



Policy

SECTION: WIOA, WTP and Business Services	POLICY#018-C0011	PAGE: 1 of 12
TITLE: On-the-Job Training (OJT)		EFFECTIVE DATE: 7.18.19
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DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF

PURPOSE: To provide guidance to CSTB WIOA, WTP and Business Services staff on administering On-the-Job Training program services.

BACKGROUND: On-the-Job Training (OJT) is a work-based training that provides WIOA eligible participants occupational skills essential to the performance of a specific job.

OJT addresses critical workforce needs, enhances skills of eligible participants and aids eligible employers in attaining qualified, skilled workforce with competencies needed to meet employer's needs. **OJT is an "earn and learn" employment model where eligible participants may upgrade, retool and increase employability skills. OJT is most appropriate for adults and dislocated workers in need of new employer-based skills, and individuals with barriers to employment including, but not limited to, unemployed workers, underemployed workers, and out-of-school-youth. Individuals must meet WIOA eligibility criteria to participate in OJT programs.**

OJT is one of the allowable program activities authorized by the Workforce Innovation and Opportunity Act (WIOA) as established in WIOA section 134(c)(3)(D) and the Welfare Transition program (WTP).

On-the-Job Training is defined as training by an employer that is provided to a paid participant while engaged in productive work in a job that:

- (a) Provides knowledge or skills essential to the full adequate performance of the job;
- b) Is made available through a program that provides reimbursement to the employer of up to 50 percent of the wage rate of the participant, except as provided in WIOA Section 134(c)(3)(H), (see note below) for the extraordinary costs of providing the training and additional supervision related to the training; and
- (c) Is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate.

OJT is conducted by public, private not-for-profit and private for-profit businesses. It occurs while an individual is engaged in productive work learning the skills and information necessary for full and adequate performance on the job.

The two unique features of the OJT program are:

1. The individual begins training as a new employee.
2. The individual receives training at the workplace, under appropriate supervision, thus acquiring occupational skills and knowledge in an “on-the-job” training environment.

An OJT agreement is appropriate for businesses who have difficulty filling their skilled labor force needs with qualified, experienced workers, or who want to upgrade their current workforce. Businesses may use an OJT in these instances by training eligible WIOA or WTP customers. Reimbursement is provided to the business to pay for the extraordinary costs of such training because these costs exceed the expenses normally incurred in training individuals normally hired for the position.

Despite the benefits to businesses who participate as an OJT business, the focus of the OJT program is on the individual. OJT is designed to provide an opportunity for WIOA/WTP eligible individuals to receive the training necessary to acquire skills and knowledge that will enable them to maintain unsubsidized employment and/or job advancement.

PROCEDURE:

The OJT Program is sponsored and administered by CareerSource Tampa Bay (CSTB) Business Services department. The service is designed to assist businesses with the training and employment needs of their workforce meeting specific guidelines so that the business and employee can maintain a competitive edge in the marketplace. OJT is eligible to businesses that meet the eligibility criteria in this policy that hire a WIOA/WTP eligible participant from Hillsborough County.

Participant Eligibility

On-the-Job Training (OJT) may be provided to eligible WIOA Adult, Dislocated Worker or Youth participants who are assessed and found to be in need of and suitable for training services in order to obtain or retain employment that leads to self-sufficiency. **CSTB defines the initial assessment to include both informal and structured assessments conducted by the WIOA Program Recruiter. CSTB offers a variety of online career assessments including: My Next Move, My Skills My Future, Career Scope and additional assessments deemed appropriate. These assessments measure the job seeker’s career interests and aptitude, identify transferrable skills and provide career guidance that is essential for the job seekers transition to employment or reemployment.**

The participants must demonstrate a need for training as recorded on the Career Plan. OJT may also be provided to eligible Welfare Transition program participants who are deemed appropriate candidates for consideration.

Suitability is established when an OJT opportunity aligns with a customer’s existing skill set or educational background and the customer is deemed to have the core competencies to be successful in the position and likely to attend and complete all training based on current needs and barriers.

Employers will have the final selection authority for individuals to be hired. All participants must meet certain WIOA eligibility criteria before training can begin. Only those individuals who meet the

eligibility requirements for individual career services, who have received an assessment and for whom a career plan has been developed may be considered for OJT.

