INCUMBENT WORKER TRAINING GRANT PROGRAM GUIDELINES
September 27, 2018 – June 30, 2019

An equal opportunity employer program. Auxiliary aids and devices are available upon request to individuals with disabilities.
Program Overview

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In today’s economy, your business depends upon skilled workers that can grow with the ever-changing landscape of your industry. Employers often need to train and re-train their current workers in order to remain competitive. When workers lack necessary skills; an employer’s ability to expand and grow may be compromised.

**The Governor’s Workforce Board Incumbent Worker Training Grant (IWTG) Program, funded by the State Job Development, addresses this issue.**

Encouraging Rhode Island employers to invest in their workforce enhances the overall competitiveness of the Rhode Island economy while delivering transferable skills to their employees which increases their earning potential and employability.

**Analysis of a similar Incumbent Worker Training program in Massachusetts by the W.E. Upjohn Institute for Employment Research¹ found that the return on investment was:**

- Increased Profits
- Increased Productivity
- Reduced Turnover
- Company Growth
- Increased Competitiveness
- Skilled Workforce

**Benefits of Training**

- Advancement Opportunities
- Job Retention
- Increased Competitiveness
- Increased Job Opportunities

**ROI in incumbent worker training:**

- 5.4% for the employees trained
- 16.6% for the employer who conducted the Training
- 38.9% for the state

**The IWTG Program was created for providing grant funding for continuing education, training, and upskilling of incumbent employees at existing Rhode Island employers**

¹ [http://research.upjohn.org/cgi/viewcontent.cgi?article=1000&context=up_policypapers](http://research.upjohn.org/cgi/viewcontent.cgi?article=1000&context=up_policypapers)
For the purposes of this Grant Program the following terms apply.

**Employer**
The grant recipient, grantee, the entity, company or organization entering into the contract agreement with the Governor’s Workforce Board, that employs the individuals to be trained. The employer may have more than one location. Please see the program overview section to learn how this applies to grant funding.

**Incumbent Worker**
The individual hired for a specific job or to provide labor and who works in the service of someone else (the employer). **AND meets ALL of the requirements below:**

- A paid employee of the employer, grant recipient, or a person working for the employer that receives a W-2, **Contracted or 1099 employees are NOT eligible. and;**
- Legally authorized to work in the State of Rhode Island
  - Please see the RI Department of Labor and Training (DLT) website on **Child Labor Laws** in the State of Rhode Island for eligibility requirements

**Allowable Training**
For the purposes of the IWTG program, Allowable Training is defined as training or educational activities that demonstrate a clear and distinct benefit to both employer and employee in terms of increased wages, productivity, competitiveness and/or skill attainment. To be approved, the training described in the application must demonstrate **at least one** of the following:

- The employer has identified new or changing local, state, federal, or international regulations or standards that require a change in technology, process, software, waste reduction, energy conservation, etc.
- The employer has identified changing skill requirements or expectations as a result of external economic or market forces, significant changes in operating processes, rapidly changing industry or occupational job requirements; new technologies; or emergence of new products/competitors.
- The employer has identified new or potential market opportunities that may become available as a result of the skills acquired through training.
- The employee(s) will receive an industry recognized credential/certification that is transferable should they ever separate from the employer.

**Industry recognized credential/certification**
An Industry recognized credential/certification is a verification of an individual’s qualification or competence issued by a third party with the relevant authority to issue such credentials which is recognized by multiple employers across an industry.

Examples include an ISO Certification, MS Office Certification, Food Safety Certification, OSHA Certificates, Certified Electronic Health Records Management, etc.
For the fiscal year beginning September 1, 2018, the maximum grant amount is fifty thousand dollars, **$50,000 per employer per fiscal year.**

If an employer has **more than one (1) location in the state of Rhode Island,** the businesses are treated as either one (1) employer or separate employers depending upon the FEIN number(s).

If the locations operate under **different FEIN numbers,** the business will be considered separate employers or business and must submit separate applications. Each application will be reviewed independently and receive separate awards.

If the locations operate **under one (1) FEIN number,** then the employer will be considered one (1) employer and will therefore need to join their training efforts and submit a single application and receive one (1) award collectively.

