



Employ Milwaukee Administrative Memo		
Issue Date	06-18-24	# 24-02
Sponsoring Executive	<input checked="" type="checkbox"/> CEO	<input type="checkbox"/> VP Programs <input type="checkbox"/> Finance Director
Dissemination	<input checked="" type="checkbox"/> Internal	<input checked="" type="checkbox"/> External

**TO:** Employ Milwaukee Staff, Service Provider Staff <sup>DS</sup> *JC*

**FROM:** Julie Cayo, Chief Planning Officer/Interim CEO

**RE:** Non-WIOA Department of Labor (DOL) grants Time Limited Policies

DOL Building Pathways to Infrastructure Jobs Grant: Skills to Build  
 DOL FOA -ETA-22-16 Nursing Expansion Grant: MEND  
 DOL FOA-ETA-23-13 Critical Sectors Job Quality Grant: ServeMKE  
 DOL Community Projects Grant – Water Works  
 DOL FOA-ETA-23-17 and FOA- ETA-21-04 YouthBuild Grants  
 Non-WIOA Programs

This memo only includes policy additions and exceptions for DOL Non-WIOA grants that differ from current Employ Milwaukee Inc. (EMI) policies and does not replace any other documents that EMI has related to work-based initiatives. **Please see EMI website for most current policies, as policies cited in this memo may be updated: [Agency Policies & Forms \(employmilwaukee.org\)](#).** This administrative memo is time limited and will expire when the grant program funding expires.

## A. Supportive Services

**Background:** EMI's current Adult and Dislocated Worker Supportive Services policy is WIOA Policy 17-02, Change 4 (effective 3/1/23).

**EMI Policy:** An individual must receive an assessment that evaluates barriers to success in the WIOA program and potential resources and support systems available to the participant for barrier alleviation. The Comprehensive Assessment tool in ASSET Manage Assessments is an acceptable assessment for these purposes.

**Non-WIOA DOL Grant Policy:** The exceptions from the current Supportive Service policy for those enrolled in Non-WIOA DOL grants are as follows:

Upon enrollment in Non-WIOA DOL grants, all participants complete an Individual Employment Plan (IEP) with grant staff. The IEP documents barriers to employment identified by the participant, includes a list of supportive services available, and serves as an assessment. The participant signs the IEP which includes an acknowledgment that supportive services available through the Non-WIOA grant have been discussed with grant staff. Services are documented in ETO when they are provided.

**Employ Milwaukee Administrative Memo 24-02****Changes to Allowable Supportive-Services Categories:**

- **Transportation Assistance**

- Non-WIOA DOL grants reimburse:**

- For round trips greater than 15 miles and shall only include travel to and from training. Mileage is reimbursed at the full IRS standard mileage rate for business (.67/mile as of 1/1/2024 <https://www.irs.gov/tax-professionals/standard-mileage-rates>).
    - The participant provides the grant staff with documentation of the participant's valid driver's license, automobile liability insurance, and current automobile registration.

- **Child and Dependent Care Assistance**

- Non-WIOA DOL grants reimburse:**

- Child and Dependent care may be provided for participants in training or other allowable activities who are not eligible for assistance through other sources. Care payments will only be made when there is an actual cost to the participant for the care. If subsidized through another program, any uncovered portion may be covered by grant funds. Participant may co-enroll in WIOA for further Supportive Service needs.
    - Care will be reimbursed at a rate that is considered usual, reasonable, and customary within WDA 2, which shall be the Wisconsin, Department of Children and Families Childcare Subsidy Maximum Rates. <https://dcf.wisconsin.gov/wishares/maxrates>.

**Supportive Service maximum amounts are determined by grant budget.**

## **B. Incentive Payments**

**Background:** In EMI's previous grants, incentives, in the form of gift cards, have been shown to increase participant's completion rate and the provision of information on grant outcomes (such as credential attainment or employment status) after they complete their training program, for the purpose of accurately reporting performance outcomes.

**EMI Policy:** EMI does not have an Incentive and/or Stipend Payment policy for WIOA Adult and Dislocated Workers.

**Non-WIOA DOL grants:** per Financial Opportunity Announcement, **grants** may offer reasonable incentives to participants for reporting achievement for grant milestones: education credentials, training completion credentials, progression to next step of individual pathway, preceptor placement, employment outcomes and job attainment in BIL funded projects. Incentive payments for each grant, shall be made in a uniform and consistent manner that ensures all participants receive equal incentives for equal achievement and/or participation. All incentive payments are subject to the availability of grant funds and are not an entitlement. EMI may suspend or withdraw authorization for incentive payments at any time and at its sole discretion.

Incentive payments will be awarded as a physical gift card or check. Activities eligible for incentive awards include:

**Employ Milwaukee Administrative Memo 24-02****Non-WIOA DOL Grants Milestones Chart**

Incentive Types of Milestones	Award Amount	Maximum Number	Example Documentation
Entered training program	Per grant budget	1	Completed vendor payment record, i.e., voucher
Completed skills training activity and obtained a certificate of completion or credential.	Per grant budget	1	Copy of training completion or credential.
Employment	Per grant budget	1	VOE form, pay stubs, employer letter, including start date, job title, wage

**Limits:** Incentive payments have a lifetime limit per participant. Documentation for incentive payments must be received no later than four (4) weeks upon completion of milestone. Participants in Incumbent Worker Training or On-The Job Training (OJT's) are not eligible for incentive payments.

