



**INSTITUTE FOR CAREER
DEVELOPMENT**

POLICY MANUAL

January 1, 2022

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**SUBJECT: Structure, Mission and Activities of Local Joint
 Committees**

DATE: November 8, 1996

Background

This policy has been in effect prior to the above date of issuance.

Policy

Career Development Programs should be locally driven if they are to succeed. Workers, local union representatives and local management will play the lead role in conceiving, designing and implementing the programs.

Each location has the initial responsibility for:

- The assessment of needs of workers
- The development of programs and services
- The identification of potential contractors, suppliers and products
- The successful implementation of the program

These responsibilities are accomplished through joint USW/management committees and worker involvement at each site. Therefore, an LJC should be formed to develop and implement local projects. The company and each local should be represented by a chairperson.

Each LJC should:

- Hold regular meetings, record minutes, and keep joint records with copies for both parties
- Make every effort to insure that all LJC members attend meetings and contribute to program planning and implementation
- Decide on appropriate CDP Staff. Such staff should be hired jointly by the USW and management. Application, interview, and orientation processes are the responsibility of the LJC.
- Enforce and adhere to the policies adopted by the Governing Board and applicable professional standards

SUBJECT: Services Provided by Career Development Programs

DATE: November 8, 1996

Background

The changes reflected in this policy, over prior policy on this subject, are effective immediately.

Policy

Local Joint Committees may use funds programmatically for many educational and counseling activities. Some examples of how these programmatic funds may be used include:

- To help individuals prepare for craft and non-craft training, but not to replace apprenticeship training (consistent with the bargaining agreement)
- To assist them to progress in the workplace (without funding job-specific training)
- To enhance workers' ability to perform their assigned work tasks to the full extent of their potential
- To increase their knowledge and understanding of the workplace
- To increase their ability to respond to change, challenge, and opportunity in the workplace
- To enable them to have more stable and rewarding personal and family lives
- To prepare for alternative careers in the event that their current careers are subject to dislocation
- To prepare for long, secure, and meaningful retirement
- To assist victims of shutdowns, layoff, restructuring, economic policies, and unfair trade practices (along with other USW/company efforts and public programs for dislocated workers)

Within the general umbrella of programmatic funds, these funds may be used for Basic Skills Enhancement, which may include:

- GED preparation
- Effective reading
- Writing for effect
- Math brush-up
- English as a second language
- Problem solving/critical thinking
- Communications
- Introduction to computers
- Other basic skills upgrading

Within the general umbrella of programmatic funds, these funds may be used for Technical Skills Enhancement, which may include:

- Shop math/practical math applications
- Technical writing
- Pre-apprenticeship and pre-craft training (consistent with the bargaining agreement)
- Introduction of computer software
- Other basic technical skills training

Within the general umbrella of programmatic funds, these funds may be used for Personal Development, which may include:

- Life skills
- Personal interests (i.e., personal computers, small engine repair, residential wiring, photography, etc.)
- College level or degree courses
- Personal enhancement (i.e., retirement planning, financial planning, etc.)

SUBJECT: Hiring of Local Career Development Program Staff

DATE: November 8, 1996

Background

The changes reflected in this policy, over the previous policy on this subject, were approved at the Governing Board meeting on 10/8/96.

Policy

Administrative or coordinator positions may be approved if the need for staff is justified by an annual plan. Job descriptions should be shown for any proposed staff with appropriate job duties and qualifications.

Career Development staff may be hired as independent contractors or through third-party employers. ICD-3 is an independent third-party employer, working closely with ICD, to provide an employer alternative for signatory companies and Local Joint Committees. Career Development staff employment relationships are decided by each signatory company/USW representatives with the participation of the Local Joint Committees.

**SUBJECT: Employment and Salaries of Field Coordinators and
 Their Sites' Program Staff**

DATE REVISED: January 1, 2022
DATE REVISED: August 29, 2005
DATE: November 8, 1996

Background

The changes reflected in this policy, over previous policy on this subject, were approved at the Governing Board meeting on 12/8/2021.

Policy

The Local Joint Committee oversees the work of the program coordinator and any other program staff. For the non-aligned coordinator and staff, this includes hiring and setting salary, benefits, working hours, and vacation. Program staff levels and salary increases should be considered by the LJC annually during the annual budget process particularly in those years when the bargaining unit receives an increase. The local USW bargaining agreements are the appropriate entities to be used to index salary rates and increases for local program staff and in most cases should not exceed those amounts.

