



Employ Milwaukee Administrative Memo		
Issue Date	10-01-25	24-02, Change 2
Sponsoring Executive	☒ President and CEO	☐ CFO
Dissemination	☒ Internal	☒ External

TO: Employ Milwaukee Staff, Service Provider Staff

FROM: Julie Cayo, President and CEO ^{DS} 

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

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- I. **BACKGROUND:** Services provided under Non-Workforce Innovation and Opportunity Act (WIOA) Department of Labor (DOL) grants are generally delivered in alignment with the WIOA policies and practices. Exceptions to this alignment may occur.
- II. **DEFINITIONS:** None.
- III. **PURPOSE:** This memo only includes policy additions and exceptions for Non-WIOA DOL 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. This administrative memo is time limited and will expire when the grant program funding expires for the following:
- 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
 - Programs under Non WIOA Program Manager
- IV. **POLICY:**
- A. Supportive Services
- The exceptions from the current Supportive Service policy for those enrolled in Non-WIOA DOL grants are as follows:
1. Upon enrollment in Non-WIOA DOL grants, all participants complete an Individual Employability Plan (IEP) with grant staff. The IEP documents barriers to employment identified by the participant and 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 DOL grant have been discussed with grant staff. Services are documented in ETO.
 2. Changes to Allowable Supportive-Services Categories
 - i. Transportation Assistance. Non-WIOA DOL grants reimburse
 - 1) For round trips greater than 10 miles and shall only include travel to and from training. Mileage is reimbursed at the full current IRS standard mileage rate for business. The participant provides the Career Planner with documentation of the participant's valid driver's license, automobile liability insurance, and current automobile registration.

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<https://www.irs.gov/tax-professionals/standard-mileage-rates>

- ii. Child and Dependent Care Assistance. Non-WIOA DOL grants reimburse:
 - 1) 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. Limited to \$1500.00 per participant. Co-enroll in WIOA for further SS needs.
 - 2) 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>

B. Incentive Payments

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 DOL 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:

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

1. 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.
2. Documentation: Incentive and stipend award payment documentation shall follow the requirements listed below:

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- a) 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.
 - b) 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
 - 1. Internships/Paid Work Experience - Provide 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 Paid Work Experience forms and Handbooks will be used.
 - a) Partner Organization/Placement Site (Internship or Paid Work Experience worksite) as the Employer of Record - The Partner Organization can be a non-profit organization, government agency, or for-profit business.
 - b) Employ Milwaukee, Inc. as the Employer of Record
 - i. 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.
 - ii. 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.

 - 2. Registered Apprenticeships (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 and/or work-based learning costs to employers Per OJT training guidelines. Maximum amount is limited to grant budget.
 - 3. Incumbent Worker Training (IWT) - Incumbent workers are an eligible employment category for enrollment into Non-WIOA Grants programs. The programs under the Non-WIOA Program Manager IWT Training Proposal, or the agency IWT Training proposal may be used for enrollment. IWT is a resource focused on employers and their existing workforce. As

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such, employers are expected to follow their own Human Resources requirements. EMI will not be providing additional Human Resource policies. EMI vouchered training process will be the usual method of securing training and payments, but direct invoicing 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. For the Skills to Build grant, demonstration of the employee using the newly acquired skills in the workplace is allowable. This can be documented via employer/employee self-attestation. Credentialed training is preferred.

4. Non-WIOA DOL Grant Policy: On the Job Training (OJT) - Non-WIOA OJT policy will follow the EMI OJT policy. The exception to this will be to waive the 30-day retention period. This is waived to make the final OJT contract payment to the employer before grant end.

D. Individual Training Accounts (ITA's)

1. A training provider for the Non-WIOA DOL grant does not need to be listed on the state's Eligible Training Programs List (ETPL), but the training must include a certificate or credential for the new skill taught. A non-WIOA DOL grant participant can receive training if they meet the eligibility requirements of the grant program.
2. Maximum participant support is limited to grant specified amounts.
3. EMI 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.

1. MEND -MATC https://drive.google.com/file/d/1BzRgdLITloXmpm_TBKVRxgfjFx-o0O1u/view?usp=sharing, pg. 13
2. MEND – Marquette [Academic Censure - Undergraduate | Marquette University](#)
3. STB – MATC STEM [Academic Standing | MATC](#).

V. Procedures. None

VI. Action Required

- A. Posting of this Admin Memo to the Employ Milwaukee website for open access to all personnel.

REFERENCES:

- EMI's current policy: 17.02 Supportive Services Adult and Dislocated Worker
- EMI's current policy: 20.04 Incumbent Worker Training
- EMI's current policy: 20.03 On the Job Training
- EMI's current policy: 17.01 Individual Training Account (ITA)

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RECISSIONS: 24-02 Non-WIOA Department of Labor (DOL) grants Time Limited Policies, Change 1.

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