Consideration should be given to the skill requirements of the occupation, academic and occupational skill level of the participant, prior work experience, and the participant's Career Plan. The results of the objective assessment, as documented on the individual's Career Plan, must indicate that the participant is in need of, and can benefit from, the activity of OJT. The Career Plan and application must capture the past work history of the applicant from the official file, assess the test results, capture additional information from the applicant about past work experience, volunteer experience, and identify strengths and weaknesses of the applicant. The OJT Training Outline must include documentation as to the new skills to be acquired during training and how skill gap deficiencies will be overcome with the training.

There are occasions when a WIOA/WTP participant may participate in multiple OJT Agreements if the first Agreement should fail at no fault of the applicant. The provisions outlined below should apply:

1. The new Agreement with a different business is for upgraded skills or a different position but related to the first position in terms of career path and skills.
2. The approved training hours for the second OJT agreement will be re-evaluated based on the training received in the first OJT agreement (commensurate with experience learned in the previous OJT agreement).
3. No applicants shall participate in more than two (2) OJT agreements unless plant closures or layoffs occur that are out of the control of the applicant and occur in progression. Any additional agreements must be approved by the CEO, COO or designee.

Business Eligibility

The hiring and training may begin after the OJT Work-Based Training Onsite Assessment form has been completed and the OJT Employer Agreement has been signed by all the parties. The Business Services Account Executive completes these documents with the employer.

The participant becomes an employee of the company on the day the OJT begins. Staff should give careful consideration when selecting a suitable employer for OJT. General business practices in terms of working conditions (safety, health), the availability of health benefits, sustainable wage structure, turnover rates, adequate staff and equipment to carry out the training, and whether the employer is in compliance with federal, state and local laws are factors to consider while completing the OJT Work-Based Training Onsite Assessment form.

When considering an employer to participate as an OJT worksite, staff should carefully review and determine the nature of the employment to ensure the employment is on-going and not temporary, probationary or intermittent employment.

Prior to entering into an agreement for OJT services with a business, the CSTB Business Services staff shall ensure that the business is eligible.

Businesses that meet the following criteria are considered eligible and may, subject to available funding, enter into an OJT agreement:

1. Physical company is located in Hillsborough County;
2. Business must legally have operated at current location for at least 120 days.

3. Hold valid business tax receipt (formally an occupational license) and/or zoning permit; (google search and printout included)
4. Active business as verified by Florida Department of State Division of Corporations (www.sunbiz.org) and provide W-9.
5. Hasn't experienced any layoffs in the past six months verified by DEO WARN site (<http://www.floridajobs.org/office-directory/division-of-workforce-services/workforce-programs/reemployment-and-emergency-assistance-coordination-team-react/warn-notices>)
6. Maintains Workers Compensation Insurance (if applicable);
7. OJT position requested is on the R15 Targeted Occupation List (TOL).
8. Must develop a detailed OJT Training Plan Outline that identifies the specific occupation, job specific skills that will be learned and estimated time required for each skill.
9. Agrees to routine monitoring and communication with the CSTB Business Services Staff regarding the progress of the program participant relating to the OJT Training Plan, progress reports, midpoint in training and completion of the OJT to capture measurable skills gained during participation.
10. Commit to hiring and retaining customers who successfully complete their training program.

Demand for Occupation in Labor Market

OJT must be for training in occupations that are in demand in the local area and listed on the regional Targeted Occupational List (TOL). OJTs that occur in small businesses where the OJT training covers a relatively broad range of functions that draw from several occupations are generally considered as a unique occupation for labor market demand purposes. With these unique occupations, the fact that an opening exists for the occupation at the business presupposes the existence of a demand for the occupation. Any OJTs for positions not on the TOL must be approved by the CEO, COO or designee.

Occupation Eligibility

All OJTs must be for occupations that are in demand in the local area and are appropriate for the program. Occupations not suitable for OJT:

- Less than part-time
- Principle source of income is tips, commissions or piecework;
- Intermittent or seasonal in nature;
- Shown as in decline on the Hillsborough County Demand/Decline List.