The wage compensation cap for newly hired full-time site coordinators is currently set at \$50,000.00. The amount of this cap is a maximum and should not be applied as a minimum. Included in the compensation cap are all costs associated with salaries (the employer's portion of FICA, workers' and unemployment compensation insurance). Third-party employer costs, pension contributions, and health insurance premiums are applied in addition to the cap.

ICD-3, an affiliate of ICD, remains as an approved third-party payroll administrator for Career Development staff. A pension benefit and health insurance are offered through ICD-3. At this time, there is no third-party administrative fee charged to utilize ICD-3.

SUBJECT: Local Joint Committees Maintain Records and Report Financial, Education and Training Data to ICD

DATE REVISED: January 1, 2022

DATE: November 8, 1996

Background

The changes reflected in this policy, over previous policy on this subject, were approved at the Governing Board meeting on 12/8/2021.

Policy

Local Joint Committees will keep and maintain uniform record-keeping systems that shall:

- Provide for orderly access of records
- Ensure that required documents are on file
- Track expenditures and program performance
- Data should be kept current within 30 days of program activity. All data from the previous year must be complete and finalized no later than March 15.
- Establish and maintain security controls and restrictions to prevent access by unauthorized personnel

To accomplish the above, the Governing Board has approved policy that mandates the use of ICD's Database.

**SUBJECT: Preparation/Submission of Annual, Supplemental,
As well as Revised/Amended Career Development
Funding Requests to ICD**

DATE REVISED: June 30, 1998

DATE REVISED: August 21, 1997

DATE: November 8, 1996

Background

The changes reflected in this policy, over prior policy on this subject, are effective immediately.

Policy

The purpose of ICD is to serve as a professional resource for the parties in the development and delivery of programs that will serve the needs of workers as determined by the Local Joint Committees. This includes helping the parties provide the most effective programs and maximizing the value of the negotiated Career Development funds. The following procedures will accomplish these objectives:

- A program or other initiative which requires funding from the Career Development funds must be submitted to the Executive Director of the Institute for his review and advice.
- The Executive Director of ICD will determine whether a given program or initiative is consistent with the collective bargaining agreement, the policies and guidelines of the Governing Board, and applicable professional standards. If he so determines, the program or initiative may be funded with Career Development funds.
- In order to facilitate the approval process within companies with multiple sites and put individual local programs in a company-wide plan, each company, jointly with its USW counterparts, may complete a company-wide cover sheet. This will be a two-part process:
 1. The LJC at each location should develop annual plans which would serve the needs of the workers at that location. These jointly developed funding requests and initiatives will be submitted to the company level representatives of the union and the company.
 2. Within multiple site companies, the company-level union and company representatives may gather all local annual plans, and complete a company-wide cover sheet. The completed company-wide cover sheet, inclusive of all local annual plans, will then be submitted to the Executive Director of ICD. The Executive Director, in consultation with the Advisory Board, has developed and will utilize the format and forms outlined in the manual, *How To Write Your Funding Plan*, while reviewing annual plans. Any revision of, renewal, or amendment to an annual plan will also be submitted to and reviewed by the Executive Director.

- Annual plans should be submitted by October 1 of the year preceding the calendar year covered by the plan.
- The parties are free to submit jointly developed supplemental requests at any time during the calendar year in question.
- The LJC's will implement zero-based budgeting sites will request funds, spend upon approval, and start anew the following year. The LJC's are authorized to use funds for approved activities up to the line item limits specified in the approved budgets. Funds approved in annual plans and supplemental funding requests are available to the LJC only for the calendar year covered by the plan.

The minimum components of a funding proposal should include:

- LJC Plan Cover Sheet
- Budget Summary
- Narrative
- Course Grid

As quoted in the January, 1990 Governing Board meeting minutes, Board members agreed that if the Executive Director determined that a program or particular initiative could not be funded with CDP funds, the request may be reviewed, approved, or disapproved by the Governing Board. Within some of the bargaining agreements, language exists outlining a dispute resolution process.

SUBJECT: Partial Approval of LJC Funding Requests

DATE: November 8, 1996

Background

This policy has been in effect prior to the above date of issuance.

