

# Work-Based Learning Policy

Policy No. 2026-500-01  
Effective Date 04/07/2026

## **PURPOSE**

The purpose of the Work-Based Learning (WBL) policy is to maintain compliance with Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, Youth programs and all other associated grants that utilize training agreements/contracts for WBL, including Work Experience (WEX) and Transitional Jobs (TJ), On-the-Job Training (OJT), Customized Training, Registered Apprenticeship Training (RAP), and Pre-Apprenticeship Training.

## **REFERENCES**

Illinois Department of Commerce and Economic Opportunity (DCEO) e-policy Chapter 7, All Sections and all Policy/References, Notices, and Technical Assistance Resources attached to the e-Policy.

Workforce Innovation and Opportunity Act (WIOA) Sec. 134(c)(3)(D); TEGL 19-16; TEGL 09-22; Illinois workNet WIOA Policy Chapters 6 & 7

The Workforce Connection, Inc. Regional Plan

## **BACKGROUND**

One type of Training Service available to participants is Work-Based Learning (WBL), which allows participants to earn income while gaining critical job skills. Participants benefit employers by meeting their demand for "work-ready" skills (assessed on the job) and tailored technical skills. The participant can use WBL to complete their training goals. Various WBL activities are available for Adults, Dislocated Workers, and Youth under WIOA and other grants that utilize WBL. Activities identified as WBL for Adults include Work Experience (WEX), Transitional Jobs (TJ), On-the-Job Training (OJT), Customized Training, Registered Apprenticeship Programs (RAP), and Pre-Apprenticeship Training. Activities identified as WBL for Youth are Work Experience (WEX), On-the-Job Training (OJT), Customized Training, Registered Apprenticeship Programs (RAP), and Pre-Apprenticeship Training.

## **ACTION REQUIRED**

This information should be disseminated to all program directors/staff responsible for developing Work-Based Learning agreements on behalf of The Workforce Connection, Inc. (TWC).

## **RESPONSIBLE PARTY**

Staff responsible for Work-Based Learning opportunities and/or processes for enrolled participants must ensure all policies are followed.

## **INQUIRIES**

Questions regarding this policy should be directed to The Workforce Connection, Inc. (TWC), President & CEO.

## **LOCAL POLICY**

### **I. GENERAL REQUIREMENTS FOR PARTICIPANT ELIGIBILITY**

Work-based learning opportunities must be identified as appropriate activities for program participants in their Individual Employment Plan (IEP) or Individual Service Strategy (ISS).

### **II. WORK EXPERIENCE AND TRANSITIONAL JOBS**

Work experiences (WEX) are planned, structured learning experiences that take place in a workplace for a limited period and enhance employability, occupational, and work-readiness skills. WEX's may be paid or unpaid, as appropriate and consistent with other laws, such as the Fair Labor Standards Act. WEX's may be within the private for-profit sector, the non-profit sector, or the public sector. WEX's are designed primarily for skill development, career exploration, and occupational exposure. The participant must have an identified need in their Individual Employment Plan (IEP) or Individual Service Strategy (ISS).

Transitional jobs (TJ) are a type of work experience that local boards may provide under WIOA and are considered an individualized career service for Adult and Dislocated Workers. TJs are time-limited and wage-paid work experiences that can be subsidized up to 100 percent and combined with comprehensive employment and supportive services. These jobs are in the public, private, or nonprofit sectors. TJs emphasize helping participants establish a work history, demonstrate work success, and develop skills that lead to unsubsidized employment.

TJs are designed specifically for individuals with barriers to employment who are chronically unemployed or have an inconsistent work history.

#### Chronically Unemployed

1. Participants considered chronically unemployed are those who have been unemployed for 15 months in the past 60 months (five years).

#### Inconsistent Work History

1. Participants may be considered to have an inconsistent work history if they change jobs frequently (worked for three or more different employers in the past five years);

2. Have multiple employment periods of less than 10 consecutive weeks in any single job;
3. Have extended periods of unemployment (13 weeks or longer of unemployment, 52 weeks prior to application for the program);
4. Show a lack of steady, full-time employment (e.g., consistently under 32 hours per week);
5. Have a history of temporary or seasonal positions;
6. Show misrepresentation of employment where inaccurate or misleading employment dates/details on applications or resumes are discovered through verification of a background check.

Participant must meet the program-specific eligibility requirements and be identified as having barriers to employment, including, but not limited to, long-term unemployment, justice involvement, homelessness, or an inconsistent work history.

