



## **FY 2018-2019 Company Guidelines**

The Workforce and Economic Development Network of Pennsylvania (WEDnetPA) brings training funds to qualified companies across the Commonwealth through a network of community colleges, state system universities and other educational institutions.

The goal of WEDnetPA is to strengthen the business environment of the Commonwealth by helping companies improve the skills and productivity of Pennsylvania workers.

Funding for this program is provided by the Pennsylvania Department of Community & Economic Development (DCED) through its *Pennsylvania First* fund.

This document is subject to change without notice.

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# WEDnetPA – Guidelines at a Glance

“Guidelines at a Glance” is provided as a convenient summary of some of the most important procedures and eligibility criteria of the program. Additional information, including a list of current WEDnetPA partners can be found at [www.wednetpa.com](http://www.wednetpa.com).

Please be sure to review the “Guideline Details” section (starting on page 5) for more information.

## Online Application Process:

- All companies must apply online through WEDnetPA’s Information Sharing, Administration and Analysis Center (ISAAC).
- Companies can choose any WEDnetPA partner as their point of contact.

## Required Documentation:

- Application must be submitted by an employee of the company.
- Memorandum of Agreement (MOA) must be signed/executed by an authorized employee of the company.
- Only employees of the company can be granted password-protected access to ISAAC.
- A detailed training plan must be completed and reviewed.
- Invoicing documentation to support training activity and cost must be provided.
- Employee social security numbers & job titles must be provided when submitting for reimbursement of eligible training costs.

## Training Grant Types:

- Essential Skills (ES) training –
  - Limited to manufacturers and technology businesses.
  - Maximum reimbursement is \$450 per eligible employee, up to \$75,000 per company.
  - See pages 12-13 for additional information.
- Advanced Technology (AT) training –
  - Available to most companies, with some limitations (see page 9).
  - Maximum reimbursement is \$850 per eligible employee, up to \$50,000 per company.
  - See pages 14-15 for additional information.

## Company Eligibility:

- Company funding is limited to two years in a row or three out of the past five years.
- Company must be located in Pennsylvania.
- A company is defined by its Federal Employee Identification Number (FEIN).
- All locations under the same FEIN are considered a single applicant and when combined, are subject to the company funding caps.
- Each company location must submit its own application.

## Employee Eligibility:

To be eligible for reimbursement, at the time of training an employee must:

- Be a resident of and employed in Pennsylvania.
- Earn at least 150% of the current federal minimum wage, excluding benefits.
- Be permanently employed full-time and eligible for full-time benefits.
- Be an employee of the specific company location awarded grant funds.
- Meet other criteria based on funding type (ES or AT).

**Training Eligibility:**

- Eligible training is defined as skill building training that is central to an employee's current job responsibilities.
- Training must start on or after July 1, 2018 and be completed on or before June 30, 2019. Partial training will not be reimbursed.
- Training costs must be "reasonable" as defined by market rates and/or other criteria. See pages 19-20 for more information.
- Regardless of how it is conducted (classroom, online, etc.), each training session must be a minimum of 30 minutes in length.

**Invoicing Procedures:**

- All invoicing is submitted/processed online through ISAAC.
- Invoices must be submitted within 45 days of the completion of each training event or by the deadline set by your WEDnetPA partner as year-end approaches, whichever comes first. Invoices submitted after 45 days (or the WEDnetPA partner established deadline) may not be reimbursed.
- Required documentation must be provided. See pages 16-18 for more information.

# WEDnetPA – Guideline Details

## Eligibility:

Eligibility must be met on three levels: company, employee and training. After a WEDnetPA partner reviews an inquiry and determines a company to be eligible, an application for funding must be completed. Employees and training must also be eligible for reimbursement to be made. If employee or training eligibility is uncertain, confirm with your WEDnetPA partner before beginning training.

## Application Process:

To apply for grant funds, a company employee must complete the following items: inquiry, application, MOA and training plan for each type of funding (ES and AT).

