

### Policy and Procedure

|                        |                                  |                   |          |
|------------------------|----------------------------------|-------------------|----------|
| <b>Title:</b>          | Incumbent Worker Training Policy | <b>Number:</b>    | OP-14-02 |
| <b>Effective Date:</b> | November 20, 2014                | <b>Revisions:</b> | 5-10-18  |

#### **Purpose**

This policy defines the use of Workforce Innovation and Opportunity Act (WIOA) formula funding to support incumbent worker training programs and strategies to improve the education and skill levels of the current workforce to increase the abilities of Shenandoah Valley Workforce Development Board (SVWDB) area businesses to compete, sustain, and grow their operations.

#### **Summary and Impact**

WIOA Section 133(b)(4) allows the SVWDB to implement programmatic Incumbent Worker Training (IWT) by using up to 20% of each year's base adult and dislocated worker local formula allocation to pay for the federal share of skills enhancement and training for incumbent workers as a part of a broad layoff aversion strategy.

The SVWDB recognizes that improving the education and skill levels of the current workforce will not only improve the regional economy and build communities, but will also increase the ability of businesses to compete and sustain their operations. Through available State and Local resources, the SVWDB seeks to create workforce development opportunities for existing employers that are coordinated strategies to offer the earliest possible intervention and employer resources necessary for the aversion of possible employee layoffs. Through this effort, SVWDB will assist participating employers to increase the capacity and productivity of their current workforces, in order to enhance the employer's potential for company stability and growth, with the primary goal of avoiding the layoff of employees.

WIOA funds may be made available through a process designed to assist SVWDB businesses, which includes a single firm or a group of firms (cohort) that share similar workforce needs of their incumbent workforce.

#### **Reference**

- 1 Public Law 113-128, Workforce Innovation and Opportunity Act (WIOA) Section 133(b)(4) and WIOA Section 134(d)(4)
- 2 20 CFR , Part 680 Subpart F, Work-Based Training
- 3 ETA Training and Employment Guidance Letter #10-16, Change 1 and #19-16
- 4 VCCS Policy 403-04 and 404-01
- 5 VWL 14-17, Change 1 and VWL 16-05, Change 1

#### **Outcomes**

Strategies for developing new workforce skills in the existing workforce shall be designed using a sector strategies approach to benefit business and industry in ways that encourage and support the integration of new technology and business processes, increase employee productivity, and support the competitiveness of the company. Incumbent worker programs create a number of positive outcomes including:

- Improving the alignment of existing workers' skills with new job requirements;
- Providing individuals access to new career opportunities within a business;
- Encouraging the retention of existing personnel who otherwise may become dislocated because of skill deficiencies, increasing the wages of newly trained workers; and
- Creating new opportunities for entry-level workers through the promotion of existing workers which supports the overall enhancement of local and regional economic development efforts.

### **Incumbent Worker Eligibility**

While there is no income eligibility requirement for incumbent workers, the following eligibility requirements apply and must be verified and documented (See Attachment A – Incumbent Worker Data Entry Process and Attachment B – Incumbent Worker Eligibility Documentation):

1. 18 years old or older; legally authorized to work in the United States; and has complied with Selective Service provisions (as applicable);
2. Meets Fair Labor Standards Act requirements for employer-employee relations and has an established employment history with the employer for 6 months or more; and
3. An employee to be trained that works at a facility located in LWDA IV or working for a staffing agency and placed at a facility located in LWDA IV.

In the event the incumbent worker training is being provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for 6 months or more as long as a majority of those employees being trained meet the employment history requirement.

If the incumbent worker is receiving WIOA Adult or Dislocated Worker services in addition to incumbent worker training, the individual must also meet the additional program specific eligibility requirements like all other Adult or Dislocated Worker participants and will be counted in local program performance.

### **Employer Eligibility**

The following requirement for Employers must be verified and documented:

1. The business has operated in Virginia for a minimum of one year prior to the IWT application date, with at least one employee other than the owner if the employer is a private business;
2. Current on all Virginia tax obligations, including all applicable county, city and local taxes;
3. Proposing to deliver the training for employees working within the SVWDB region;
4. Demonstrates the linkages of the training activity to demand occupations and/or regionally targeted industries in LWDA IV;
5. Demonstrates the positive relationship of the training to the competitiveness of a participant and the employer and the potential of the training to have a positive impact on the state and regional economy.
6. Completion and acceptance of a standardized proposed training program application (see Incumbent Worker Training Application) as a prerequisite for training services, including projected relative wage and benefit level for employees (pre-training and anticipated upon completion of the training).
7. Assurance that sufficient information will be provided to SVWDB to include participants in federal and state reporting requirements.

### **Costs Eligible for Training Reimbursement\***

- Instruction costs: wages for instructors and training coordinators employed by the applicant or training provider, curriculum development, public and/or private school tuition, contracts for vendor trainers;
- Materials and supplies costs: training texts and manuals, audio/visual materials, skills assessments (documents or services to determine training needs), Computer Based Training (CBT) software; and
- Other costs: fees for facility rental associated with the training contract and fees directly related to training.

\*All expenses are subject to allow ability under OMB Uniform Guidance and WIOA regulations.

### **Costs Not Eligible for Training Reimbursement**

- Trainee's wages and fringe benefits during training\*\*;
- Travel costs: travel for trainees for training located off-site\*\*;
- Travel for trainers and training coordinators (company and training provider)\*\*;
- Foreign travel;
- Purchase or lease of capital equipment;
- Construction or purchase of facilities or buildings;

- Business relocation expenses;
- Advertisement or recruitment;
- Meals and entertainment;
- Administrative costs;
- Charitable contributions;
- Lobbying activities;
- Losses, fines and penalties;
- Any costs incurred prior to the approval date of the contract;
- Conferences; and
- Employment or training in sectarian activities.

\*\*Expenditures may be used for the employer's match requirement (non-federal share); however, they are not considered a reimbursable expense.