- A. For paid WEXs and TJs, the program will pay the participants' wages, related payroll taxes, workers' compensation, liability, and benefits provided under the Illinois Department of Labor Paid Leave for All Workers Act 820 ILCS 192 and the Federal Fair Labor Standards Act. <https://www.dol.gov/agencies/whd/flsa> Wages will be paid at the same entry-level rate that is paid to trainees or employees in the same or similar positions at the worksite. No position will be paid less than the State of Illinois established minimum wage.
- B. Participants in WEXs and TJs will work a planned 30 hours or fewer per week. The duration of the WEX is generally up to 350 hours; exceptions must be justified in case notes and approved in writing by the direct supervisor. The duration of the TJ must be time-limited (no more than 6 months and preferably 8 to 12 weeks) and require at least fifteen (15) but not more than thirty (30) hours of work per week.
- C. The duration of the WEX and TJ will be determined based on the expected outcomes.

The WIOA Youth program:

1. WEXs must include academic and occupational education.
  2. Participants might participate in more than one WEX assignment throughout their program participation – i.e., summer employment, job shadowing, pre-apprenticeship programs (681.600). However, if the participant participates in more than one WEX, the combined WEXs cannot exceed 350 hours.
- D. The worksite supervisor is expected to provide supervision and training for participants, as well as monitor the progress and application of job readiness skills. The ratio of trainee to supervisor will not exceed 5 to 1.

- E. WEX and TJ participants are considered trainees. Therefore, staff developing such training opportunities must ensure adequate supervision at the worksite. A supervisor must always be on-site during the trainee's work hours.
- F. Worksite Approval and Monitoring: Staff will pre-approve and monitor all worksites. Worksites must sign a Worksite Agreement outlining responsibilities, supervision, evaluation, and compliance with wage/hour laws. Staff will visit the site at least twice during the WEX or TJ period. Staff will monitor WEX and TJ worksites for compliance with WIOA, Illinois Department of Commerce & Economic Opportunity (DCEO) policies, and this local policy. WEX and employers/worksites will be monitored within the first 30 days of placement and again before the end of his/her WEX or TJ. All visits will be documented on the evaluation forms, including supervision and any issues or concerns. The employer/host site must provide a safe, supervised, and appropriate work environment. They must agree not to displace current employees or infringe upon promotional opportunities.

For TJ placements, employers must work with career planners to support participant transition to unsubsidized employment.

- G. The number of WEX or TJ participants assigned per worksite will not be greater than 50% of the total employees at the worksite.
- H. Future WEX or TJ requests from worksites will be denied if those worksites have not honored the requirements set forth in previous worksite agreements.
- I. WEX or TJ activity cannot directly promote or support political, religious, or anti-religious activities, nor may the participant support sectarian instruction or direct operations for religious worship. The contract or training agreements will confirm or indicate that "the responsibilities will not directly support sectarian instruction or direct operations for religious worship."
  - 1. WIOA prohibits the use of funds to employ participants to carry out the construction, operation, or maintenance of any part of any facility used for sectarian instruction or as a place for religious worship, apart from maintenance of facilities that are not primarily used for instruction or worship and are operated by organizations providing services to WIOA participants.
  - 2. The organization may not require beneficiaries or prospective beneficiaries to attend or participate in any explicitly religious activities that are offered by the organization, and any participation by beneficiaries in such activities must be purely voluntary.
  - 3. The organization must separate in time or location any privately funded explicitly religious activities from activities supported by direct Federal financial assistance.

- J. Programs will utilize the WEX Agreement, TJ Agreement, and Training Plan established by the Illinois Department of Commerce and Economic Opportunity (Attachment A), in accordance with e-policy Chapter 7 Section 2.2

### **III. ON-THE-JOB TRAINING (OJT)**

On-the-Job Training (OJT) reimburses employers to help cover the costs of skills-upgrade training for newly hired employees and the lost production of current employees providing the training (including management staff). OJT training can assist employers looking to expand their businesses and need additional staff trained in specialized skills.