PROHIBITIONS

1. Participants shall not be employed to carry out the construction, operation, or maintenance of any part of any facility that is used or to be used for sectarian instruction or as a place for religious worship (except with respect to the maintenance of a facility that is not primarily or inherently devoted to sectarian instruction or religious worship, in a case in which the organization operating the facility is part of a program or activity providing services to participants).
2. OJT agreements shall not be written for part-time employment. Proof of full-time employment shall be established and documented by the business. Whether the participant is categorized as full-time

shall be verified by the CSTB Business Services staff. CSTB Business Services staff may submit a written request to the CSTB CEO or designee for an exception to this rule prior to execution of an OJT agreement.

4. The CSTB shall not enter into agreement with a business who has previously exhibited a pattern of failing to provide OJT participants with continued long-term employment with wages, benefits, and working conditions that are equal to those provided to regular employees who have worked a similar length of time and are doing the same type of work.

5. No officer, employee, agent, or representative of the Business or CSTB may charge a participant a fee for the placement or referral of such individuals in or to a training funded under an OJT agreement or amendments thereof.

6. A participant in a program or activity authorized under title I of WIOA must not displace (including a partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits) any currently employed employee (as of the date of the participation).

7. An OJT funded agreement must not impair existing contracts for services or collective bargaining agreements. When a program or activity authorized under Title I of WIOA would be inconsistent with a collective bargaining agreement, the appropriate labor organization and employer must provide written concurrence before the agreement is initiated.

8. An OJT participant may not be employed in or assigned to a job if: a. Any other individual is on layoff from the same or any substantially equivalent job; b. The employer has terminated the employment of any regular, unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy so created with the OJT participant; or c. The job is created in a promotional line that infringes in any way on the promotional opportunities of currently employed workers.

9. OJT funds shall not be used for any political activity, lobbying of federal, state or local legislators, or to promote or oppose unionization.

10. OJT funds may not be used to directly or indirectly assist, promote or deter union organizing.

11. OJT participants shall not be placed in a home-based business.

12. OJT funds shall not be used to encourage or induce a business, or part of a business, to relocate from any location in the United States, if the relocation results in any employee losing his or her job at the original location.

13. OJT funds cannot be utilized to pay for the following:

- Paid or unpaid holidays
- Sick leave
- Vacation
- Overtime hours
- Fringe benefits; and/or
- Training related supplies and/or equipment
- Work performed outside of the OJT contract.

Duration and Rationale of OJT Training

An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which training is being provided. Traditionally, OJT is limited to a maximum of six

(6) months or 1,040 hours. The length of the training, which will be determined by CSTB Business Services staff, should take into consideration the amount of time required for a participant to become proficient in the occupation for which training is being provided (skill requirements of the occupation, the academic and/or occupational skill level of the participant, and prior work experience). The length of the OJT will be documented in the OJT contract with the employer and the participant's individual career plan.

The rationale for the length of the training should take into consideration the following:

1. amount of time required for a participant to become proficient in the occupation for which training is being provided
2. skill gaps that exist
3. skill requirements of the occupation
4. the academic and/or occupational skill level of the participant
5. prior work experience of the participant
6. barriers to employment
7. any disability and need for reasonable accommodations; and,
8. the availability of programmatic funding.

Staff will also consider results attained from assessments as well as referencing additional materials such as O*Net (<https://www.onetonline.org/find/>) which list a Specific Vocational Preparation (SVP) Code. SVP Codes should be used as the baseline for duration determination. The baseline hours listed should not prohibit on-the-job training agreement durations and may be adjusted depending on the individual's skills gap. The chart below is to be used as a baseline reference.

SVP Code	Level Time Explanation	Estimated Hours
1	Short demonstration only	160
2	Anything beyond short demonstration up to and including 1 month	240
3	Over 1 month up to and including 3 months	320
4	Over 3 months and including 6 months	500
5	Over 6 months and including 1 year	640
6	Over 1 year up to and including 2 years	800
7	Over 2 years up to and including 4 years	960
8	Over 4 years up to 10 years	1040

