

Camden County Workforce Development Board

Incumbent Worker Training Policy

Purpose: To establish a policy on Incumbent Worker Training (IWT) for the Camden County Workforce Development Board.

Background: Section 134 (d) (4) of the WIOA permits local areas, with Board of Commissioner approval, to reserve and use not more than 20 percent of allocated Adult and Dislocated Worker funds to pay for the cost of providing training for incumbent workers. This policy allows the local area to consider utilizing this funding on an as needed basis; the goal is to assist local employers with enhancing the skills of their current workforce to support employee and/or organizational sustainability and growth. The funds will only be utilized, subject to availability, with approval of the Workforce Development Board.

IWT engagements will follow the guidance in New Jersey Workforce Innovation Notice 9-16, Change 1(A).

Employer Eligibility:

The following criteria apply in establishing employer eligibility:

- Employer must have a presence in Camden County.
- Generally, IWT should be provided to private sector employers. However, there may be instances where non-profit and local government entities may be the recipients of IWT funds (Priority will be given to individuals with barriers to employment).
- The quality of the training and link to competitiveness of the individual and employer, including the following factors: Industry recognized credentials and/or skills gained from training, wage increase, career pathway strategy.
- The employer is in high growth/high demand sector or if not, there are compelling reasons justifying the investment in the training.
- The employer must not have laid off any workers within 120 days to relocate from another state.
- The employer must be current in unemployment insurance and workers' compensation taxes, penalties, and/or interest or related payment plan.

Other factors may include but are not limited to:

- The number of employees participating in the training.
- The number of employers participating in a course/program.
- The employees' advancement opportunities along with wages and benefits (both pre and post training earnings).
- Employer size and employer's industry and their market position.
- Layoffs averted as a result of the training.
- The existence of additional opportunities provided by the employer.

Individual Participant Eligibility:

Incumbent worker Training is intended for workers with an established work history with the current employer, and who, because of changes in the necessary skills and in order to remain in their position, to advance in the company, or to avoid a layoff, these workers now need additional training. To qualify as an Incumbent Worker, the individual employee must be:

- US Citizen or Resident, or otherwise authorized to work in the U. S.
- Age 18 or older.
- Registered with Selective Service or has received a letter from Selective Service stating that there is no evidence that failure to register was knowing or willfull.
- Employed in accordance with the Fair Labor Standards Act requirements for an employer-employee relationship.
- Have an established history with the employer for a minimum of six months. Exception: in the event that the incumbent worker training is being provided to a cohort of employees, a majority and not all employees, in the cohort must have an established employment history with employer of minimum six months. The decision to allow employees with less than six months of employment can be made by the WDB.
- Separation from employment with the Employer makes the individual ineligible to start and/or continue in the IWT course/program.

Employer Share of Training Costs:

Employers who receive IWT funding are required to pay, at minimum, the non-federal share of the costs of the training, as follows:

Number of Employees	Minimum Employer Share
50 or fewer	10%
51 to 100	25%
More than 100	50%

The share of the cost may be negotiated by the WDB with the employer to stay within budget constraints.

Budget:

The Camden County WDB reserves the right to set maximum amounts per employee and per employer to keep within budget constraints. The Camden County WDB may, at its discretion, modify for pilot programs, multi-course cohorts, and budgets determined prior to July 1, 2023. Training of approved employees will not begin until 10 work days after a fully completed IWT contract is signed by the WDB and the Employer, in addition to individual IWT vouchers.

Maximum amounts are as follows:

Per Employer	\$100,000 per federal identification number (life)*
Per Employee	\$2,000 per lifetime

*Multiple employers may increase this amount.

Per employee amounts do not reset after the year. Employers and Employees have a lifetime maximum amount.

NJDOL Operating System Requirements

Following WDB approval, the Employer and Training Provider (if applicable), are responsible for providing the Camden County One-Stop (CCOS) the following documents, no later than 10 days prior to the start of the approved IWT program:

- Final list of trainee/employees participating in the IWT course/program, including:
 - Completed Registration
 - Completed release form
 - Social Security Number
 - Date of Birth
 - County of residence
 - Selective Service status, if applicable
 - Actual start date with employer(s)
 - Current hourly rate
 - Current title
- The following information is due monthly during course/program participation:
 - Attendance records, including:
 - Time-in and Time-out each training date;
 - instructor signature;
 - trainee/employee signature;
 - skills gain documentation during program participation, as approved in advance by the IWT application and agreement.
- Employer and/or Training Provider will ensure that training will not result in a gap of 90-calendar days or greater. If same day service events are necessary to avoid a gap, the Employer and/or Training Provider will conduct a single-day service event, document, and send the following information to the WDB and CCOS MIS Manager:
 - Description of single-day service event
 - Date of service event
 - Trainee/Employees who attended the single-day service event.
 - Failure for Trainee/Employee to participate in single-day service events, may cause the Trainee/Employee to be ineligible to continue in the IWT program.
- Program Outcomes include the following information reported to the WDB as well as the One-Stop MIS Manager, six-months after course/program completion:
 - Employee Title
 - Employee Hourly Wage
 - Copy of transcripts, industry-valued credential, or other WDB negotiated post-program credential

Pilot Programs:

Depending upon the scope of an IWT Application, the WDB reserves the right to negotiate and approve IWT course/programs on a small-scale level to help the workforce development area determine how a larger scale program will work in practice, prior to expending and utilizing additional resources. Such a pilot program is subject to meet the current negotiated WIOA performance targets for Title I Adult programs. Failure of pilot programs to meet or exceed performance targets, might affect future program consideration and approval.