



INCUMBENT WORKFORCE DEVELOPMENT TRAINING POLICY

EFFECTIVE DATE: SEPTEMBER 1, 2015

A. OVERVIEW

As part of its ongoing commitment to established businesses and their existing workers, the Greensboro/High Point/Guilford County Workforce Development Board (WDB) has implemented an Incumbent Workforce Development Training Policy to provide educational/skills training and assessment for current workers to increase employee productivity and the potential for company growth.

Funds for this program are made available through the Workforce Innovation and Opportunity Act (WIOA) Adult and Dislocated Worker programs. These funds are received from the U.S. Department of Labor and passed through the N.C. Department of Commerce's Division of Workforce Solutions. Local grants are administered by the City of Greensboro's Office of Workforce Development Division as the administrative entity for the WDB.

WIOA defines incumbent worker training in Section 134(d)(4)(B) and in the April 16, 2015 Notice of Proposed Rulemaking §680.790 as

- a) designed to meet the special requirements of an employer (including a 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 and
- b) conducted with a commitment by the employer to retain or avert the layoffs of the incumbent worker(s) trained

Guilford County businesses may request funds in accordance with the following parameters and specifically through the process described in **Section E** below.

B. PROJECT FUNDING

The WDB will make available up to 20% of its annual Adult and Dislocated Worker allocations. This availability may be reduced in any fiscal year based on Board priorities in that year, but will not exceed that amount.

Individual grants to Guilford County businesses will be limited to **\$15,000 per project**. Grants to groups of businesses are limited to **\$30,000 per project**. A business will be limited to one grant per any twelve month period and to **\$30,000 in lifetime funding** for incumbent worker training, including participation in group projects. The lifetime limit applies only to grants provided on or after September 1, 2015.

Guilford WDB believes that we all have a stake in making our country more competitive by closing the skills gap that threatens our economy. Officially, Guilford County has joined many other counties across the Nation, and is pursuing the designation of Work Ready Community (www.workreadycommunities.org). Costs related directly to WorkKeys-based Career Readiness Certification (CRC) testing and upgrade (as referenced in Section C below) are not included in this monetary limit; the WDB will fund those costs directly in connection with an approved project.

C. LOCAL PROGRAM FOCUS AND PRIORITIES

Overview

On an annual basis (or as deemed necessary), the designated WDB Committee will develop recommendations for local Incumbent Workforce Development program emphasis and priority criteria for funding. Local Area factors to be considered will include:

- ❖ Economic conditions
- ❖ Changing needs within occupational clusters
- ❖ Changes in the demographics or status of the workforce

Focus, Priority for Selection and

There are two primary areas of focus and priority

1. Employee and Employer Improvement
 - ❖ upgrading employee skills
 - ❖ upgrading employee wages
 - ❖ training in portable skills
 - ❖ business and/or employee retention
2. Targeted Occupational Clusters
 - ❖ Healthcare
 - ❖ Advanced manufacturing

- ❖ Transportation and logistics
- ❖ Aviation

Priority for project applications will be given to businesses whose primary product or service is focused in these areas or for training employees within the business who work in these occupational areas.

D. APPLICANT CRITERIA

Because funds are limited, the business must certify that it is not eligible for or has exhausted efforts to secure training funds through existing incumbent worker training programs at the North Carolina Community College System (Customized Training).

The business applicant must:

- ❖ Be a private, for-profit, or private not-for-profit business which generates revenue
- ❖ Have been in operation for at least twenty-four (24) months and in operation in Guilford County for the entire twelve (12) month period preceding the application date and be limited to training for workers in a Guilford County location only
- ❖ Be current on all North Carolina, Guilford County, and city tax obligations
- ❖ Ensure that all trainees are current employees of the business, per the Fair Labor Standards Act. To be considered an employee, an employee-employer relationship must exist between the worker and the business. Workers employed through staffing agencies are not eligible for incumbent worker training in the Local Area.
- ❖ Have 100 or less employees at its primary business location in Guilford County; a group applicant cannot have more than 250 employees in Guilford County and no single employer may employ more than 100 individuals.

The business must agree to provide an opportunity to interview and consider an NCWorks-registered or referred job seeker(s) to backfill the incumbent worker trainee's position(s) if promoted.

A third party may develop a project application on behalf of a business or group of businesses but fees for developing the application or administering any aspect of the project are not reimbursable under this grant.

