



Administrative Policy #1004 Incumbent Worker Training (IWT)

Date Issued: 01/01/2018 Date Effective: 01/01/2018 Date of Last Revision: 03/25/2019

I. Purpose

The purpose of this policy is to articulate how West Central Job Partnership (WCJP) may utilize funding in support of training Incumbent Workers.

II. Background

As part of WCJP's mission, vision, and goals outlined in its local and regional plans, Incumbent Worker Training resources have been historically made available to employers in order to work with employers to identify skill sets they need in their businesses/industries/companies to reach or retain competitiveness and help individuals advance in in-demand careers that offer family sustaining wages. In development of this policy, resources were consulted including, but not limited to the Workforce Innovation and Opportunity Act (WIOA), Department of Labor Employment and Training Administration 20 CFR 680.530, 680.780-820, and Pennsylvania Department of Labor Workforce System Guidance (WSG) No. 06-PY 2015.

III. Definitions

Incumbent Worker – an individual who is employed, meets Fair Labor Standards Act requirements for an employer-employee relationship, and has an established employment history with the employer for six (6) months or more.

New Employee – an individual who is employed, meets Fair Labor Standards Act requirements for an employer-employee relationship, and has an established employment history with the employer for less than six (6) months.

Incumbent Worker Training – Training provided either in-house by employer or by a third-party provider to an employee which contributes to the company's competitiveness and/or the individual's advancement in a career pathway.

IV. Roles and Responsibilities

WCJP may, at its discretion and dependent on the availability of funding, make monies for Incumbent Worker Training available through WIOA, competitive public or private grants, and sustainability funds. Financial support of Incumbent Worker Training requests will be determined by WCJP through assessment of the following criteria:

1. The strategy of the local board in fulfilling the vision and goals established for the local area (i.e., the local plan);
2. The characteristics of the incumbent workers to be trained (i.e., the extent to which these individuals historically represent individuals with barriers to employment as defined in WIOA Section 3(24), and how such individuals would benefit from a skills-gain that results in retention or advancement);
3. The quality of the training (e.g., industry-recognized credentials, advancement opportunities, etc.);
4. The number of participants the employer plans to train or retrain;
5. The wage and benefit levels of participants (before and after training);
6. The occupation(s) for which incumbent worker training is being provided must be in-demand as defined by WIOA Section 3(23) and as determined by workforce development area-specific labor market information produced by CWIA;
7. Employer's industry status. Is the employer in:
 - a. An in-demand industry as defined by WIOA Section 3(23) and determined by CWIA labor market information; or
 - b. A stable industry as determined by CWIA labor market information; or

- c. A declining industry, but there are compelling reasons (e.g., evidence of long-term viability of the employer) justifying investment in incumbent worker training.
8. Recent lay-offs and relocations. The employer must not have laid off workers within 120 days to relocate to Pennsylvania from another state; and
9. Employer's unemployment insurance and workers' compensation status. The employer must be current in unemployment insurance and workers' compensation taxes, penalties, and/or interest or related payment plan.

For Incumbent Worker Training funded through local Adult and/or Dislocated Worker formula funds or WIOA statewide discretionary funds provided by the governor. WCJP will document the factors that were considered in approving an incumbent worker training project with an employer. In cases of non-WIOA funding, eligibility and other requirements of the funding source will be imposed.

Employers who wish to receive Incumbent Worker Training Funds must have an active folder on the PA CareerLink® system and agree to participate in PA CareerLink® activities. Employers must provide information required for contracting, reporting, and monitoring as required by WCJP and the source of the Incumbent Worker Training funds.