

Guaranteed Free Training (GFT) Program Guidelines



For Fiscal Year
2012-2013

Basic Skills Training

Up to \$450 per eligible employee

Information

Technology Training

Up to \$850 per eligible employee

Training Period:

July 1, 2012-June 30, 2013

The Goal of the **Guaranteed Free Training** Program is to strengthen the business environment of the Commonwealth of Pennsylvania by improving the skill level and productivity of Pennsylvania workers.

Funding for the Guaranteed Free Training (GFT) Program is provided by the PA Department of Community and Economic Development (DCED) through its *Pennsylvania First* fund.

Information Sharing, Administration & Analysis Center (ISAAC):

WEDnetPA recently converted all documents and processes to the new ISAAC online system. ISAAC eliminates paper documents and gives companies the ability to manage their contracts, training plans and invoices online, from anywhere any time.

ISAAC was developed with the latest technology and requires the use of an Internet standards-compliant browser. Any of the following browsers are compatible and recommended: Google Chrome, Mozilla Firefox, Safari or Opera.

Internet Explorer (IE) is NOT a standards compliant browser. While it is a commonly used browser and holds significant market share, it is not compatible with some of the latest web development tools. As a result, some functions and features in ISAAC may not work in IE, which could prevent a company from being able to complete an application and/or invoice. We are taking steps to modify some ISAAC code to attain an acceptable level of performance in IE.

It is highly recommended that the ability to use one of the recommended browsers listed above be confirmed before submitting an application for funding. WEDnetPA will not be responsible for issues surrounding IE that inhibit or prevent a company from submitting documentation and/or receiving reimbursement of grant funds.

For more information and the most current status of IE compatibility, please consult your WEDnetPA partner before applying.

WEDnetPA Data Security Policy:

The security of sensitive data is taken very seriously. WEDnetPA has implemented comprehensive procedures to ensure that all of the information provided by our clients is well protected. WEDnetPA collects, processes, and stores all private data on a management platform known as ISAAC which utilizes multiple overlapping layers of security.

On the physical level, the datacenter is secured with key and electronic keycard access available only to authorized personnel and a security system which immediately notifies the police of an intrusion. We also prefer and recommend that clients directly input their data into ISAAC through our secure link, preventing any possible mishandling of paperwork via email, mail or fax. This way, everything remains digitally encrypted at all times.

On the network level, the servers and data are protected by a Cisco ASA 5200 series firewall and an intrusion detection and prevention system (IDS/IPS). Data is transmitted between companies and ISAAC with RC4 128-bit SSL encryption, ensuring privacy en route over the internet.

On the server level, the ISAAC web interface is protected by an application firewall and intrusion detection software. The web and database servers are also maintained with the latest security patches and updates.

On the software level, access is restricted to authorized personnel via a password-protected tiered permissions management system, allowing each person access only to the information necessary to complete their tasks. And sensitive information such as Social Security numbers are obscured even to those authorized to deal with those records. Information is stored with ISAAC on a separate highly-secure IBM iSeries DB2 relational database.

WEDnetPA also maintains strict policies for handling sensitive information, including any cached or temporary storage on individual workstations, laptops, tablets, smart phones or other electronic devices, requiring immediate and permanent deletion when assisting companies to import information to ISAAC.

Data Privacy Policy:

WEDnetPA is committed to protecting the private, sensitive information of our clients. We will only share certain information with the Commonwealth's state departments responsible for funding, monitoring and evaluating workforce development programs. Certain, limited information may also be made available to anyone submitting a formal request through Pennsylvania's Right to Know Law.

Information Collection:

Application and Invoicing Data: To apply for training grant funds, we ask companies to give us contact information (including name, address, phone number and email address). We use this information to contact companies about the application and invoicing process and to notify companies of their awards. We DO NOT distribute contact information, including e-mail addresses or phone numbers outside of WEDnetPA, its funding source and other related state departments.

Social Security Numbers:

WEDnetPA requires companies receiving grant funds to provide valid Social Security Numbers (SSNs) for the eligible employees for which they are requesting training reimbursement. SSNs are needed to accurately track employee training caps. They are entered, transmitted and stored securely and are not viewable in their entirety once enter in the ISAAC data base.