### **Prohibitions and Restrictions on Use of Funds**

1. No funds provided under this title shall be used, or proposed for use, to encourage or induce the relocation of a business or part of a business if such relocation would result in the loss of employment for any employee of such business at the original location and such original location is within the United States.
2. A business or part of a business that has relocated from any location in the United States, until that company operates for 120 days within the SVWDB region, if the relocation has resulted in any employee losing his or her job at the original location (WIOA Section 683.260 (a)(2))
3. Businesses that have a history or pattern of failing to provide WIOA participants with continued employment with wages, benefits, and working conditions that are equal to those provided to regular employees who have worked a similar length of time and perform the same type of work will not be allowed to participate in IWT.

### **Considerations**

The following additional considerations may be used to determine SVWDB's support of IWT as part of a layoff aversion strategy:

- The characteristics of the individuals in the program (e.g. individuals with barriers to employment);
- The changing skills requirements are outside of normal skill growth and upkeep that would be provided by the employer;
- The training will reasonably prepare workers to address these skill gaps;
- Unless provided with training, the potentially laid-off worker does not have marketable, in-demand skills;
- The new skills can be attained in a reasonable period of time; and
- There exists a strong possibility of a job, either with the existing employer or a new employer, if the potentially laid-off worker attains new skills

### **Non-Federal Share**

Employers participating in incumbent worker training are required to pay for the non-federal share of the cost of providing the training to incumbent workers of the employers. The non-Federal share shall not be less than 50 percent of the cost of training.

The non-Federal share provided by an employer participating in an incumbent worker training program may include the amount of the wages paid by the employer to a worker while the worker is participating in the training activity. The employer may provide the share in cash or in-kind, fairly valuated.

Proposed training costs must be reasonable and necessary and clearly relate to the purposes and activities of the project as described. IWT funds are not intended to supplant training normally provided by employers.

### **Incumbent Worker Training Documentation**

SVWDB will receive, review and approve employer Incumbent Worker Training Application for participation in incumbent worker training. Upon employer eligibility verification and documentation an agreement will be secured with the employer and the required data elements obtained and entered into the Virginia Workforce Connection, the supported state system of record, as outlined in Attachment A – Incumbent Worker Data Entry Process and Attachment C – Incumbent Worker Training Required Data Elements. The following documentation will be retained for a period of three years from the date of completion of the one-year employer follow-up. Documents that must be retained include:

- Completed and approved Incumbent Worker Training Application
- Completed Incumbent Worker Training Description and Budget Worksheet
- Completed Incumbent Worker Training Employee Information Form
- Required Incumbent Worker Training Employee Eligibility Documentation
- Completed and signed Agreement for Delivery of Incumbent Worker Training
- Copies of credentials received or employer certification of training completion
- A copy of the invoice from the training provider
- A copy of the employer's payment made to the training provider
- A completed Incumbent Worker Training Reimbursement Request Form
- A signed form indicating that the employer has been made aware of SVWDB Grievance and Equal Opportunity Policies
- All documentation regarding IWT related complaints and actions taken on those complaints.

Those employees receiving only incumbent worker training and no other WIOA Title I service do not fall under the definition of "participant" in 20 CFR 677.150(a) and shall be reported as an "individual" and not a WIOA Program Participant (VWL 16-05 Change 1).

The required file format for IWT contracts, for both individual and cohort contracts, shall include the information noted above with a note of the location of the participant file for each individual co-enrolled in a WIOA Adult or Dislocated Worker Program. All documentation collected and maintained will be subject to validation during the auditing, monitoring, and data validation processes.

### **Program Performance Reporting**

The SVWDB will enter into the VaWC all individuals receiving WIOA Title I funded incumbent worker training and report outcomes on all individuals who receive incumbent worker training in compliance with Attachment C: Incumbent Worker Training Required Data Elements.

### **Attachments**

Attachment A – Desk Reference Checklist for Incumbent Worker Training Data Entry Process

Attachment B – Incumbent Worker Eligibility Documentation

Attachment C – Incumbent Worker Training Required Data Elements

### **Employer Forms:**

Incumbent Worker Training Application

Agreement for Delivery of Incumbent Worker Training

Incumbent Worker Training Reimbursement Request Form

Revisions: May 10, 2018



## Attachment A

### VWL No. 16-05 Change 1 Incumbent Worker Training

#### Desk Reference Checklist for Incumbent Worker Training Data Entry Process

**Note:** *It is important to mention that this document was created based on the most current feedback received from the Department of Labor Employment and Training Administration (DOL-ETA). Incumbent Worker Training is a new topic under WIOA (Workforce Innovation and Opportunity Act) and additional clarification is forthcoming, however this document was produced with the most recent information and guidance available.*

*We are required to meet certain minimum reporting requirements that are related to the current PIRL (Participant Individual Record Layout) reporting, therefore this document was created with these data collection and reporting requirements in mind.*

*We will continue to request additional guidance and clarification; however we are providing this solution at this point in time in an effort to move this Incumbent Worker Training initiative forward.*

*We are also pursuing system enhancements that will help streamline the Incumbent Worker intake and reporting process. To finalize any system enhancement, we will need specific and detailed reporting guidance in the form of a TEGL or other written guidance from DOL-ETA. We will continue to evaluate system enhancements and other alternatives; however until DOL-ETA can provide more specific detail on specific program reporting requirements, it will remain difficult to reprogram the system to collect less data and in a less structured format for Incumbent Worker Individuals, while remaining compliant within the currently required data collection and reporting requirements.*

*This is currently the most efficient and effective means by which we can record service to individuals receiving Incumbent Worker Training and also meet the current reporting requirements set forth by DOL-ETA. We will continue to review methods through which we may be able to make this process more efficient.*

## Keying Individuals receiving Incumbent Worker Training activities funded through WIOA into the Virginia Workforce Connection

Individuals that receive Incumbent Worker training activities funded through WIOA Title 1 must be recorded within the Virginia Workforce Connection (VaWC) so that these Individuals may be properly reported.

### Virginia Workforce Connection (VaWC)

1- Individuals must be registered in the **Virginia Workforce Connection (VaWC)**. In situations where the employer is unable to provide certain data elements, the individual can be directed to complete their own system registration. This process could alleviate concerns such as in cases where the employer is reluctant to provide SSN or perhaps is unaware of other required demographic information.