Skills Gap Analysis (SGA) / OJT Training Plan Development

Following the execution of the OJT Employer Agreement, an individualized OJT Training Plan must be developed for the acquisition of skills that the trainee does not already possess. The plan is a formal and written program of a structured job training, which will provide participants with an orderly combination of instruction in observable, and measurable job-ready skills, general employment

competencies and occupational skills that will enable the participant to work towards self-sufficiency. **The OJT Training Plan must be agreed upon and signed by the employer and CSTB. The customer and CSTB staff sign off on the IEP/Career Plan documenting provision of OJT service.**

An analysis of the trainee's prior work history, transferrable work skills and the job skills gained must be compared to the job skills/job description the employer requires in the OJT occupation. The resulting gap in skills will be the basis for the development of the OJT Training Plan. Each skill description should be concise and the individual tasks should be measurable and observable. The specific types and sources of information used to identify the scope of the skills gap must be included in the participant's case file.

OJT Contract Requirements

CSTB's OJT contract meets all of the requirements outlined in the CareerSource Florida Administrative Policy – OJT.

Reimbursement:

Participating businesses will receive a fifty percent (50%) reimbursement for eligible OJT participants. In accordance with CareerSource Florida Administrative Policy on OJT LWDB's may increase the reimbursement rate for OJT up to 75% for OJT contracts when the following factors have been evaluated:

1. The characteristics of the participants;
2. The size of the employer, with an emphasis on small businesses; and
3. The quality of employer- provided training and advancement opportunities, e.g. the OJT contract is for an in-demand occupation that leads to an industry-recognized credential.

A 75% reimbursement rate will be established when a business enters into an OJT agreement where the employer has 50 or less employees.

All training assistance awards are based on eligibility and available funding as well as:

- agree to enter into an OJT Agreement;
- agree to provide on-the-job skills training for the new employee(s) selected, and
- agree to retain the employees(s) upon successful completion of training.

Conflict of Interest

1. The CSTB will not favor a referral from and/or to a Board member of the CSTB over another business in the community. OJT placements shall be made based upon what will be most beneficial to the participant.

2. The CSTB CEO/COO shall be notified whenever the OJT Agreement is connected to a CSTB Board member or employee.

3. CSTB are prohibited from recommending an agreement or making OJT referrals to businesses who are members of their immediate family or members of families of other CSTB staff.

4. The contracted OJT business shall not hire a participant who is a relative (member of the family) of the business. Relative is defined as: father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law,

brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, or half-sister. (Section 112.3135, Florida Statutes).

5. No participant is placed in an OJT where a member of that person's immediate family is directly supervised by or directly supervises the participant. Family means two or more persons related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories:
 - a. A married couple and dependent children;
 - b. A parent or guardian and dependent children; or
 - c. A married couple.

Reverse Referrals

In very limited circumstances OJT initiated through "reverse referral" may be permitted. Reverse referral occurs when an individual is referred to CSTB from a prospective employer (under either formal or informal agreement) for assessment as to whether the individual meets the employer's hiring requirements for a specific position. **Employers must not make or have made a hiring decision prior to the participant becoming eligible for the OJT program through CSTB.** Development of an OJT for an individual referred by the employer may be permitted only when:

1. the individual progresses through the intake process as with any other CSTB customer and meets all WIOA eligibility and suitability requirements;
2. the completed individual career plan/**service strategy** indicates training is necessary for the individual to perform the work associated with the position for which the employer has an opening;
3. justification for WIOA training services outlines OJT is most appropriate, needed and identifies participant skill gap analysis;
4. the employer meets all the eligibility criteria outlined in this policy; and
5. the employer has not made a hiring decision prior to the individual referral to CSTB (If so, OJT cannot occur)
6. the employer provides assurance that the individual has not previously been employed by the employer in the same or similar position.

A reverse referral is when the business has identified someone they would like to hire but the individual has demonstrated skills deficiency related to the position's requirements. A business may refer a job applicant to CSTB for potential OJT enrollment. In the case of reverse referrals, the candidate must schedule an eligibility determination and assessment appointment with CSTB and must be eligible for WIOA as a dislocated worker or adult. CSTB must utilize normal eligibility assessment and enrollment procedures. Participant's eligibility must be determined prior to employment; no pre-hires or period of employment prior to the execution of an OJT agreement and participant training plan are acceptable.