SSNs are provided only to the Pennsylvania Department of Labor and Industry (L&I) for the purpose of evaluating program impacts as measured by continued employment, wage increases and other criteria. When shared with L&I, SSNs are transmitted in a secure format and do not include any other identifying information.

WEDnetPA is committed to protecting this information and has taken many precautions to ensure its security. Please see our Data Security Policy for more details.

Other Information:

WEDnetPA collects other information over the course of the application and contracting process. This includes general company information and proposed training plans. This information is used only for the purpose of determining eligibility and is not shared outside WEDnetPA, its funding source and other related state departments.

Notification of Changes:

WEDnetPA will post changes to this privacy statement on our Web site (www.wednetpa.com), and in other places we deem appropriate so companies are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

Basic Skills Training

To be eligible for a basic skills grant, Employers and employees trained must meet the following qualifications:

Company:

- Must be based in Pennsylvania or maintain a significant presence in the state.
- This Grant is limited to manufacturing or technology-based businesses to include Biotech and Environmental-Tech companies.
- Point-of-sale retail businesses, gaming establishments, employment agencies, government agencies, government owned facilities, educational institution, training vendors and non-profit entities are **not** eligible. Note: some unions, labor organizations, and non-profit healthcare entities may qualify as exceptions. Please contact a WEDnetPA partner for more information.

Employees participating in the training:

- Must earn at least 150% of the current federal minimum wage at start of training, excluding benefits. Trainees can earn no less than \$10.88/hour at the start of training.
- Must be a permanent full-time employee and eligible to receive full-time benefits. Full-time benefits define full-time employment, not hours worked.
- Must be a verifiable resident of Pennsylvania and employed in Pennsylvania.
- Must be a front-line employee or a first level supervisor.
- Employees with decision making responsibilities (may include, but not limited to budgetary, policy making, etc.) are not eligible for basic skills funding.
- Employees who supervise other supervisors are excluded from this program except for small companies.

Information Technology Training

To be eligible for an information technology grant, companies and employees trained must meet the following qualifications:

Company:

- Must be based in Pennsylvania or maintain a significant presence in the state.
- This Grant is not limited to specific economic clusters except those ineligible companies listed below.
- Point-of-sale retail businesses, gaming establishments, employment agencies, government agencies, government owned facilities, educational institution, training vendors and non-profit entities are **not** eligible. Note: some unions, labor organizations, and non-profit healthcare entities may qualify as exceptions. Please contact a WEDnetPA partner for more information.

Employees participating in the training:

- Must earn at least 150% of the current federal minimum wage at the start of training, excluding benefits. Trainees can earn no less than \$10.88/hour at the start of training.
- Must be a permanent full-time employee and eligible to receive full-time benefits. Full-time benefits define full-time employment, not hours worked.
- Must be a verifiable resident of Pennsylvania and employed in Pennsylvania.
- Must have a clear connection between the training and the employee's job responsibilities.

Basic Skills Training

Additional Criteria:

- The company must verify that any employee involved in this training contract does not exceed the maximum reimbursement of \$450 for the Basic Skills training for any GFT contract within a fiscal year.
- A company may receive a maximum of \$75,000 (all locations under the same FEIN) per fiscal year.
- The company is limited to participation in the Guaranteed Free Training program and the Customized Job Training program to two consecutive years and three out of any five consecutive years. This restriction includes GAT offers. If a GAT offer is for multiple years, each year is counted as a year of eligibility. A company can check their eligibility at <http://wednetpa.com/gft/companygrant.asp>.
- The company will sign/execute a current Statement of Eligibility Memorandum of Agreement (MOA) that includes the company's 9-digit FEIN confirming that the Company, employees and training meet all of the requirements of the program.
- The company must provide the participating employee's valid social security number and job title to determine eligibility to the program.
- A company is defined by their Federal Employer Identification Number (FEIN), not their location or operating functions.
- Each location (regardless of FEIN) must apply separately.

