

# SNAPSHOT

Subject:	Incumbent Worker Training (IWT)
Policy Number:	ADWDB-XX-2021

ALL JANUARY 2021 PGL REVISIONS ARE HIGHLIGHTED IN YELLOW

*Incumbent worker training is an available service led by workforce centers tailored for the benefit of business. This policy defines incumbent worker training and provides a structure for the provision of services in the Arapahoe/Douglas Works local area.*

## POLICY/ACTION

### **A. What is Incumbent Worker Training?**

Incumbent worker training is work based and/or classroom training provided to individuals currently working that increases the competitiveness of the employee and the employer, based on the definition of competitiveness identified in local policy.

It is focused on the needs of local employers and is training:

- Designed to meet the special requirements of an employer or group of employers to retain a skilled workforce or avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment;
- Conducted with a commitment by the employer to avert the layoff of the incumbent worker(s) trained, or otherwise retain the worker(s); and
- May include apprenticeship training

### **D. What Funding Can Be Used to Pay for Incumbent Worker Training?**

Arapahoe/Douglas Works may reserve up to 20% of Adult formula funds and/or up to 20% of Dislocated Worker formula funds for incumbent worker training.

### **F. Determination of Employer Eligibility**

For the purpose of determining the eligibility of an employer to participate in an IWT contract and receive IWT reimbursements, the ADWDB shall take into account the following factors:

- The characteristics of the potential employed participants;
- The relationship of the training to the competitiveness of a participant and the employer; and
- Other such factors that the ADWDB may determine to be appropriate are:
  - The number of employees participating in training;
  - The wage and benefit levels of those employees (current and anticipated upon completion of the training); or
  - Existence of other training and advancement opportunities provided by the employer.

### **G. Determination of Non-Federal (Employer) Share of IWT Costs**

The Arapahoe/Douglas Works Workforce Development Board shall determine the employer share of the IWT costs, taking into consideration such factors as:

- The number of employees participating in training;
- The wage and benefit levels of the employees (at the beginning and anticipated upon completion of the training);
- The relationship of the training to the competitiveness of the employer and the employees; and
- The availability of other employer-provided training and advancement opportunities.

The calculation of the employer share may include the amount of wages paid by the employer to the workers attending the IWT program. The employer may provide the share in cash, or in kind contributions that are fairly evaluated (per OMB Uniform Guidance at 2 CFR 200.306). But the percentage share shall not be less than:

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

## I. Procedures and Documentation

### 1. Employer Selection

Arapahoe/Douglas Works will maintain sufficient documentation to demonstrate that participating employers were selected equitably and that a variety of employers were given sufficient opportunity to participate in IWTs.

### 2. Pre-Award Assessment Review and 3. Contractual Requirements

The required criteria for the pre-award review and contractual requirements will all be included per the PGL.

### 9. State Monitoring Requirements

See attached (Attachment 2 of corresponding PGL: Incumbent Worker Training File Review Guide)

## J. Local Incumbent Worker Training Policies and Procedures

The Arapahoe/Douglas Works Workforce Development Board is responsible for creating local IWT policies and procedures that use, at a minimum, the guidelines in sections A through I above of this state policy. The ADWDB may add requirements that are stricter than those of the state, but not less restrictive. The minimum state factors include:

1. Procedures for determining the percentage (up to the maximum of 20%) of local Adult and/or Dislocated Worker local formula funds to be used for IWT; and obtaining local board approval to use these funds for IWT
2. Qualifications for/definition of an incumbent worker
3. Definition of employer and employee competitiveness
4. Determining employer eligibility for IWT
5. Length of training; sliding scale for reimbursements, maximum reimbursement allowed, and procedures for approval of exceptions to the maximum reimbursement
6. Determining employer share of the IWT costs
7. Pre-award assessments/factors for selecting employers and awarding contracts
8. Contract requirements
9. Reimbursements and procedures for tracking employer share of costs
10. Incumbent worker tracking and documentation requirements
11. Local contract monitoring process
12. Demonstrating alignment with the WIOA local 4-year plan, particularly sector strategy approaches for in-demand occupations
13. Other requirements established by the local board, which may include establishing local performance outcomes for IWT initiatives