



WIOA Title I Program Policies

Employee Training Grant Program

POLICY #:	<i>P-WFC-1001, Rev. 5</i>
EFFECTIVE:	<i>August 7, 2024</i>
SUPERSEDES:	<i>Employer Reskill/Upskill Fund Policy, Rev. 4, effective August 25, 2023</i>

PURPOSE:

This policy describes the eligibility, application, and documentation requirements for WorkForce Central’s Employee Training Grant program (i.e., incumbent worker training).

The purpose of this policy revision is to:

- Update the program name from “Employer Reskill/Upskill Fund” to “Employee Training Grant Program”.
- Create a new section titled, “Management Information System (MIS) Reporting Requirements”.
- Non-substantial edits for clarity purposes.

BACKGROUND:

WorkForce Central’s Employee Training Grant is designed to increase the competitiveness¹ of employees and employers or avert employee layoffs². It is 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 skills necessary to retain

¹ WorkForce Central defines “increase competitiveness” to mean:

- Training will result in an employee promotion or wage increase.
- Training will negate the need to lay off an employee.
- Training may increase efficiency, production, or other improvements that increase the company’s profits.
- Increased proficiency may open additional hiring opportunities.
- Training will improve the company’s competitiveness in their industry.

² Layoff aversion – A layoff is averted when a worker’s job is saved with an existing employer that is at risk of downsizing or closing, or a worker at risk of dislocation transitions to a different job with the same employer or a new job with a different employer and experiences no time or minimal time on unemployment. Employees may need assistance in retaining a good job by enhancing their skills or learning new technologies and procedures in an ever changing economic environment. Without appropriate training that allows existing workers to gain the necessary skills to operate new processes or technologies, employer may find it necessary to lay off workers with obsolete skills.



employment. Training provided through the Employee Training Grant is conducted with a commitment by the employer to retain or avert the layoff of the employees being trained.

WorkForce Central may utilize a variety of federal, state, local and other funds to support the Employee Training Grant program. If funded with Workforce Innovation and Opportunity Act (WIOA) Title I grants, WorkForce Central may reserve and expend up to 20% of its combined WIOA Title I Adult and Dislocated Worker formula funds for the Employee Training Grant if those funds have been provided by the Governor for that purpose.

POLICY:

Employer Application Process

WorkForce Central is committed to ensuring fair and equitable access to its Employee Training Grant. Applications are located on WorkForce Central's website at <https://workforce-central.org/business/training-grants/>. Employer applications will be reviewed within 30 calendar days of submission. Applications meeting the minimum criteria set forth in this policy may be considered for the Employee Training Grant. Applicants may be invited for an interview for further discussion. WorkForce Central will notify applicants of their application award status via email within 30 calendar days of their application submission.

WorkForce Central reserves the right to deny or reject applications without explanation.

Selection Committee

WorkForce Central's selection committee will evaluate Employee Training Grant applications based on the criteria outlined in this policy. WorkForce Central must ensure the following are documented and made available upon request by authorized entities:

- Conflict of Interest (COI) statements for each selection committee member.
- Evaluation sheets that show justification for the selection of the Employee Training Grant.

Employer Eligibility Criteria

The employer will be evaluated against the following criteria to determine the appropriateness and allowability for the Employee Training Grant:

1. The business, or department or affiliate of the business that would benefit from reskilling or upskilling their employees must be located in Pierce County.

2. The extent to which the business employs individuals who are furthest from opportunity and who encounter systemic barriers to employment³ and how they would benefit from retention or advancement.
3. The quality of the proposed training (e.g., industry-recognized credentials, advancement opportunities).
4. The number of employees the employer plans to train.
5. The wage and benefit levels of employees before and after training.
6. The employer:
 - a. Is in an in-demand industry as determined by local and state labor market information; or
 - b. Is in an in-balance industry as determined by local and state labor market information; or
 - c. Is in a declining industry but presents compelling reasons justifying investment in employee training.
 - d. Must not have laid off workers within 120 days to relocate to Washington State from another state.
 - e. Must be current in unemployment insurance and worker's compensation taxes, penalties, and/or interest or related payment plan.

WorkForce Central must document the factors that were considered when selecting or declining an Employee Training Grant project with an employer.

Employee Eligibility

Employees selected for training must meet the following criteria:

1. Be currently employed with the awarded business.

³ Individuals who are furthest from opportunity and who encounter systemic barriers to employment include, but are not limited to:

- Displaced homemakers.
- Low-income individuals.
- Indians, Alaska Natives, and Native Hawaiians.
- Individuals with disabilities.
- Older individuals.
- Justice system involved individuals.
- Unhoused individuals or those with unstable housing.
- Youth who are in or aged out of the foster care system.
- Individuals who are English language learners, or who have low levels of literacy, and individuals facing substantial cultural barriers.
- Eligible migrant and seasonal farmworkers.
- Individuals within two (2) years of exhausting lifetime TANF eligibility.
- Single parents, including single pregnant women.
- Long-term unemployed individuals.

2. Meet the Fair Labor Standards Act requirements for an employer-employee relationship.
3. Have an established employment history with the awarded business for six (6) months or more.
 - a. If training is provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for six (6) months or more as long as the majority of (51% or more) of the employees being trained meet the six (6) month employment history requirement.