Employee Turnover Policy:

- New grant recipients with a high historical employee turnover rate of 50% or greater may be declared ineligible.
- Prior grant recipients with a high employee turnover rate of 40% or greater may be declared ineligible.

Written justification from the company is required to be submitted with their application for consideration. This policy may be waived and is at the discretion of the WEDnetPA statewide director.

Information Technology Training

Additional Criteria:

- The company must verify that any employee involved in this training contract does not exceed the maximum reimbursement of \$850 for the Information Technology training for any GFT contract within a fiscal year.
- A company may receive a maximum of \$50,000 (all locations under the same FEIN) per fiscal year.
- The company is limited to participation in the Guaranteed Free Training program and the Customized Job Training program to two consecutive years and three out of any five consecutive years. This restriction includes GAT offers. If a GAT offer is for multiple years, each year is counted as a year of eligibility. A company can check their eligibility at <http://wednetpa.com/gft/companygrant.asp>.
- The company will sign/execute a current Statement of Eligibility Memorandum of Agreement (MOA) that includes the company's 9-digit FEIN confirming that the Company, employees and training meet all of the requirements of the program.
- The company must provide the participating employee's valid social security number and job title to determine eligibility to the program.
- A company is defined by their Federal Employer Identification Number (FEIN), not their location or operating functions.
- Each location (regardless of FEIN) must apply separately.

Employee Turnover Policy:

- New grant recipients with a high historical employee turnover rate (greater than 50%) may be declared ineligible.
- Prior grant recipients with a high employee turnover rate (greater than 40%) may be declared ineligible.

Written justification from the company is required to be submitted with their application for consideration. This policy may be waived and is at the discretion of the WEDnetPA statewide director.

Basic Skills Training

Eligible Training:

Eligible training activities, as set forth by DCED will be those that improve the skill level of employees through the introduction of **basic** skills required to be successful in various jobs. As such, basic skills training will be defined according to the type and scope of business being conducted by the employer.

The eligible training period is July 1, 2012 through June 30, 2013. Training cannot take place outside of this timeframe and must not have been invoiced/reimbursed on another current fiscal year's contract.

Training purchased prior to July 1, 2012 will not be eligible for reimbursement even if the training occurs with the current fiscal year.

Training must not have been invoiced on another GFT contract.

Training must start or be scheduled by February 1, 2013, or within 30 days of the contract approval date (whichever comes later) and be completed by June 30th or the awarded funds may be forfeited at the WEDnetPA partner's discretion.

Information Technology Training

Eligible Training:

Eligible training uses technology to **improve the technical skill level** of trainees. The employees participating can be reimbursed with ITT funds, regardless of job title, type of company or company size, as long as there is a clear connection between the training and the employee's job responsibilities. As such, Information Technology training will be defined according to the type and scope of business being conducted by the employer but cannot include company-wide software end user training.

Training not eligible under the Information Technology program may be eligible under the Basic Skills program as long as the employees trained also met the BST eligibility requirements. Please consult a WEDnetPA partner for assistance.

The eligible training period is July 1, 2012 through June 30, 2013. Training cannot take place outside of this timeframe and must not have been invoiced/reimbursed on another current fiscal year's contract.

Training purchased prior to July 1, 2012 will not be eligible for reimbursement even if the training occurs with the current fiscal year.

Training must not have been invoiced on another GFT contract.

Training must start or be scheduled by February 1, 2013, or within 30 days of the contract approval date (whichever comes later) and be completed by June 30th or the awarded funds may be forfeited at the WEDnetPA partner's discretion.

Basic Skills Training

Types of Eligible Training (not all inclusive):

- Communication and Teamwork
- Applied Mathematics and Measurement
- Workplace Health and Safety
- Problem Solving
- Quality Assurance
- Business Operations
- Computers
- Product and Process Control
- Workplace Behavior Skills
- Manufacturing Fundamentals:
 - Blueprint Reading
 - Welding, Soldering
 - Tooling, Grinding
 - Machine Setup & Maintenance

No On-the-Job, company orientation or company/industry/ product specific sales training is eligible for reimbursement. Grant funds cannot be used for adult literacy activities such as ESL. Where appropriate, WEDnetPA partners will collaborate with Adult Literacy Service providers to address workplace literacy needs. If the company possesses the internal expertise, in-house training is permitted for eligible training.