For the fiscal year beginning September 1, 2018, the GWB will be applying a cost reasonableness standard set at Five thousand dollars, **$5,000 per individual trainee.** This cap is applied to the amount of matching grant funds (i.e. A employer may conduct training that costs $10,000 per trainee; however, the maximum grant contribution toward that training will be limited to $5,000).

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**Are you a company associated with the Marine Trades or Manufacturing?**

If you are a manufacturing company, or seek to train individuals related to the marine trades (boat building, captain, etc.) and composites industry, the GWB encourages you to contact one of the following Real Jobs RI approved incumbent-working training providers to access training grants, technical assistance and more:

- Rhode Island Marine Trades Association (RIMTA)
- Polaris MEP (For manufacturing)
Reimbursable training activities cannot begin until an application has been approved. It is required that employers submit their application at least 30 calendar days prior to the desired start date of training to maximize reimbursable costs. Training costs incurred prior to the contract start date will not be reimbursable.

Allowable costs

- Tuition and course fees for Community College or undergraduate courses
- Training provider fees
- Conference Registration Fees
- Training materials and supplies
- Software (that is directly used for training activities)
- Curriculum development

Unallowable costs

- Graduate and Post-Graduate tuition courses are not eligible for reimbursement
- Equipment (including hardware and software) that is not for the exclusive use of the training
- Membership fees/dues
- Lost worker productivity
- Grant preparation or administrative costs
- Travel expenses, meeting space, lodging, and food
- Trainee wages and fringe benefits cost
- Routine Employee orientation/on-boarding/training
- In-house trainer wages (Limited - SEE BELOW)

For the purposes of this grant, In-House training is training developed, conducted or evaluated by a current employee of the employer receiving the IWTG funding.

Applications for In-House trainer wages will be evaluated on a case by case basis and funding is at the discretion of the Governor’s Workforce Board.

If In-House Trainer wages are approved, the reimbursement is capped at $5,000 per grant and $10,000 in a given fiscal year. Fringe benefits are unallowable. Appropriate time cards, or wage records, hours spent on training and training dates will be required for reimbursement. Wage records, hours spent on training and training dates will be required for reimbursement.
There are three (3) eligibility requirements for Employers

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<tr>
<th>JDF Contributor</th>
<th>Good Standing</th>
<th>State Supplier</th>
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<td>• All Rhode Island for-profit and non-profit organizations that currently contribute to the Job Development Fund (JDF) and are up-to-date on all tax obligations are eligible for the IWTG program.</td>
<td>• Potential applicants must be in good standing with all divisions of the Department of Labor and Training and must not be debarred from contracting with an agency that administers federal funds.</td>
<td>• In order to receive reimbursement for wages paid through the Incumbent Worker Training program, the State of Rhode Island requires that the employer be registered as a supplier with the State Division of Purchasing</td>
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<td>• Labor organizations, trade organizations or consortia of employers may apply collectively to the program provided ALL participating members contribute to the JDF</td>
<td>• Federal, state, county, or city governmental entities are not eligible; however, this does not include schools, universities, and colleges provided they are otherwise eligible.</td>
<td>• The Incumbent Worker Training program is unable to issue payments if an employer is not registered.</td>
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**YOU MUST COMPLETE THE STATE SUPPLIER REQUIREMENT BEFORE APPLYING FOR THE INCUMBENT WORKER TRAINING PROGRAM.**

If you are not yet registered as an approved RI state supplier, please visit the Rhode Island Financial Accounting Network System (RIFANS) website to download and complete the Supplier Packet. If you have any questions regarding the RIFANS application please email doa.pursuppliercoordinator@purchasing.ri.gov.

You can expect a turnaround of up to a week from the time you submit the RIFANS Supplier packet until you receive your RIFANS log-in and password from the Division of Purchasing. Once you receive that information, you may apply for the Incumbent Worker Training Program. The GWB does not process RIFANS’s applications and cannot keep the employer informed of RIFAN’s application status.