All applicants must submit an initial inquiry:

- For first-time applicants: go to <http://wednetpa.com/Apply/inquiry.html>.
- For returning applicants: log onto <https://isaac.wednetpa.com/> with username and password.

An email notice will be sent when the inquiry has been accepted by the WEDnetPA partner. After receiving this email, the application process is:

- Step #1: Electronically execute or upload a signed Memorandum of Agreement (MOA).
- Step #2: Complete training plan.
- Step #3: Review application information and submit to WEDnetPA partner.
- Step #4: WEDnetPA partner review.
- Step #5: Statewide Office review.

## Company Description on ISAAC Dashboard:

This description should be at least 1-2 sentences to include an overview of the company and what product/services are offered so eligibility can be confirmed by the statewide office.

## Company Size:

Company size is defined as the total number of PA employees by FEIN, not by location.

## NAICS Codes:

Companies are required to provide their 6-digit NAICS code. This will help to determine eligibility and evaluate training investments by specific industry, industry clusters and sub-clusters. If a company does not know its NAICS code, it can be found online at <http://www.naics.com/search> or <http://www.census.gov/eos/www/naics/>. ISAAC requires an accurate code for the application to be processed for approval.

## Training Plan:

Companies are required to complete a training plan for each application type (ES and AT).

Each unique training event must be entered separately on the training plan. Multiple invoices can be submitted under one training event as long as the training event name, topics/subjects covered and training provider type are the same. Different training events cannot be combined on the training plan, regardless if they are itemized on the same vendor invoice, provided by the same training vendor, occur on the same training date or are similar in nature.

The course description must be at least 1-2 sentences to include topics/subjects covered in training. Course eligibility is generally determined by the course description. If the course description is vague and/or incomplete, it is likely clarification will be required or reimbursement will be declined. The course description does not need to state why the training is needed, which employees will be trained, who will provide the training, how long the training will be, how the training will be completed or repeat of course title.

**Application Timeline:**

Companies may apply online beginning June 1, 2018. Applications will be reviewed in the order they are received by the statewide office. Applications may continue to be submitted after the initial application period (June 1 through July 31), and will be considered based upon the availability of funds. Application approval is dependent upon passage of the state budget and program funding.

Applications are competitive. Consideration is given, but not limited to: quality of training, quality of jobs, industry partnerships, targeted industry clusters, geographic impact and company size.

**Company Signing Authority:**

The person who executes documents on behalf of the company must be an employee of the company and have signing authority. This includes the MOA, invoice submissions and other documents that are used in the administration of the program. The same person is not required to execute each document. Under no circumstances can anyone who is not an employee of the company be considered to have signing authority. As such, only company employees can be given password-protected access to ISAAC.

**Industry Partnerships:**

Industry Partnerships (IPs) bring together industry-specific employers, educational institutions, government agencies and others to address common business needs, including employee training and skill development. Training objectives include the attainment of industry-recognized credentials and career advancement. In addition to cost-effective training, IPs may also focus on sector strategies to:

- Identify opportunities to spur innovation and adopt new technologies
- Respond to global competition
- Address supply chain issues
- Improve general industry perceptions
- Share best practices
- Change legislative policies

The intended goal of the Industry Partnership program is to encourage highly strategic partnership initiatives that develop a cost-effective and financially sustainable means of producing quantitative outcomes by meeting the needs of an industry cluster and its regional workforce. Ask your WEDnetPA partner for more information about how you can participate or visit this [link](#).

As part of the application process, companies will be asked if they participate in an Industry Partnership or other workforce development partnership. If so, they will need to provide the name of the Industry Partnership or other workforce development partnership. This will help us to coordinate activities and to ensure we are providing the best possible service.

**Data Security and Privacy Policies:**

WEDnetPA takes significant steps to secure and protect the information provided by companies. WEDnetPA uses the information collected solely for purposes related to the management and administration of the program. We do not share information outside the WEDnetPA partnership, its funding source and other related state departments except as required by law. Our complete [data security](#) and [privacy](#) policies are available online.

