

OJT NEG Program and Policy Questions and Answers

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General Grant Administration

1. Do ARRA Prohibitions of the Law still apply, such as Casinos, Swimming Pools, Golf Courses, etc?

All the general and specific grant requirements and limitations applicable to ARRA funded NEG's will be applicable to the OJT NEG initiative including the allowability cost provisions (e.g. worksite location). Therefore, OJT jobs are prohibited at casinos or other gambling establishments, swimming pools, aquariums, zoos, and golf courses under this NEG. The NEG/ARRA agreement will be posted on-line and all applicants will be notified to review and to be prepared to sign the agreement, in the event their application is approved.

2. Will there be time to negotiate an indirect rate?

If an applicant (i.e. tribe) needs an indirect cost rate, they may propose a budgetary billing rate (90 day temporary) as part of the initial application and if awarded a grant, will be required via the NEG agreement, to submit a cost allocation plan/proposal to the USDOL Division of Cost Determination within the specified time frame.

3. Would a modification be required to add new employers?

No. If new employers are added during the grant period, the Federal Project Officer (FPO) and the Grant Officer should be notified, but a formal grant modification will not be required.

4. How are administrative costs defined?

See 20 CFR 667.220.

5. Are administrative costs allowable at state/local level? Are staffing costs available to be covered under grant?

Yes, administrative costs are allowable at all levels so long as the overall administrative costs do not exceed 10% for the overall grant per the standard NEG Guidelines. An applicant could propose to exceed the 10% overall limitation if a justification is provided and approved by the Grant Officer. Staffing costs (Administrative or Program) are allowable costs and are subject to the OMB Cost Principles, including, for example the “necessary, reasonable and allocable” criteria. See also WIA regulations on classification of costs at 20 CFR 667.220.

6. When do funds have to be spent?

All funds for the ARRA funded OJT NEG initiative must be expended by June 30, 2012.

Allowable Costs

1. What is the guidance on services to employers?

Employer support services are not allowed. However, services such as participant screening, skill assessments to determine skill gaps, etc., are allowable participant services, which will also be beneficial to prospective employers.

2. Please provide examples of additional support services CBO’s might provide to participants.

CBOs can play a critical support role in the individual’s transition from dislocated worker to OJT participant, ranging from the provision of supportive services (such as transportation assistance, child care, access to food banks and other community resources) to direct off-site training, counseling and/or mentoring activities for participants, particularly as related to basic employability, low English proficiency, substance abuse, disabilities, or other key barriers to successful participation in the OJT program. CBOs can also provide effective outreach and recruitment services to help identify potential participants, and may provide support to trainees during the OJT period.

3. Can staff salaries be included in the NEG application or is it only for the employer reimbursement?

Yes. All the general and specific grant requirements and limitations applicable to ARRA funded NEGs will be applicable to the OJT NEG initiative, including the allowability of staffing costs involved in administering the OJT NEG at both the grantee level (state or federally recognized tribe) and the sub-grantee or project operator level.

4. Are we allowed to budget for state and local level staff costs, and the costs of other sub-grantees, (i.e. CBOs)?

All the general and specific grant requirements and limitations applicable to ARRA funded NEG's will be applicable to the OJT NEG initiative, including the administrative cost definition and limitation. The costs of CBOs should be budgeted according to the allowability and allocability of staffing costs involved in administering the OJT NEG at the project operator level.

5. In this grant may skill training and OJT be used together? For example, would it be allowable for training plans to include a very short term classroom component?

Yes. Subject to the state or local policies in place, skill training should be an integral component of this OJT NEG initiative. The Individual Development Plan should articulate each training component.

6. Will funding awards take into consideration the intensive level of monitoring required by OJT?

ETA acknowledges the significant level of monitoring that is required for a successful OJT and advises that applicants plan accordingly when allocating resources and formulating implementation plans.

7. Who is responsible for covering the employee's U.I. and Workers compensation costs?

The employer of record - costs such as Unemployment Insurance and Workers Compensation costs remain the responsibility of the employer.