The following entities are not eligible for funding:

- ❖ A business that is currently receiving training funds from a state or local government or other public entity that, in any way, duplicates the training being proposed
- ❖ A business that previously received funds passed through the local WDB for any type of project, that upon the determination of the WDB, did not substantially meet the proposed outcomes of the previous project or that did not act in good faith toward achieving the objectives of the project
- ❖ A training provider
- ❖ A labor union
- ❖ A government entity

- ❖ A not-for-profit agency that does not generate revenue
- ❖ A business that employs more than 100 workers
- ❖ A business that does not meet the WDB administrative requirements.

Each employee trainee must:

- ❖ Be at least 18 years old
- ❖ Meet selective service requirements if applicable
- ❖ Be a citizen of the United States or a non-citizen whose status permits employment in the United States
- ❖ Have an employee-employer relationship with the applicant business and must work at a Guilford County facility of that applicant business; workers employed through a staffing or temporary agency are not eligible for inclusion
- ❖ Have wages below the current Local Area self-sufficiency level designated by the WDB; employees earning wages above that level may also be served through projects, but direct costs for those trainees must be borne by the company.

Integration of WorkKeys and Career Readiness Certification

The WDB is a strong supporter and partner in a statewide initiative to issue skill-based credential ratings to job seekers and existing workers. The WorkKeys Assessment System (<http://www.act.org/workkeys/index.html>) is used to identify job seekers and employees whose skills are at one of four levels: platinum, gold, silver or bronze. These rated credentials are portable and standardized throughout North Carolina and many other states as a Career Readiness Certification (CRC) (<http://www.crcnc.com/>) that gives employers and career seekers a uniform measure of key workplace skills.

The WDB also supports the use of the ACT KeyTrain instructional system delivered through Guilford Technical Community College to remediate workplace skills deficiencies identified through WorkKeys assessments. Such remediation enables new or existing workers to achieve skill levels for a Gold CRC and/or to achieve skill levels identified for specific jobs within companies.

As a result of its support for these initiatives and approaches to skill-based assessment and learning, **the WDB requires that all local Incumbent Workforce Development projects include CRC outcomes for its workers as part of the design.** As noted in Section B, costs directly related to CRC outcomes are not required to be included in the submitted budget, but will be funded directly by the WDB.

E. PROGRAM OUTCOME MEASURES

A business will identify project performance outcomes in its application and explain why each outcome is important to the business and its employees and how the project will produce the outcome. The local Incumbent Workforce Development program focuses resources on strengthening the profitability and competitiveness of businesses and increasing documented and portable worker skills that lead to wage gains and job security.

Each project application must identify at least one employee-related outcome measure and at least one employer-related outcome measure from the list below:

Employee-Related Outcomes

- ❖ Increased skill level of trained worker as documented by credential attainment such as GED, occupational certificate, competency-based completion of skill-specific training, or other similar outcome. This skill achievement must include CRC attainment at a minimum silver level but may also include additional credential attainment.
- ❖ Increased wage level of trained worker within ninety (90) days of training completion. If this outcome is identified, it must also be paired with CRC achievement at a minimum silver level.
- ❖ Retention of a worker who has been identified as a candidate for layoff due to lack of a required skill set. If this outcome is identified, it must also be paired with CRC achievement at a minimum silver level.

Employer-Related Outcomes

- ❖ Aversion of a layoff, plant closing, business relocation or consolidation as a result of the training
- ❖ A documented decrease in employer turnover rate for the six months following training completion
- ❖ Increased profitability of the business as a result of the training
- ❖ Enhancement of the company's competitiveness in its industry as a result of the training

Outcomes must be written in clear terms that indicate exactly what is expected and how it is to be obtained and measured. As part of the project award agreement, the WDB will expect to receive follow-up documentation that demonstrates the ultimate success of the project based on the planned outcomes.

F. APPLICATION PROCESS

The project application, guidelines and rating criteria are available at the WDB's website at <http://www.guilfordworks.org/>. The documents are also available at the WDB office located at 2 Centerview Drive, Greensboro, NC 27401.

Local businesses must contact WDB staff for advice and technical support prior to preparing an application. Questions related to this program or other business services available through the WDB may be directed to **Guilford WDB Business Services Unit** via email at sharline.comer@greensboro-nc.gov or by phone at (336) 373-8041.