2- Employers must provide a list of all Individuals receiving Incumbent worker training. A list of all the required data items can be found in Attachment B. If an Individual is already registered, the Employer can provide the VaWC system user ID instead of the Individual's SSN (such as in the situation described in item 1).

3- Regardless of approach used to register the Individual within the system, staff must complete a WIOA Application for any individual that receives Incumbent Worker training through WIOA Title I funds. In the absence of other reporting guidance, TEGL 3-15 indicates that all Incumbent Workers should be reported in the WIASRD (Workforce Investment Act Standardized Record Data), which was subsequently replaced by the PIRL (Participant Individual Record Layout); therefore sufficient information must be collected in order to complete the WIOA application and produce the required reports.

*Note: Additional guidance related to the PIRL (Participant Individual Record Layout) and other reporting requirements may still be forthcoming. The VaWC and the WIOA Application will ultimately be used to create and comply with DOL published reporting requirements.*

Though some of the WIOA Application questions are not specific to Individuals receiving only Incumbent Worker Training, it is still required that information be collected. The Final Rule indicates that individuals receiving **Only** Incumbent Worker training are not subject to the same eligibility criteria as those that participate in Adult or Dislocated Worker activities. While this distinction is noted, it is still required that sufficient information be collected in order to produce a PIRL Reporting file; even though these elements would not directly impact an individual's eligibility for Incumbent Worker Training.

4- Staff must still verify DOB and Authorization to work (Citizenship) for all Individuals; and Selective Service Registration where appropriate. See Attachment B for Employer certification.

5- Staff will need to click on the Link to Create the WIOA program within the programs tab to work with the WIOA Application.

Directory of Services

Services for Workforce Staff

- Manage Individuals
- Manage Employers
- Manage Résumés
- Manage Job Orders
- Manage Labor Exchange
- Manage Activities
- Manage Providers
- Manage Case Assignment
- Manage Follow-Up

Reports

- My Reports
- Summary Reports

Case Summary | **Programs** | Plan | Assessments

Show Summary Tabs

Worker IV, Incumbent

Filter Applications: All

Filter Activities: ☒ Open ☒ Closed ☒ Voided

Filter Programs: Workforce Innovation and Opportunity Act (WIOA)

|   |         |
|---|---------|
| Workforce Innovation and Opportunity Act (WIOA) Program | Apps: 0 |
|---|---------|

Create Workforce Innovation and Opportunity Act (WIOA) Application

Activity Status: = Open, = Closed, = System Closed, = Voided

[ Print All ]

6 - Once in the WIOA Application is open, the staff will navigate through the application Wizard. On the Start tab, staff will use the “Incumbent Worker Eligibility” check box to select and utilize the Incumbent Worker Application.

*(Note – Staff will also indicate the use of “Incumbent Worker Eligibility” at the end of this application. The Incumbent Worker Customer Program Group should be used for all Individuals that receive only Incumbent Worker training and this process will be described later in this document.)*

As staff begin the process of creating the application, they may use the date of Incumbent Worker Training Contract with employer or other more appropriate date as the WIOA Application and Eligibility dates. Any unique processes used or oddities encountered during the application process should be recorded in a case note within the system.

Application/Registration Information

\* **Application Date:** 04/01/2017 (mm/dd/yyyy) Today

**Adult Eligibility:** ☐

**Dislocated Worker Eligibility:** ☐

**Youth Eligibility:** ☐

**Incumbent Worker Eligibility:** ☒

**Incumbent Worker Eligibility Date:** 04/01/2017 (mm/dd/yyyy) Today

Staff will scroll down the page and update any required field; including region and responsible office, then click the “Next” button at the bottom of the page to continue through the WIOA application.

[Exit Wizard](#)



The Incumbent Worker Eligibility application offers less data collection and fewer verification requirements than found in the more traditional WIOA application. There are a number of data fields and verification options that appear within the application; however staff will only be required to complete the verification options found on the “Demographics” tab.

7- On the Demographics Tab, staff will need to add/update and verify the Individual's Date of Birth, Registration for the Selective Service and the Authorization to Work in the U.S. elements. These should be the only elements within the system that staff are required to select verification before advancing to the next screen/tab. See Attachment B for Verification requirements.

If no other verification is available and/or the employer has provided sufficient verification information, staff may verify these required items using the category "Other Applicable Documentation" and add a comment (such as "IWT Contract/Employer" or "IWT Employer Certification") to the text box. This approach may be used, where appropriate, for other verification options within the Incumbent Worker Individual's WIOA application.

The screenshot shows the 'Demographic Information' tab in a web application. The form contains several fields with annotations:

- Date of Birth:** A date picker shows '08/18/1968'. Below it, the 'Verify' link is circled in black. To the right, the 'Other Applicable Documentation, (specify)' radio button is selected, and its text box contains 'IWT Contract/Employe'.
- Age at Earliest Eligibility:** A text field shows '48 (Today's Age: 48)'.
- Gender:** Radio buttons for 'Male' (selected), 'Female', and 'Did not self-identify' are present.
- Selective Service Website:** A link labeled 'Selective Service Website' is shown.
- Registered for the Selective Service:** A dropdown menu shows 'Yes'. Below it, the 'Verify' link is circled in black. To the right, the 'Other Applicable Documentation, (specify)' radio button is selected, and its text box contains 'IWT Contract/Employe'.
- Selective Service Registration Number:** An empty text field.
- Selective Service Registration Date:** A date picker.
- Authorization to Work in US:** A dropdown menu shows 'Citizen of U.S. or U.S. Territory'. Below it, the 'Verify' link is circled in black. To the right, the 'Other Applicable Documentation, (specify)' radio button is selected, and its text box contains 'IWT Contract/Employe'.



8 – Staff will advance through the application and navigate to the “Employment” tab. Staff will need only to indicate that the Individual is currently “Employed” and the “Unemployment Eligibility Status” maybe set to “Unknown” or “Neither a Claimant or Exhaustee” (by the nature of being an Incumbent Worker) on the Employment tab. The system should not require any verification for elements on this page. Staff may scroll down the page an advance to the subsequent page using he next button.