Policy

Partial approval may be given to an LJC funding request. Portions of a plan in conflict with existing policy, or for which no policy is established, will be held in abeyance until conformity with established policy is reached or until such policy is established.

SUBJECT: Site Specific Approval of Funding Requests

DATE: November 8, 1996

Background

This policy has been in effect prior to the above date of issuance.

Policy

Generic approval of a specific type of program at one location, such as small engine repair, may not be considered valid at all Career Development Program locations. Variables in program presentation, such as budget, location of classes, vendor selection, etc. may result in disapproval at specific locations.

**SUBJECT: Funds Allocated to Local Joint Committees Based
On the Merit of Funding Requests**

DATE: November 8, 1996

Background

This policy has been in effect prior to the above date of issuance.

Policy

Funds allocated to Local Joint Committees will be based on the merits of submitted program proposals and the track record of their Career Development Program. In its broadest sense, “merit” means that funds should be allocated based on demonstrated need, interest and program merit, rather than on strict plant pro rata or on an employee per capita basis. In multiple site companies, excellent programs with comprehensive, thorough proposals can be approved for more Career Development funds than the pro rata share generated at that site.

SUBJECT: Career Development Program Facilities

DATE: November 8, 1996

Background

This policy has been in effect prior to the above date of issuance.

Policy

1. Where possible, Career Development Programs should be housed *at no cost* in existing union or company facilities.
2. In those cases where the above option is not available, the company may use Career Development funds to rent/lease space from either the local union or the company. This would require safeguards to insure that rental fees charged do not exceed the fair market rate for the area; that the space rented is space readily accessible to the workforce; and that the workers to be served have a positive perception of the facility in which the rental space is located.
3. Space leased or purchased can be paid for with Career Development funds to the extent that the space is used for Institute-supported programs.
4. Purchase or construction of buildings ordinarily will not be paid from Career Development funds. Any capital costs for construction or rehabilitation of facilities should be absorbed by the company and then recovered through a fair market lease agreement with the local Career Development Program.

SUBJECT: Career Development Program Equipment and Furnishings

DATE: November 8, 1996

Background

This policy has been in effect prior to the above date of issuance.

Policy

1. Local Joint Committees may use Career Development Program funds to purchase needed equipment and furnishings for the program at the most advantageous cost.
2. When a lease or rental agreement would be more favorable than purchase, capital expenditures should be avoided.
3. All equipment and furnishings purchased with Career Development Program funds remain the property of the local program.
4. For property purchased with program funds, the Institute will resolve residual value issues at the appropriate time through mutual agreement between the union and the company.

SUBJECT: Purchasing

DATE: November 8, 1996

Background

The changes reflected in this policy, over previous policy on this subject, were approved at the Governing Board meeting on 10/8/96.

Policy

Purchasing equipment, materials, etc. at local Career Development Program sites can and should be done through company purchasing departments only if that is the most cost effective and reasonably expedient alternative. A Career Development Program purchase can be made outside the company's system; and if it is, three bids are mandatory and the Co-Chairs of the LJC must sign off on all such purchases.

SUBJECT: Paid Representation to ICD Sponsored Conferences

DATE: November 8, 1996

Background

This policy has been in effect prior to the above date of issuance.

Policy

Local Joint Committees can send one company representative and a representative from every local union represented on the LJC to ICD-sponsored conferences. The cost of sending a company representative may be drawn from Career Development funds. The reimbursed costs would be for such things as lost time for union members (but not for company reps), hotel, airfare and per diem. It is not mandatory to send more than minimal representation: one company and one union representative. The final decision is left up to the LJC.

SUBJECT: Services Not Funded by Career Development Programs

DATE: November 8, 1996

Background

This policy has been in effect prior to the above date of issuance.

Policy

Certain kinds of services cannot be funded through Career Development Programs. These are:

- Apprenticeship, craft training, and training for position-rated jobs
- Occupational safety and health (OSHA) training, basic safety and environmental training
- New facility training
- Training related to employee assistance programs (EAPs) and cooperative partnership agreements

SUBJECT: Lost Time

DATE: November 8, 1996

Background

This policy has been in effect prior to the above date of issuance.

Policy

1. Career Development funds may not be used to pay lost-time wages for participants enrolled in the program.

2. Career Development funds cannot be used to pay lost-time for Local Joint Committee activities unless authorized by the Governing Board.

SUBJECT: Monetary Incentives

DATE: November 8, 1996

Background

This policy has been in effect prior to the above date of issuance.

