

INCUMBENT WORKER TRAINING QUESTIONS & ANSWERS

What is the Workforce Innovation and Opportunity Act (WIOA) Incumbent Worker Training Program (IWT)?

The Workforce Innovation and Opportunity Act (WIOA) Incumbent Worker Training (IWT) is designed to provide funding assistance to qualifying employers to provide skills training to full-time, permanent employees. The training must be necessary for employers to retain a skilled workforce, improve the skills of employees, increase the competitiveness of the employee and the employer or retain or avert layoffs of the incumbent workers trained.

What is an Incumbent Worker?

A full-time paid employee who:

- Has been employed at least 6 months with the applicant employer more (which may include time spent as a temporary or contract worker performing work for the employer receiving IWT funds,
- Is at least 18 years of age; and
- Is a citizen of the United States or a non-citizen whose status permits employment in the United States.
- Males born on or after January 1, 1960 must register with the selective service system within 30 days after their 18th birthday or at least before they reach the age of 26.

Can an employer train workers employed through a temporary agency?

No, workers must have an employer/employee relationship as defined by the Fair Labor Standards Act and have an established employment history with the employer for 6 months or more. (This may include time spent as a temporary or other contract worker for the employer).

Some of the workers in need of training have recently moved from the temporary agency payroll to full time employment with the employer, are these workers eligible?

In the event that IWT is being provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for 6 months or more as long as the majority of those employees being trained meet the employment history requirement.

What kind of training can be funded under IWT?

Training can include, but is not limited to, industry or employer-specific work skills, basic job skills, technical computer skills, new manufacturing technologies, equipment operation training, changes in production processes, and skills such as leadership, teamwork, communication, conflict resolution, and management skills if the employer can document the need and effect on employee production and/or retention with the company. Employers will determine and select the types of training and training provider(s) that meet their employer and training requirements before submitting an application for consideration. Employers are strongly encouraged to reach out to their local community college for assistance in developing and/or implementing a customized training program. Additional training providers may be found on the WIOA eligible training provider website (www.NSCITE.org) Funding of training projects is prioritized by high demand sector strategies which determines employers that will have the greatest potential for impacting job growth and retention and economic competitiveness.

Which companies are eligible to apply?

IWT should be provided for private sector employers. Employers must be in operation at least twelve months and employ at least five full-time employees, be financially viable and current on all state and federal tax obligations. Any company that has received payments under a previous WIOA contract and that exhibited a pattern of failure to provide workers continued long term employment as regular employees with wages and working conditions at the same level and to the same extent as similarly situated employees is ineligible.

Which entities are not eligible for IWT funding?

- Employers currently receiving training funds, either directly or indirectly, from NH State government unless those training funds do not duplicate the training efforts outlined in the IWT application
- Non-profit public entities and/or Community Based Organizations
- Training providers, unless it is to address the skills gaps of the training provider's incumbent workers.
- Labor unions

What information is required for the "Employer Match" portion of the training budget?

The employer must identify, in their IWT application, their share (non-federal match) to the training program. The employer match is dependent on the size of the employer and shall not be less than:

- 10 percent of the cost, for employers with not more than 50 employees;
- 25 percent of the cost, for employers with more than 50 employees but not more than 100 employees; and
- 50 percent of the cost, for employers with more than 100 employees.

How is Employer Size Determined?

Employer size is based on the number of employees currently employed in the state of New Hampshire. Employer size is determined by the number of employees at the time of the execution of the incumbent worker training contract. This applies to all employers, including employers with seasonal or intermittent employee size fluctuations. Employers must provide documentation that indicates employer size.

What costs are included in Employer Match?

The non-Federal share provided by an employer may include the amount of the wages paid by the employer while the worker is attending training, equipment purchased for training, curriculum development expenses, travel and lodging costs, etc. The employer may provide the share in cash or in kind, fairly evaluated. The employer non-Federal share must not be paid by the Federal government under another Federal award.

The employer will be required to calculate its non-federal share as a part of the application for training funds and an actual share at the conclusion of the training. Should the non-federal share not meet the limits, the funds could potentially have to be repaid. Official payroll records, time and attendance records, invoices for equipment purchased, etc. must be utilized to determine the amount of the employer's share of cost.