**Information Sharing, Administration & Analysis Center (ISAAC):**

ISAAC is WEDnetPA's online system, which eliminates paper documents and gives companies the ability to manage their contracts, training plans and invoices from anywhere at 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: Microsoft Edge, Google Chrome, Mozilla Firefox, Safari or Opera.



Microsoft Internet Explorer (IE) is not a “standards-compliant” browser and, therefore, will no longer be supported beyond July 31, 2018. As a result, some functions and features in ISAAC will not work in IE, which will prevent users from being able to complete an application and/or invoice.

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.

Uploading class rosters will require companies to use Excel 2007 or higher. If this is not available, you will need to download Microsoft's [Compatibility Pack](#).

For more information, please consult your WEDnetPA partner before applying.

### **ISAAC Access Levels:**

It is important to remember that **ONLY EMPLOYEES** of the company can be given password-protected access to ISAAC. Consultants, training providers and other non-employee entities are not permitted to access ISAAC on behalf of a company. User names and/or passwords should not be shared with anyone outside the company.

In company user management, ISAAC access levels are defined as follows:

- Manager-level access provides the ability to change anyone else's access level, privileges or preferences at their company *except for their own*. For example, a primary point of contact (POC) may have been given manager-level access, but only the payroll manager at their company (perhaps an ISAAC staff-level user) has the SSN privilege. The POC cannot self-assign SSN access against their company policy, but must get another ISAAC manager at their company to do so -- or in extenuating circumstances, their WEDnetPA partner or the Statewide Office (SWO).
- Staff-level access have the ability to modify their own preferences, but not their privileges or access level. Those can only be changed by a manager-level user at their company -- or in extenuating circumstances, by their partner or the SWO.
- Associate-level access is "read-only" for the purpose of reviewing reports and other information without being able to change or submit anything.

The designation of primary or executive POC does not convey any special access or privileges, but merely denotes to whom communications should be directed. POCs are often also managers, but not as a rule.

Remember that passwords must **never** be shared, *especially* as a means to circumvent these policies. Users must work within their assigned access levels and privileges or get them changed through the proper channels.

Only employees of the company can be granted password-protected access to ISAAC.



## Eligibility Criteria Common to both ES & AT Training:

### Types of Funding Available:

WEDnetPA grants are available for two training target areas – Essential Skills (ES) training and Advanced Technology (AT) training. Each target area requires a separate application and MOA. The following section covers the guidelines that apply to both target areas. Guidelines unique to each target area are outlined separately in the next section of this document.

### Company:

- A company is defined by its Federal Employer Identification Number (FEIN). Company caps and funding history will be determined by the company's FEIN, not by location or operating functions. If the company has more than one location using the same FEIN, it is the company's responsibility to coordinate applications among the various locations.
- Multiple company locations sharing the same FEIN number must apply separately.
- The company location applying for training funds must be in Pennsylvania.
- A company is limited to participating in the program two consecutive years and three out the past five years. This restriction includes Governor's Action Team (GAT) offers. If a company receives a GAT offer from the Commonwealth, which could be for multiple years, each year funding is used counts as a year of eligibility.
- The company must sign a current Memorandum of Agreement confirming that the company, employees and training meet all of the current requirements of the program.
- Only those employees from the specific company location receiving a training grant can be considered for reimbursement.
- The company must provide each participating employee's valid social security number and job title.
- Point-of-sale retail businesses, gaming establishments, employment agencies, government agencies, government owned facilities, educational institutions, 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.

### Employee:

- Must earn at least 150% of the current federal minimum wage at start of training, excluding benefits. Currently, trainees can earn no less than \$10.88/hour at the start of training. This could change during the contract period.
- Must be a permanent full-time employee and eligible to receive full-time benefits. Full-time benefits (not hours worked) define full-time employment.
- Must be a verifiable resident of Pennsylvania and employed in Pennsylvania.