[Click Here for RIFANS Website]
PREVIOUS GRANT RECIPIENTS:

If your organization has participated in the Work Immersion program, Incumbent Worker Training program, Real Jobs RI program, or has otherwise received payment from the State within the last five years, it is likely that your organization is already registered with the Division of Purchasing. However, if you have moved, changed your address, or changed your business name, you will need to complete the RIFANS Supplier Packet at the link above in order to update your information.

AVAILABILITY OF FUNDS

IWTG are contingent upon the receipt of funds and continued authorization for program activities. In the event that such funds become unavailable for any reason, or authorization for program activities is withdrawn or otherwise modified, the Grantor, GWB, has the unilateral right and discretion to terminate a contract at any time. The Grantor, GWB, also has the right to reduce, and or modify funding and program activities. The Grantor reserves the right to reduce the obligation amount under this contract in the event that expenditure of funds by the Employer/Grantee for eligible activities is at such a rate as to likely result in a surplus at the termination of this contract.

APPLICATION PROCESS

Prior to applying, have the following items ready for reference for each training you are applying

- The name of the training
- Training Dates, documented by the training provider
- Description of the training and relevance to the organization
- Number of Employees to be trained
- Estimated Costs for each training activity (books, registration, Trainor fees)
- The Training Provider information

Applications are reviewed on a first-come/first-served basis until all available funding has been awarded for the fiscal year. A notification will be posted on the Governor’s Workforce Board (GWB) website when funds are no longer available.

Up to ten (10) trainings can be submitted in a single online application; any employer submitting more than ten (10) individual trainings is asked to email the GWB.
Upon receipt, the application will be reviewed for the following criteria:

- Employer eligibility
- If the training allowable
- If the cost is reasonable

The IWTG Program Application must be completed on-line. The on-line application is the only document that may be used to apply for an IWTG. The application can be accessed through the GWB website and is also linked here.

### TIPS FOR COMPLETING THE IWTG APPLICATION

**Fully review the Allowable Training section of these Program Guidelines.** When asked to describe the impact that training will have on your organization; the application will be approved or denied based on the degree to which you satisfy the criteria in section four.

**Be concise but thorough.** While there is no desired length for each answer; program staff, and potential auditors, should have a full picture of what, why, and how training will occur.

**Combine trainings when appropriate.** While applicants can submit as many trainings as they wish (the online application is limited to ten, but any applicant submitting more than ten may contact program staff) – similar trainings do not necessarily have to be listed separately. If, for example, your staff will be undergoing three separate trainings on the same industrial software; you can simply enter all three under as one and describe the individual components when describing training content.

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To apply for a second Incumbent Worker Training Grant, all criteria for the first grant must be met. Additionally, the first grant must be closed before a second one can be opened. Your grant will be considered closed if:

- All the funds for the grant have been expended down to a zero (0) balance
- The employer notifies the GWB in writing that no other expenses will be submitted for reimbursement and directing the GWB to close the grant.
  An Email can be sent to the [fiscal specialist](mailto:####)
- The employer will have sixty (60) calendar days to submit for reimbursement from the contract end date. After the sixty days the grant will be closed

Once the grant has been closed, any unspent balances will not be reimbursed. Please be sure that all submissions have been received prior to sending notification to close
If the application is approved, the Employer will receive the following documents to review, via the email contact provided in the application.

1. **A Notification** of initial approval

2. **A Contract**-outlining the dates, activities and awarded funds for the training. The contract will set forth all processes and expectations for administering, implementing, and completing the training.

The employer will have thirty (30) calendar days to sign and return the contract to the DLT. Failure to sign and return the executed contract in a timely manner will result in an automatic nullification of the contract.

**The start date of the contract is the date of the final signature on the contract.** The sooner the contract is returned to the DLT with the employer’s signature, the sooner the contract can begin.

Upon contract execution, the employer will receive an email containing a [link to reimbursement materials](#) and a [purchase order number](#) via the email contact provided in the application. Please retain this number to check the status of payments towards grant reimbursements.

**Contract Termination:**

- **Termination for cause:** If the Grant Recipient fails to perform under this grant or fails to make sufficient progress so as to endanger performance; if reimbursement documents are not received within 60 days of the contract end date; the Grantor may terminate the grant, in whole or in part, upon written notice to the Grant Recipient.