Training can be provided by the WEDnetPA partner institution, in-house or by third party vendors. **The company will always select their training provider.**

Information Technology Training

Types of Eligible Training (not all inclusive):

- E-Business/Commerce
- Technology Support
- Information Security
- Data Base Development
- Software Engineering
- Computer Programming
- Network Administration
- Systems Analysis
- Management Information Systems
- Website Design & Development
- Advanced Applied Manufacturing Technology:
 - CAD -CAM
 - CNC -PLC

Any training deemed ineligible under basic skills is not eligible for ITT reimbursement. Introductory courses, spreadsheet, word processing, presentation/graphic software training or basic/introductory database management training are ineligible for ITT reimbursement as they are considered basic skills and are eligible under the Basic Skills program. Company-wide software training for end users is not eligible for the Information Technology training program. If the company possesses the internal expertise, in-house training is permitted for eligible training.

Training can be provided by the WEDnetPA partner institution, in-house or by third party vendors. **The company will always select their training provider.**

Guaranteed Free Training Program

Eligibility:

Eligibility must be met on three levels: company, employee and training. Once a company has been determined to be eligible by a WEDnetPA partner, an application can be submitted on its behalf. Employees and training must also be determined eligible before reimbursement will be made.

Subcontracting:

The Company will always select the training provider. The Third Party Subcontractor Memorandum of Agreement must be completed if the WEDnetPA partner is reimbursing the training provider directly. By signing the Third Party Memorandum of Agreement (GFT-004 rev. 05/03/12), the third-party training provider is responsible for meeting all of the same reporting requirements as WEDnetPA partners would under these guidelines. In cases where a WEDnetPA partner is using a subcontractor for the training, the WEDnetPA partner will receive reimbursement for the training, and will be responsible for reimbursing the subcontractor or Company according to the terms of the subcontract.

WEDnetPA does not endorse any third party training vendor services.

GFT Application Timeline:

Only the approved WEDnetPA partners are authorized to administer applications for the GFT program. WEDnetPA accepts no responsibility for applications solicited by entities other than the approved WEDnetPA partners. To apply for Grant funds, the Company must complete the following items: application, training plan, statement of eligibility MOA and third-party subcontractor MOA (if applicable).

Eligible companies may apply online through our website between June 1, 2012 and July 15, 2012. Contingent upon passage of the state budget, companies will be notified in by email regarding the approval/non-approval of their applications by August 31, 2012. Applications may continue to be accepted after the initial application period, based upon the availability of funds.

When applications are reviewed, consideration will be given to, but not limited to the following target areas: industry partnerships, targeted industry clusters, geographic impact, company size, quality of jobs and quality of training.

Governor's Action Team Applications:

Applications for Governor's Action Team (GAT) offer letters may be submitted any time during the fiscal year. For consideration, a copy of the complete GAT offer letter with the signed acceptance page must accompany the application. Generally, GFT policy

guidelines apply to GAT offer letters. Within these guidelines, WEDnetPA is only obligated to fund the Company based on the specific stipulations of its GAT offer letter.

Reimbursement for Training:

Companies are eligible to receive grant funds up to \$450 for Basic Skills training and up to \$850 for Information Technology training per eligible employee in one fiscal year, regardless of training methodology (i.e. traditional, online, blended, etc.). An employee can appear on multiple contracts within the same fiscal year provided he/she does not exceed the \$450 and/or \$850 cap. An employee cannot be reimbursed for the same training more than once.

To receive reimbursement for training, the company **MUST** provide valid Social Security Numbers for all eligible employees. There are no exceptions to this policy. In addition, the company, employees and training must also meet all eligibility requirements as set forth under the Eligibility section of this document. If the cost of providing the training exceeds the stated cap per employee under the grant, the Company must cover the balance of those costs.

GFT funds cannot be used to reimburse for training that has been or will be paid (in whole or in part) by another local, state and/or federal funding source.