**WIOA Wizard**

Start Contact Demographics Veteran **Employment** Education Eligibility and Grants

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**Employment Information**

**\* Employment Status:** Employed ▼  
[\[ Verify \]](#) [\[ Scan \]](#) [\[ Upload \]](#) [\[ Link \]](#)

**\* Unemployment Eligibility Status:** Unknown ▼

**UI Referred By Status:** None Selected ▼

**Claimant has been exempted from work search:** ☐ Yes ☐ No ☒ Unknown

**Date claimant was exempted from work search:**  [Today](#)

**Unemployment Compensation Verify** [\[ Verify \]](#) [\[ Scan \]](#) [\[ Upload \]](#) [\[ Link \]](#)

*Please enter the Wage and Onet Code for all applicants with current/previous employment.*  
[Search Onet](#)

9 - Staff will continue through application and navigate to the Eligibility and Grants tab. Staff should see the term “Undetermined” attached to the tradition WIOA Title I Adult, Dislocated Worker and Youth Programs if they have followed the steps so far and selected only the Incumbent Worker Eligibility.

In the WIOA Grants Eligibility section, the staff will see the following statement under the Incumbent Worker Eligibility:

“Applicant meets the basic requirements for Incumbent Worker eligibility, but staff must manually set this to “Yes” and add a grant, when appropriate.”

Staff will need to select “Yes” for the “Incumbent Worker Eligibility”. All Activities/Services attached to records that are to be reported only as Incumbent Worker Individuals must be attached to this customer program group.

**WIOA Wizard**

[Start](#) [Contact](#) [Demographics](#) [Veteran](#) [Employment](#) [Education](#) [Eligibility and Grants](#)

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**Applicant Eligibility**

**Income Table:**

| Program           | Eligible     | Priority | Calculated Exception/Limitation | Reason(s) Not Eligible     | Action                            |
|-------------------|--------------|----------|---------------------------------|----------------------------|-----------------------------------|
| Adult             | Undetermined |          |                                 | No Adult Eligibility Date. | <input type="checkbox"/> Inactive |
| Dislocated Worker | Undetermined |          |                                 | No DW Eligibility Date.    | <input type="checkbox"/> Inactive |
| Youth             | Undetermined |          |                                 | No Youth Eligibility Date. | <input type="checkbox"/> Inactive |

VET = Veteran, BSD = Basic Skills Deficient, PA = Public Assistance, LI = Low Income, SLP = Additional Priorities

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**WIOA Grant Eligibility**

**Incumbent Worker Eligibility:** ☒ Yes ☐ No ☐ Not Applicable ☐ Inactive

Applicant meets the basic requirements for Incumbent Worker eligibility, but staff must manually set this to “Yes” and add a grant, when appropriate.

Continue down the page to the Grants section and click on the “View Available Grants” link.

10 - Staff will access Grants section and will need to select the appropriate funding to be applied to the Incumbent Worker activities.

| Grant Type       | Grant ID | Grant Name | ETA/Local Grant Code | Date Added | Action |
|------------------|----------|------------|----------------------|------------|--------|
| No records found |          |            |                      |            |        |

[View Available Grants](#)

| Grant Type       | Grant ID | Grant Name | ETA/Local Grant Code | Action |
|------------------|----------|------------|----------------------|--------|
| No records found |          |            |                      |        |

After clicking the “View Available Grants” link, staff will be given the opportunity to “Add” the appropriate “Grant Type”/ funding source to be applied to this individual.

*Note: If this step is skipped and the specific Grant is not attached to the application, the appropriate funding selection will not be available when the Incumbent Worker activities are added.*

[View Available Grants](#)

Select from the list of available grants.

| Grant Type                         | Grant ID | Grant Name                            | ETA/Local Grant Code | Action              |
|------------------------------------|----------|---------------------------------------|----------------------|---------------------|
| Statewide Incumbent Worker (Adult) | 33       | IWT Small Business/RRAA Funded        | NA                   | <a href="#">Add</a> |
| Statewide Incumbent Worker (Adult) | 34       | Locally Adult Funded Incumbent Worker | NA                   | <a href="#">Add</a> |
| Statewide Incumbent Worker (Adult) | 35       | Locally DW Funded Incumbent Worker    | NA                   | <a href="#">Add</a> |

These three Grant Types have been added to the system:

**IWT Small Business/RRAA Funded** – this option should be selected for any Incumbent Worker activities that are part of the “IWT Small Business” Grant and provided through the use of Statewide Rapid Response Additional Assistance funds.

**Locally Adult Funded Incumbent Worker** - this option should be selected for any Incumbent Worker activities that are attached to Local WIOA Adult funds.

**Locally DW Funded Incumbent Worker** - this option should be selected for any Incumbent Worker activities that are attached to Local WIOA Dislocated Worker funds.

After clicking “Add” link and selecting the appropriate Grant type, the section should appear as follows.

Grants

| Grant Type                         | Grant ID | Grant Name                            | Local Grant Code | Date Added | Action                 |
|------------------------------------|----------|---------------------------------------|------------------|------------|------------------------|
| Statewide Incumbent Worker (Adult) | 33       | IWT Small Business/RRAA Funded        | Not Defined      | 04/28/2017 | <a href="#">Remove</a> |
| Statewide Incumbent Worker (Adult) | 34       | Locally Adult Funded Incumbent Worker | Not Defined      | 04/28/2017 | <a href="#">Remove</a> |
| Statewide Incumbent Worker (Adult) | 35       | Locally DW Funded Incumbent Worker    | Not Defined      | 04/28/2017 | <a href="#">Remove</a> |

No grants are available.

*Note: The example above was used specifically to demonstrate **all** the Incumbent Worker funding sources currently available. It is not meant to represent what the record must look like. Staff do not need to select or make all sources available to the application; they need only select the specific source for the Individual.*

With the appropriate funding source attached, staff may proceed to the bottom of the page to complete the application process. Staff may use one of the buttons at the bottom of the page to continue.

The “Next” button will save the application data and navigate the staff directly to the first service assignment. This is a step to speed staff through the process and was designed to assume that the day the application was completed within the system is also the start of the first service. Staff should use the “Finish” button if the first service or indicator should have any date other than the day it is keyed.