Policy Questions

Wage Cap

1. Are there any caps on the OJT wages?

Yes. For the purposes of these NEG OJT grants, ETA has established a wage cap policy that the training reimbursement level is *not to exceed a percentage (typically 50% up to 90%) of the state's average wage rate*. This limitation on the training reimbursement provides grantees with latitude in the type of occupations that can be targeted while maximizing the number of OJT opportunities. Grantees may enter into contracts with employers who elect to pay participants more than the state average wage; however, the employer cannot receive a training reimbursement beyond a percentage of the capped level.

2. Can you please clarify what the state "average hourly wage rate" means?

The states' average salary is provided by the Bureau of Labor Statistics in the Quarterly Census of Employment and Wages. The most up-to-date annual data are for 2009. The hourly wage caps for each state can be found at: <http://www.doleta.gov/layoff/avgHourlyWagesbyState.cfm>

3. Please explain again how the reimbursement is tied to the state average salary.

The ceiling for the wage reimbursement is a percentage between 50% and 90% of the state's average wage rate. These are training wages for the extraordinary costs of training an OJT participant on the job. The percentage reimbursed may vary based on the size of the employer or participants' skill gaps. We require states and local areas to have policies in place to take into account all of these factors when determining the level of reimbursement.

4. Why not cap reimbursement at average state wage for the occupation?

ETA chose a single cap for each state that would be feasible to administer and monitor, and that kept grantee documentation and reporting requirements to a reasonable level.

5. WIA regulations require OJT trainees be paid wages comparable to similar employees. Does this apply or can reimbursement go up to state average?

The WIA regulations should be followed. The reimbursement to employers is capped at the state's average wages. Employers are required to compensate OJT participants at the same rates as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills (Sec. 181(a)(1)(A)). Therefore, if the job pays less than the capped level for similar work, the OJT wages and training reimbursement should be based on this lesser level. The OJT employee should not be paid more simply because the state's average wage makes available a higher reimbursement threshold.

Two examples may help to illustrate reimbursement within the wage cap.

i. A participant in Pennsylvania may enter OJT as an insurance cost estimator, the average hourly wage for which is \$28.50 (above the wage cap). Since the average hourly wage for Pennsylvania is \$19.53, the employer may only be reimbursed at some percentage of this wage cap determined by the employer's size or the skills gap of the trainee. However, the employer must compensate the participant at the same rate as the person sitting next to the trainee doing the same job with similar levels of training, experience, and skills.

ii. A participant in Pennsylvania may enter OJT as a certified nurses assistant, the average hourly wage for which is approximately \$11.00 (below the wage cap). Even though the average hourly wage cap for Pennsylvania is \$19.53, the OJT reimbursement level must be based on a wage deemed equal to other employees doing the same job with similar levels of training, experience, and skills. The reimbursement would be some percentage of the wage to be determined by employer size or skill gaps of the trainee. In this case, the wage level would be lower than the capped level.

6. The webinar mentioned that OJT wage reimbursement is capped at the states' average wage rate. Does that mean for the occupation of the OJT participant or state average wage for all occupations combined?

For each OJT contract that is written, the wage is capped at the states' average wage rate which takes into account all occupations within the state.

7. Is there a waiver possible for the wage ceiling in urban areas where industry specific training might call for higher wage and higher skill positions?

No. There are no waivers available for this requirement. It is possible for employers to pay a higher wage level, however the reimbursement is capped at a percentage of the state average wage level.

OJT Duration

1. Why is NEG OJT limited to 6 months? This is not a WIA requirement.

This OJT NEG is a special initiative under the Recovery Act, and as the TEN indicates, the current economic conditions have contributed to an increased number of significant layoff events across the country. Since resources are limited, ETA has determined that the period of reimbursement will be limited to six months to maximize opportunity. This exceeds the average length of time for current WIA OJT activities.

2. Since WIA does not limit OJT's to 6 months, would co-enrollment be allowed to expand the training experience beyond 6 months?

No. The OJT NEG program has been designed to limit employer reimbursement to six months.