Duration of Training:

To be eligible for reimbursement, all training sessions (regardless of delivery method) must be a minimum of 30 minutes in duration. Any training submitted for less than this minimum will not be considered for reimbursement.

Eligible Expenses:

Eligible costs include: hourly salary of the instructor(s) for actual hours in training (not to include preparation time), instructor benefits (not to exceed 40%), cost of books and training materials, room rental (if applicable) for off-site training only, copying/printing of training materials or other materials consumed within the training period. **Companies who provide in-house training may seek reimbursement only for actual eligible training costs incurred.**

Training CDs, DVDs and videos are generally considered an eligible expense. **However, the purchase of CDs, DVDs and videos that exceed \$200 must be approved in advance by the statewide director.**

Ineligible Expenses:

Regardless of how or where the training is conducted, ineligible expenses include, but are not limited to: membership fees, in-house online training, employee (trainee) salary during training period, exam fees, test preparation, fees not associated with actual training,

sales tax, travel expenses for trainers or employees trained, preparation time of trainer, costs to develop the training, room rental for on-company-site training, food, materials and tools used in job (calculators, calipers, hard hats, etc.), shipping and handling of training materials to training site, training materials not consumed within training period (such as hardware and software), fixed assets, general education requirements towards a college degree, college-level advance degree coursework (master, doctorate, etc.), and credit courses towards completion of degree work unrelated to current job.

All training must be purchased within the same fiscal year that the training occurred. Any training purchased prior to July 1, 2012 is not eligible for reimbursement.

Some purchases of training materials require pre-approval from the statewide director. Please consult a WEDnetPA partner for clarification of eligible & ineligible training costs.

Exceptions:

All requests for exceptions to the guidelines such as, but not limited to company eligibility, employee eligibility, training eligibility, reasonable cost of training, ineligible expenses, etc. must include written justification and be pre-approved by the statewide director.

Exceptions must be requested and approved each fiscal year. If a company was given an exception in a past fiscal year, another request for the same or similar exception must be made for any future funding.

Companies with 1-100 employees are considered small. Employees of small companies with decision making authority or who supervise supervisors do not have to request an exception for employee eligibility. There is a blanket exception made for small companies regarding employee eligibility. This blanket exception does not apply to company or training eligibility.

Workplace Health & Safety (WHS):

The eligibility of WHS training will be determined based on whether or not it has a direct impact on improving an employee's job-related skills.

For example, in most cases, CPR training will not directly improve an employee's job-related skills. However, there are examples of when CPR training may be eligible: **1.** the employee is in a healthcare-related field and/or facility, **2.** the employee is a designated "emergency responder" within the company, **3.** the employee will be one of a few employees properly trained in CPR.

Listed below are types of WHS training that may be eligible for basic skills training. However, for each of the following it is the company's responsibility to confirm with its WEDnetPA partner at the time of application and/or prior to the start of training that the training will improve the employee's job-related skills.

- Ergonomics
- Stress management
- Driver safety
- Fire safety, including proper use of fire extinguishers
- Severe weather emergencies
- Sexual harassment prevention
- Diversity

Fire safety and the proper use of fire extinguishers is a particularly challenging training request to address. Some additional guidelines are provided below to clarify eligibility:

1. A reasonable number of first responders would generally be considered eligible (one per department, one or two per shift, etc.)
2. Low cost, in-house training is generally more acceptable than costly third party provided training.
3. "Large scale" or companywide fire safety training is not eligible unless pre-approved by the statewide director. An exception approval may be warranted in a highly volatile environment, where fire hazards are of the greatest concern (for example: chemical manufacturing).
4. When in doubt, contact your WEDnetPA partner.

Online Library Training Invoicing:

Online library training is not defined by the number of courses within the library, but that it has unlimited access for a specific period for a fixed price. A trainee must complete three different courses within an online library curriculum track before the company can invoice, regardless of the training provider. For example, a Business and Professional Development Library may have hundreds of courses within the track; a trainee can take any or all of these courses but must complete at least three courses to receive reimbursement. "Complete" is defined as the review of all chapters within a course and the completion of all course assessments.