### Training:

- The eligible training period is July 1, 2018 through June 30, 2019. Training must be started and completed between July 1, 2018 and June 30, 2019.

- At least one or more training events must start or be scheduled by January 31, 2019, or within 30 days of the contract approval date (whichever comes later), or grant funds will be at risk of forfeiture at the discretion of the WEDnetPA partner.
- The training vendor invoice or other acceptable documentation must include training event name and training cost. If the documentation is dated outside the fiscal year, it must also include the training dates or other acceptable support documentation must be submitted. Support documentation may include but is not limited to certificate of completion, web site documentation or email clarification from training vendor.
- Certification training is eligible and encouraged, however, periodic re-certification (i.e., annual, semi-annual, etc.) is not eligible.
- Training must not have been invoiced on another contract.
- An employee cannot be reimbursed for the same training more than once.
- On-the-Job training and company orientation are not eligible for reimbursement.
- Adult literacy activities such as ESL are not eligible for reimbursement.

**Employee Turnover Policy:**

- Companies with an annual employee turnover rate of 25% or greater are not eligible.
- This policy may be waived with justification and at the discretion of the statewide director. For consideration, a written request from the company, including what steps are being taken to improve the turnover rate, must be submitted with each application.

**Other Terms and Conditions:**

- Grant awards are contingent upon the availability of funding and are subject to all terms and conditions of the program's contract with DCED, which is available upon request.
- Training can be provided by the WEDnetPA partner institution, the company's in-house staff or any third-party provider.
- The company will always select its training provider and is never required to use a WEDnetPA partner for training.
- WEDnetPA does not endorse any third party vendors.
- WEDnetPA funds cannot be used to reimburse for training that has been or will be paid or supported (in whole or in part) by another local, state and/or federal funding source.
- From time to time, training providers may be determined to be ineligible to receive reimbursement for their training through WEDnetPA. It is the sole responsibility of the company to confirm trainer eligibility through the WEDnetPA partner or the program's website. Should a training provider be identified as ineligible, the company understands that reimbursement will be denied.
- The company understands that this program is funded with public tax dollars and certain information about the company's participation may be made available to the public.
- The company agrees to participate in surveys. WEDnetPA undertakes a number of initiatives to determine the quality and impact of services provided. Candid feedback is critical to the long-term success of the program.
- To help ensure continued funding, the company is encouraged to contact state legislators to share information about the WEDnetPA program and its benefits. Funds

are provided through the Pennsylvania Department of Community & Economic Development's *PA First* fund.

- The company agrees to provide, upon request, any information related to its contract(s) under this program (including but not limited to employee home addresses). Information must be provided for a period up to six years (current fiscal year plus five fiscal years) when requested by the WEDnetPA partner, the WEDnetPA statewide office, Pennsylvania College of Technology, the Pennsylvania Department of Community & Economic Development, the Office of the State Inspector General, Comptroller or their designated representatives.
- Guidelines are subject to change without notice.

## Additional Essential Skills (ES) Training Criteria

### Company:

- This grant type is limited to manufacturers and technology businesses, including biotech and environmental-technology companies.
  - A technology business is defined as one that produces or provides a technology product or service. Simply using technology in the process is not sufficient.
- Funding decisions for manufacturers are based on a company's correctly applied NAICS code (<http://www.naics.com/search>). Manufacturing codes fall into the range of 31 through 33.
- Primary care hospitals are eligible for ES training. Nursing homes, long-term care facilities, home healthcare, mental health facilities, hospices, clinics, doctor's offices, pharmacies and similar entities are NOT eligible.
- Bank corporate headquarters and all employees of this location are eligible for ES training. Branch locations and their employees are not eligible.

### Employee:

- Executives with company-level decision making responsibilities (budgetary, policy making, etc.) are not eligible for ES training. Final decisions will be at the discretion of the statewide director. Small companies (up to 100 employees) are exempt from this policy.