- **Termination for reduction of funding:** The funding obligation authority contained within this grant shall be subjected to availability of State funds. In the event the funding is cut or reduced by the State of Rhode Island, the funding authorized in this grant shall be subject to either partial or total de-obligation.

- **Termination by the Employee/Grantee:** At times Employers experience changes within the business that impacts the availability or viability of training; where it becomes necessary for the Employer to terminate the contract. The employer may terminate the contract by contacting their grant advisor.
Payments are made on a **cost reimbursement basis** in which the employer pays the costs of the training up front and then requests reimbursement after the cost has been incurred. Employers may request reimbursement up to and only **up to four (4) times** per the duration of the contract. Unexpended funds beyond the fourth (4th) reimbursement will not be available for payment.

**THE FOLLOWING ITEMS ARE REQUIRED TO RECEIVE REIMBURSEMENT.** If any of the items below are not present, payment will not be issued for that training cost.

1. **Incumbent Worker Training Request for Reimbursement Lead Sheet**
   
   The DLT will send a link to the Incumbent Worker Training Request for Reimbursement Lead sheet (Lead sheet), when the contract is awarded. The Lead sheet must be completed and submitted along with the other supporting documents, outlined below. To ensure timely payment, the Lead sheet must be filled out completely and correctly. Note that you will need the PO number to complete the form.

2. **Verification of Payment**

   For **Each** training, you must supply an itemized invoice and/or receipt from your training vendors and suppliers that verify the cost of each expense and that the expense was paid. The following are acceptable forms of verification of payment.

   **For Trainer fees** - An invoice containing the **Name of the training, Name of training vendor or supplier and Itemized costs accompanied by a processed check or receipt of payment**

   **For In-house trainer fees** you must supply the **In-House Wage Verification Form**, and the **employee’s wage records and number of hours dedicated to training activities only**.

   **For supplies and other materials**: the itemized invoice with processed check or receipt of payment

   **NOTE: Purchase order forms or hand written notes are not accepted**

3. **Training Dates for EACH Training**

   The **actual dates of training** must be identified for each training. Examples of acceptable documents are:

   - Course registration document
   - Course agenda
   - Class and/supplies training invoices
   - Certificate of completion

   **Emails or hand-written notes containing training dates are not accepted**
For each invoice submitted, you must also submit proof that the invoice was paid. This can be in the form of a processed check or a credit card verification of payment receipt.

Verification of Course/Training Completion

For each participant, provide verification that the course or class was successfully completed. Acceptable documents include: Certificate of Completion or Course Transcripts

Final invoices including all applicable expenditures must be submitted within 60 days of the contract end date. Any invoices submitted beyond the 60 day period will be reimbursed based upon availability of funds and at the discretion of the program director.

Any Expenses incurred outside the contracted period are NOT eligible for reimbursement

Examples: course registration, books, supplies and any training related expense purchased before the contract start date are not reimbursable

The DLT reviews the invoice and determines if the expenses submitted for reimbursement, agree with the contracted scope of work. If the documentation is appropriate, the expenses will be sent to the DLT’s Business Affairs units for processing of payment.

If there is missing documentation, the DLT will reach out to the employer to correct the issue. The employer will have ten (10) business days to make the correction. After that point, the payment will be partially paid or denied based on what documents are present.

You may check the status of your payment with your Purchase Order number, supplied after your contract, with the RIPAY.
PERFORMANCE REPORTING

**FINAL REPORT (All grants):** At the completion of the grant, a final report on the training is due no later than 30 days from the end of training. Performance reports are completed using an online form. Program staff will provide a link to this report to you at the time of the grantee’s final reimbursement request. Once the report is received, the final reimbursement will be released.

**Ongoing communication (All grants):** Program staff expect to have ongoing communication with employers regarding the progress of training. If training is occurring and reimbursement requests are occurring on no less than a monthly basis, this is sufficient. However, if no training has occurred and no requests have been received, then on a quarterly basis, employers are expected to have some form of communication with IWTG program staff, which may include e-mails or phone calls to discuss the progress of the training and, potentially, any delays or hindrances. If no communication has occurred, the Grants Manager will reach out to the employer contact to inquire regarding the status of the training project. If no contact is made over a three-month period, this may render the contract null and void.

