



**GREATER MEMPHIS LOCAL WORKFORCE DEVELOPMENT BOARD (GMLWDB)**

**GREATER MEMPHIS LOCAL WORKFORCE DEVELOPMENT AREA**

- EFFECTIVE DATE:** July 1, 2020
- DURATION:** Indefinite
- POLICY:** Registered Apprenticeship Training Grant Policy
- PURPOSE:** This policy will establish a uniformed guideline consistent with WIOA for Registered Apprenticeship Training programs.

**REFERENCE(S):**

WIOA Section 134(d)(4)(A), 134 (d)(4)(A)(I),134 (d)(4)(C), 134 (d)(4)(4)(D), 2 CPR. 200.306, 20 CPR 690.780, 680.790, 680.800, 680.810, 680.820, 681.210(b), 681.210(b)(3)-(4), TEGL 9-16; 134 (a)(2) and WIOA Section 134 (a)(3)(A)(i).

**BACKGROUND:**

The purpose of this policy under the Workforce Innovations & Opportunities Act (WIOA) Title I Adult, Dislocated, and Youth programs is to provide procedures for implementing and managing training agreements and/or contracts for Registered Apprenticeship Training.

**Employer Eligibility Criteria:**

In order for a business or employer to qualify for a grant, it must meet all the following criteria:

- Grantee must be classified as a Tennessee for-profit business (or a not-for-profit business in health care)
- Must be either a State or Federally approved Apprenticeship Program
- Must employ at least five full-time employees or more
- Must be current on all local, state, and federal tax obligations
- Must be a financially viable business not currently or recently experiencing, nor expecting to experience, a bankruptcy in the past twelve (12) months
- Must not appear on any federal suspensions or debarment list.

**Participant Eligibility Criteria:**

- All individuals taking part in an Apprenticeship Training Grant (ATG) must meet the eligibility criteria of an Adult, Dislocated Worker, or Youth, as defined by WIOA.
- Funds may be used to implement innovative programs and strategies designed to meet the needs of all Tennessee employers (including small employers). These programs may include:
- Customized training

- Sectoral and industry cluster strategies
- Implementation of industry or sector partnerships
- Career pathway programs
- Microenterprise, entrepreneurial training, and support programs
- Utilization of effective business intermediaries
- Layoff aversion strategies
- Activities to improve links between the One-Stop Delivery system and all employers (including small employers) in the State

The following will also be considered during the review:

- Characteristics of the individuals to be trained: consideration should be given to employers who propose to train individuals with barriers to employment as defined in WIOA Section 3(24).
- The quality of training - whenever possible the training should allow the participant to gain industry-recognized training experience and/or lead to industry-recognized credentials and/or an increase in wages
- The number of participants the employer plans to train or retrain
- The wage and benefit levels of participants both before and after training
- The occupation(s) for which incumbent worker training is being provided must be in demand for that industry

#### **Types of Grants and Funding:**

Grant funds will be awarded to businesses based on their needs as defined by local policy and guidance. All expenditures must follow the policies and procedures of the Federal, State and Local government fiscal responsibilities and expended in the contract period.

The contract awarded will be cost reimbursed. No expenses are reimbursed until a contract has been fully executed (signed by all parties) and, all participant data has been submitted and deemed eligible. Monthly invoices are due for the previous month and must include documentation of expenditures. Invoices will be paid within 30 days of receipt of approved documentation.

#### **Apprenticeship Training**

An **apprenticeship** is a system of **training** a new generation of practitioners of a trade or profession with on-the-job **training** and often some accompanying study (classroom work and reading). **Apprenticeships** can also enable practitioners to gain a license to practice in a regulated profession.

##### **Other factors:**

- a. Must be an apprenticeship or pre-apprenticeship program to increase the skill level and proficiency of their employees, and
- b. Promote an increase in production efficiency
- c. Employer is required to match a minimum of 10-50% of the requested classroom instruction training costs.
- d. Can be Eligible Training Providers (ETPs). Examples include
  - i. Employers who provide related instructions - they can provide in-house instruction as well as on-the-job training (OJT) at the worksite.
  - ii. Employers who use an outside educational provider - the related instruction or educational portion of the apprenticeship is provided by an outside educational entity to deliver instruction. The employer is the ETP and must identify their instructional provider.
  - iii. Joint Apprenticeship Training Program - the programs are made up of employers and unions that have an apprenticeship training school. The instructional portion

of the apprenticeship program is delivered. The training schools are usually administered by the union, which could be the ETP. Multiple employers can be a part of the same Joint Apprenticeship Training Program.

- iv. Intermediaries: can serve as program sponsors, taking on the responsibility for the administration of the apprenticeship program. They can also provide expertise such as curriculum development, classroom instruction, and supportive services, as appropriate. They serve as the ETP and must identify the instructional provider if an outside organization is providing the educational portion of the apprenticeship

Intermediaries include:

1. Educational institutions include 2-4 year post-secondary institutions or technical schools
  2. Industry associations
  3. Community-based organizations
- e. Given the unique nature of Apprenticeship Programs, there are several ways in which training services may be used in conjunction with these ETPs:
    1. An ITA may be developed for a participant to receive Apprenticeship training;
    2. An OJT contract may be developed with an Apprenticeship program for training participants. OJT contracts are made with the employer or Apprenticeship program sponsor, and the Apprenticeship generally involves both classroom and on-the-job instruction. The OJT contract may be made to support some or all of the OJT portion of the Apprenticeship program;
    3. A combination of an ITA to cover the classroom instruction along with an OJT contract to cover the on-the-job portion of the Apprenticeship is allowed; and
    4. Incumbent worker training may be used for upskilling apprentices or journey workers who already have an established working/training relationship with the Apprenticeship program.
    5. Local areas may also include supportive services, in coordination with career and/or training services, to participants in an Apprenticeship program. These support services must be consistent with WIOA.