- A. Representatives Authorized to Negotiate OJT Contracts: The Business Service Representatives of the One-Stop-Operator and Youth Services Provider and all other associated grants that utilize training agreements in LWIA 3 are authorized to negotiate OJT contracts on behalf of TWC, the Local Workforce Board.
- B. Contract Period: The training program will generally not exceed a total of 1,040 full-time hours of actual training (the equivalent of full-time training for six months).
  - 1. Training may exceed six (6) months if the OJT is related to a Registered Apprenticeship Program (RAP) or there are extenuating circumstances such as lengthy illness, plant shutdown, holidays, etc., but total training hours will generally not exceed 1040. Any exceptions not related to a RAP will be reviewed and approved by TWC Board's President and CEO.
- C. Individuals selected for an OJT contract will not be placed in an occupation in which they have had prior experience unless some of the skills required are in a new area for which technology and skills have changed significantly enough to warrant additional training.
- D. Reasonable tools, equipment, and clothing not provided by the employer for all employees in the same position may be provided by the program provider, based on the participant's need. The cost of tools, equipment, and clothing is pursuant to the Supportive Service policy in accordance with TWC's Board Policy. A reasonable attempt will be made to retrieve tools and equipment from the participant if the participant has completed less than 4 weeks of OJT training. The participant will complete the form acknowledging receipt of the items and agree to return any and all tools and equipment.
- E. Reimbursement for Training (in accordance with IL DCEO e-policy Chapter 7 Section 2.2.1.7):

1. Through the OJT contract, training is provided for the participant in exchange for reimbursement, typically up to 50 percent (50%) of the participant's wage rate.
2. In limited circumstances, as provided under WIOA and all other associated grants that utilize OJTs, the reimbursement rate may be up to 75 percent (75%) of the participant's wage rate.
  - a. As allowed by the WIOA Final Rules, the Governor has determined that the reimbursement rate for OJT contracts funded through the statewide employment and training activities can be up to seventy-five percent (75%).
  - b. Under this same authority and other grant policy, TWC may also increase the reimbursement rate for OJT contracts described up to 75 percent (75%) when considering the following factors:
    - 1) The characteristics of the participants, considering whether they are "individuals with barriers to employment," as defined in WIOA sec. 3(24).
    - 2) The size of the employer, with an emphasis on small businesses.
      - i. TWC shall consider the size of the business based on the total number of full-time employees at the location where the OJT will occur; however, there is no requirement that only small businesses may receive the seventy-five (75%) reimbursement rate.
      - ii. TWC may increase the reimbursement rate to up to ninety percent (90%) for businesses with 50 or fewer employees under a waiver approved through June 30, 2028, provided factors 1), 3), and 4) are met.
    - 3) The quality of employer-provided training and advancement opportunities; and
    - 4) TWC may consider various factors, including but not limited to the training occupation, whether the participant receives an industry-recognized credential after training, the number of employees taking part, the participant's work history, labor market conditions, hourly wage, fringe benefits, promotional opportunities, and the overall training budget.

Any percentage above the 50% standard reimbursement rate must be documented in the case file.

- a. An employee in OJT may work overtime hours, but overtime hours are not eligible for wage reimbursement.
  - b. Funds provided to employers for OJT must not directly or indirectly assist, promote, or deter union organizing.
  - c. WIOA and all other associated grants that utilize Work-Based Learning agreement funds may not be used to provide OJT if the business has relocated from a location that resulted in any employee losing his or her job at the original location. In this instance, the business would only be eligible for OJT after it has been operational at the current site for more than one hundred twenty (120) days.
3. Evaluation: Staff will pre-approve and monitor all worksites. Worksites must sign a Worksite Agreement outlining responsibilities, supervision, evaluation, and compliance with wage/hour laws. Staff will visit the site at least twice during the OJT period. Staff will monitor OJT worksites for compliance with WIOA, Illinois Department of Commerce & Economic Opportunity (DCEO) policies, and this local policy. OJT employers/worksites will be monitored at the beginning of placement, and one more time before the end of his/her OJT. For example, in a traditional OJT, employers/worksites will conduct the first evaluation within 1-1.5 months and the final at the end of OJT. OJT Employer Evaluation form, contract, and all monitoring documents will be kept in the participant's file.
- F. OJT Agreements will be developed in accordance with IL DCEO e-policy Chapter 7 Section 2.2, utilizing the forms established by DCEO.

#### **IV. CUSTOMIZED TRAINING**

Customized training is designed to meet the specific requirements of an employer or group of employers, with the commitment that the business or businesses will employ an individual(s) upon successful completion of the training. The business(es) must pay for a significant portion of the cost of training, as defined below.