The “Finish” will save the application, complete the process and return staff to the Individual’s Programs tab. This option offers staff more flexibility for saving the application and offer more alternatives for setting the start of the first activity.

[Exit Wizard](#)

<< Back

Next >>

Finish

Staff may click on the “Create Participation” link to access the first service assignment.

| Workforce Innovation and Opportunity Act (WIOA) Program   |   |                     |            | Apps: 1 |
|---|---|---------------------|------------|---------|
| <a href="#">Create Workforce Innovation and Opportunity Act (WIOA) Application</a>  |   |                     |            |         |
| <div> <div> <div> <div> <div></div> <div></div> <div></div> <div></div> </div> <div> <div></div> <div></div> <div></div> <div></div> </div> </div> <div> <div></div> <div></div> <div></div> <div></div> </div> </div> <div>WIOA #4377131 - Complete</div> </div> |   |                     |            |         |
| LWIA:   | 09 - Capital Region Workforce Partnership | Application Date    | 04/01/2017 |         |
| Onestop:  | 276 - WIOA Systems Office                 | Participation Date: | N/A        |         |
| Open/Total Activities:  | 0 / 0                                     | Closure Date:       | N/A        |         |
|   |   | Exit Date:          | N/A        |         |

|  |     |
|--|-----|
| Eligibility Summary                                    |     |
| Participation  | N/A |
| <a href="#">Create Participation</a>                   |     |
| Activities / Enrollments / Services                    | 0   |
| <a href="#">Create Activity / Service / Enrollment</a> |     |
| There are no records to display.                       |     |

Participation Information

\* Participation Date:

Today

Date of Birth:

08/18/1968

Age at Participation:

\* Employment Status at Participation:

Employed

[ Verify | Scan | Upload | Link ]

\* UC/UI Status:

Unknown

[ Verify | Scan | Upload | Link ]

Highest Grade Completed:

12 Elementary/Secondary school grades completed

School Status at Participation:

Not attending school; Secondary School Graduate or has a recognized equivalent

[ Verify | Scan | Upload | Link ]

If the status displayed from the application is not the current status, please check the box below (requires privileges) or update the application record.

☐ Update Application School Status

Out-of-School Youth:

Not Applicable

Cancel

Next >>

Print

12 - Staff will proceed through the service assignment and will need to add the appropriate Customer Program Group (Funding source) for the given activity. The Statewide Incumbent Worker Eligibility should be the only Customer Program Group that is available. Scroll down the page and select the specific Grant to be associated with this Incumbent Worker. Staff will also need to select the Incumbent Worker Individual Identifier activity.

The screenshot displays the 'Enrollment Information' section of a web application. In the 'Application Summary' section, the 'Customer Program Group' is set to '92 - Statewide Incumbent Worker - Adult'. The 'Grant' dropdown is currently set to 'None Selected'. A link labeled 'Select Activity Code' is highlighted. A pop-up window is open, showing a list of activities. The activity 'IW1 - Incumbent Worker Individual' is selected and highlighted. A 'Close Window' button is visible at the bottom of the pop-up.

**Application Summary:**  
 Program: WIOA  
 Application Dates: 4/1/2017  
 Earliest Eligibility Date: 04/01/2017  
 Participation Date: 04/01/2017  
 \* Customer Program Group: 92 - Statewide Incumbent Worker - Adult  
 \* LWIA Region: Capital Region Workforce Partnership  
 \* Office Location: WIOA Systems Office

**Enrollment Information**  
 Grant: None Selected  
 WIOA Title II Partner Program: Locally DW Funded Incumbent Worker  
 \* Activity Code: [Select Activity Code]  
 Projected Begin Date: [Today]  
 Actual Begin Date: 04/01/2017  
 \* Projected End Date: [Today]  
 Any classes attended through Distance Learning: ☐ Yes ☒ No  
 Participant has been issued an ITA and the ITA will pay for this service: None Selected

**Activity Selection Window:**  
 To select an activity, click on an activity link below. Activities that do not have a link mean there are no programs offered for the selected customer group and / or region.

| Activity Code | Activity Title   | Provider Type        |
|---------------|--|----------------------|
| 101           | Orientation  | PS - Office Services |
| 102           | Initial Assessment   | PS - Office Services |
| 104           | Job Search Workshop  | PS - Office Services |
| 105           | Job Finding Club   | PS - Office Services |
| 107           | Provision Of Labor Market Research                         | PS - Office Services |
| 110           | Attended Rapid Response                                    | PS - Office Services |
| 153           | Job Search/Placement Assistance, including Career Coaching | PS - Office Services |
| 131           | Testing/ background check as required by employer          | PS - Office Services |
| 047           | WIF Video Viewed   | PS - Office Services |
| IW1           | Incumbent Worker Individual                                | PS - Office Services |

Close Window

Staff will click on the “Select Activity Code” link and select the appropriate Incumbent Worker Individual activity.

In an effort to more specifically identify individuals that are in receipt Incumbent Worker Training; several new activity codes have been added to the system. The first activity added for any individual served only for the purpose of Incumbent Worker training should be the “IW1 – Incumbent Worker Individual” identifier (as shown in the picture above).

The activities that have been added to specific identify and track Incumbent Workers include:

IW1 - Incumbent Worker Individual – this would be the first service added to any Individual’s record that is attached to an employer that will be providing Incumbent Worker Training. This code is design to identify or flag this person specifically as an “individual” and help differentiate this individual from participants in future reporting. Once the activity is in place, it will make available more specific Incumbent Worker Training activities.

IW3 - Incumbent Worker Training – With Credential – this activity would be added to the record of an individual engaged in Incumbent Worker Training and it is known that the ultimate outcome of this training would result in an Industry Recognized Credential, Certification or other reportable credential that will benefit the individual and this credential could be recorded within the system.

IW5 - Incumbent Worker Training – Without Credential - this activity would be added to an individual engaged in Incumbent Worker Training that will result in a gain of Industry recognized skills and help the individual retain their employment, however it is known from the beginning of training that this activity will not result in a Credential or Certification.

The purpose of these new codes will be to make it easier for staff to report on individuals receiving Incumbent Worker training and also more appropriately record and report the type of training these Individual are engaged in.