#### **Costs That May Qualify for Reimbursement:**

Grant funding may reimburse all or part of the costs (provided that the employer has proper documentation) of training eligible employees.

#### **Reimbursable Training Expenses**

- Instructors/trainers salaries capped at the actual amount or \$50/hour if company trainers are used (whichever is less)
- Curriculum development not to exceed 5% of total State obligation (curriculum development is defined as the time necessary for company officials to determine training needs or the actual development of curriculum)
- Textbooks and manuals
- Materials and supplies
- Tuition expense (tuition is defined as instruction provided by an institution regulated by the Tennessee Higher Education Commission)

## **Non-Reimbursable Costs**

- Purchases of capital equipment
- Purchase of any item or service that may possibly be used outside of the training project
- Travel expenses of trainers or trainees
- Assessment, testing, or certification fees
- Language training unless specific to terms of employment
- Advertisement or recruitment
- Any costs not approved in the final subrecipient agreement

## **Training Services**

- All training should have specific start and end dates. All training must be completed by the last day of the specific program period.
- Training can be provided through Tennessee's public or private educational institutions, private training organizations, trainers employed by the business, or a combination of training providers.
- Training can be conducted at the business's own facility, at the training provider's facility, or at a combination of sites.

## **Grant Award Determination:**

### **GMLWDB GMLWDA Determination**

GMLWDB GMLWDA must follow the steps below prior to submitting applications to TDWLD:

1. GMLWDB GMLWDA must work within its regional planning structure in accordance with the adopted regional plans to review and consider each application based on the scores reflected in the criteria fulfillment guide.
2. Representatives from the Greater Memphis Local Workforce Development area should take part in the scoring of applications.
3. Applications funded by local area formula funding, per WIOA Section 134(d)(4), will not be required to be scored on a regional level.

Businesses must submit the application online and all required documents found at <https://www.tn.gov/workforce/employers/training.html>. Local Workforce Development Boards must determine the eligibility of applications for each LWDA that is representative (based on county and grouped by region) of the company or business.

## **Grant Awards Requirements**

- Businesses approved for funds must enter into a contractual agreement. The contract commits the business to complete the training as proposed in its application, as well as committing to compliance with all applicable local, state, and federal laws.
- Approved budget items are reimbursed upon presentation of adequate documentation of the training and evidence that the training expense incurred has been paid.
- Businesses must submit reimbursement requests in a timely manner in agreement with WIN GMLWDA as referenced in the contract, with required support documentation, to their WIN GMLWDA representative.
- Businesses will keep accurate records of the project implementation process and certify that all information provided, for the purpose of requesting reimbursements and reporting training activity,

is accurate and true.

- Any other contract provisions established by the GMLWDB GMLWDA.

**Grant Award Considerations:**

- Will the training be associated with an in-demand occupation?
- Will the training provide a skills upgrade?
- Will the training create new jobs?
- Will the training save jobs or prevent layoffs?
- Will the training improve the long-term wage level of the trainees?
- Will the training improve the short-term wage level of the trainees?

Will the training provide a certification

- Will the training provide or enhance process improvement for the business?

**Additional Grant Award Procedures**

- A. Cost per participant will be considered when evaluating the effectiveness and efficiency of the award. Factors include:
  - a. Is the training provided in a demand occupation? Does it provide the steps for an in-demand career pathway?
  - b. Has the company/trainer demonstrated successful performance previously?
- B. Monitoring
  - a. Participant data will be reviewed for eligibility and completeness prior to payment of invoices
  - b. Supporting documentation must be provided with each invoice demonstrating appropriate and allowable expenses and employer match.
  - c. For trainer wages, documents providing direct expenses (gross wages paid) to grant must be provided.
  - d. The Contract Manager should review submitted data and invoices for accuracy.
  - e. The Contract Manager should have regular contact with grant recipients to ensure proper information is being maintained.
  - f. Lack of response by grant recipient to the Contract Manager may result in termination of the contract.
- C. Promotion Strategies and Goals
  - a. GMLWDA will respond to any pre-applications entered into the State's website in order to answer any questions and provide detailed information about the Business Grants.
  - b. GMLWDA will share information about the Business Grants on visits to all employers during their meetings.
  - c. GMLWDB will reach out to employers who express interest through pre-application and determine the appropriateness of requests to the Business Service Team.

**INQUIRIES**

Please contact Amber Covington, Executive Director, [acovington@memphischamber.com](mailto:acovington@memphischamber.com), with any questions or concerns regarding this policy.

*Greater Memphis Local Workforce Development Board (GMLWDB), is a proud partner of the American Job Center network, is an Equal Opportunity Employer. The Career Center System is an Employer/Equal Opportunity Program. Auxiliary aids and services are available upon request to individuals with disabilities.  
TTY: 1-800-848-0299*



Desi Franklin  
Greater Memphis Local  
Workforce Development Board  
Board

July 20, 2021  
Adopted Date