Policy

Career Development funds cannot be used to pay for monetary incentives, bonuses, allowances and the like.

SUBJECT: Eligibility for Participation in Career Development Programs

DATE REVISED: February 15, 2013

DATE: November 8, 1996

Background

The changes reflected in this policy, over prior policy on this subject, were approved at the two Governing Board meetings on 10/8/96, 6/4/97, and 11/28/12.

Policy

Active workers are eligible to participate in Career Development Programs. For the purposes of Career Development Programs, the term “active” is applied so that laid-off workers who have not broken pension-accruing service are entitled to participate in Career Development Programs and initiatives. Additionally, all represented workers who suffer dislocation due to the closing of a facility or part of a facility will be entitled to participate in Career Development Programs and initiatives for two years from the employee's last day of work. This would include workers who have chosen retirement or severance as a result of the closing of a facility or part of a facility. This is provided all public funds available for dislocated workers shall be sought and obtained and the availability of such funds shall be considered in determining the extent of the need for Career Development Program funds. Dislocated workers off the job longer than two years **may** participate in training, if such participation does not prevent an active worker from receiving training and provided that Career Development Program funds are not used for additional payments toward their participation.

Participation in the CDP cannot extend the employee’s service and will not count as time worked. Employee family member(s) and retirees **may** participate in training, if such participation does not prevent an active worker from receiving training and provided that Career Development Program funds are not used for additional payments for family member(s) or retirees. An exception to this policy is the Retiree Tuition Assistance Policy found on page 29.

If non-represented workers, or management employees, participate in Career Development classes, the company must contribute funds to cover the cost of serving these workers. Expenses are assessed on a pro rata basis for non-represented workers or management employees that participate.

SUBJECT: Tuition Assistance

DATE REVISED: January 1, 2022
DATE REVISED: January 1, 2019
DATE REVISED: September 23, 2014
DATE REVISED: June 30, 2005
DATE OF CLARIFICATION: October 3, 2000
DATE REVISED: June 30, 1998
DATE REVISED: August 21, 1997
DATE: November 8, 1996

Background

The changes reflected in this policy, over previous policy on this subject, were approved at the Governing Board meeting on 12/8/2021.

Policy

1. Standards applicable to the use of Career Development funds for tuition assistance are as follows:
 - a. The tuition assistance program will be separate from existing, contractually-obligated reimbursement programs.
 - b. The use of such funds will be limited to tuition costs, the costs of mandated books, and the payment of course-related fees such as required lab fees. Career Development funds will not be used to pay for such things as monetary incentives, parking fees, non-required books, or subscriptions to periodicals. In addition, the use of Career Development funds for the purchase of such items as personal computers, sets of tools, firearms or kits, engine analyzers, or any engine repair equipment, even if such equipment is associated with a given course, is prohibited. Neither may Career Development Program funds be used for equipment rental fees, such as aircraft, boat, welding, or scuba gear rental.
 - c. Tuition assistance funds may be used for either degree-seeking or non-degree-seeking courses. However, classes or courses with the primary purpose of recreation or personal enjoyment, rather than career or educational development (e.g., Weight Watchers, golf, and martial arts), are not eligible for tuition assistance funding.
 - d. There will be annual limits on the amount of funds available for tuition assistance and on the amount of tuition assistance that will be payable on behalf of a represented worker over a specified period of time. These annual limits will be:
 - Ten percent (10%) of each company’s Career Development contribution, or twenty percent (20%) of a company’s Career Development contribution providing the

company is in compliance with **all** established Governing Board and Institute policies ***including the following:***

- an acceptable audit of expenditures
 - an adequate communications process between both Boards and the Local Joint Committees
 - a documented tuition assistance approval process at each LJC
 - a periodic report of expenditures from the LJC's
 - an approved plan for the development of customized courses
- A total of \$2,500.00 per year per eligible worker for credit or non-credit courses provided by schools recognized by the Council for Higher Education Accreditation, by private occupational/vocational schools recognized by state boards of vocational education, or by State Workforce Development Agencies. For exceptions, the Institute for Career Development will make a determination as to the eligibility of a provider to receive tuition assistance funds.
 - Tuition Assistance funds may be used for subscription-based online learning providers. However, a participant is limited to one active subscription at a time and no more than \$500 per year. Online providers must be pre-approved by ICD, through the Application for Provider Status process, before funds are expended.
2. The annual limit of \$2,500.00 per eligible worker *is not* cumulative. Individuals may not carry forward unused portions of their tuition assistance for use in later years.
 3. With the exception of correspondence courses, tuition assistance funds will be payable to the institution at the commencement of a course.
 4. Efforts should be made to present courses at the work site in order to take advantage of any efficiencies associated with group rather than individual participation in these courses.
 5. Reimbursement will be provided in accordance with the aforementioned standards for courses beginning after the effective date of the respective LJC's Career Development Program financing.
 6. If an employee receives tuition reimbursement from any other source, no duplication of payment will be made to that employee.