### Training:

- Eligible training activities are those that directly improve the essential job skills required for the employee's current position. These job skills are central to the employee's position and would likely be found in the employee's job description.

### Additional Criteria:

- Total funding cannot exceed the company cap of \$75,000 per fiscal year. Any employee reimbursed for ES training cannot exceed the employee cap of \$450. Costs incurred above this amount are the responsibility of the company.

### Types of Eligible Training (not all inclusive):

- Applied Mathematics and Measurement
  - Tooling, Grinding
  - Welding, Soldering
- Business Operations
- Communication and Teamwork
- Computer Operations
- Continuous Improvement/Kaizen
- Lean Manufacturing/Lean Enterprise
- Manufacturing Fundamentals:
  - Blueprint Reading
  - Basic Machine Setup and Maintenance
- Problem Solving
- Product and Process Control
- Project Management
- Quality Assurance
- Six Sigma White Belt and Yellow Belt
- Workplace Behavior (see next section)
- Workplace Health and Safety (see next section)

## Workplace Behavior:



Workplace behavior training includes subjects such as sexual harassment, violence, diversity and similar topics. While these are important matters in any work environment, they are not considered essential “skills” for the general employee population. These training topics are, however, very relevant to and would be considered eligible for those in human resource (HR) management. On a limited basis, managers, supervisors and employees participating on committees to address these specific issues may also be considered eligible. Companies should confirm eligibility with their WEDnetPA partner prior to the start of training.

## Workplace Health & Safety (WHS):



The eligibility of WHS training is based upon whether or not it has a direct impact on improving an employee’s essential job skills. The training must improve the skills that are central to the employee’s job function. Only first-time trainees are eligible. Periodic refresher/re-certification training is not eligible. It is the applicant’s responsibility to confirm eligibility with their WEDnetPA partner at the time of application and/or prior to the start of training. **In most cases, WHS training is not eligible on a broad or company-wide basis.**

- **CPR training:** Eligible only for those in a healthcare-related field or facility and for those designated “first responders” within a company where only a few will be properly trained in CPR.
- **OSHA training:** Eligible only for those who are specifically responsible for overall company safety measures and are designated as a “competent person,” “person in charge,” safety director/manager, etc.
- **Fire Safety training:** Eligible only for a reasonable number of first responders (i.e., one or two per department, shift, building, etc.). Pre-approved exceptions may be made in highly volatile environments where fire hazards are of great concern.

**Other WHS training:** Listed below are other types of WHS training that may be considered eligible on a limited basis.

- **Driver Safety:** only for those who routinely/regularly drive a company vehicle.
- **Ergonomics:** only as required by industrial job responsibilities (i.e., heavy lifting, repetitive motion, etc.).

# Additional Advanced Technology (AT) Training Criteria

## Company:

- This grant is available to all industries, except those defined as ineligible on page 9.

## Employee:

- All employees are eligible for AT training regardless of job title or company size, as long as there is a clear connection between the training and the employee's current job responsibilities.

## Training:

- Eligible training activities will be those that directly improve the advanced technology job skills required for the employee's current position.
- To be eligible, software product training must conclusively be considered advanced technology.
- Basic consumer products (like word processing, spreadsheet and presentation software) are not AT eligible.
- Project Management (PM) training that targets the general theory and principles is considered ES. However, when PM training applies to software development or other advanced technology outcomes, it is considered AT. Likewise, training on the use of PM software is considered AT.

## Additional Criteria:

- Total funding cannot exceed the company cap of \$50,000 per fiscal year. Any employee reimbursed for AT cannot exceed the employee cap of \$850. Costs incurred above this amount are the responsibility of the company.

