

SECTION 4 – TRAINING SERVICES AND WORK-BASED LEARNING

4.1 Purpose

This section establishes policy governing training services, work-based learning activities, employer-based training, and employment placement services for workforce programs administered or overseen by the New River/Mount Rogers Workforce Development Board.

Training and work-based learning services are designed to support participant skill development, career pathway progression, credential attainment, and employment outcomes in occupations that are in demand within the regional labor market.

This section establishes requirements governing:

- Training service authorization
- Work-based learning activities
- Work experience placements
- On-the-job training (OJT)
- Incumbent Worker Training (IWT)
- Employer eligibility and participation
- Placement and employment verification
- Monitoring and oversight of employer-based training activities

Training services must align with applicable provisions of the Workforce Innovation and Opportunity Act (WIOA), federal regulations, Virginia Works guidance, and local workforce development strategies.

4.2 Training Service Authorization

Training services may be authorized for participants when assessment and career planning activities determine that training is necessary for the participant to obtain or retain employment.

Training services must:

- Align with the participant's Individual Employment Plan (IEP), Individual Service Strategy (ISS), or other approved career planning document
- Support employment in in-demand industries or occupations

- Address documented skill gaps identified during assessment
- Be supported by appropriate documentation in the participant record

Training services may include occupational skills training, work-based learning activities, registered apprenticeship participation, incumbent worker training, or other allowable training strategies permitted under applicable program regulations.

Training services may not be authorized until eligibility is verified and enrollment requirements established under Section 2 of this Manual have been satisfied.

4.3 Types of Training Services

Allowable training services may include, but are not limited to:

- Occupational skills training
- Work-based learning activities
- On-the-job training (OJT)
- Registered Apprenticeship participation
- Pre-apprenticeship programs
- Incumbent Worker Training (IWT)
- Customized training where permitted by program regulations
- Industry-recognized credential training programs

Training services must support participant career pathway development and lead to employment, wage progression, credential attainment, or advancement in the workforce.

4.4 Work-Based Learning Overview

Work-Based Learning (WBL) provides participants with opportunities to gain practical work experience, develop occupational skills, and build connections with employers while progressing toward employment in in-demand occupations.

Work-based learning activities serve as a bridge between education, training, and unsubsidized employment and support the development of job-ready workers within the regional workforce.

Work-based learning activities must:

- Occur in a real or simulated workplace environment
- Support development of occupational and employability skills
- Align with the participant's career pathway or employment goals
- Be documented in the participant's Individual Service Strategy (ISS) or Individual Employment Plan (IEP)
- Support measurable progress toward employment or career advancement

Work-based learning activities may occur in public sector organizations, private non-profit organizations, or private for-profit businesses and must comply with applicable labor laws, including the Fair Labor Standards Act.

4.5 Work-Based Learning Principles

Work-based learning activities implemented under this Manual must follow these core principles:

Structured Learning

Work-based learning activities must provide structured learning experiences that include clearly defined responsibilities, training objectives, and supervision expectations.

Career Pathway Alignment

Work-based learning must support the participant's career pathway plan and align with identified career interests and skill development needs.

Skill Development

Activities must provide opportunities for participants to develop occupational competencies, employability skills, and workplace behaviors necessary for long-term employment success.

Employer Partnership

Employers participating in work-based learning serve as training partners and must provide supervision, meaningful work assignments, and opportunities for skill development.

Worker Protection

Work-based learning activities must comply with federal and state labor laws and may not:

- Displace currently employed workers
- Replace workers on layoff
- Infringe upon promotional opportunities for existing employees
- Impair existing collective bargaining agreements

Participants must be provided a safe work environment and appropriate supervision.

Documentation and Accountability

All work-based learning activities must be documented and supported by written agreements, monitoring documentation, and participant case records.

4.6 Work Experience (Youth and Young Adult Programs)

Work Experience provides participants with planned and structured learning opportunities in a workplace environment for a limited period of time.

Work experience activities allow participants to:

- Explore career interests
- Develop employability skills
- Build work history
- Gain exposure to workplace expectations

Work experience activities must align with the participant's Individual Service Strategy (ISS) or Individual Employment Plan (IEP).

Work experience placements may occur in:

- Public sector organizations
- Private non-profit organizations
- Private for-profit employers

4.6.1 Types of Work Experience

Work experience activities may include:

- Summer employment opportunities
- Internships
- Job shadowing
- Pre-apprenticeship programs
- Other structured workplace learning opportunities

Activities may be paid or unpaid depending on program design and compliance with applicable labor laws.