Participant Eligibility

1. Who is eligible for the program?

WIA Section 101(9) defines the term dislocated worker as an individual who meets one of the following four categories:

- (A)(i) has been terminated or laid off, or who has received a notice of termination or layoff, from employment;
 - (ii)(I) is eligible for or has exhausted entitlement to unemployment compensation; or (II) has been employed for a duration sufficient to demonstrate, to the appropriate entity at a one-stop center referred to in section 134(c), attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a State unemployment compensation law; and
 - (iii) is unlikely to return to a previous industry or occupation;
- (B) (i) has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of any permanent closure of, or any substantial layoff of, a plant, facility, or enterprise;
 - (ii) is employed at a facility at which the employer has made a general announcement that such a facility will close within 180 days; or

(iii) for purposes of eligibility to receive services other than training services described in section 134(d)(4), intensive services described in section 134(d)(3), or supportive services, is employed at a facility at which the employer has made a general announcement that such a facility will close;

(C) was self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disaster; or

(D) is a displaced homemaker.

Dislocated workers whose layoffs occurred since the onset of the recent recession (January 1, 2008) may be considered to be unlikely to return to their previous industry or occupation for purposes of determining eligibility to participate under these grants (also see TEN 38-09). This helps clarify part A (iii) of the Dislocated Worker definition.

2. Can registered apprenticeship sponsors use this program for new apprentices?

Yes, if the apprentice meets the definition of a dislocated worker as described above, and the program meets the NEG OJT design.

3. Will recently returned veterans be eligible?

If a recently returned veteran meets the definition of a dislocated worker, s/he would be eligible for the OJT NEG program. Veterans are to receive priority of service for qualified job training programs. For those recently returned veterans who do not meet the eligibility requirements of a dislocated worker, the WIA Adult program, which has limited program eligibility criteria, is also available to help provide valuable employment and training services to returning veterans.

4. Is it the intent of the OJT NEG's to assist dislocated workers not otherwise served by the WIA Dislocated Worker program, the Trade Adjustment Assistance program, and other NEG's?

Not exclusively. The OJT NEG's are intended to go to dislocated workers and areas most impacted by the recession. To the extent possible, ETA expects program designs to include strategies to serve dislocated workers experiencing prolonged unemployment and others with the greatest barriers to reemployment.

5. How is prolonged unemployed dislocated workers defined for the purposes of these grants?

Prolonged unemployed refers to those dislocated workers who have been unemployed beyond the state's average Unemployment Insurance (UI) duration. The number of weeks is the important indicator not the UI status. Therefore, an individual not covered by UI may still be considered prolonged unemployed if the period of unemployment exceeded the state's average UI duration.

6. How does OJT affect an individual's unemployment insurance (UI) benefits?

The unemployment insurance (UI) program is a federal-state partnership based on Federal law but administered by states under their laws. Individuals who have lost their jobs through no fault of their own, who are able and available for work, and who meet all other eligibility requirements of state UI law are eligible for benefits. *While UI requirements vary from state to state, an individual who enters into an OJT relationship with an employer and begins to earn OJT wages is, in general, no longer unemployed and no longer eligible to receive UI benefits.* OJT participants who are not converted to unsubsidized employment after the completion of the OJT may be eligible for UI benefits. Once they become unemployed, OJT participants would need to apply for UI benefits. Eligibility requirements, benefit amounts, the length of time benefits are available, and whether the benefits are charged to / reimbursed by the employer are determined by the State.

Sliding Scale

1. Can you explain specifically what the waiver (a.k.a. reimbursement flexibility) is and what it is used for?

For all OJT NEG grants, ETA will allow states to reimburse employers for the extraordinary cost of training OJT participants. With these grants, states can reimburse employers at a rate as high as 90% based on the following conditions:

Employer size: states may use the following sliding scale for employer reimbursement based on employer size: 1) up to 90 percent for employers with 50 or fewer employees; and 2) up to 75 percent for employers with 51-250 employees. For employers with more than 250 employees, the standard requirements (50 percent reimbursement) would continue to apply.

Skill gaps: For these funds, states also have flexibility to implement a sliding scale for employer reimbursement based the participant's initial skill level and the skill level needed to perform the job, within a scale to be established by state policy which incorporates the use of recognized skill assessment tools.

These flexibilities may be used independent of one another. It should be emphasized that states need not apply for waivers to obtain these flexibilities. The sliding scales for reimbursement will be built into the terms and conditions of the grant award.