When invoicing for online library training, you will need to submit documentation from the training vendor of the three courses taken for each employee along with invoice documentation. This vendor documentation must include the course status (finished/completed), the amount of time it took to complete each course and the start and end dates of the training.

When calculating the cost per person for an online library, divide the total cost incurred by the number of user licenses purchased. Example: company purchases online library subscription for \$4,500 for 100 user licenses. The cost per license is \$45.

Invoicing Process:

Companies must submit invoicing documentation to their WEDnetPA partner within 45 calendar days of the completion of each training event or the applicable WEDnetPA partner's designated year end invoicing deadline, whichever comes first. The GFT Verification Statement, executed online by the Company when submitting an invoice, will serve as the company's guarantee of satisfaction statement.

If the Company is dissatisfied with the training done by a training provider and a current signed Third-Party Subcontractor Memorandum of Agreement (GFT-004 rev. 05/03/12) is attached to the company's current ISAAC contract, the training provider will retrain the employees at the training provider's expense.

Invoicing documentation must include a copy of training provider's invoice. If an invoice cannot be provided, alternate documentation is required such as credit card receipt, cancelled check, registration confirmation showing payment, vendor certificate of completion, or other documentation approved by the statewide director. Regardless of what is submitted when invoicing, the alternate documentation must include the training event name and cost.

Reasonable Cost:

Companies are expected to incur only reasonable costs for training. Companies should be willing to pay the same cost out-of-pocket for the training if it were not reimbursed through WEDnetPA. The examples below will help further illustrate the intent of "reasonable cost," but are not intended to cover every possible scenario:

- When a company agrees to training arrangements, it is the company's responsibility to **be sure that the cost is reasonable compared to local market rates** for comparable training. (Example: if the market rate for an 8-hour basic Excel course is \$175, then a charge of \$350 would not be considered reasonable.)
- When a company enters into an agreement with a training provider to purchase a mobile lab/class at a fixed cost, it is the company's responsibility to **be certain that enough employees attend so the average cost per employee is reasonable**. (Example: If a fixed-fee "communications" class costs \$1,500 and ten employees are expected to attend, the average cost is \$150 per employee – this seems reasonable. However, if only three employees attend, the average cost is \$500 per employee and may no longer be reasonable.)

- When a company has a large number of employees attending the same training, it is incumbent upon the company to **be sure the total cost is reasonable and, if necessary, negotiate a discounted rate.** (Example: 200 employees attend a two-hour basic math skills course at a cost of \$200 each. The total cost of the training is \$40,000. Even if the training occurred over a period of four days – that’s \$10,000 per day and certainly not reasonable.)
- There seems to be an increasing trend for “cross-training,” especially in small companies. This often results in an exception request for employees whose job titles don’t align with the training. It is the responsibility of the partner to help **determine a reasonable level of cross-training.** (Example: a small company with ten employees wants to train everyone on network administration because “everyone is involved in the integration of the system.” This is not reasonable.)

Reporting Requirements:

There are a number of reporting requirements from the Pennsylvania Department of Community and Economic Development. In order for the WEDnetPA statewide office to meet those requirements, an application has been developed that includes all of the required information. That application and other required documents must be completed and submitted to a WEDnetPA partner for review and approval by the statewide office. The application timeline is outlined on page 6 of this document.

There are specific reporting requirements for invoicing. The invoicing guidelines and procedures are outlined above in this document.

Point of Contact (POC) Signing Authority:

The company’s statement of eligibility Memorandum of Agreement (MOA), verification statement and all invoices must be executed by someone who has signing authority on behalf of the company, but do not have to be executed by the same person.

Application and Invoicing Data:

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WEDnetPA is committed to protecting this information and has taken many precautions to ensure its security. Please see our Data Security Policy for more details.

Other Information:

WEDnetPA collects other information over the course of the applications and contract period. This includes general company information and proposed training plans. This information is used only for the purpose of determining eligibility and is not shared outside WEDnetPA, its funding source and other related state departments.

Contact Information: For additional information regarding the **Guaranteed Free Training** program, please contact any one of the authorized WEDnetPA partners directly or visit our web site at www.wednetpa.com.