SECTION 20 – EMPLOYER TRAINING AGREEMENTS AND REIMBURSEMENT PROCEDURES

20.1 Purpose

This section establishes operational procedures for executing, documenting, monitoring, and reimbursing employer-based training activities administered or overseen by the New River/Mount Rogers Workforce Development Board.

These procedures apply to employer-based training activities including:

• Occupational Skills Training provided through third-party providers
• Work Experience
• On-the-Job Training (OJT)
• Incumbent Worker Training (IWT)

The purpose of these procedures is to:

• Ensure employer eligibility verification
• Ensure proper execution of training agreements
• Maintain compliance with procurement and contracting standards
• Ensure proper reimbursement documentation
• Provide internal monitoring and oversight of employer agreements
• Protect against unsupported employer payments and disallowed costs

Employer-based training activities must comply with the policy framework established in Section 4 – Training Services.

All fiscal execution and reimbursement processing must comply with the Financial Management and Procedures Manual.

20.2 Employer Eligibility Verification Procedure

Prior to executing any employer training agreement, staff must verify employer eligibility.

Staff must:

1. Verify employer legitimacy, including:
   • Active business registration

• Valid tax identification number
• Physical business address

2. Verify employer standing, including:
   • Confirmation that the employer is not debarred or suspended through SAM.gov verification
   • Review for known labor law violations that would prohibit participation

3. Document verification by maintaining:

• SAM verification screenshot
• Completed employer eligibility checklist
• Conflict-of-interest disclosure review when applicable

No employer agreement may be executed without documentation of eligibility verification.

Where an employer relationship meets the definition of a subrecipient under 2 CFR §200.331, monitoring requirements must additionally comply with the Subrecipient Monitoring provisions contained in the Financial Management and Procedures Manual.

20.3 Occupational Skills Training Procedures

When occupational skills training is provided through a third-party training provider, staff must:

1. Confirm provider eligibility, including ETPL eligibility when required.
2. Confirm training aligns with the participant's Individual Service Strategy (ISS).
3. Obtain training cost documentation.
4. Verify availability of funds prior to authorization.
5. Execute a written training agreement prior to the start date.
6. Enter the financial obligation into the tracking system.

Required documentation must include:

• Training plan
• Cost breakdown
• Enrollment verification
• Attendance documentation
• Progress verification

Training payments may not be made without documentation verifying attendance and participation.

Documentation must be maintained in accordance with Section 19 – Case File Management and Documentation Standards.

20.4 Work Experience Procedures

Before a work experience activity begins, staff must:

1. Execute a written worksite agreement.
2. Define job duties and supervision plan.
3. Confirm wage rate and work schedule.
4. Ensure workers' compensation coverage is documented.
5. Confirm alignment with the participant's Individual Service Strategy.

During work experience, staff must:

• Collect signed timesheets for each pay period
• Maintain documentation of employer contact at least monthly
• Document skill development progress

Supervisory monitoring must be documented.

20.5 On-the-Job Training (OJT) Procedures

Prior to the start of OJT:

1. Conduct employer eligibility verification.
2. Develop a training outline identifying required skills.
3. Establish training duration and reimbursement rate.
4. Execute the OJT contract before the start date.
5. Enter the obligation into the tracking system.

Reimbursement procedures require:

1. Employer submission of payroll documentation.
2. Staff verification of:

• Wages paid
• Hours worked
• Compliance with approved reimbursement percentage

3. Case manager confirmation of training progress.

4. Supervisory review and approval.
5. Fiscal processing in accordance with the Financial Management Manual.

No reimbursement may occur without verified payroll documentation.

20.6 Incumbent Worker Training Procedures

Prior to execution of an incumbent worker training agreement, staff must:

1. Confirm employer contribution requirements are met.
2. Document incumbent worker wage levels.
3. Confirm training improves retention, advancement, or wage progression.
4. Execute a written training agreement prior to the start of training.

Employer cost-share documentation must include:

- Employer payroll contribution documentation
- Proof of employer-paid training costs
- Employer contribution calculation worksheet

Employer contributions must be verified prior to reimbursement.

20.7 Employer Monitoring Standards

Monitoring of employer-based training activities must include:

- Verification of training delivery
- Confirmation of participant attendance
- Confirmation of wage payments where applicable
- Verification of skill acquisition
- Documentation of site visit or employer contact

Minimum monitoring frequency:

- On-the-Job Training: At least once during the training period
- Work Experience: Monthly
- Incumbent Worker Training: At midpoint or completion

Monitoring activities must be documented in case notes and retained in the participant file consistent with Section 19 – Case File Management and Documentation Standards.

20.8 Placement and Employment Verification Procedure

When a participant obtains employment, staff must:

1. Collect employment verification documentation.
2. Confirm employment start date.
3. Confirm wage rate.
4. Document alignment with training services received.
5. Enter employment outcomes into the reporting system.

Documentation hierarchy for wage verification:

Primary source:

• State wage record data

Secondary sources (when permitted):

• Employer verification
• Pay stub
• Offer letter
• Apprenticeship documentation

Self-attestation may only be used where permitted and must include written justification.

Documentation must comply with Section 14 – Data Management and Reporting Controls.

20.9 Employer Payment Internal Controls

To ensure proper segregation of duties, no single individual may:

• Execute the employer agreement
• Approve reimbursement
• Process payment
• Reconcile payment

Segregation of duties must be maintained consistent with the Financial Management and Procedures Manual.

20.10 Contract Modification and Amendment Procedures

If any material term of a training or employer agreement changes, including but not limited to:

• Wage rate
• Reimbursement percentage

- Training duration
- Maximum reimbursement amount
- Scope of training

A written contract amendment must be executed prior to implementation of the change.

The amendment must:

- Be signed by all required parties
- Be approved by the Program Manager
- Be reviewed for budget availability
- Be reflected in the obligation tracking system

Retroactive amendments are prohibited.

20.11 Red Flags Requiring Escalation

Immediate supervisory review is required when any of the following occur:

- Employer refuses to provide documentation
- Payroll documentation appears altered or inconsistent
- Reimbursement request exceeds contract limits
- Training start date precedes contract execution
- Employer fails to provide monitoring access

Suspected fraud must be reported in accordance with organizational fraud reporting procedures.

20.12 Internal Review and Quality Assurance

Supervisory review of employer agreements must occur:

- Prior to first reimbursement
- At midpoint of the agreement when applicable
- At completion of the training activity

Quarterly internal reviews of employer agreements must include:

- Active contract list
- Total reimbursement paid
- Remaining financial obligation
- Compliance with contract terms

Findings must be documented and corrective action implemented when necessary.

Monitoring activities must align with Section 12 – Internal Monitoring and Quality Assurance.

20.13 Record Retention

Employer agreements and supporting documentation must be retained consistent with:

• 2 CFR §200.334
• Virginia Works requirements
• Grant-specific requirements
• Organizational record retention standards

Records must remain accessible for audit, monitoring, and review.