2. For each participant, must the grantee use both the employer size and participant skill gap to determine reimbursement to the employer?

No. As mentioned above, the flexibility can take effect based on employer size or the gap between the participant's initial skill level and the skill level needed to perform the job. Grantees will develop their own policies and procedures to indicate for when a given flexibility should be utilized. When determining which flexibility to use, the needs of both the trainee and employer should be considered.

3. How do I quantify the skill gap?

The state is responsible for developing its own policy to assess individual participants' skill gaps as well as determining the appropriate tools the state will use to measure it. There are several tools that are useful in determining the skills necessary for specific occupations and industries. Some of these include:

- Industries: Competency Model Clearinghouse www.CareerOneStop.org/CompetencyModel
 - Includes competency models for bioscience, construction, automation, and more
- Occupations: O*NET OnLine <http://online.onetcenter.org>
 - Occupational Competency Profiles contain: tasks, knowledge, skills, abilities, detailed work activities
- Certification Finder: http://www.careerinfonet.org/certifications_new/default.aspx
 - Includes certifications for hundreds of occupations

4. Could the state build a sliding scale for OJT reimbursement that uses educational attainment as a proxy for skills?

No. OJT contracts for each participant must address specific occupational skills gaps and training needs to meet those gaps. Simply basing the training plan on educational attainment would not provide the detail necessary to determine a detailed training plan and, as appropriate, to determine the reimbursement rate.

5. Is company size based on the size of the operation locally or must you consider total employment nationally?

Employer size is based on the employment at the company's local operation where the OJT placements will be made. For instance, a hotel chain that employs thousands nationwide, but only 40 at its company in the targeted region, may be eligible for reimbursement up to 90%, when reimbursement is determined based on size.

6. Is the sliding scale waiver automatic under this NEG or do states have to request the waiver as part of the initial application?

There is no need for a waiver, as the skill gap and the employer size reimbursement flexibility is part of the conditions of the OJT NEG; this flexibility applies to the grant under these OJT NEG funds only.

7. How do we reconcile the requirements for both the sliding scale and skill level to determine reimbursement rates?

ETA requires that states have in place policies and procedures around determining reimbursement rates. It is the responsibility of the states to provide this guidance to the local areas. ETA will be providing technical assistance to help states craft these policies in the near future.

Employer Hiring Limitations

1. Do the rules and regulations around displacement apply for OJT?

Yes. 20 CFR Sec. 667.270 of the WIA regulations imposes safeguards to prevent WIA participants, including those in OJTs, from displacing other employees. A participant may not be placed in an OJT if (1) any other individual is on layoff from the same or any substantially equivalent job; (2) the employer has terminated the employment of any regular employee with the intention of filling the vacancy with an OJT participant; or (3) if the OJT position infringes on the promotional opportunities of currently employed workers. It should be noted that the prohibited displacement may also include a partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits of any currently employed employee.

2. May an employer who has laid off workers be eligible to offer an OJT for a position in which there is no layoff?

This is potentially allowable though proper adherence must be paid to the displacement regulations mentioned previously.

3. During the webinar, a reference was made to the employer "hiring" the OJT participant after the completion of training? Please explain.

OJT participants are considered hired at the point they begin the OJT position. In the webinar, ETA intended to communicate that employers should retain OJT trainees, that is, offer permanent employment to trainees at the end of the OJT.

4. Please address the sequence of employer contract development, trainee hiring and also "reverse" referrals.

We will be offering technical assistances to grantees to help them understand the process of OJT contract development, participant assessment, and monitoring. Some early technical assistance will begin being rolled out by June 15th.

In terms of reverse referrals, (that is when employers contact the state or WIB with a hiring need as well as potential OJT participant who would fit their hiring needs), we suggest that the states or federally recognized tribes and affiliated WIBs and program operators set policies and

procedures around OJT development and monitoring. The workforce system should work closely with employers to determine processes that meet the needs of both the OJT participants and the employers. This meets the goals of the dual customer approach and is in line with the other services being provided to employers and customers.

5. Is there guidance to applicants as to how to assess viability of employers with regard to their capacity to retain workers trained on OJT grants?

