



## Work Based Learning Under COVID-19

---

### Overview

The Illinois Department of Commerce and Economic Opportunity Office of Employment and Training (DCEO) has provided updated guidance for participants who were enrolled and actively engaged in a Paid Work Experience or On-the-Job Training that were affected by COVID-19.

**Note: The OJT reimbursement can only be made to the WIOA participant IF other Non-WIOA reimbursed employees are also being paid during the shutdown due to COVID-19.**

### Reference

DCEO COVID-19 Response Frequently Asked Questions for WIOA Title 1 Administrators

### Guidance

If the program participant's time commitment, stipend structure and/or academic or work terms were established prior to the national health emergency declaration, grantees should continue to pay the participant for the remainder of the established term established in the participant's ISTEP or Work Experience Plan

LWIAs are authorized to pay work-based customers whose worksites were closed as a result of COVID-19 back to March 1, 2020. This is the same date that is referenced in the President's Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak.

According to the USDOL, ensuring fair and reasonable compensation payments should be based on the State of Illinois' established policies. It is State of Illinois policy to base these payments on the planned services that are outlined in the participants Individual Employment Plan or Individual Service Strategy. The LWIA must also base the work-based training payments based on the terms of the Work Site Agreement, ISTEP and/or Work Experience Plan including but not limited to the hourly rate of payment and the length of the service (number of hours per week and the number of total weeks). If the number of hours that the participant varies from week to week, then it is allowable to average the number of hours as long as, there is a reasonable and equitable basis for providing the payments. A detailed case note is required for LWIAs that make these payments.

If the work site has reopened and the participant does not go back to work or quits, the customer is ineligible for "COVID Pay" for the remainder of their hours/term of the agreement.

Internal controls should be in place where a process is required to obtain participant signatures for payments on time worked. Documenting the process, whether through actual or electronic signatures will verify an authorized representative reviewed and approved the documentation for payment. The electronic process must include internal controls to ensure that authorized representatives' signatures cannot be duplicated by non-authorized personnel.

## Programmatic Documentation

1. Documentation from the WEX or OJT work site employer stating that the WEX was closed. Make sure the closed date is on the documentation
2. Prepare a case note explaining that the WEX and OJT site was closed and continuation of payment to client based on work site agreement or ISTEP.
3. Keep copies of checks for proof of payment
4. Statement from the OJT employer attesting to the fact that other non-WIOA employees were also paid during the COVID-19 related shut down.
5. A detailed case note must be entered. **Please review case note template below:**

*Jane Days is participating in a PWE service. She was employed part-time at ABC Bookstore working 20 hours a week at a rate of \$13.75/hour. Her employment began on 2/13/2020 and was scheduled to work through 5/30/2020. On 3/16/2020 Jane Days was dismissed from her position/business closed due to the impact of Covid-19. Based on DCEO guidance, Jane is eligible to be paid for the time she would have been working. Jane will receive a total of \$1200.00 compensation based on Worksite Agreement time frame of 3/17/2020 through 5/30/2020 with ABC Bookstore. Participant's schedule, worksite agreement, and paycheck information are all included in paper file.*

## Voucher Submission

1. Participants schedule and Attachment B (Guidance on Tax Treatment of Work Experience), if applicable
2. Printout of case note
3. Methodology supporting how you arrived at their payment amount, since timesheets are not available, with the authorized signatures
4. Proof of payment to participant
5. If partial payment was made, indicate what has been paid and for what timeframe to avoid double billing. If breaking up the payments, indicate exactly the timeframe you are providing compensation for each time a payment is issued so that the written matches the paper file
6. Statement from the OJT employer attesting to the fact that other non-WIOA employees were also paid during the COVID-19 related shut down.

**Note: Please contact your Regional Manager if you have additional questions**