FY 2016-2017
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 and Economic Development (DCED) through its *Pennsylvania First* fund.

This document is subject to change without notice.

TABLE OF CONTENTS

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.

Please be sure to review the "Guideline Details" section (page 5) for more information.

Online Application Process:
- All companies must apply online.
- Companies can choose any WEDnetPA partner as their point of contact.

Required Documentation:
- Application must be completed by an <u>employee</u> of the company.
- Memorandum of Agreement must be signed by an <u>authorized employee</u> of the company.
- 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 page 11-12 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 page 13 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 <u>location</u> 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 <u>skill building</u> training that is <u>central</u> to an employee's current job responsibilities.
- Training must <u>start</u> on or after July 1, 2016 and be <u>completed</u> on or before June 30, 2017. Partial training will not be reimbursed.
- Training must be invoiced by the training provider between July 1, 2016 and June 30, 2017.
- Costs incurred (dated) before July 1, 2016 or after June 30, 2017 are not eligible.
- Training costs must be "reasonable" as defined by market rates and/or other criteria. See page 17 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 the program's Information Sharing, Administration and Analysis Center (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 15-16 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 <u>before</u> beginning training.

Application Process:
All applicants must submit an initial inquiry:
- For first-time applicants: go to http://wednetpa.com/apply/inquiry.asp.
- 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 following steps must be completed:
- Step #1: Electronically execute or upload a 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.

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

Companies may apply online beginning June 1, 2016. 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 to, 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 <u>and</u> 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.

<u>Industry Partnerships</u>
Did you know that, in addition to WEDnetPA, you may be eligible to participate in an Industry Partnership?

Industry Partnerships 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 link.

Starting this year, 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: Google Chrome, Mozilla Firefox, Safari or Opera.

Internet Explorer (IE) appears to be the least "standards-compliant" browser and, therefore, may not be 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. Steps have been taken 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.

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:

- o 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 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).
- o Staff-level access includes 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.
- o 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.

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 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.

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, 2016 through June 30, 2017. Training must be started, completed and invoiced by the training vendor between July 1, 2016 and June 30, 2017.
- Training commitments (i.e., contract, invoice or payment) dated prior to July 1, 2016 or after June 30, 2017 will be rejected for reimbursement even if the training occurs within the grant period.
- At least one or more training events must start or be scheduled by February 1, 2017, or within 30 days of the contract approval date (whichever comes later) or the awarded funds may be forfeited at the discretion of the WEDnetPA partner.

- The training vendor invoice or other acceptable invoicing documentation must be dated between July 1, 2016 and June 30, 2017 and <u>must</u> include training event name and training cost.
- 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.

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 its 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 <u>employee home addresses</u>). 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 <u>produces or provides a technology product or service</u>. 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:

- Must be a front-line employee or a first level supervisor. Employees who supervise other supervisors are not eligible for ES training. Small companies (up to 100 employees) are exempt from this policy.
- Employees with company-level decision making responsibilities (budgetary, policy making, etc.) are not eligible for ES training. 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
- Business Operations
- Communication and Teamwork
- Computer Operations
- Manufacturing Fundamentals:
    - Blueprint Reading
    - Basic Machine Setup and Maintenance
    - Tooling, Grinding
    - Welding, Soldering
- Problem Solving
- Product and Process Control
- Project Management
- Quality Assurance
- Workplace Behavior Skills
- Workplace Health and Safety (see next section)

<u>Workplace Health & Safety (WHS):</u>
The eligibility of WHS training will be determined based on whether or not it has a direct impact on improving an employee's <u>essential</u> job skills. The training must improve the skills that are central to the employee's job function.

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 considered eligible for reimbursement:
- **o** employee is in a healthcare-related field and/or facility;
- **o** employee is a designated "first responder" within the company and will be one of a few employees properly trained in CPR.

Listed below are types of WHS training that may be eligible as ES training. However, for each of the following it is the company's responsibility to ensure at the time of application and/or prior to the start of training that the training will improve a <u>skill</u> that is <u>essential</u> to the employee's job. In most cases, WHS training is not eligible on a company-wide basis.

- o Fire safety, including proper use of fire extinguishers (first responders)
- o Driver safety (for those who routinely/regularly drive a company vehicle)
- o Sexual harassment prevention (HR staff and managers/supervisors only)
- o Diversity (HR staff and managers/supervisors only)
- o Ergonomics (only as required by specific job responsibilities)

Some additional guidelines for fire safety training are provided below to help clarify eligibility:
- o A reasonable number of first responders would generally be considered eligible (one per department, one or two per shift, etc.).
- o <u>Low cost</u>, in-house training is generally more acceptable than more costly third party training.
- o "Large scale" or company-wide fire safety training is not eligible unless <u>pre-approved</u> by the statewide director. An exception may be warranted in a highly volatile environment, where fire hazards are of the greatest concern (for example: chemical manufacturing).
- o When in doubt, contact your WEDnetPA partner.

Additional Advanced Technology (AT) Training Criteria

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

Employee:
- 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 <u>advanced technology</u> job skills required for the employee's current position.
- To be eligible, software product training must conclusively be considered <u>advanced technology</u>.
- 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.
- Company-wide software or end user training is not eligible for 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
- Software Engineering
- Systems Analysis
- Technology Support
- Website Design & Development

<u>Advanced Manufacturing Technology</u> 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 <u>each</u> 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, 2017, however, <u>the WEDnetPA partner may establish an earlier deadline</u> for companies in order to meet this statewide office deadline.

Reimbursement for Training:
Companies are eligible to receive grant funds <u>up to</u> $450 for ES training and <u>up to</u> $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 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 must cover the balance of the cost. The company will be responsible for the 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 be dated, include specific training event name <u>and</u> 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.

When calculating the cost per person for any training, the # emps. receiving training must be the total number of employees trained, regardless if the employee is WEDnet eligible or not. For example, if a training costs $10,000 for 100 employees but only 25 of the employees trained 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.

In-House Training:

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

Instructor's hourly rate must be accurate and reasonable. At the discretion of the statewide director, a company may be required to provide payroll records to verify an instructor's hourly rate. If requested, failure to provide payroll records will result in the invoice being rejected.

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.

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.

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 trainers' name, job title & hourly rate. The "instructor's rate per hour" field on the in-house spreadsheet should reflect the average rate of all in-house instructors, not their combined hourly rate.

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 ten employees attend a four-hour lean manufacturing course at a cost of $200 each, the total cost ($2,000) 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: membership fees, in-house online training, trainee wages during training period, exam fees, test preparation/review, fees 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 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.

All training must be purchased within the same fiscal year that the training occurred. Any training purchased prior to July 1, 2016 or completed after June 30, 2017 is not eligible for reimbursement.

INDEX