The state will have done some labor market analysis and determined the occupational sectors that are growing. States and local operators should establish policies and procedures that make it clear to employers that it is the intent of the program to off-set initial training expenses, with the goal of retained OJT employees. We suggest grantees and sub-grantees consider local labor market information and occupation demand, the size of the employer, its hiring projections, as well as the employer's layoff history when considering employer partners.

Technical Assistance

1. Where can potential applicants find out more about these grants?

Please visit our OJT NEG website at http://www.doleta.gov/layoff/Job_Training.cfm

2. When will the user guide be released?

It was released on May 3, 2010 and can be found at the OJT NEG website referenced in the previous answer.

3. Will the Technical Assistance (TA) on OJT be just as it relates to this program or for OJT in general?

ETA has a Technical Assistance (TA) plan that will begin releasing OJT materials beginning June 15 for any OJT placement. These materials will be supplemented with program specific TA for OJT NEG grantees. TA will range from assistance with implementation planning to providing access to sample OJT contracts and monitoring tools.

Implementation Plans (post award)

1. How long do grantees have to submit implementation plans?

Final plans, with the ETA regional Federal Project Officer pre-approval, must be submitted to E-Grants System no later than 60 days after the date of grant award. ETA will provide a planning template and guidance. A draft implementation plan will be due no later than 21 days after the grant award to the regional Federal Project Officer.

2. What if the implementation plan is submitted after 60 days?

The 60 day deadline following award is a contingency for full funding of the grant. Plans not submitted in a timely manner may be grounds to terminate the grant.

3. What information must grantees provide around knowledge or skill attainment for the OJT NEG implementation plan?

In the implementation plan, grantees must articulate how the attainment of knowledge or skills, essential to the full and adequate performance of the job, will be determined and/or obtained. Knowledge or skill attainment related to the job requirements is an expected outcome of the training plan associated with the OJT placement.

There is not a formal performance metric associated with skill attainment that grantees will report on. Although the WIA Youth program does measure skill attainment, there is no existing performance measure for skill attainment for NEG participants.

Indian and Native American Tribes

1. Who is eligible to apply for the OJT NEG grant funding?

Due to finite resources and short timeframes for submitting responsive applications, this OJT NEG grant opportunity will be opened to States, through State Workforce Agencies, and Federally Recognized Tribes.

2. Do tribes need to follow the state average wage rate?

Yes. In cases where a tribal area crosses state lines, the grantee can simply explain which state average it will use in its implementation plan.

3. If the tribes apply and get funded, will the states do the planning to get the OJT workers into a training position?

Tribes are encouraged to work with the public workforce system to leverage programmatic expertise. For example, WIBs may be viewed as valuable partners in the recruitment of participants and development of OJT contracts. A description of roles and responsibilities of partners will be required of each grantee in the implementation plan once grants are awarded.

4. Can Tribes apply directly or must they apply through the state?

Tribes may apply directly for these funds.

5. How does the indirect rate differ for a tribal entity with no indirect rate negotiated?

If an applicant needs an indirect rate, they may use a budgetary rate (temporary) and if awarded a grant, will be required via the NEG agreement, to submit a cost allocation plan/proposal to the USDOL Division of Cost Determination to obtain an approved rate.

6. Are all WIA section 166 grantees eligible to apply for OJT NEGs, including non-profit organizations?

As provided in TEN 38-09, not all Section 166 grantees are eligible to apply for OJT NEGs, only those that are Federally Recognized Tribes.

Partnerships

1. What are the Department's expectations regarding Community-Based Organization (CBO) involvement? What roles are CBOs expected to play in OJT NEG applications and programs?

As TEN 38-09 outlined, it is the Department's expectation that where possible, CBOs be utilized to recruit participants and OJT opportunities. They may also act as an intermediary offering contacts to community employers for potential OJT creation or be potential employers themselves.