13 - Once the “IW1 - Incumbent Worker Individual” activity is in place; the record will appear as picture below.

Location and Staff

**LWIA:** 09 - Capital Region Workforce Partnership  
**Create Staff Username:** VASGOWD538  
**Case Manager:** N/A

**Onestop:** 276 - WIOA Systems Office  
**Edit Staff Username:** VASGOWD538  
**Temporary Case Manager:** N/A

Eligibility Summary

Participation

04/01/2017

[Edit Participation](#)



**Participation Date:** 04/01/2017  
**School Status:** Not attending school; Secondary School Graduate or has a recognized equivalent  
**Employment Status:** Employed

Activities / Enrollments / Services

1

[Create Activity / Service / Enrollment](#)

Search:

| Status  | Activity / Provider  | WZ  | Funding / Grant  | Projected Begin Date | Actual Begin Date | Projected End Date | Actual End Date                                     |
|---|--|---|--|----------------------|-------------------|--------------------|---|
|  | <a href="#">IW1 - Incumbent Worker Individual</a><br>WIOA Service Provider |  | Statewide Incumbent Worker<br>- Adult<br>Locally DW Funded<br>Incumbent Worker | N/A                  | 04/01/2017        | 04/01/2017         | <a href="#">04/01/2017</a><br>Successful Completion |

Page

1

Rows

10

*In this example; the Incumbent Worker activity is attached to Local Dislocated Worker Funds.*

14 - Once the Incumbent Worker Individual Identifier is in place, staff may click on the “Create Activity” link to add the appropriate Incumbent Worker Training activity to be associated to this individual.

Activities / Enrollments / Services 2

[Create Activity / Service / Enrollment](#)

Search:

| Status | Activity / Provider  | WZ | Funding / Grant  | Projected Begin Date | Actual Begin Date | Projected End Date | Actual End Date                     |
|--------|--|----|--|----------------------|-------------------|--------------------|-------------------------------------|
|        | IW1 - Incumbent Worker Individual<br>WIOA Service Provider |    | Statewide Incumbent Worker - Adult<br>Locally DW Funded Incumbent Worker | N/A                  | 04/01/2017        | 04/01/2017         | 04/01/2017<br>Successful Completion |

Page 1 of 1 Rows: 10

As staff enter the activity assignment, they will again want to be sure the Statewide Incumbent Worker Customer Group and appropriate Grant is attached to the activity.

\* Customer Program Group: **92 - Statewide Incumbent Worker - Adult**

\* LWIA Region: Capital Region Workforce Partnership

\* Office Location: WIOA System Office

**Enrollment Information**

Grant: **Locally DW Funded Incumbent Worker**

WIOA Title II Partner Program: ☐ Yes, service is a WIOA Title II Partner Program.

\* Activity Code: **[ Select Activity Code ]**

Projected Begin Date:  Today

Actual Begin Date:  Today

\* Projected End Date:  Today

Any classes attended through Distance Learning: ☐ Yes ☒ No

Participant has been issued an ITA and the ITA will pay for this service: **None Selected**

Select an Item - Internet Explorer

https://stagingta4.geosolinc.com/150/vos51000000/vosnet/programs/enrollment/enrollfieldsselect.aspx?enc=8fG

To select an activity, click on an activity link below. Activities that do not have a link mean there are no programs offered for the selected customer group and / or region.

| Activity Code | Activity Title   | Provider Type                    |
|---------------|--|----------------------------------|
| 101           | <a href="#">Orientation</a>  | PS - Office Services             |
| 102           | <a href="#">Initial Assessment</a>   | PS - Office Services             |
| 104           | <a href="#">Job Search Workshop</a>  | PS - Office Services             |
| 105           | <a href="#">Job Finding Club</a>   | PS - Office Services             |
| 107           | <a href="#">Provision Of Labor Market Research</a>                         | PS - Office Services             |
| 110           | <a href="#">Attended Rapid Response</a>                                    | PS - Office Services             |
| 153           | <a href="#">Job Search/Placement Assistance, including Career Coaching</a> | PS - Office Services             |
| 131           | <a href="#">Testing/ background check as required by employer</a>          | PS - Office Services             |
| 047           | <a href="#">WIF Video Viewed</a>   | PS - Office Services             |
| IW1           | <a href="#">Incumbent Worker Identifier</a>                                | PS - Office Services             |
| IW3           | <a href="#">Incumbent Worker Identifier - With Credential</a>              | PS - Non-ITA Occupational Skills |
| IW5           | <a href="#">Incumbent Worker Identifier - Without Credential</a>           | PS - Non-ITA Occupational Skills |

After making all the appropriate selections, Scroll down and click next to advance to the Service Provider tab.

In an effort to streamline this process, a single provider has been made available to these Incumbent Worker Training activities and the service type will appear as “WIOA Incumbent Worker Training” as displayed below.

| <a href="#">General Information</a>            | Service Provider  | <a href="#">Enrollment Cost</a>  | <a href="#">Financial Aid</a> | <a href="#">Enrollm Budget</a> |
|--|---|--|-------------------------------|--------------------------------|
| <b>Enrollment Service Provider Information</b> |   |  |                               |                                |
| <b>Enrollment Summary:</b>                     |   | Enrollment ID: 949444<br>Username: INCUMBENTWORKER4<br>WIOA Application ID: 4377131<br>Activity Code: IW3<br>Activity Dates: 4/29/2017 - 6/30/2017 |                               |                                |
| <b>* Provider:</b>                             | <div>WIOA Service Provider</div> <a href="#">[ Select Provider ]</a>  |  |                               |                                |
| <b>* Service, Course or Contract:</b>          | <div>WIOA Incumbent Worker Training - Occupational Skills</div> <a href="#">[ Select Service, Course or Contract ]</a>      |  |                               |                                |
| <b>Provider Locations:</b>                     | <div>WIOA Service Provider</div> <div>1 WIOA Way<br/>Richmond, VA 23219</div> <a href="#">[ Select Provider Locations ]</a> |  |                               |                                |
| <b>Provider Contacts:</b>                      | <div></div> <a href="#">[ Select Provider Contacts ]</a>  |  |                               |                                |
| <b>* Occupational Training Code:</b>           | <div></div> <a href="#">[ Occupational Training Code ]</a>  |  |                               |                                |

Note: Some LWDA may elect to add the specific provider of the Incumbent Worker training to the system through the same mechanism used for the more traditional Eligible Training Provider process. This option is not required and the provider would not need to go through the eligibility process traditionally associated with WIOA Eligible Training Providers, however, the appropriate staff would have to key the information within the provider section of the system. If this option is exercised, staff would have multiple providers to choose from and they would need to use the “Select Provider” link and attach the appropriate provider to be attached to this IWT activity.