Applications will be reviewed and recommended per the following quarterly schedule (based on fiscal year):

Quarter	Deadline for Submittal	Deadline for Award Announcement
1 st : July – September	August 31	September 30
2 nd : October – December	November 30	December 31
3 rd : January – March	February 28/29	March 31
4 th : April – June	May 31	June 30

Applications received by quarterly deadline will be reviewed and evaluated by WDB staff. Recommendations will be developed based on established rating criteria and presented to a sub-committee of the WDB for approval. Notification of approval, rejection or recommendations for adjustments will be made by the last day of each quarter. Applications that are resubmitted meeting the recommended adjustments may be considered for funding in the quarterly cycle in which they were originally submitted.

G. MATCHING FUNDING REQUIREMENTS

All other projects must pay for a portion of the cost of providing the training to incumbent workers. This portion is defined as the *non-federal share*. The non-federal share is based on the following limits:

- Not 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.

The non-federal share provided by an employer participating in the program may include the amount of the wages paid by the employers to a worker while the worker is attending a training program. The employer may provide the share in cash or in kind, fairly evaluated.

H. PROJECT REQUIREMENTS

Types of Allowable Training

All project applications **must include** assessment of all workers identified for inclusion in training for the Career Readiness Certification and provision of ACT KeyTrain remedial training for those not eligible for the minimum silver level of certificate as described in **Section C** above.

If this is the only aspect of the training proposal, there is no matching funding requirement.

Training and developmental activities that **may** be proposed in the project application include:

- ❖ Occupational skills training designed to meet the special requirements of a business or group of businesses, and result in retention of all trained workers
- ❖ Educational training including workplace literacy, basic skills, soft skills, and English language learner.

Project Specifications

- a) A completed application must be submitted in order to be considered. At a minimum, this will include: statement of need, training and/or curriculum plan, budget with supporting narrative, number of employees being trained, projected outcomes.
- b) The business must describe how, where, and by whom the training will be provided.
- c) A business subject to a collective bargaining agreement must include a letter from the authorized union official indicating involvement in the planning and/or support of the proposed training project.
- d) The Workforce Innovation and Opportunity Act (WIOA) requires that individuals receiving training subsidized by WIOA funds must be at least eighteen years old; be U.S. citizens or non-citizens legally allowed to work in the U.S.; be in compliance with Selective Service Registration requirements if applicable; have a valid Social Security number; and be a current paid employee of the business. A standard application will be required for each individual and attested to by an authorized business representative.
- e) Both the employer and all employees receiving training must be registered in NCWorks
- f) All employees to be trained using grant funds must be full-time payroll employees of the applicant company and may not be temporary or contracted employees.
- g) The business must be prepared to begin contracted activities within sixty days of contract execution and complete training (unless otherwise stated in the contract) within twelve months of the contract start date.

I. REIMBURSABLE AND NON-REIMBURSABLE COSTS

Reimbursable Costs

Only expenses specifically included in the final contract budget will be allowable and may include:

- ❖ Instructor/trainer salaries
- ❖ Tuition and registration expense
- ❖ Training materials and supplies directly related to training
- ❖ Textbooks and manuals directly related to training
- ❖ Cost of training certifications, licenses, credentials, and tests

Non-Reimbursable Costs

- ❖ Training-related software or equipment to provide the training
- ❖ Employee wages or fringe benefits
- ❖ Compensation for third party preparation and/or management of proposals/contracts or for consulting fees
- ❖ Expenses incurred prior to the start date of the contract
- ❖ Capital improvements, purchase of real estate, and construction or renovation costs

- ❖ Business relocation expenses
- ❖ Employment or training in sectarian activities
- ❖ Costs associated with in-house company trainers
- ❖ Travel expense
- ❖ Curriculum design or development expense
- ❖ General office supplies not specific to the training itself
- ❖ Non-personnel service costs such as postage and copying expense
- ❖ Website design, development, or upgrade expenses
- ❖ Membership fees or dues
- ❖ Process improvement or quality-related training.

J. EVALUATION PROCEDURES

- ❖ The business will submit a monthly project performance report during the term of the agreement.
- ❖ Based on the specific objectives identified in the contract, additional reports and/or provision of documentation to verify longer term outcomes will be expected from the business. Specifics will be identified in each contract.
- ❖ Invoices for activities will be on a cost-reimbursement basis only and documentation must be sufficient to justify the requested payment. Only items identified in the contract budget will be reimbursable.
- ❖ Formal monitoring of the project will be conducted by WDB staff at least once during the term of the contract.
- ❖ A Final report and invoice must be submitted within 45 days of project completion date. The final reimbursement will not be distributed till receipt of final report.