



Customized Training Policy

Approval Date: March 7, 2025

Purpose

This policy provides guidance on the requirements for customized training.

Background

Customized training is one type of work-based training model and is designed to meet the specific requirements of an employer or group of employers. WIOA establishes that local workforce development boards (WDB) may offer customized training through an agreement with either a vendor or employer.

Definitions

Customized training: training that is:

- Designed to meet the specific requirements of an employer (including a group of employers);
- Is conducted with a commitment by the employer to employ or continue to employ an individual upon successful completion of the training; and
- For which the employer pays a significant portion of the cost of training (per Section 3 (14) of WIOA and the accompanying regulations in 20 CFR 680.760) as determined by Greater Cleveland Works, taking into account the size of the employer and such other factors, as Greater Cleveland Works 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.

Types of Customized Training

Customized training may be offered to individuals under local area formula-funded programs or as a type of incumbent worker training. As a type of training offered in local formula-funded programs, trainees must meet all adult or dislocated worker eligibility requirements.

Customized training may be provided for the introduction of new technologies, new production or service procedures, upgrading existing skills, or other appropriate purposes. The employer must commit to employ, or continue to employ, the worker(s) upon successful completion of any form of customized training. The customized training must enable individuals to obtain industry or employer-recognized skills.

Customized training may be provided through individual training accounts (ITAs) or through contracts for services.

Employer Eligibility

For an employer to be eligible it must establish that it meets both the following eligibility criteria.

1. Federal and State Requirements. The following is the minimum eligibility criteria that must be demonstrated to satisfy federal and state eligibility requirements.
 - a. Must not be presently debarred, suspended, proposed for disbarment, and declared ineligible or voluntarily excluded from participation in transactions by USDOL, the state of Ohio, Cuyahoga County, the City of Cleveland or the Fair Employment Wage Board.



Customized Training Policy

Approval Date: March 7, 2025

- Federal Exclusion and Debarment Site: <http://www.sam.gov>
 - Ohio Department of Taxation: <http://www.tax.ohio.gov>
 - Business Filing Search: <http://www.sos.state.oh.us>
- b. Shall not have any outstanding tax liability to the state of Ohio for over six months and will disclose any known outstanding tax liabilities with other states prior to entering into contract.
 - c. Must not be identified as having more than (1) unfair labor practice contempt of court finding on the most recent list established by the Ohio Secretary of State.
 - d. Must have all the approvals, licenses, or other qualifications needed to conduct business in the state of Ohio and all must be current. Training under the Customized Training program will cease if the business is disqualified from conducting business in Ohio during the course of the training.
 - e. Governmental entities, including the city, county and state, may not participate in the local customized training program.
 - f. Must not have been in operation in the state of Ohio for less than 120 days if the business had laid off workers at a former location in the United States. To verify that a business is not relocating employment from another area, a pre-award review must include the names under which the establishment conducts business, including predecessors and successors in interest; the name, title, and address of the company official certifying the information, and whether WIOA assistance is being sought in connection with past or impending job losses at other facilities of their company. The pre-award review should also include a review of whether appropriate notices have been filed, as required by the Worker Adjustment Retraining Notification (WARN) Act. The review may also include consultations with labor organizations and others in the affected local area(s).
 - g. Must not have any outstanding civil, criminal or administrative fines or penalties owed to or pending in the state of Ohio.
 - h. Must have workers compensation insurance.
2. Greater Cleveland Works Additional Requirements. The following is the minimum eligibility criteria that must be demonstrated to satisfy Greater Cleveland Works Requirements.
 - a. The employer must submit to a meeting/interview with a Greater Cleveland Works representative as part of the consideration of the application. An interview done within twelve (12) months prior to the submission of the application will qualify.
 - b. The industry and/or the occupations for which the training is to be provided must be on the State of Ohio's In-Demand list.
 - c. The employer must promise within its written training agreement that future job openings will be listed through Greater Cleveland Works.
 - d. Must have been in business in Cuyahoga County the previous 12 months.
 - e. Must have no layoff in the position being considered within the past 6 months.



Customized Training Policy

Approval Date: March 7, 2025

Employee Eligibility

Customized training can be offered to new or incumbent workers.

1. New workers must meet each of the following minimum federal, state, and local requirements.
 - Must be an enrolled WIOA Adult or Dislocated Worker.
 - The employee meets the Fair Labor Standards Act requirements/definition for an employer-employee relationship.
 - Completed selective service registration (for males 18 and over born after January 1, 1960).
 - Individual has citizenship status.
 - Individual is age 18 or older.
 - The employee will make at least fifteen dollars (\$15.00) at the conclusion of training.
2. The incumbent worker must meet each of the following minimum federal, state, and local requirements.
 - Employed by the employer doing the training for six months or more.
 - The employee meets the Fair Labor Standards Act requirements/definition for an employer-employee relationship.
 - Completed selective service registration (for males 18 and over born after January 1, 1960).
 - Individual has citizenship status.
 - Individual is age 18 or older.
 - The employee makes at least fifteen dollars (\$15.00) an hour prior to the training, for no less than thirty-two (32) hours per week. If the employee makes less than fifteen dollars an hour, they will need to make at least that amount at the conclusion of training.