Employer cost share contributions must be tracked and documented in the contract file and recorded on the monthly invoices. In addition, the methodologies for determining the value of in-kind contributions must be documented in the contract file and conform to cost sharing requirements under the OMB guidelines. (2 CFR 200.96 – in-kind contributions)

What costs may be reimbursed under IWT?

Examples of allowable costs include:

- Training materials and supplies including manuals
- Training tuition or registration
- Instructor/trainer wages (If not included in tuition)
- Materials and supplies
- Certification/Testing
- Off-site training space (e.g., classroom rental, etc.)

Company training site/facility located in an international location is not allowed. All expenses must be reasonable, necessary and allowable and conform to the regulations found in the Uniform Administration Guidance.

What training costs will not be reimbursed under IWT?

WIOA funding cannot be used to pay for trainee's wages and benefits during the training, travel expenses, capital improvements, training equipment, administrative costs, catering of training events, and costs outside the agreement period (effective beginning and ending dates of the agreement). However, these types of training expenses, incurred within the approved agreement period, may be included as part of the "Employer Match".

How does an employer submit an application and become approved for an IWT Program?

Upon receipt of a completed Incumbent Worker Training Employer Application, the application will be reviewed to determine the employer's eligibility for IWT funding. More information may be requested from the employer to determine eligibility. Applications should be submitted at least 30 days prior to the start date of the desired Incumbent Worker Training. The application must be reviewed for eligibility and approved. Then, a contract for delivery of Incumbent Worker Training is drafted, approved and signed by all parties. **This contract must be executed prior to the start date of the IWT.** Funding cannot be provided for any costs for an Incumbent Worker Training program that starts before the contract for delivery of training has been executed.

What information is an employer required to submit on the employees to be trained?

WIOA requires the following information collected for each incumbent worker trainee: name, contact information, Social Security number, DOB, citizenship/right to work status, selective service compliance and participant characteristics. A participant roster including occupation title, date of employment, actual training begin and end date, completion of training and credentials or certificates awarded is included as part of the IWT contract. Documentation of the six months employment requirement should also be submitted.

Where may the training take place?

Training may be conducted at the employer's own facility, at a public or private training provider's facility, online, or at a combination of sites that best meet the needs of the employer.

Who selects the training provider?

The employer selects the training provider that best suits the company's training needs. Trainers may be public, on-line, or private professional trainers, equipment vendors, or subject matter experts.

What training costs can be reimbursed under IWT?

Training expenses may include instructors' fees, trainee(s) tuition, required textbooks, manuals and required expendable training supplies and materials and off-site training space. Reasonable and necessary computer software that is used 100% for grant training purposes only, may also be considered for reimbursement.

How are employers reimbursed for approved training expenses?

Employers will be provided with the required forms to complete for expense reimbursements. Employers should submit the reimbursement requests as stipulated in the contract agreement, but no later than the completion of training. Final expenses must be reported within thirty (30) days after training activities are complete or the agreement end date, whichever is the earliest end date of program activity.

What information is required for reimbursement of expenditures covered in the agreement?

Before an invoice can be paid, the following documentation must be received:

- Copy of paid employer or training provider invoice. The invoice should include the date(s) and type(s) of training provided.
- Copy of the check with which the invoice was paid or other documentation as evidence of payment.
- For each training program or session, a copy of the participant roster, which includes trainees' names, last four (4) digits of SSN, the date(s) and type(s) of training, completion and credentials/certificates awarded should be noted on each roster. In addition, this roster should include the signature of the trainer or employer certifying that the listed employees did participate in the training.
- Documentation of matching expenditures such as payroll registers, copies of paid travel costs, etc.

What outcomes are expected from the IWT grant?

The specific outcomes of training through the IWT will provide skill-attainment opportunities for employees, or contribute to the competitiveness and productivity of the employee and the employer or retain or avert layoffs of the incumbent workers trained.

What information will the employer need to maintain for the Training Program Assessment monitoring reviews?

WIOA federal guidelines require that the Governor ensure that all programs are monitored for program effectiveness, performance outcomes and contract compliance. Once training begins, the employer should maintain adequate records of the costs associated with the training and benefits the training activities have provided to the employer and to the employees. This information will be used to document the impact the training has had on employee retention, wages, promotions, efficiency, etc.