- A. Customized training is designed to meet the special requirements of an employer or group of employers.
- B. The employer(s) must pay not less than 50 percent of the cost of the training based on the cost of the training and available funds.
- C. Employer matching costs must be in cash or in-kind, must be documented, and are subject to audit.
- D. Customized training may be provided to WIOA and all other associated grant program participants eligible for training services.
- E. The employer (or group of employers) must commit to hiring individuals who complete the customized training program, and trainees must agree to accept employment offers from the employer.
- F. The employer groups will assist staff in identifying appropriate training providers. As appropriate, local procurement of training providers will occur.
- G. An agreement between The Workforce Connection, Inc., the training provider, and the employer (or group of employers) will be finalized and signed before the start of training.
- H. A customized training contract may also be written to train a participant who is already working for the employer (or group of employers) for which the customized training is being provided, when the employee is not earning a self-sufficient wage. In this situation, customized training provided to a previously employed worker must elevate the employee to reach at least a self-sufficient wage through skill upgrade training that relates to either:
  - a. The introduction by the employer of new technologies;
  - b. The introduction to new production or service procedures; or
  - c. Upgrading to new jobs that require additional skills/workplace literacy.

## V. REGISTERED APPRENTICESHIP PROGRAM (RAP)

A Registered Apprenticeship Program (RAP) is an employer-driven, “earn while you learn” model that combines on-the-job training (OJT) with job-related instruction in curricula tied to the attainment of industry-recognized skills standards. The employer typically provides OJT only, but in some cases may also provide Related Technical Instruction (RTI).

- A. RAP sponsors can be Eligible Training Providers. The RAP sponsors will be verified through the US DOL RAPIDS Database. All apprenticeship-related inquiries and activities must be entered in the data tracking system.
  - 1. Employers can use an outside educational provider for classroom instruction. Employers can use two- or four-year post-secondary institutions, technical training schools, or online courses for related instruction. The employer is the Eligible Training Provider and must identify its instructional provider.
  - 2. Funding for multiple- year apprenticeships may be used to cover the cost of related training instruction. Training costs will be negotiated/obligated in line with the apprenticeship program's established training schedule, whether delivered in an academic semester or quarter, in a modular format, or in a work-based format. Obligations will not exceed six months at a time. Related training instruction costs will not exceed the Individual Training Account (ITA) cap.
- B. OJT Agreements will be utilized for the OJT hours of the apprenticeship. It should be noted that the monitoring/evaluations of an OJT also apply to a RAP (Reference Section III, Subsection 3). For multiple-year apprenticeships, the total hours for reimbursement will be negotiated. Most OJT agreements will not exceed 1040 hours.
- C. Intermediary-Run Apprenticeships sponsor and/or coordinate the apprenticeship programs, coordinate with employers to hire, mentor apprentices, facilitate program development and the provision of related technical instruction, and manage other components of the program. They aggregate employers' needs and coordinate apprenticeship programs with and for them.

The intermediary is not the employer of record; the employer of record will be assigned by the intermediary. The intermediary will confirm that before a participant begins a RAP, the RAP is approved through the Department of Labor (DOL). The intermediary will determine that an employer partner is mapped through the RAP and that it has an approved wage scale before ITA approval. During this process, the intermediary will confirm with the employer the job title, progressive wage scale, and expected employment outcomes before program enrollment (list certifications, degree, credentials that will be earned).

- D. Documentation must include:
  - 1. The name of the employer partner
  - 2. A progressive wage schedule outlining starting wages and scheduled wage

increases throughout the apprenticeships, signed by the employer (Appendix D).

3. Verification of all required elements in the participant's case file.

## **VI. PRE-APPRENTICESHIP TRAINING**

A pre-apprenticeship is a program designed to prepare individuals to enter and succeed in a Registered Apprenticeship Program (RAP).

- A. A Pre-Apprenticeship Training Program must include the following:
  1. Training and curriculum that align with the skill needs of employers in the economy of the State or region (Refer to Regional Plan);
  2. Access to educational and career counseling, and other supportive services;
  3. Hands-on learning activities connected to education and training activities, such as exploring career options and understanding how skills acquired through coursework can be applied to a future career;
  4. Opportunities to attain at least one industry-recognized credential; and
  5. A partnership with one or more RAPs that assists in placing individuals who complete the pre-apprenticeship into a RAP.
- B. WIOA-funded and all other associated grant-funded pre-apprenticeship programs must have a documented, formal connection to one or more RAPs.
- C. Documentation must include:
  1. A clear transition pathway into a related RAP
  2. A clear schedule that outlines classroom hours/schedule, modality (in-person, online, or hybrid), and Work-Based Learning hours, if any.