The awarded business will submit documentation verifying their employees meet the above criteria.

For WIOA Title I funded training only: Employees do not have to meet the WIOA Title I Adult or Dislocated Worker program eligibility requirements to participate in their employer sponsored training. Employees receiving WIOA Title I funded training through their employer are not eligible for WIOA Title I supportive services unless they are enrolled in the WIOA Title I Adult or Dislocated Worker programs.

WorkForce Central is not authorized to waive any of the above employee eligibility criteria.

Employer Share of the Employee Training Grant

Businesses awarded Employee Training Grant opportunities must pay a share of the cost of training their employees. Wages paid to the employee while in training can be included as part of that share and the employer share can be provided as cash or in-kind that is fairly evaluated. The employer share is based on the size of the workforce as follows:

- At least 10% of the cost for employer with 50 or fewer employees.
- At least 25% of the cost for employer with 51 to 100 employees.
- At least 50% of the cost for employer with more than 100 employees.

Examples:

- ABC Company has two locations in Pierce County. Location One has 35 employees and Location Two has 25 employees, with a combined total of 60 employees. ABC Company would pay at least 25% of the cost of the training based on the chart above, regardless of how many of those employees need training. Conversely, if that same company had a total of 35 employees and only one location, the company would pay at least 10% of the cost of training.
- ABC Company has two locations in Pierce County. Location One has 50 employees and Location Two has 55 employees for a total of 105 employees. Only employees at Location Two need training. The employer's cost is at least 25% of the cost, not 50%.



- Type(s) of training and number of training providers are also factors to consider. ABC Company needs the same training for 35 employees in Location One and 25 employees in Location Two. Two different training providers may be needed in which case the employer's cost would be at least 10% of the cost for each location.

WorkForce Central must track and document the employer's share of the cost of training.

Employee Wages

Employee Training Grant funds cannot pay the wages of employees receiving training. However, as noted above, the employer may elect to include those wages in the employer's share of the cost of providing training.

If the business utilizes one or more of its own employees to provide training to other employees of the company (as opposed to paying an outside trainer), the wages paid to the employee(s) conducting the training may be included in the cost of training and funded through Employee Training Grant.

Training Requirements

Training provided through the Employee Training Grant must be above and beyond the normal training offered by businesses to their employees and reasonably prepare workers to address skills gaps.

WorkForce Central procured training: If contracting directly with training providers on behalf of awarded businesses, WorkForce Central must ensure procurement procedures are allowable and at a reasonable cost, and consistent with WorkForce Central's Procurement Policy.

Employer secured training: An employer may choose to provide Employee Training Grant funded training through community and technical colleges, vocational-technical centers, state colleges and universities, licensed and certified private entities/institutions, industry specific consulting or training organizations, professional associations or credentialing entities, or the business itself through in-house employees facilitating the training.

- In-house training: When in-house training is provided by an employee of the business, the reimbursement amount is based on the employer share calculation. For example, the employer purchases new machinery, but now must train staff on its use. One employee has been trained to use it and has the capacity and skill to train others, but calculations indicate it will be costly to devote that employee to the task because they would not be able to perform their own job while training staff. That employee's wages when providing the training would be included in the cost of training and therefore, part of the cost share

calculation. The employer must provide evidence of the employee's time facilitating training.

- Employer secured training: When the training provider is secured by the employer, WorkForce Central procurement is not required. WorkForce Central enters into contract with the employer to reimburse the employer their shared cost of training. The contract will include the type and cost of training being provided with assurance the cost of training is reasonable, and the approximate dollar amounts paid by the employer and paid with WorkForce Central's Employee Training Grant.

Documentation Requirements

WorkForce Central must collect and document the following:

- Factors WorkForce Central considered in selecting or declining an Employee Training Grant application.
- Employer eligibility.
- Employee eligibility including evidence the employees, or majority of employees (51% or more of a cohort) were employed six (6) months or longer.
- Selection Committee Conflict of Interest (COI) statements.
- The entity or individual conducting the training. If in-house employee is conducting the training, evidence of the employee's time conducting the training.
- Employer match.
- Assurance the training is not funded from another federal, state, local, or other funding source.

Reporting Requirements

WorkForce Central must collect and report certain data elements on employees receiving training through the Employee Training Grant award. WorkForce Central will provide the employer with the required data elements upon award (data elements are dependent on funding source).

Employees receiving WIOA Title I funded Employee Training Grant services are not included in WIOA Title I performance outcomes unless they are enrolled in the WIOA Title I Adult or Dislocated Worker programs.

Management Information System (MIS) Reporting Instructions

- [WIOA Title I ETO reporting instructions](#)
- [EcSA Business Support and Subsidized Training \(CRF\) ETO Instructions](#)



REFERENCES:

- WIOA sec. 3(23) and 3(24)
- WIOA sec. 134(d)(4)
- WIOA sec. 181(d)(2)
- 20 CFR 680.780 – 680.820
- 20 CFR 682.210(b) and 682.320(a) and (b)(4)
- 20 CFR 683.250(a)
- TEGL 10-16, Change 1
- TEGL 19-16
- ESD Policy 5607, Rev. 6

WorkForce Central is an equal opportunity employer/program. Auxiliary aids and services are available upon request for individuals with disabilities. Washington Relay Service – 711.