SUBJECT: Correspondence Courses

DATE REVISED: January 1, 2019

DATE REVISED: June 17, 1998

DATE: November 8, 1996

Background

The changes reflected in this policy, over the previous policy on this subject, were approved at the Governing Board meeting on 6/5/2018.

Policy

1. As with other tuition assistance courses, there will be limits on the amount of tuition assistance funds that will be payable on behalf of a represented worker over a specified period of time for correspondence courses. Funding available for correspondence courses is considered, in all cases, as being applied against an eligible individual's total annual tuition assistance funds of \$2,500.00 per year. The annual limits will be:
 - a. In cases where an eligible participant is working toward a state recognized formal Associate, Bachelor, or Graduate degree, and where that participant is required to travel more than 100 miles to participate in a college program, a correspondence course can be taken in lieu of traveling more than 100 miles. Costs will be 100% reimbursed up to the \$2,500.00 annual limit. In these cases, the institution offering the correspondence course must be certified using the same certification standards outlined in the tuition assistance policy.
 - b. Payment for non-degree correspondence courses will be limited to a maximum of \$900.00 per calendar year. This payment is also applied against the participant's available tuition assistance funds of \$2,500.00 per calendar year.
2. Career Development funds expended for correspondence courses will be on a reimbursement basis. Allowable costs will be reimbursed only upon course completion or the attainment of appropriate benchmarks as determined by the Local Joint Committee. LJC's should implement procedures to insure Career Development funds are not misapplied due to participants enrolling but not completing courses.
3. Prior to approval of funding for any correspondence course, the LJC must provide information to the potential participant regarding alternative methods, such as tuition assistance classes, or both on-site and off-site customized classes, for obtaining the requested education or training. The LJC should document that they have accomplished this.

4. The LJC will verify completion of previous correspondence courses, if taken, prior to approving an individual's request for funding for an additional correspondence course.
5. The Institute for Career Development will make a determination regarding requested exceptions to limitations placed on correspondence courses.

SUBJECT: Customized Courses

DATE REVISED: January 1, 2019
DATE REVISED: August 1, 2002
DATE REVISED: June 7, 2000
DATE: November 8, 1996

Background

The changes reflected in this policy, over previous policy on this subject, were approved at the Governing Board meeting on 6/5/2018.

Policy

1. Any course that does not meet the criteria for tuition assistance funding must be presented as a customized course. All customized courses must include three major components:
 - a. Information describing the services offered by the Career Development Program will be presented at least once during each customized course. Additional presentations will be made as new Career Development services become available.
 - b. It must be demonstrated that the customized course will enhance certain skills. The vendor/institution offering customized courses must, in detail, describe activities that will enhance at least four of the following fourteen skills:

Learning-to-Learn
Reading
Writing
Computation
Oral Communication
Listening
Problem Solving
Creative Thinking
Motivation
Interpersonal Skills
Negotiating Skills
Teamwork
Leadership
Information Technology