## Types of Eligible Training (not all inclusive):

- Advanced Machine Operations and Maintenance
- Advanced Manufacturing Technology includes CAD, CAM, CNC, PLC (see section below)
- Advanced Software Implementation
- Computer Programming
- Data Base Development
- E-Commerce
- Information Security
- Management Information Systems
- Medical Applications
- Network Administration
- Scientific Applications
- Six Sigma Green Belt, Black Belt, Master Black Belt
- Software Engineering
- Systems Analysis
- Technology Support
- Website Design & Development

Advanced Manufacturing Technology is defined as follows:

Using technology/automation, the integration of networked computers and manufacturing operations (e.g. machine tools, control processes) to boost capacity, productivity and quality. Can also include:

- advanced control systems design, operation and maintenance
- automating business functions (order processing, inventory management, etc.)
- automated machinery design, operation and maintenance
- electrical and mechanical design, operation and maintenance
- manufacturing instrumentation design, operation and maintenance
- ERP/MRP systems (factory management software)
- rapid manufacturing
- robotic systems design, operation and maintenance
- solid modeling

# Invoicing Process

## **Timing:**

Companies must submit invoicing documentation for eligible training reimbursement within 45 calendar days of the completion of each training event or by the WEDnetPA partner's designated year-end invoicing deadline, whichever comes first. Partial training will not be reimbursed.

The last day that the statewide office will approve invoices for payment from a WEDnetPA partner will be July 31, 2019, however, the WEDnetPA partner may establish an earlier deadline for companies in order to meet this statewide office deadline.

## **Reimbursement for Training:**

Companies are eligible to receive grant funds up to \$450 for ES training and up to \$850 for AT training per eligible employee in one fiscal year, regardless of training methodology (i.e. classroom, online, blended, etc.). An employee can appear on multiple contracts within the same fiscal year provided he/she does not exceed the \$450/ES or \$850/AT employee 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 and current job titles 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 in this document. If the cost of the training exceeds the stated cap per employee under the grant, the company will be responsible the balance of the cost. The company will be responsible for the full cost of any training that is determined to be ineligible.

Training CDs, DVDs and videos are generally considered an eligible expense. However, the purchase of CDs, DVDs and videos that exceed \$300 must be approved in advance by the statewide director. High cost materials are considered a capital expenditure not consumed in the training event and are not eligible for reimbursement.

## **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.

## **Partner/Third Party Provided Training:**

Invoicing documentation must include at least one of the following documents (in .pdf, .doc, .tif or .jpg format) which must include specific training event name and training cost:

- training provider invoice
- paid registration confirmation/receipt
- completed registration form and proof of payment (cancelled check, credit card receipt/statement)



The training event name on the training plan must closely match what appears on the submitted vendor invoice.

If a submitted vendor invoice does not specify what training was provided or is not dated, it will not be accepted. Handwriting the training event name or date on the vendor's invoice will not be accepted.

If the vendor's invoice is in a foreign currency, bank documentation showing the foreign currency amount, conversion date, exchange rate of conversion and USD equivalence will also be required to be submitted with the vendor's invoice. Handwritten documentation will not be accepted.

In cases where an employee has paid for training out of pocket and the company is seeking reimbursement for this training, company must provide proof of payment that the employee has already been reimbursed for the training.

When calculating the cost per person for any training, the "number of employees receiving training" must be the total number of employees trained, regardless if all employees are WEDnetPA eligible or not. For example, if a training event costs \$10,000 for 100 employees but only 25 of the employees are WEDnetPA eligible, the cost per person is \$100 ( $\$10,000/100$  total employees trained), not \$400 ( $\$10,000/25$  WEDnet employees).

#### Library Training:

Library training is not defined by the number of courses within the library, but that there is unlimited access for a specific period of time at a fixed price. To be eligible, a trainee must complete three different courses within a library. For example, a Business and Professional Development Library may include hundreds of courses. A trainee must complete at least three 30-minute courses to receive reimbursement for the library. "Complete" is defined as the review of all chapters within a course and the completion of the course assessments.

The company will be responsible for the full cost of library training for each eligible employee that does not complete a minimum of three courses. Training costs are typically incurred when an employee receives a login and password from the training vendor.