However, a number of other roles for CBOs should be explored. The local knowledge base, wrap-around service resources, training capability and key community networks of CBOs can be utilized as value-adding components of OJT NEG programs. Integrating the local networks, community awareness, resources and services available through CBOs into the project can enhance the wrap-around support provided to participants, as well as the community specific information and contacts available to the applicant in the design and application phase. Such value-adding resources should not go untapped. The expanded role of CBOs can be described on two primary levels:

First, CBOs can play a critical support role in the individual's transition from dislocated worker to OJT participant, ranging from the provision of supportive services (such as transportation assistance, child care, access to food banks and other community resources) to direct off-site training, counseling and/or mentoring activities for participants, particularly as related to basic employability, low English proficiency, substance abuse, disabilities, or other key barriers to successful participation in the OJT program. The CBOs supportive role should carry through to the post-OJT phase, ensuring a continuity of support and follow up either on-site or off-site in the participant's post-OJT employment.

Second, because in most cases CBOs have direct contact with the communities in which they are embedded, they may be valuable intermediary partners in obtaining information on the impact of the economic downturn on those communities, including the kind of specific examples of job losses and economic depression which can significantly enhance an application otherwise limited only to unemployment statistics. Since one of the key factors in an application for these funds will be the demonstrated need in the relevant community, partnering with CBOs can provide a critical boost to a given application.

2. Must CBOs and other intermediaries partnering with the state be competitively procured for the OJT NEG?

As long as the partner organizations are “official” partners from the time of the proposal development and are listed in the grant application, arrangements with the partners for the provision of services under the grant are not subject to the standards for procurement in 29 CFR 97.36. The providers of all other services and goods, including equipment, must be selected in accordance with the standards for procurement in 29 CFR 97.36. The state is responsible to ensure all proper procurement practices are followed.

3. What is the role of the State and Local Workforce Investment Boards (WIB)?

We anticipate that the WIB will play a central role in the administration of this project. WIBs have experience working with local employers, the knowledge and infrastructure necessary to manage the WIA reporting and monitoring requirements, and are already providing OJT services in the local area, in many cases. While the management structure and service delivery mechanisms may vary with each NEG, the grantee is responsible for creating linkages to WIBs and One-Stop Career Centers and to ensure all of the grant requirements, including reporting and monitoring, are met.

4. Can start up companies be potential partners?

Yes, as long as they are an established business entity with a verifiable Employer Identification Number or DUNS number.

5. What is meant by the "local workforce system"?

The local workforce system refers to local Workforce Investment Boards and One-Stop Career Centers in a local Workforce Investment area.

6. Can placement agencies be beneficiaries of OJT funds?

No. The OJT NEG program is intended to benefit dislocated workers by utilizing employers who are 1) willing to train participants who are in need of up-skilling and 2) willing to permanently hire trainees at the end of the training period. Therefore, OJT contracts should be written with the employers who are actually employing participants and assuming the costs and benefits of the OJT. For these reasons, OJT contracts should not be written with employment brokers such as hiring agencies, temporary placement agencies or other third party entities.

OJT Contracts

1. Is there a general or specific expectation that the employer will hire the participant after completion of the OJT?

It is ETA's intention that OJT participants receive priority for hiring with their employer once the training period has ended. OJT contracts should be developed in such a way as to maximize the potential of trainees to be permanently hired once the training period has ended.

Reporting

1. If an individual is co-enrolled in both an OJT NEG program and another WIA program, would the credential attainment result be waived for both programs?

Individuals in the OJT NEG program will not count against the performance of the credential attainment measure. States also may request a time limited waiver to also exclude OJT NEG participants who are co-enrolled in other WIA programs so that the credential result for that individual would not count against performance of either program. It should be noted that while the individual does not count against performance of this measure, the data on credential attainment for each individual must still be "collected" by the grantee in the WIASRD and submitted to ETA.

2. Since the grants will be ARRA funded, will 1512 reporting be required?

Yes. Additionally, all grantees must have a DUNS number registered at www.ccr.gov which is tied to the 1512 reporting system.

3. What is the DOL definition of "credential"?

For purposes of defining credential, please use the "certificate" definition contained in TEGL 17-05, *Common Measures Policy for the Employment and Training Administration's Performance Accountability System and Related Performance Measures*.

In the WIASRD reporting system, grantees must indicate the type of recognized educational or occupational certificate/credential/diploma/degree attained by the individual who received training services.

4. Will a certificate issued by local areas for the completion of an OJT count as a certificate or credential?

No. A certificate issued by local areas for completion of OJT would not satisfy the requirement for a "recognized" credential.