Employer Application Process

Businesses requesting Customized training funds must submit an application (training plan). Greater Cleveland Works must approve the training plan prior to the commencement of training and before reimbursement may be made to the Employer. The approval process will take into consideration the following criteria and must lead to one or more of the following:

- Improves the occupational skills of the employers' workforce and lead to enhanced career pathways for individual employees.
- Assists employers in averting layoffs**
- Helps employees continue their skill building and maximizing their potential
- Raises the skill level of workers that leads to promotion**
- Provides career progression that opens entry-level positions to others
- Increases retention in employment
- Results in a wage increase of at least \$1/hour**
- Supports employees earning less than \$22/hour (\$45,760 annually)**

**Denotes criteria that are given higher priority in the approval process.



Customized Training Policy

Approval Date: March 7, 2025

Additionally, the training plan must identify the following:

- The provider(s) of training;
- Type of training;
- Planned start and end dates;
- Number of individuals to be trained;
- The pre and post training wages of individuals to be trained;
- The projected cost of training; and
- Any other information required by Greater Cleveland Works.

While employers may suggest a trainer or educational institution, Greater Cleveland Works must approve the trainer/educational institution to be used. In determining whether a trainer/educational institution is acceptable or not, the following criteria will be considered:

- satisfactory past performance,
- accreditation,
- curricula that lead to credentials,
- relevant training experience, accredited instructors,
- proven high job placement rates,
- proven high training completion rates,
- a proposed training environment that supports learning and is within reasonable proximity to the trainees, so the cost and time required for travel is minimized.

Any costs incurred, or monies expended by the Applicant on the project prior to the final approval and the execution of the written Agreement, is done at the Employer's own expense. The Employer's decision to go forward does not obligate Greater Cleveland Works to provide assistance before all required approvals. Training expenses are reimbursed only if Greater Cleveland Works has approved the training application.

Allowable and Unallowable Costs Associated with Customized Training

1. Allowable costs may include only costs directly related to training. Allowable costs may include:
 - a. Cost of tuition if using an educational provider, which includes expense of instructor/trainer.
 - b. Instructor/trainer salaries if not otherwise covered by tuition.
 - c. Curriculum development.
 - d. Materials and consumables including textbooks, instructional equipment, manuals, materials and supplies.
2. Unallowable costs include:
 - a. Foreign travel.
 - b. Purchase or lease of capital equipment including electronic devices.
 - c. Trainees' benefits/fringes
 - d. Wages of trainees while attending customized training.
 - e. Costs that are not directly related to customized training for eligible individuals.



Customized Training Policy

Approval Date: March 7, 2025

Employer's Share of Training Costs

Employers participating in Customized Training shall be required to pay a share of the cost of the training. As part of the application process, Greater Cleveland Works shall establish the non-Federal share of such cost by taking into consideration such factors as the number of employees participating in the training, wage and benefit levels of the employees, the relationship of the training to the competitiveness of the employer and employees, availability of other employer-provided training and advancement opportunities and remaining budgeted funds.

Employer match must be cash or in-kind and cannot include federal, state or other grant funds. Trainee wages and benefits can be included as match while in training.

The minimum amount of employer share depends on the size of the employer:

- 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.

Employer size is based on the number of employees currently employed (at the time of the execution of the customized training contract) at the local operation where the customized training program will take place. This applies to all employers, including employers with seasonal or intermittent employee size fluctuations.

The share provided by an employer participating in the program may include the amount of wages paid by the employer to a trainee while the trainee is attending a customized training program.

Greater Cleveland Works Contract and Payment Terms

1. Requirement of a Written Agreement.

If an employer's application for the provision of assistance in providing customized training is approved, Greater Cleveland Works will contact the employer to negotiate the remaining terms and conditions associated with the provision of assistance. Greater Cleveland Works and the employer are not committed to the provision of training and assistance until a written agreement is in place.

2. Terms of the Payment/Repayment.

The employer shall be solely responsible for paying the trainer and/or educational institution pursuant to terms and conditions agreed upon. Greater Cleveland Works shall be responsible for compensating the employer for an agreed upon share of actual expenses incurred by the employer, after the completion of the training and following the employer submission of all the following:

- an invoice,
- a copy of all supporting documentation provided to the employer by the educational provider,
- a copy of each of the certificates of training earned by each participant, and



Customized Training Policy

Approval Date: March 7, 2025

- the employer's proof of payment including match, showing the amount paid to the trainer/educational provide, or for employee wages;
- Where required in the contract, proof that individuals trained received a raise.

Monitoring

A Greater Cleveland Works representative will visit employer sites, no less than one visit within a six-month period unless issues of non-compliance arise. The representative will work with employer to resolve any findings of non-compliance.

Monitor shall review the following:

- Specific application criteria used to determine approval of the training were met
- Training was provided to the participant(s)
- The training was reasonable
- Employer share of costs was met
- Other applicable rules and regulations