TECHNICAL ASSISTANCE

Program staff is available to provide technical assistance throughout the process—from the application stage throughout contract execution, monitoring and fiscal closeout. An individual or organization may assist a employer or group of employers in the application process; however, that individual/organization may not be compensated with grant funds.

FREQUENTLY ASKED QUESTIONS

**How do I know if my organization pays into the Job Development Fund?**

Generally, if an employer pays the state Unemployment Insurance tax - they likely pay into the Job Development Fund (JDF). However, to verify if your organization pays into the JDF and is current on all tax obligations, please contact the RI Division of Taxation at 401-574-8710.

**I’ve been informed that the name on my supplier registration with Division of Purchasing doesn’t match my employer name on the application. This does not sound correct to me. How can this be resolved?**

You will need to contact the State Controller’s Office, Division of Purchases, to resolve the issue.
**My company is participating in another training effort (ex. Real Jobs RI) that is, in whole or in part, funded with public resources; can I apply for an IWTG grant to pay for the employer portion of that training?**

Funds can be used only for separate training activities. The GWB encourages you to talk to a Real Jobs Partnership or grant advisor for guidance.

**Where may the training take place?**

Training may be conducted at the employer’s own facility, at a public or private training provider’s facility, or at a combination of sites that best meet the needs of the employer.

**Who selects the training provider?**

The employer selects the training provider that best suits their training needs. Trainers may be public or private professional trainers, equipment vendors, subject matter experts, or in-house staff (limitations apply to use of in-house staff, see section 9)

**How and when will I be reimbursed?**

Assuming all paperwork is submitted correctly and in full, up to 45 days.

**Can my reimbursement payment be expedited?**

No.

**My application wasn’t approved, do I have any recourse?**

If an application is denied for any reason the employer will receive a letter outlining the reason for denial.

**Employers are encouraged to remedy the issue if able to reapply.**

- **Eligibility Denials** - (see eligibility) If the applicant employer is not eligible for the IWTG program, they will be apprised of the reason why. Depending on the reason, they will be encouraged to remedy any issues that are related to their eligibility and informed of their ability to re-apply.

- **Unallowable Trainings** - (see unallowable trainings) If training is determined unallowable; the employer will be informed of their ability to appeal this determination to the Executive Director of the Governor’s Workforce Board.

- **Expenses Exceed Limits** - If the amount of matching funds per trainee exceeds $5,000, the employer will be provided the option to revise their budget and training proposal so that the amount of matching funds per trainee is less than or equal to $5,000; or to proceed with the application with the understanding that the IWTG match will be limited to $5,000.00
1. All appeals must be filed within two weeks (10 business days) of initial notification of determination
   a. The appeal should be addressed to the Executive Director – Governor’s Workforce Board and should be emailed to DLT.GWBINFO@DLT.RI.GOV or mailed to the Governor’s Workforce Board at 1511 Pontiac avenue, Cranston, RI 02920, Building 72-2

2. The appeal must include the following information
   a. Your name, your employer name, address, and contact telephone number
   b. A description of how the proposed training demonstrates a clear and distinct benefit to both employer and employee based on eligibility requirements.

The Executive Director will issue a decision within two weeks (10 business days) of the filing of the appeal. The decision of the Executive Director is final.

The Appeals process will cause me to miss my start date of training; but my original application met the 30-day window. If my appeal is approved, can I still proceed with my original date?

No. The required 30-day window from application to training start date is intended to provide program staff with sufficient time to properly vet and review the application. The appeal process increases the amount of time needed for that vetting. While the GWB regrets any inconvenience, this delay may cause; these processes are in place to protect the taxpayer and grant recipients and cannot be expedited. If an appeal was approved; the training start date would have to be delayed in order for expenses to be eligible for reimbursement.

If I receive an Incumbent Worker Training Grant will there be tax implications?

There may be tax implications for receipt of an Incumbent Worker Training grant. Organizations are encouraged to discuss these implications with their tax advisors.

How is the Incumbent Work Training Grant Program funded?

The Incumbent Worker Training Grant Program is currently funded with Job Development Funds.