Individual Employment Plan (IEP)

CSTB must develop an individual service strategy for each participant. A service strategy is a document created jointly by the participant and case manager, and is based on career planning and the results of the objective assessment. The service strategy includes a summary of the jobseeker's strengths, barriers, services needed, education and employment goals, and services provided. The IEP will be updated during a one-on-one appointment between the trainee and a CSTB Career Specialist. This process will also define the short and long term goals of the work experience opportunity as well as future employment plans of the trainee. **The trainee's IEP must identify their internship/work experience field of training while outlining goals and objectives with defined timelines and projected completion dates.**

When selecting work-based training for a participant, the WIOA Career Specialist must include the following in the service strategy:

1. A determination that a work-based training activity is appropriate to meet the participant's needs;
2. The specific work-based training most appropriate for the participant based on an assessment of the participant's needs, skill set, and other characteristics necessary to determine the best activity for the participant;
3. The specific short and long-term goals for the work-based training activity, by identifying the purpose of the activity and outcomes expected;
4. The employer with whom the activity will be done and other information relevant to the work-based training activities;
5. Responsibilities of the CSTB, employer and participant; and
6. Other activities necessary to support the work-based training activity.

Worksite Agreement

OJT activities require a Worksite Agreement in the customer file. The Worksite Agreement will establish the parameters wherein a customer will gain the job-readiness skills necessary to obtain unsubsidized employment, and must be secured prior to the participant beginning their OJT assignment.

Each employer participating in work-based training must develop a CSTB OJT Agreement. The worksite agreement must include:

1. A job description and/or training outline
2. Contact information for the supervisor
3. Record-keeping and payroll information,
4. Process to monitor the participant's worksite activities and ensure adherence to the records retention requirements, as applicable.
5. Worksite agreements for work-based training. For agreements with a staffing agency, the worksite agreements must include signatures of both the worksite employer and the staffing agency.

CSTB will maintain information on each job placement in the form of an agreement signed by all parties. Each employer partner will receive a copy of the fully executed OJT agreement.

Work-Based Training Employ Florida Service Codes

Each work-based training activity is assigned a unique service code in Employ Florida service codes identified and described in the Employ Florida Service Code Guide. CSTB must assign the appropriate code to each individual engaged in a work-based training activity. The details of the work-based OJT activity must be included in the service strategy.

Recording of Worksite, Provider and O*Net Code Information

When a participant is enrolled into a work-based training activity, staff must record in Employ Florida, the address and location of the worksite where the participant will work. For OJT, the worksite is the same as the employer and the actual location where the participant will report for work. When a participant is enrolled in a work-based training activity, the provider and O*Net Code for the occupation in which the participant will engage or receive training must be entered into Employ Florida as part of the enrollment process.

Trainee Skill Evaluation

On a monthly basis, the trainee's acquisition of the required occupational skills on the Training Plan will be evaluated by the employer/supervisor using the OJT Training Monthly Progress Report. This is an opportunity for the employer/supervisor and the trainee to interact and review the skills progress made during the review period. The OJT Training Monthly Progress Report will also be used at the conclusion of training to document the mastery of the required skills. **This will be utilized to document Measurable Skills Gained for WIOA program participants as it outlines the validation of skills and competency attainment for participants.**

The trainee's progress under an OJT contract will be formally monitored by the CSTB Business Services staff on a monthly basis during participation in the OJT program. Periodic communication with the OJT employer/supervisor and the trainee during the training period is required to insure the successful completion of the training.

Modifications

Modifications to the OJT contract and OJT Work Based Training Plan Outline may be needed. The Business Services staff would be required to submit a CSTB Agreement Modification OJT Agreement and specify the purpose of the modification, total training hours and maximum reimbursement. This requires the CSTB CEO or designee signature approval before any agreement modifications can be fully executed.

Invoicing and Payment

CSTB WIOA Programs Recruiter will track the completion of OJT positions and work directly with employers to ensure that required OJT reimbursement forms and supporting documentation is submitted timely for processing.

Employers will be required to complete Attachment II – Individual OJT Reimbursement Form. The form identifies the employer name, # of weeks, hours and total reimbursement amount being requested. The form along with supporting documentation is submitted to OJTinvoice@careersourcetampabay.com or fax to 855.484.6949. Supporting documentation includes the following:

1. Payroll Documents shall include paystubs showing pay period dates, pay date, type of hours worked, rate of pay, deductions, etc.
2. Timesheet Detail for only the FIRST and Last week worked of the OJT/PWE Training Period.
3. W9 Form for employers receiving OJT Reimbursement.