4.6.2 Youth Work Experience Requirement

In accordance with WIOA Section 129(c)(4), local workforce areas must expend **at least 20 percent of WIOA Youth program funds on work experience activities.**

Allowable expenditures supporting the work experience requirement may include:

- Participant wages or stipends
- Staff time developing and monitoring work experience placements
- Participant orientation activities
- Employer orientation activities
- Employability skills training related to work experience

- Academic or occupational education components connected to work experience
- Supportive services necessary for participation in work experience activities

Program administrators shall monitor expenditures to ensure compliance with the statutory work experience expenditure requirement.

4.6.3 Academic or Occupational Education Component

Work experience for youth participants must include an academic or occupational education component.

This component may occur:

- Concurrently with the work experience activity
- Prior to the work experience activity
- After completion of the work experience activity

The academic or occupational education component may occur in classroom settings, workshops, training programs, or through structured career counseling activities that reinforce workplace learning.

4.6.4 Worksite Agreements

A written worksite agreement must be executed prior to the start of any work experience activity.

The agreement must identify:

- Responsibilities of the employer, participant, and workforce program representative
- Job duties and learning objectives
- Duration and hours of participation
- Wage or stipend information where applicable
- Supervision expectations
- Timekeeping and attendance requirements

4.7 On-the-Job Training (OJT)

On-the-Job Training (OJT) is a work-based training strategy that provides participants with occupational training while engaged in productive work that leads to long-term unsubsidized employment.

OJT provides employers reimbursement for a portion of the costs associated with training participants while allowing participants to develop occupational skills within a real workplace environment.

OJT activities must align with the participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS).

4.7.1 Employer Eligibility

Employers participating in OJT must:

- Operate as legitimate businesses within the local workforce area
- Possess a valid Federal Employer Identification Number (FEIN)
- Maintain workers' compensation coverage where required
- Provide adequate supervision and training
- Demonstrate the capacity to retain participants following training

OJT may not be used where participation would:

- Displace currently employed workers
- Replace workers on layoff
- Infringe upon promotional opportunities
- Support sectarian or political activities
- Support positions with no expectation of continued employment

4.7.2 OJT Agreements and Training Plans

An OJT agreement must be executed prior to the start of training.

Each OJT agreement must include:

- Employer and participant information
- Job title and description
- Wage rate and work schedule
- Training duration
- Reimbursement rate
- Occupational skills to be learned
- Monitoring and documentation requirements

Training plans must reflect the participant's skill gaps and the expected competencies to be developed during the training period.

4.7.3 Employer Reimbursement

Employers participating in OJT may receive reimbursement for a portion of the wages paid to participants during the training period.

Reimbursement must:

- Be based on actual wages paid
- Be supported by payroll documentation
- Comply with reimbursement limits established under federal and state guidance
- Follow fiscal procedures established in the Financial Management Manual

4.8 Incumbent Worker Training (IWT)

Incumbent Worker Training provides training opportunities to currently employed workers to upgrade skills, support career advancement, and strengthen the competitiveness of regional employers.

IWT may be used as part of broader workforce strategies supporting sector partnerships, skill development, and economic growth.

IWT funds may not replace training that employers are required to provide as a normal cost of business operations.

4.8.1 Employer Cost Share

Employers receiving Incumbent Worker Training funds must contribute toward the cost of training.

Minimum employer contributions are:

- 10 percent for employers with 50 or fewer employees
- 25 percent for employers with 51 to 100 employees
- 50 percent for employers with more than 100 employees

Employer contributions may include direct payments, wages paid during training, or allowable in-kind contributions.

4.9 Customized Training

Customized Training may be provided to meet the specific skill needs of an employer or group of employers and to ensure that participating individuals acquire the skills necessary for successful employment.

Customized Training is conducted with a commitment by the employer to employ the participant upon successful completion of the training.

Customized Training must comply with 20 CFR 680.760–680.770, applicable policy issued by Virginia Works, and the policies of the New River/Mount Rogers Workforce Development Board.

Customized Training must support employment in occupations that align with regional labor market demand and workforce development priorities.

4.9.1 Eligibility Criteria for Employers and Participants

Customized Training may be approved when the following conditions are met:

- The training is designed to meet the specific requirements of an employer or group of employers.
- The employer commits to employ participants who successfully complete the training.
- The training prepares participants for employment in occupations that meet local labor market demand.
- The training results in employment that provides wages consistent with local labor market standards.
- Participants meet eligibility requirements for the applicable WIOA program under which the training is funded.