In addition to invoice documentation, additional documentation is required from the training vendor for the three courses taken by each employee. This information must include the employee's name, course name, course status (finished/completed), the amount of time required to complete each course and the start and end dates of the training.

When calculating the cost per person for a library, divide the total cost incurred by the number of user licenses purchased. For example, if a library subscription costs \$4,500 for 100 user licenses, the cost per license is \$45. This represents the maximum potential reimbursement per trainee, regardless of how many employees complete the training.

If the company is purchasing library training as a monthly subscription vs. annual subscription, each month is considered a separate library and employees must complete the three course minimum requirement for each month.

### **In-House Training:**



The in-house training option is intended for limited use to primarily assist small- and medium-sized companies. Unless an exception request is approved by the statewide director in advance:

- Group training is limited to a maximum of 40 hours per event.
- Single-employee training (i.e., one trainee at a time) is limited to a maximum of 8 hours per event.
- When it appears that training is structured in a way to circumvent the above limits or when any training is deemed to be excessive, it can be denied at the discretion of the statewide director.
- Companies with more than 500 employees are not eligible for in-house training reimbursement.

The reimbursement amount for eligible in-house training must be calculated using the ISAAC in-house spreadsheet.

All in-house instructors must be employees of the company and properly qualified through education or experience to provide the training. The company also agrees to maintain records of trainee attendance.

Instructor's base hourly rate must be accurate and reasonable. At the discretion of the statewide director, a company may be required to provide payroll records (preferably the employee's most recent redacted W-2) to verify an instructor's base hourly rate. Failure to provide requested payroll records will result in the invoice being rejected.

In the instructor's rate per hour description of cost(s) field on the in-house spreadsheet, add the name and job title of the in-house instructor. If more than one trainer conducted the training, list each trainer's name, job title & base hourly rate. The "instructor's base rate per hour" field on the in-house spreadsheet should reflect the average base rate of all in-house instructors, not their combined base hourly rate.

Eligible costs include: hourly salary of the in-house instructor(s) for actual hours in training (not to include preparation time), instructor benefits, cost of training books and related materials, room rental for off-site training only, copying/printing of training materials or other materials consumed (i.e., fully utilized) within the training period. Reference manuals, software or other products not consumed wholly and specifically for training purposes are not eligible for

reimbursement. Companies conducting in-house training may seek reimbursement only for actual eligible training costs incurred.

Books, supplies, facility rental, outside copying and other expenses will require the attachment of a vendor invoice at time of submission.

### **Reasonable Cost:**

Companies are expected to incur only reasonable and/or customary 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. Costs determined by and at the sole discretion of the statewide office to be unreasonable will not be reimbursed and will be the responsibility of the company. The examples below help to 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 \$450 would not be considered reasonable.)
- When a company enters into an agreement with a training provider to purchase training 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: if five employees attend a four-hour lean manufacturing course at a cost of \$200 each, the total cost (\$1,000) seems reasonable. However, if 30 employees attend the same four-hour course, the total cost is \$6,000 and is no longer reasonable.)
- “Cross-training” can sometimes result in an exception request for employees whose job titles don’t align with the training. It is the responsibility of the company, with help from the WEDnetPA partner, to **determine a reasonable level of cross-training**. (Example: a small company with fifty employees wants to train everyone on network administration because “everyone is involved in the integration of the system.” This is not reasonable.)

### **Ineligible Expenses:**

Regardless of how or where the training is conducted, ineligible expenses include, but are not limited to: refresher/re-certification training, membership fees, in-house online training,

trainee wages during training period, exam fees, test preparation/review, costs not associated with actual training, sales tax, travel expenses, 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.), reference materials/manuals/props/games that can be used after the training, shipping and handling charges for training materials, training materials not consumed within training period (such as hardware and software) and fixed assets.

General education requirements towards a college degree and credit courses towards completion of degree work unrelated to the employee's current job are not eligible. Advance degree coursework (masters or doctorate) requires pre-approval from the statewide director.

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