If you still need to search and select the appropriate Occupational Training code for the individual then use the “Next” button to Proceed to last tab and use the “Finish” button to complete the process of adding the IWT training activity to the system.

\* Occupational Training Code:

[\[ Occupational Training Code \]](#)

<< Back

Next >>

[\[ Exit Wizard \]](#)

15 - Once the appropriate Incumbent Worker Individual Identifier and Training activity is in place, the record should appear as pictured below.

[Edit Participation](#)

Participation Date: 04/01/2017

School Status: Not attending school; Secondary School Graduate or has a recognized equivalent

Employment Status: Employed

Activities / Enrollments / Services

2

[Create Activity / Service / Enrollment](#)

Search:

| Status | Activity / Provider   | WZ | Funding / Grant  | Projected Begin Date | Actual Begin Date | Projected End Date | Actual End Date                                     |
|--------|---|----|--|----------------------|-------------------|--------------------|---|
|        | <a href="#">IW5 - Incumbent Worker Training Without Credential</a><br>WIOA Service Provider |    | Statewide Incumbent Worker - Adult<br>Locally DW Funded Incumbent Worker | N/A                  | 04/28/2017        | 06/30/2017         | <a href="#">Close</a>                               |
|        | <a href="#">IW1 - Incumbent Worker Individual</a><br>WIOA Service Provider                  |    | Statewide Incumbent Worker - Adult<br>Locally DW Funded Incumbent Worker | N/A                  | 04/01/2017        | 04/01/2017         | <a href="#">04/01/2017</a><br>Successful Completion |

A Record that appears as the above pictured example will only be reported as an Incumbent Worker Individual.

At this point, no other activities need to be added to the record of an Individual that is receiving only Incumbent Worker Training. When training is complete, staff would need only to close the service codes with the appropriate end date, status and outcome.

Staff may use these activity codes to produce reports from the system related to Incumbent Workers served. Additional guidance on the use of the existing reporting function may be provided in a separate document.

**Important Note: These Incumbent Worker Services were numbered with an “IW” and added to the system specifically for the Individuals that are going through Incumbent Worker Training. Those records that have only the “IW” services added will be captured and reported as Individuals only. Any record that has at least one of the other more traditionally numbered WIOA service codes will be considered to be Co-enrolled and would meet the requirement to be reported as a WIOA Participant.**

If the record has any activities associated with any other Customer Program Group; that record would be subject to the full eligibility, reporting, performance and data validation requirements for said program.

*This document may be modified and updated as additional reporting guidance and system enhancements become available.*



## **Attachment B**

### **VWL No. 16-05 Change 1 Incumbent Worker Training**

#### **Incumbent Worker Eligibility Documentation**

Attachment B contains the following incumbent worker training eligibility documentation forms:

- Incumbent Worker Training Employee Eligibility Certification Form
- Incumbent Worker Training Employee Information Form
- Incumbent Worker Training Employee Eligibility Checklist

## **Attachment B (continued)**

### **Incumbent Worker Training Employee Eligibility Certification Form**

As an authorized representative of the Business submitting this application, I hereby certify that the individuals to be trained meet the requirements listed below.

- All individuals receiving training are at least 18 years of age or older;
- All individuals receiving training are citizens of the United States or a non-citizen whose status permits employment in the United States;
- All males born after January 1, 1960 are registered with the selective service system (see attached Selective Service Documentation forms);
- All individuals receiving training meet the Fair Labor Standards Act requirements for employer-employee relations and have an established employment history with the employer for 6 months or more; and
- All individuals receiving training are employed at a facility located in Virginia.

I also certify that the IWT Employee Information Form has been completed for each individual participating in Incumbent Worker Training.

I am aware that any false information, intentional omissions, or misrepresentations may result in rejection of the application and possible disqualification for future funding. I agree to adhere to all of the reporting requirements; and to provide all requested data elements as required for federal reporting.

Further, I agree that this business shall not discriminate against any employee, applicant for employment, applicant or Workforce Innovation and Opportunity Act participant, subcontractor or potential beneficiaries of employment and training programs or projects because of race, color, disability, religion, age, sex, national origin, political affiliation or belief.

Signed: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

**Attachment B (continued)**

## Incumbent Worker Training Employee Information Form

*Collection of the following information is required to ensure accurate data is reported to the Federal government on individuals participating in Incumbent Worker Training. This form must be presented with the signed Employee Eligibility Certification form or the Eligibility Checklist.*

[illegible]

\*If SSN not provided then employer follow up for supplemental wage data is required.

**\*\*May select option – individual chose not to disclose.**



## Attachment B (continued)

### Employee Eligibility Checklist

Individual Name: \_\_\_\_\_

Employer Name: \_\_\_\_\_

Completed by: \_\_\_\_\_

Reviewed by: \_\_\_\_\_

*The following information comes directly from VWL 15-01, Attachment D- Acceptable Verification and Documentation for WIOA Eligibility dated July, 1, 2015. Please select the source documentation used to verify the IWT employee eligibility criteria and attach a copy of the documentation to this checklist.*

| Selected Item          | Documentation source                                     |
|------------------------|--|
| Social Security Number |  |
|                        | Social Security card/ notice of SSN assigned             |
|                        | DD-214, Report of transfer or Discharge if SSN is listed |
|                        | Employment Records                                       |
|                        | IRS Form Letter 1722                                     |
|                        | Letter from Social Service Agency                        |
|                        | Driver's License if SSN is shown                         |
|                        | Pay stub if SSN is shown                                 |
|                        | Social Security Benefit documents                        |
|                        | W-2 Form   |
|                        | Unemployment Comp/UI records if Name and SSN are listed  |
|                        | School records   |
| Age                    |  |
|                        | Baptismal record if date of birth is shown               |
|                        | Birth Certificate  |