Customized Training may also be used to upgrade the skills of existing employees when necessary to retain employment or support business expansion.

4.9.2 Training Purpose and Allowable Activities

Customized Training must be directly related to the needs of the employer and may include training related to:

- Introduction of new technologies
- New production processes or service procedures
- Expansion of business operations
- Upgrading employees to new jobs that require additional skills
- Preventing layoffs by upgrading employee skills

Training must result in the acquisition of skills necessary to perform the job for which the training is provided.

4.9.3 Training Duration and Contract Limitations

Customized Training contracts must be limited to the amount of time required for participants to become proficient in the occupation for which training is provided.

Training duration must be reasonable based on:

- The complexity of the occupation
- Skills required for job performance

- Prior experience of the participant
- Employer training plan

Employers must submit a training plan that includes:

- Training objectives
- Skills to be obtained
- Training duration
- Instruction methods
- Expected employment outcomes

4.9.4 Employer Cost Sharing Requirements

Employers participating in Customized Training are required to pay a portion of the training costs in accordance with **20 CFR 680.760**.

Employer contributions must not be less than:

Employer Size	Minimum Employer Contribution
50 or fewer employees	10%
51–100 employees	25%
More than 100 employees	50%

Employer contributions may include:

- Wages paid to participants during training
- Instructor costs
- Training materials or equipment
- Curriculum development
- Other allowable training-related expenses

Documentation of the employer contribution must be maintained in the training agreement and fiscal records.

4.9.5 Employer Application and Approval Process

Employers seeking Customized Training must submit a request that includes:

- Description of the business and workforce need
- Number of individuals to be trained
- Occupations to be filled
- Proposed training plan and curriculum

- Duration of training
- Employer cost share commitment
- Commitment to employ successful trainees

Requests are reviewed by Workforce Development Board staff to ensure compliance with federal regulations, state policy, and local workforce priorities.

Final approval must be documented prior to execution of the training agreement.

4.9.6 Training Agreements

Customized Training must be documented through a written agreement between the Workforce Development Board and the employer.

The agreement must include:

- Description of the training program
- Number of participants to be trained
- Training duration
- Employer cost share amount
- Payment terms
- Expected employment outcomes
- Monitoring and reporting requirements

No training activities may begin until the agreement has been fully executed.

4.9.7 Relocation and Displacement Prohibition

Customized Training funds may not be used to assist an employer who has relocated employment from another area within the United States and caused job loss at the original location within the previous 120 days.

Employers must certify that participation in the Customized Training program will not result in the displacement of currently employed workers.

4.9.8 Monitoring and Documentation

Customized Training activities must be monitored to ensure compliance with federal regulations, state policy, and Workforce Development Board requirements.

Documentation must include:

- Signed training agreements
- Employer cost share verification

- Participant eligibility documentation
- Training attendance records
- Training completion documentation
- Employment outcomes

Records must be maintained in accordance with applicable federal and state record retention requirements.

4.10 Employer Eligibility Verification

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

Verification must include confirmation of:

- Legitimate business operations
- Federal Employer Identification Number
- Workers' compensation coverage where required
- Compliance with nondiscrimination laws
- Absence of suspension or debarment under federal regulations

Where applicable, verification shall include review of the System for Award Management (SAM.gov).

Verification activities must be documented in program records.

4.11 Placement and Employment Services

Placement services support participants in securing employment aligned with career goals and training outcomes.

Placement services may include:

- Job matching
- Resume development
- Interview preparation
- Employer referrals
- Apprenticeship placement
- Coordination with employer partners

Employment outcomes must be verified using acceptable documentation including:

- State wage records
- Employer verification
- Pay stubs

- Offer letters
- Supplemental wage documentation where permitted

4.12 Performance Alignment

Training and work-based learning activities must support workforce program performance outcomes, including:

- Measurable Skill Gains
- Credential attainment
- Employment placement
- Wage progression and career advancement

Staff must ensure that services reported in official reporting systems are supported by documentation contained in the participant record.

4.13 Monitoring and Oversight

Program managers and supervisory staff shall periodically review employer-based training activities to ensure compliance with program requirements.

Monitoring activities may include review of:

- Employer agreements
- OJT contracts
- Worksite agreements
- Incumbent Worker Training agreements
- Attendance documentation
- Payroll reimbursement documentation
- Employment verification records

Monitoring shall ensure:

- Agreements are executed prior to service delivery
- Documentation supports payments and reimbursements
- Training activities align with participant career goals
- Worksite activities comply with program and labor standards

Monitoring findings shall be documented and corrective action implemented when necessary.