The **CSTB WIOA Programs Recruiter** will notify the Finance Department and submit completed OJT Reimbursement forms for processing.

Monitoring

Monitoring and evaluation of the program plays a critical role in insuring that the goals of the OJT are achieved. The on-site monitoring is essential and must include documenting information received directly from the OJT trainee and should capture the trainee's supervisor's perspective about how the training is progressing. **Onsite monitoring will include site visits to the worksite and interviews of participants and supervisors by the OJT Program staff and internal CSTB Program Monitors.** In addition to this, the monitoring should examine the process of compliance with the OJT Agreement, training plan, the regulations, payment of wages, and the maintenance of records and working conditions in keeping with Federal requirements. **At a minimum CSTB must conduct an in-person visit to each worksite where an OJT participant is placed at least once per year.**

Any Agreement deviations noted should be dealt with promptly, either with a corrective action plan or by suspension or termination of the agreement if serious violations have occurred. All visits to the business should be documented in the business EF account file and electronic file. The entry should identify when the visit was made, **the name of the CSTB staff member conducting the visit**, what was observed, who was interviewed, a synopsis of the content of the conversation, any items of concern that need to be addressed **and the outcome of the visit**.

Additional programmatic monitoring will be conducted throughout the PY by our internal Program Monitor under the direction of our Director MIS and Data Services. Financial monitoring will be handled by our Director of Fiscal Compliance.

Supportive Services

Support services are available for Adult, Dislocated Worker and Youth work-based training participants. Limited support services may be made available to trainees on an individualized case-by-case basis. The trainee must verify that a need exists and cannot be met by other community resources. The provision of such support services must be documented in the individual service strategy. Support service needs are identified through the assessment process and outlined in the service strategy. Support services may be provided pursuant to **CSTB Supportive Service and Incentive Policy - # #018-C0012b**.

Performance

A. All businesses must be deemed eligible to participate in the OJT program. The eligibility status will be determined by CSTB a Business Service Account Executive Onsite Assessment as well as outcome and retention performance from previous OJT Agreements.

B. CSTB will monitor OJT Agreements for performance. Businesses are expected to maintain a specific OJT completion rate and a retention ratio as defined herein. Businesses who do not meet these performance measures will be suspended from additional OJT opportunities for a period of (6) months.

1. **OJT Completion and Retention - WIOA:** at least 80% of OJTs executed must be successful (to completion) in order for businesses to continue to participate in the OJT program. This means the entire OJT period is completed and the trainee is retained after the training period.
2. **OJT Completion and Retention - WTP:** at least 60% of OJTs executed must be successful (to completion) in order for the business to continue to participate in the OJT program. This means the entire OJT period is completed and the trainee is retained after the training period.
3. Exceptions to the OJT completion rate may be made for a trainee's release involving mitigating circumstances that may result in a "neutral termination." Mitigating circumstances may include circumstances such as the OJT trainee resigns for higher wage employment; death of OJT trainee; or extreme circumstances out of the business's control. Neutral terminations will not be considered in determination of retention ratio and must be clearly documented and approved.
4. Retention is measured on OJT agreements based on completion dates within the previous twelve (12) months. Failure to meet performance standards may result in a business's suspension from the OJT program.
5. A suspended business may be considered for additional OJT's in one of two ways (whichever occurs first):
 - a. After six (6) months from exit date of most recent unsuccessful OJT or non-retained OJT trainee, OR
 - b. Business demonstrates a willingness to allow CSTB to screen and place

candidates to non-OJT jobs, and those hires result in a positive retention at the end of six (6) months from hire date.

Authorized Signatories

- The Chief Executive Officer, Chief Operating Officer and designee are hereby authorized to execute OJT Agreements.
- If necessary during the OJT process, CSTB will accept electronically submitted scanned or faxed documents with signatures of the representatives that have legal authority to contract and bind the respective organization in their capacity as a signatory official.

INQUIRIES: Any questions about this policy should be directed to the Chief Operating Officer and his/her designee.