
**Trident Workforce Development Board
Workforce Innovation and Opportunity Act**

INCUMBENT WORKER TRAINING POLICY

TO: SC Works Trident Operator/ Staff

ISSUANCE DATE: November 07, 2023

EFFECTIVE DATE: November 07, 2023

SUPERSEDES: October 29, 2019, December 6, 2018, July 1, 2017, September 27, 2017 May 15, 2012, July 1, 2010, June 30, 2008, and October 29, 2007

SUBJECT: Incumbent Worker Training Policy

PURPOSE:

To provide resources for employers to train currently employed workers in an effort to keep businesses and workers competitive. Incumbent Worker Training (IWT) addresses training needed to meet changing skill requirements caused by new technology, retooling, new product lines and new organizational structuring.

BACKGROUND:

WIOA permits the use of allocated funds in support and expansion of Incumbent Worker Training (IWT). The local board may reserve and use not more than 20 percent of the funds allocated to the local area involved under section 133(b) to pay for the Federal share of the cost of providing training through a program for incumbent workers.

POLICY:

Regardless of the source of WIOA funds used for IWT, there are common requirements related to business eligibility, worker eligibility, and reporting IWT in the SC Works Online Services (SCWOS) system. The Trident Workforce Development Board will follow State Instruction Number 17-03 and the Incumbent Worker Training Program Guidelines in offering IWT contracts to employers. The Trident Workforce Development Area will issue State and/or Local Incumbent Worker Training contracts to employers located in Berkeley, Charleston, and Dorchester counties. Local IWT funds will require applications to receive prior approval from the Executive Director of the Berkeley Charleston Dorchester Council of Governments (BCDCOG) before the execution of a contract. The local area may reserve **up to twenty percent (20%) of their combined total adult and dislocated worker allotments for IWT.**

IWT funds will be used to provide training resources for businesses:

- To train currently employed workers in an effort to keep businesses and workers competitive;

- for training needed in current businesses due to expansion, new technology, retooling, new services/product lines or new organizational structuring or as part of a layoff aversion strategy;
- For which the employer provides a matching contribution (see below under Business/Consortium requirements)
- IWT is not intended to fund the periodic safety and refresher courses necessary for a business to continue to operate (i.e. First Aid, CPR, and Occupational Safety and Health Administration certifications) or the occupational training a new hire would need.

Eligibility for Incumbent Worker Training Funds

Businesses that:

- Have at least one full-time employee; and
- Are current on all state tax obligations

A consortium may serve as a broker for Incumbent Worker Training and may enter into an agreement on behalf of participating businesses. Consortia may include business associations, industry councils, chambers of commerce, downtown development corporations, etc., or two or more businesses in need of similar training. The required matching contribution will be based on the total consortium employment and will be prorated among the participating businesses based on the number of employees trained.

Training entities and city, county and state governments are not eligible for IWT funding. Businesses receiving services through ReadySC™ may be eligible for IWT so long as the training funded is not a duplication of services. IWT funds are not available to a business that has relocated, if that relocation resulted in the loss of jobs at the original location, until the company has operated at that new location for 120 days. INCUMBENT WORKER DEFINED To qualify as an incumbent worker, the incumbent worker needs to be: • Employed; • Meet the Fair Labor Standards Act requirements for an employer-employee relationship; and • Have an established employment history with the employer for six months or more, unless the training is being provided to a group/cohort of employees and the majority of employees have been employed with the business for six months or more.

No reimbursements can be made for expenditures that occur prior to the agreement period. This includes ordering training, paying for training and/or beginning training etc.

Application Evaluation:

- Characteristics of the employees to be trained: Laborers and Front Line Staff take priority
- The relationship of the training to the competitiveness of both the employer and employee
- The Per participant cost of training
- Credentials and Skills gained as a result of the training: Received a State, National Certification or industry recognized credential
- TWDB approved training Sectors Industries: (Diversified Manufacturing, Transportation/logistics, HealthCare, IT, Construction Trades, Hospitality & Tourism)
- Employer Size: (Small, Medium & Large)

Trainee Eligibility

- Any individual employed by the eligible business

Trainee Data Collection

- Information about employees participating in this federally-funded training will be collected in a database used to measure the impact of the training.
- Only aggregate data will be used.

Reimbursable Training Expenses

- Instructor/trainer salaries
- Textbooks/manuals
- Consumable materials/supplies

Non-Reimbursable Costs

- Trainee/employee wages or travel
- Trainee wages
- Travel/food/lodging
- Training Equipment
- Capital improvements
- Curriculum Development
- Purchase of any item or service that may be used outside of the training project (to include computer equipment hardware and non-training related software)
- Costs incurred prior to the approval date of the application
- Administrative costs incurred by consortia

Training may be provided through:

- Technical colleges
- School Districts
- Area vocational-technical centers
- State colleges and universities
- Licensed and certified private entities/institutions
- Industry-specific consulting/training organizations
- Professional associations and credentialing entities
- The business itself, through in-house training provider
- Registered Apprenticeship programs

Training may be conducted at:

- The training provider's facility
- The business's own facility
- A combination of sites

Application and Approval Process

- The Incumbent Worker Training Application is completed and submitted to the local workforce development board.
- Upon approval of an application, an agreement is written between the business/consortium and the local workforce development board administrative entity.
- Recaptured funds are funds that have been unused and/or de-obligated by the employer. The Trident Workforce Development Board allows the Executive Director of the BCDCOG to approve the applications of employers to receive the recaptured funds for the purpose of an expedited reallocation.

The Executive Director of the BCDCOG has the authority to:

- Increase the award amount if recaptured funds become available (Must be to Employers already approved and in the training that has been approved by the TWDB).
- Approve modifications to agreements that would help expedite the expenditure of IWT funds.

Business/Consortium Requirements

- Businesses/consortiums must provide a matching contribution to the training project that shall not be less than:
 - 10% of the costs for businesses with no more than 50 employees;
 - 25% of the costs for businesses with more than 50, but no more than 100 employees;
 - 50% of the costs for business locations with more than 100 employees
- Business/consortium must sign an agreement to complete the training project as proposed
- Business/consortium must keep accurate records of the project's implementation process
- Business/consortium must submit reimbursement requests with the required documentation

Project Completion

- Training projects are performance-based with specific measurable outcomes, including the completion of the training
- Business/consortium will provide sufficient documentation for the identification of all employee trainees for the calculation of performance measures and outcomes deemed pertinent to the local workforce system
- The last payment will be withheld until the final report is submitted and all performance criteria specified in the agreement have been achieved including:
 - (1) Submission of required documentation
 - (2) Documentation of business matching contribution

Awarding of IWT contracts is a competitive process. Contract priority will be given to those IWT agreements where the training results in an industry or nationally-recognized credential.

See State Instruction Letter 17-03 for further guidelines on awarding State and Local IWT funds.



Ronald E. Mitchum, Executive Director
BCDCOG

November 7, 2023

Date