

**DU PAGE COUNTY  
INCUMBENT WORKER  
TRAINING PROGRAM POLICY**



**July 1, 2021 to June 30, 2022**

## **DuPage County Incumbent Worker Training Program Policy**

Incumbent Worker Training (IWT) is job-specific training arranged by an employer for one or more current full-time employees. IWT can be used to help avert potential layoffs of employees, or to increase the skill levels of employees so they can be promoted within the company and create backfill opportunities. IWT aims to improve the skills and competitiveness of the participant and the competitiveness of the employer. (20 CFR Subpart F – Work-based Training) Under section 134(d)(4) of WIOA, the DuPage Workforce Board can use up to 20% of Adult and Dislocated Worker funds toward the cost of providing Incumbent Worker Training.

**Workers:** Workers, either individually or as a group, must meet the following definition to be considered incumbent workers.

An incumbent worker is:

- a. An individual who has a full-time established employment history with a participating employer or an employer being provided Incumbent Worker Training as part of an economic development incentive package; and
- b. Receiving upgrade training:
  - To increase his or her skills in an occupation in which the individual is already an incumbent; or
  - To prepare the worker for entry into a new occupation within the targeted workforce.
- c. Employed in targeted sectors/or in an occupation deemed appropriate by Department of Commerce & Economic Opportunity (DCEO) staff (or working for an employer being provided Incumbent Worker Training as part of an economic development incentive package regardless of the sector.)

**Training:** A wide range of training topics and delivery arrangements may be proposed. Training that is closely linked to specific jobs, as well as job advancement and/or layoff prevention, is encouraged. Proposed training that is only loosely related, or unrelated, to specific jobs, while not completely prohibited, is discouraged. Examples of training that is not directly job-linked include soft skills training (e.g. customer service, continuous improvement, sales, Six Sigma), stand-alone adult basic education (ABE), stand-alone English as a Second Language (ESL), team building training, motivational training, basic computer literacy skills, professional development (i.e. PMP), and new hire orientation. Please note that ABE and ESL training that is fully integrated with specific job-linked skill training is allowable.

All IWT training programs must include a signed IWT contract/written agreement between the local workforce innovation board (WIB) and the employer and must at a minimum contain the following:

- a. Who is providing the training;
- b. What training will be provided;
- c. Where the training will be provided;
- d. The length of the training to be provided (to include the start and end date, number of days per week, and number of hours per day);
- e. The cost of the training program (to include only reasonable and acceptable costs);
- f. The amount of employer matching support and how it will be provided;
- g. Certification that all incumbent workers to be trained through the project have been employed by the company for six months or more unless the exceptions listed in WIOA regulations apply;

h. An agreement by the employer to provide company and client information necessary to track worker/project activity and outcomes within 30 days of the end of the calendar quarter.

i. A training agreement from the training institution should be provided at the time of application. The agreement between workNet DuPage and the employer must be signed before training begins.

**Matching:**

Employers participating in the program are required to pay a non-federal share of the costs of providing the Incumbent Worker Training. The non-federal share paid by an employer or group of employers may include the amount of the wages paid by the employer(s) to a worker while the worker is attending a training program and may include in-kind contributions. All matching contributions must be necessary for the provision of the training, fairly evaluated, and verifiable. Under Section 134(d)(4)(D) of the Workforce Innovation and Opportunity Act (WIOA), the minimum amount of employer share in the IWT project depends on the size of the employer:

- 10% of the cost of training for employers with 50 or fewer employees;
- 25% of the cost of training for employers with 51 to 100 employees; and
- 50% of the cost of training for employers with 100+ employees.

**Costs:**

Subject to the approval of DuPage County Workforce Development Division (WDD) and DuPage Workforce Board (WIB), all reasonable and necessary costs related to the conduct of the training are allowable. A maximum of \$10,000 per incumbent worker and/or \$25,000 per company is set for PY19. Funding beyond the \$25,000 cap may be considered in cases where trainees are part of an official apprenticeship program and/or will receive promotion in rank and pay. The LWIB will approve any projects that exceed \$25,000. There is no reimbursement until all training programs approved in the initial application are successfully completed. Should a trainee quit or fail the training program, his or her costs will not be reimbursed. Additionally, as limited by state policy, the costs of workers' wages paid while in training are allowable only as employer match contributions.

Allowable Costs - Costs that are reasonable and necessary for the conduct of the training are allowable.

Listed below are costs that may be reimbursed through the grant or used as the matching contribution when incurred after the local area and business execute the IWT Employer Agreement outlined in the IWT Employer Agreement section of this policy.

- 1) Training development;
- 2) Instructor wages (**non-company employed trainer wages only**);
- 3) Tuition;
- 4) Training materials and supplies;
- 5) Fees required to complete training;
- 6) Travel for trainers and trainees beyond normal commute;
- 7) Training facility costs (off-site);
- 8) Training facility costs (on-site only, if it results in an extraordinary cost to the company, e.g., shut down a line/production to conduct the training);
- 9) Cost for use of firm's equipment during training; or
- 10) Fees for technical or professional certifications and/or licensures.

When evaluating project proposals, DuPage WDD and DuPage WDB will consider the following criteria.

**Approval:** **Benefits to Workers and The Employer:** The training should result in benefits to workers, including enhanced employability, job upgrades, increased wages, and/or increased job security.

\*\*IWT project plans that will yield documented:

- Jobs saved from furloughs or layoffs *and/or*
- Pay increases for the trainees *and/or*
- Promotions for the trainees *and/or*
- Industry-recognized certifications or credentials *and/or*
- Completion of a portion of an apprenticeship program/model

will be given preference over other applications.\*\*

IWT project plans must identify the skills employees will obtain as a result of the training and how those skills will make both the employees and the employer more competitive. The number of workers being trained will also be considered.

**Quality of the Training:** The training proposal must be adequately specified and job specific. The training must be clearly linked to anticipated increases in productivity and to the competitiveness of the employer and employees in the context of regional, national and/or international market and industry trends.

**Impact of the Training:** Organizations that clearly demonstrate a need for training that will result in the retention and/or reinstatement of employees affected by economic crisis (example: COVID-19) may be prioritized.

**Matching Costs:** The minimum employer cost participation requirement must be met.

**Recent Relocation:** Using workforce development funds to encourage business relocation, as described in WIOA Sec. 181(d)(1), is prohibited. If a relocation resulted in any employee losing his or her job at the original location, incumbent worker training services may not be provided until the company has operated at the new location for 120 days.

No changes should be made to the Project Plan once approved.

**Application Process & Reporting:**

Organizations receiving incumbent worker training grants must comply with all state planning and reporting requirements as specified in state policy.

Requirements include:

- The submission of a complete application to workNet DuPage (workNet submits formal grant application to the State), including training agreements between the training provider and the participating organization. **Applications must be submitted and approved before any training costs are expended and before training begins.**
- Identification of all incumbent workers participating in training using the Participant Detail Form to gather personal data about the worker including Social Security numbers, gender, ethnicity, and veterans' status, etc.
- Documentation of training outcomes for each incumbent worker including the skill attainment goals of the project for each, i.e. credential attainment, successful exam completion, etc.
- Submission of Quarterly and Final reports documenting progress and completion information. The quarterly reporting periods will be January through March, April through June, July through September, and October through December. Quarterly reports are to be completed and submitted to workNet DuPage within 30 days from the end of each quarter.