|  |  |
|--|--|
|  | DD-214   |
|  | Driver's License   |
|  | Federal, State or Local Government ID card   |
|  | Hospital record of birth if full name is shown   |
|  | Passport   |
|  | Public Assistance/Social Service Records   |
|  | School records/ID card   |
|  | Work Permit  |
| <b>Citizenship/ Right to Work</b> <i>(if on the verification source, the place of birth is not in the United States, additional verification may be needed.)</i> |  |
|  | Baptismal Record if place of birth is shown  |
|  | Birth Certificate  |
|  | DD-214- if place of birth is shown   |
|  | SNAP award letter from DSS   |
|  | Hospital record of birth if place of birth is shown  |
|  | Hand gun permit  |
|  | Naturalization certificate   |
|  | Public Assistance records  |
|  | Social Security Card (work eligible) with ID   |
|  | Native American Tribal Document  |
|  | E-verify- <a href="https://e-verify.uscis.gov/Self-Check">https://e-verify.uscis.gov/Self-Check</a>  |
|  | US Citizenship and Immigration Services (USCIS) Forms ( <a href="http://www.uscis.gov">www.uscis.gov</a> ; from the home page click "Verification" in the left column, then click "I-9 Central" on the right column, then click "Acceptable Documents" on the left column. |
| <b>Selective Service Registration</b> <i>(required for all males born after January 1, 1960)</i>   |  |
|  | Selective Service Advisory Opinion Letter  |

|  |  |
|--|--|
|  | Selective Service Registration Record, Form 3A   |
|  | DD-214   |
|  | Stamped Postal Service Receipt of Registration   |
|  | Internet Verification/Registration- <a href="http://www.sss.gov">www.sss.gov</a>       |
|  | Selective Service Telephone Verification (847)-688-6888 <i>(please fill out below)</i> |
|  | Date of Individual's Registration:   |
|  | Agent Verifying Registration:  |
|  | Date of Verification:  |



## Attachment C: VWL 16-05 Change 1 Incumbent Worker Training

### Incumbent Worker Training Required Data Elements

| REQUIRED DATA ELEMENTS – INCUMBENT WORKER TRAINING |   |   |
|--|---|---|
| PIRL Element #                                     | PIRL Data Element Name  | Primary Collection Method   |
| 100  | Unique Individual Identifier  | Local/State (VAWC)  |
| 101  | State Code of Residence   | Local/State   |
| 108 - A  | ETA-Assigned 1 <sup>st</sup> Local Workforce Board Code   | Local/State (VAWC)  |
| 403  | Occupational Code of Most Recent Employment Prior to Participation  | Employer  |
| 404  | Industry Code of Employment 1 <sup>st</sup> Quarter Prior to Participation  | Employer  |
| 907  | Recipient of Incumbent Worker Training  | Local/State (VAWC)  |
| 1600   | Employed in the 1 <sup>st</sup> Quarter After Exit Quarter (WIOA)   | If SSN – UI wage records:<br>If SSN not provided – employer follow-up |
| 1601   | Type of Employment Match 1 <sup>st</sup> Quarter after Exit Quarter (WIOA)  | If SSN – UI Wage records  |
| 1602   | Employed in 2 <sup>nd</sup> Quarter after Exit Quarter (WIOA)   | If SSN – UI Wage records  |
| 1603   | Type of Employment Match 2nd Quarter after Exit Quarter (WIOA)  | If SSN – UI Wage records  |
| 1604   | Employed in 3rd Quarter after Exit Quarter (WIOA)   | If SSN – UI Wage records  |
| 1605   | Type of Employment Match 3rd Quarter after Exit Quarter (WIOA)  | If SSN – UI Wage records  |
| 1606   | Employed in 4th Quarter after Exit Quarter (WIOA)   | If SSN – UI Wage records  |
| 1607   | Type of Employment Match 4th Quarter after Exit Quarter (WIOA)  | If SSN – UI Wage records  |
| 1618   | Retention with the Same Employer in the 2 <sup>nd</sup> Quarter and the 4 <sup>th</sup> Quarter (WIOA)                      | If SSN – UI Wage records  |
| 1703   | Wage 1 <sup>st</sup> Quarter After Exit Quarter (WIOA)  | If SSN – UI Wage records  |
| 1704   | Wage 2nd Quarter After Exit Quarter (WIOA)  | If SSN – UI Wage records  |
| 1705   | Wage 3rd Quarter After Exit Quarter (WIOA)  | If SSN – UI Wage records  |
| 1706   | Wage 4th Quarter After Exit Quarter (WIOA)  | If SSN – UI Wage records  |
| 1800   | Type of Credential (WIOA)   | Employer Follow-up  |
| 1801   | Date Attained Recognized Credential (WIOA)  | Employer Follow-up  |
| 1806   | Date of Most Recent Measurable Skills Gain: Educational Achievement (WIOA)  | Employer Follow-up  |
| 1807   | Date of Most Recent Measurable Skills Gain: Secondary Transcript/Report Card(WIOA)  | Employer Follow-up  |
| 1808   | Date of Most Recent Measurable Skills Gain: Post-Secondary Transcript/Report Card (WIOA)                                    | Employer Follow-up  |
| 1809   | Date of Most Recent Measurable Skills Gain: Training Milestone (WIOA)   | Employer Follow-up  |
| 1810   | Date of Most Recent Measurable Skills Gain: Skills Progression (WIOA)   | Employer Follow-up  |
| 1811   | Date Enrolled in Education or Training Program Leading to a Recognized Postsecondary Credential During the Program (WIOA)   | Employer Follow-up  |
| 1501   | Most Recent Date Received Rapid Response Services<br>**Required for IW if IWT funded with RR funds (WIOA sec.134 (a)(2)(A)) | Local/State   |

**Reference:** Training and Employment Guidance Letter No. 10 -16: Attachment 8 –Incumbent Worker Training Required Data Elements