**Documentation:**

Documentation for incentives shall follow the requirements listed below:

- The participant's IEP must identify the education/training or work experience that the participant will participate in and the corresponding incentive award(s) that can be achieved.
- Incentive awards are payable as a gift card or check which must be distributed in person. Gift cards/checks must be tracked when purchased with grant funds and grant staff must document via spreadsheet who the gift cards/checks were issued to and obtain the signature of receipt by the participant. Log should be reconciled at least quarterly.

### C. Work Based Learning: Internships/Paid Work Experience, Registered Apprenticeships, On-The-Job Training, and Incumbent Worker Training

**Background:** Work Based Learning in DOL programs includes Internships (also referred to as a Paid Work Experience), Registered Apprenticeships, On-The-Job Training (OJT's) for new hires and Incumbent Worker Training.

#### **Internships:/Paid Work Experience (PWE)**

**EMI Policy:** EMI does not have specific Internship or Registered Apprenticeship policies.

##### **a. Non-WIOA DOL Grant Policy: Internships/Paid Work Experience (PWE)**

Internships provide for paid work experiences that take place in a workplace for a limited period of time and are designed to enable participants to build a work history, occupational skills, and exposure to the working world. EMI PWE forms and Handbooks will be used.

- Partner Organization/Placement Site (Internship or Paid Work Experience worksite).  
The Partner Organization can be a non-profit organization, government agency, or for-profit business.

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- **EMI as the Employer of Record**
  - **Wages and Benefits:** Wages for the participant will be at a rate within a range as trainees or employees who are similarly situated in similar occupations at that business, and who have similar training, experience, and skills. No benefits are provided, other than Supportive Services. **Maximum amount is determined by grant budget.**
  - **Hours: Participants can work a maximum of 29 hours per week, for a maximum of 3 months.** Labor standards apply in any Internship where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law exists.

An Internship/Paid Work Experience may be followed by an OJT contract, assuming the worksite demonstrates an extraordinary training need and the participant is performing more advanced work than during the Internship. The OJT contract would need to be approved before the participant's Internship concludes and before the OJT begins.

**b. Non-WIOA DOL Grant Policy: Registered Apprenticeships**

Registered Apprenticeship (RA) is an industry-driven, high quality career pathway validated by the U.S. Dept. of Labor where employers can develop and prepare their future workforce, and individuals earn and learn, receive classroom instruction, and a portable, nationally recognized credential.

Non-WIOA DOL grants may pay for the RA's related classroom instruction per ITA guidelines, and/or work-based learning costs to employers per OJT guidelines. **Maximum amount is determined by grant budget.**

**c. Non-WIOA DOL Grant Policy: On-The-Job Training (OJT)**

**EMI Policy:** EMI's current OJT policy is Policy 20-03, Change 2 (effective 12/17/2023).

An OJT provides knowledge or skills essential to the full and adequate performance of the job for a business making a **new hire**. For Non-WIOA DOL Grant OJT's, the maximum length of time for an OJT is 480 hours reimbursed at a maximum of 50%. **Maximum amount is determined by grant budget.**

**d. Non-WIOA DOL Grant Policy: Incumbent Worker Training**

**EMI Policy:** EMI's current Incumbent Worker Training policy is Policy 20-04 (effective 8/25/23).

Incumbent workers are an eligible employment category for enrollment into Non-WIOA Grants program. Non-WIOA programs IWT are for grant enrolled participants. The DOL Grants IWT Training Proposal and Contract will be used with the employer, to ensure full understanding of the performance outcomes and documentation that is required. Vouchered training will be the usual method of securing training although other methods may be used.

Businesses are required to give successful completers of incumbent worker training a wage increase or promotion/new job title within 3 quarters of training completion.

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### D. Individual Training Accounts (ITA's)

**Background:** EMI's current Individual Training Account (ITA) policy is 17-01, Change 6 (effective 03/06/2024). This policy states that participants who seek training services must select an eligible provider of training services from the state list of eligible providers and programs (ETPL); and that ITA payments to training providers (other than those listed as eligible for 100% reimbursement of ITA costs at time of voucher approval), will be based on 80% of voucher value at program enrollment and 20% when the student has obtained placement.

**Non-WIOA DOL Grant Policy:** The exceptions to the current ITA policy for Non-WIOA DOL Grants are as follows:

- A training provider for the Non-WIOA DOL grant does not need to be listed on the state's ETPL list, but the training must include a certificate or credential for the new skill taught. **NOTE:** Grants may document use of new skills without the raise or promotion and be counted in the metric of completers who received a credential. Documentation may include ETO case notes, or a letter from Employer.
- A Non-WIOA DOL grant participant can receive training if they meet the eligibility requirements of the grant program.
- **Maximum participant support is limited to grant specified amounts.**
- Employ Milwaukee will reimburse 100% of ITA costs to the training provider upon receipt of training invoice which must include one week of participant attendance for reimbursement. Participants that drop out prior to one week will not be reimbursed. College drop policies and refund schedule will be followed as an exception.

### E. Academic Standing for College Participants

Students in academic programs must meet program and/or college academic standards to progress in their program. The DOL grant staff will use each institutions policy to screen applicants and to review individual participation.

- MEND -MATC <https://www.matc.edu/student-life-resources/districtwide-advising-services/academic-standing.html>
- MEND – Marquette [Academic Censure - Undergraduate | Marquette University](#)
- STB – MATC STEM <https://www.matc.edu/student-life-resources/districtwide-advising-services/academic-standing.html>

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**Revisions:** None.

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