- c. There must be a course evaluation upon the completion or termination of each customized course. This evaluation should include, but need not necessarily be limited to: (1) the learner's evaluation of the course; (2) the Local Joint Committee's evaluation of the course; and (3) any evidence, documented or anecdotal, of individual improvement in the skills areas addressed by the customized course.
2. As with tuition assistance and correspondence courses, there are limitations on the funding of customized courses. There are four limits:
 - a. Each participant is limited to \$2,000 worth of customized courses per year.
 - b. Money is available to pay the costs of books *required* to complete a course. The costs of optional publications, such as newspapers, magazine subscriptions, or non-required books are not eligible to be paid from Career Development Program funds. The criterion of required is frequently defined in a course syllabus. If no such definition is available, the appropriate Local Joint Committee must accept the responsibility to determine whether funds requested are for *required* books.
 - c. Funds are available to meet the costs of fees that are *required* and directly related to a course being taken. Some fees, such as a fee for a required lab, are obviously course-related, while fees such as parking fees are obviously not. The LJC must, therefore, accept the responsibility of determining whether requested fees are required and course-related, and not pay unnecessary fees.
 - d. Career Development funds cannot be spent on monetary incentives or the purchase of such items as personal computers, sets of tools, firearms or kits, engine analyzers or any engine repair equipment even if such equipment is associated with a given course. Neither may Career Development Program funds be used for equipment rental fees, such as aircraft, boat, welding, or scuba gear rental.
3. The Governing Board originally adopted the following policy revisions and additions to policy regarding customized courses on 6/7/00. The adopted policy applies to all customized courses offered under any of the three designated categories (*Basic Skills, Pre-technical, Personal Development*). Revision #2 was updated on 6/5/2018 (effective 1/1/19), and specifically addresses the issues related to customized courses categorized as *Personal Development* classes and offered under the two sub-categories *Arts/Crafts/Music* and *Health/Fitness/Recreation*.
 - a. **Revision #1:** ICD's existing reporting requirements should include that each CDP site monitor and report appropriate data (to be determined by ICD) regarding the number of individuals for whom annual customized course expenditures equal or exceed \$2,000. ICD would be expected to share the information annually with the Advisory and Governing Boards.
 - b. **Revision #2:** Funding for Personal Development courses under the sub-categories of *Arts/Crafts/Music* and *Health/Fitness/Recreation* should be limited to \$1,250 per participant, per year. To be able to accurately account for a \$1,250 maximum,

Personal Development courses should not be negotiated on the basis of a fixed rate per class regardless of the number of workers participating, but rather Personal Development courses (in the sub-categories of Arts/Crafts/Music and Health/Fitness/Recreation) should be negotiated only on the basis of a fixed cost per participating active USW member. We also recommend that ICD review its system for categorized courses and provide standardized direction, either through definition, examples, or both, so that courses are consistently and uniformly categorized. A participant who wishes to pursue a vocation in courses which are designated Personal Development under the sub-categories of Arts/Crafts/Music and Health/Fitness/Recreation, must complete and file an **ICD Standardized Educational Development Plan (EDP)** with their Local Joint Committee or Program Coordinator. The **EDP** must include educational objectives and name the certifying institution, listing appropriate courses to be taken over a specified period. Monitoring of the **EDP** is the joint responsibility of the LJC and Program Coordinator.

The Governing Board will review updates to this revision after one year.

- c. **Revision #3:** The LJC must ensure that customized courses are truly tailored specifically for CDP participants and, whenever space allows, provided on site with a minimum of four (4) legitimate basic skills written into a comprehensive curriculum. ICD will provide guidance to the Local Joint Committees on how to determine whether proposed customized courses are consistent with the CDP's goals, and whether prospective providers' proposals are acceptably addressing the enhancement of basic skills.
- d. **Revision #4:** The LJC should eliminate private lessons and private classes and eliminate the practice, where it exists, of so-called open enrollment courses. There must be a minimum of five (5) active USW members enrolled and attending class at the same location at the same time or the class will be canceled. Sites with fewer than 200 USW members will have some latitude in establishing minimum enrollment guidelines after review and approval with national staff in Merrillville.
- e. **Revision #5:** Whenever possible the LJC's must initiate a vendor selection process based on three (3) competitive bids, a standard Request For Proposal, (RFP) and a standardized contract for services that is developed by ICD and signed by selected vendors. When selected, providers will participate in training so that they understand the requirements of being a Career Development Program provider and to ensure that they have the competence needed to include in their curriculum, and effectively teach, the designated basic skills to workers.

**SUBJECT: Company Cost Centers, Audits and Reporting for
Career Development Programs**

DATE REVISED: January 1, 2022
DATE REVISED: June 7, 2000
DATE: November 8, 1996

Background

The changes reflected in this policy, over previous policy on this subject, were approved at the Governing Board Meeting on 12/8/2021.

Policy

Cost centers for the Career Development Programs' generated revenues and expenditures should be established within the framework of existing corporate accounting systems. A cost center should be established for each site within multi-site companies. Since the LJC determines how Career Development funds are spent, each committee, utilizing established corporate accounting and procurement systems and procedures, should be responsible for administering these funds through this cost center.

