates for the training and employment opportunities

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envisioned in this initiative. Identify the criteria that will be applied in selecting specific employers for participation. Describe safeguards to protect against the displacement of workers as a result of OJTs created through this grant. Discuss the process to orient employers to their responsibilities both in training and retaining workers, and any other planned technical assistance.

**Appropriate Employers:** OJT positions cannot be developed with public sector employers or with employers:

- which are gambling establishments, swimming pools, aquariums, zoos, and golf courses.
- that will or may result in displacement of current employees.
- have relocated all or part of their business within the previous 120 days where the relocation action has resulted in the loss of employment of any employee at the original location.

### **(III) Service Delivery Management Structure**

Provide a description of how the service-delivery system will be operated. What entity or entities will be responsible for participant assessment; developing contracts with businesses; gathering information and data reporting; monitoring the project; and assuring fiscal accountability? For each organization, describe its experience and capacity to conduct the function(s) effectively.

### **(IV) Assessment Procedures**

Provide a description of the assessment procedures that will allow the Grantee to determine dislocated worker skill levels and gaps (this may include one-on-one comprehensive assessments and/or software tools, as applicable).

### **(V) Matching Training Needs with Employer Needs**

Provide a description of how the assessment information gathered through the process described in section (C) (IV) will be used to match the participant's training needs with the prospective employer's business needs. If available, provide a list of participating or potential employers. This initial list does not preclude the Grantee from adding new employers.

### **(VI) Subgrants, Contracts and Subcontracts**

Describe Grantee policy regarding the development and management of subgrants, contracts and subcontracts, including the type and frequency of monitoring the Grantee will carry out. What entity or entities will be fiscally and programmatically responsible for the grant funds? How will current policies be adjusted with regard to special policy guidelines for OJT NEG Projects?

See Section 5 of the OJT NEG TEGl for details on special policy guidelines for the OJT NEG Project. This includes:

- *Training Reimbursement*
  - i. *Wage Cap*
  - ii. *Sliding Scale Reimbursement Percentage*
- *OJT Duration Limit*
- *Allowable Employers*
- *OJT Contracts*
  - i. *Allowable Employers*
  - ii. *Employer Documentation of Skills*
  - iii. *Criteria for Reimbursement*

### **(VII) Reimbursement Guidance and Policies**

Describe the policies that will guide the determination of training reimbursements to employers. Describe how the Grantee plans to use the additional reimbursement flexibility (from 50% up to 90%) available under this OJT NEG, based on participant skill gaps or employer size. Identify the entity(ies) that will be responsible for processing the requests for reimbursements. Identify the entity(ies) that will verify the wage rate is the same as similar positions in the business? Identify the entity(ies) that will verify that there is no displacement of other employees? What practices will the grantee use to maximize permanent hiring and job retention?

### **(VIII) Cost Per Participant**

Provide an explanation of how the cost per participant was determined. Include in your description expected administrative costs (not to exceed 10% of award), staff salaries, average wage for OJT placements, average duration of training for the targeted occupations, employer reimbursement levels, costs and description of supportive services, and any other details related to your anticipated cost per participant. Provide the State's prior year (i.e., PY 2008) OJT cost per participant for the WIA Dislocated Worker program, if available.

## **(D) PARTNERS AND INTERMEDIARIES**

### **(I) List of Partners**

Provide a list of all engaged partners (workforce system partners, business associations, Federal, State and local government, CBOs, organized labor, foundations, etc.) and describe the roles of each.

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### **(II) Anticipated Leveraged Resources**

Provide a description of key anticipated leveraged resources and services, and link each resource to the partnership discussed in item (I).

### **(III) Partner and Intermediary Outreach**

Describe how you will conduct outreach to other potential partners and intermediaries, including how you will comply with procurement requirements.

### **(IV) Role of Workforce Investment Boards**

Describe the local Workforce Investment Boards' role and responsibility for the project, as well as the roles and responsibilities of key subcontractors to the LWIBs. How will the operation of the project intersect with One-Stop activity for outreach, referrals and tracking of participants, reporting, etc.?

## **(E) PERFORMANCE & FINANCIAL REPORTING**

### **Required Reports:**

- ETA 9090 – WIA Quarterly Report (OMB Control No. 1205-0420);
- Workforce Investment Act Standardized Record Data (WIASRD) Quarterly Submission (OMB Control No. 1205-0420);
- ETA 9148 WIA Adults, Dislocated Workers, and National Emergency Grants Monthly Report (OMB Control No. 1205-0474); This report is submitted by each State on the 15th of each month to ETA for the previous month. Accurate monthly counts of OJT NEG participants provides a means to track the progress of OJT NEGs as they are implemented across the country. This is important because it provides ETA with an early warning system to identify Grantees that may be in need of technical assistance to get their OJT NEG operational.
- ETA 9130 – U.S. DOL ETA Quarterly Financial Status Report (OMB 1205-0461);
- ETA 9104 – NEG Quarterly Performance Report (QPR) (OMB 1205-0439);
- ARRA Section 1512 – Quarterly Recipient Report. Please note, the Recovery Act recipient report is submitted by direct recipients or designated sub-recipients of ARRA funds to OMB through an electronic reporting system at [www.FederalReporting.gov](http://www.FederalReporting.gov), no later than the 10th day after the end of each calendar quarter. This Recipient Report contains cumulative data on the projects and activities funded by ARRA from the inception of the grant award. For additional reporting guidance and references, see TEGL 1-09, Change 1 and 2, *Reporting Requirements under Section 1512 of the American Recovery and Reinvestment Act of 2009*.

In addition, the Workforce Investment Act Standardized Record Data (WIASRD) must be submitted quarterly on all participants and exiters from the NEG. In order to evaluate the success of OJT NEGs, it is imperative that States make every effort to submit the required

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reports on a timely basis, and that they be accurate and complete. There are a few important WIASRD elements pertaining to OJT and NEG funding sources to be completed:

1. WIASRD data items 340 and 341 (*Type of Training Service #1 and Type of Training Service #2*) are the sources for determining which individuals received OJT. A lack of complete data on these WIASRD elements will result in an undercounting and underreporting of the number of individuals who received OJT;
2. WIASRD data item 342 (*Occupational Skills Training Code*) is important because it contains information on the occupation in which the individual was trained. This information facilitates the identification of occupations where OJT most often occurs or where it is the most successful in obtaining better employment outcomes for workforce system customers;
3. WIASRD data items 313a, 313b and 313c (*1<sup>st</sup>, 2<sup>nd</sup>, and 3<sup>rd</sup> NEG Project IDs*) in conjunction with WIASRD data item 326 (*Other WIA or Non-WIA Programs*) make possible the isolation of individuals who were provided OJT through ARRA-funded NEGs.

### **(I) Performance Information and Measures**

All Grantees must list expected performance levels for Entered Employment Rate, Employment Retention Rate and Average Earnings. For State Grantees, indicate whether the Grantee anticipates meeting its negotiated Dislocated Worker formula program performance levels, (in the case of Indian and Native American Tribes, 166 performance levels apply). Provide an explanation for any anticipated variations from these levels.

All Grantees must also indicate how the Grantee will gauge skill attainment for participants. Indicate the anticipated total number of participants, number of participants who will earn a credential (including degree and/or certificate), completers, and the percent that the Grantee expects to be retained after 6 months.