Additionally, all member companies will report to USW President Thomas Conway the amount of funds generated by the ICD program from the time the contract was signed with each company, as well as the unspent balances. The Conway Letter will serve to monitor the companies' contributions and total expenditures per quarter. A copy of these reports should be sent to the Union Chairman of the Negotiating Committee, to the Union Co-Chairs of each Local Joint Committee, and to the Executive Director of ICD.

In addition to the Conway Letter, a detailed breakdown of actual expenditures related to program activities must be reported by all member companies quarterly, and all expenditures must be broken down by plant. These reports will give ICD the capability to compare Career Development Program expenditures against site expenditure commitments.

The company or the union may, for good reason, request an audit of company reports through an independent outside auditor, jointly selected. The audit may be company-wide or plant-specific, and fees for the audit may be paid out of ICD funds.

SUBJECT: Combining Tuition Assistance and Customized Course Funds

DATE REVISED: January 1, 2019

DATE REVISED: August 3, 2007

DATE: August 24, 2005

Background

The changes reflected in this policy, over previous policy on this subject, were approved at the Governing Board meeting on 6/5/2018.

Policy

The objective of this policy is to allow individuals with clear career goals to accelerate progress through more flexible access to program funds. The Local Joint Committee (LJC) would approve and monitor combined usage of both Tuition Assistance (TA) and Customized Course (CC) funds either for a degree program or for a certificate program. For example, given current limits on TA and CC spending, up to \$4,500.00 would be made available for qualifying individuals to apply to either tuition bills or to customized course expenditures in a given year.

All standards applicable to the use of Career Development funds for TA and CC as outlined in the *ICD Field Policy Manual* (pp. 20-21, 24-26) remain intact.

The LJC is responsible for fulfilling all of the following four exception guidelines when allowing an individual to combine TA and CC funds:

1. In some instances it may be appropriate for a participating Steelworker to petition the LJC to spend over the limits of his/her TA and CC yearly allotment in order to complete a specified course of study leading to certification or a degree which is recognized by an accredited national body.
2. The LJC will maintain spending limits in compliance with established Governing Board policy and will consider **extenuating circumstances on a case-by-case basis** when reviewing a Steelworker's petition to exceed his/her TA/CC yearly allotment.
3. The LJC will regularly monitor the expenditure of funds from the TA and CC categories to insure that any Steelworker's account does not exceed the limits as established by the ICD Governing Board Policy and as enforced by the LJC and the ICD national office in Merrillville, IN.
4. If a Steelworker seeks to combine his/her TA and CC funds in accordance with this policy, LJC's would be required to (a) secure written approval from the ICD national office on a case-by-case basis, and (b) maintain an Educational Development Plan (EDP) on file at the site.

The Governing Board will review the policy annually.

SUBJECT: Retiree Tuition Assistance

DATE: February 15, 2013

Background

Sites with yearly surplus in their Tuition Assistance spending requested that the Governing Board consider allowing retirees to use those funds on a limited basis. At its November 28, 2012 meeting, the Governing Board enacted the following policy.

Policy

Local Joint Committees may choose whether or not to offer tuition assistance to retirees on an annual basis based on available funds and relevant local policies, such as the ability of retirees to participate in the program. Each local program must identify whether retiree tuition assistance will be available as part of their annual approved budget. Local participation in Retiree Tuition Assistance may not exceed the following policy standards.

1. Employees who are enrolled in a formal course of study and have completed program course(s) through Career Development prior to their retirement will be allowed to continue such course work for a period of up to one year following the date of their retirement in accomplishment of the program goal.
2. Funding for this benefit will be limited to the site's approved but unused TA funding from the previous calendar year. (Example: USW/U.S. Steel-Minnesota Ore budgets \$25,000 for TA in 2012, but expends only \$15,000; \$10,000 is then available to be spent on retiree TA in 2013, provided that the total amount spent on retiree TA in 2013 does not push the 2012 amount spent on TA over the 20% limit.)
3. Since there is a natural limitation on funds, retiree requests would be met on a first-come/first-served basis.
4. Each site must administer the use of retiree tuition assistance in accordance with this Program Issuance and make an annual report to the ICD Program Specialist assigned to that site of all retiree tuition assistance provided.