



**Next Generation Submarine Shipbuilding
Supply Chain Partnership
*Incumbent Worker Trade/Industrial Skills
Training Program Guidelines***

Program Overview

The DoD's ability to produce and maintain the systems required by the nation's modern military forces is threatened by the lack of skilled industrial workers. Defense suppliers face critical shortages (i.e., up to tens of thousands of unfilled positions) in many areas including the trades and industrial skills needed for submarine shipbuilding.

The New England region specifically is tasked to produce and maintain the nation's submarines. To meet the demand for submarine shipbuilding and maintenance that DoD has requested, the submarine shipbuilding supply chain needs a skilled workforce. Specifically, the Department of Defense has identified a 'National Imperative for Industrial Skills' (NIIS), which details a deficiency in trades-skilled professionals. To address this deficiency, the Department of Defense Industrial Base Analysis and Sustainment (IBAS) program awarded the Southeastern New England Defense Industry Alliance (SENEDIA) with a contract to support the training of trades-skilled professionals. Through this contract the Next Generation Submarine Shipbuilding Supply Chain Partnership was developed to connect industry partners with regional stakeholders in the development of trades-skilled workforce.

The Submarine Shipbuilding Supply Chain Partnership, with financial support from IBAS, has developed the Incumbent Worker Trade/Industrial Skills Training Reimbursement Program to help the supply chain meet this trades-skilled workforce demand.

This program is managed by SENEDIA on behalf of the Next Generation Submarine Shipbuilding Supply Chain Partnership.

Program Summary

Up to 100% Reimbursement

The program provides up to 100% reimbursement to employers to pay for preapproved, direct, training-related costs.

\$30,000 Cap

Grants are available up to \$30,000 maximum over a 12-month period.

\$10,000 per Trainee

Reimbursable training dollars are capped at a per-trainee, per grant amount of \$10,000.

Key Terms

Employer

The program recipient, entity, company, or organization entering into agreement with SENEDIA, that employs the individuals to be trained. The employer must be a U.S. company and may have more than one location. Reimbursements are only for New England-based workforce.

Incumbent Worker

The individual hired for a specific job or to provide labor and who works in the service of the employer and meets the following requirements:

- A paid employee of the employer, grant recipient, or a person working for the employer that receives a W-2 or 1099. Contractors not receiving a 1099 can apply under their own organization.
- An individual legally allowed to work in Maine, New Hampshire, Vermont, Massachusetts, Rhode Island, or Connecticut.

Allowable Training

Training or education activities that demonstrate a clear and distinct development of industrial trades skills in support of submarine shipbuilding. To be approved, the training described in the application must demonstrate at least one of the following:

- The employee(s) will receive training for trades/industrial skills in support of submarine shipbuilding.
- The employee(s) will receive an industry recognized credential/certificate that is transferable should they ever separate from the employer.

Industry Recognized Credential/Certification

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, OSHA Certificates, etc.

Employer Eligibility

The eligibility requirement for employers:

1. U.S. Company

All U.S. companies that are currently or could be Department of Defense supplier, contractor, or subcontractor.

Reimbursement Funding Structure

In the FY22 program year beginning on 1 July 2021, the maximum agreement amount is \$30,000 per employer.

Employers with more than one location in the New England region (ME, NH, VT, MA, RI, CT) may be treated as either one employer or separate employers depending on the Federal Employer Identification Number(s) (FEIN(s)).

- Employers with locations operating under different FEINs will be considered separate employers or businesses and must submit separate applications. Each application will be reviewed independently and receive separate awards.
- Employers with more than one location operating under a single FEIN are considered one employer and therefore will need to join their training efforts and submit a single application and may receive one award collectively.

SENEDIA applies a cost reasonableness standard set at \$10,000 per individual trainee.

Application Process

All applications can be accessed through www.BuildSubmarines.com and must be completed online by the employer participating in the training (training providers

are unable to apply). A maximum of 10 training activities are allowed per application.

Applications are reviewed on a first-come/first-served basis until all available funding has been awarded for the fiscal year. When all available funding has been awarded, a notice will be posted on www.BuildSubmarines.com.

Successful applications meet the following criteria:

1. Employer eligibility
2. Allowability of training activity/activities
3. Reasonability of training activity/activities

Helpful Tips

- Fully review the Allowable Training section of these program guidelines. When asked to describe the type of training or credential/certification, the application will be approved or denied based on the degree to which you satisfy the criteria set forth in the program guidelines.
- 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 the training will occur.

Availability of Funds

This program is contingent upon the receipt of funds and continued authorization for program activities. If such funds become unavailable for any reason, or authorization for program activities is withdrawn or otherwise modified, SENEDIA has the unilateral right and discretion to terminate this program at any time. SENEDIA, also has the right to reduce, and/or modify funding and program activities. SENEDIA reserves the right to reduce the obligation amount under this agreement if expenditure of funds by the Employer for eligible activities is at such a rate as to likely result in a surplus at the termination of this contract.

Award Process

If the application is approved, the employer will receive the following documents to review, via the email contact provided in the application:

- Notification of initial approval.
- Agreement outlining the dates, activities, and awarded funds for the training. The agreement will set forth all processes and expectations for administering, implementing, and completing the training.

The employer will have fifteen (15) calendar days to sign and return the agreement to SENEDIA. Failure to sign and return the executed agreement in a timely manner will result in an automatic nullification of the agreement.

The start date of the agreement is the date of the final signature on the agreement. The sooner the agreement is returned to SENEDIA with the employer's signature, the sooner the agreement can begin.

Upon agreement execution, the employer will receive an email containing a link to reimbursement materials via the email contact provided in the application.

An agreement number will be provided with the initial agreement and subsequent communications. Please retain this number to include on all reimbursement documentation.

Agreement Termination

- **Termination for Cause**
If the Recipient fails to perform under this program or fails to make enough progress to endanger performance; or if reimbursement documents are not received within 60 calendars of the agreement end date, SENEDIA may terminate the agreement, in whole or in part, upon written notice to the Recipient.
- **Reduction in Funding**
The funding obligation authority contained within this agreement shall be subject to the availability of DoD funds. In the event the funding is cut or reduced by the Department of Defense, the funding authorized in this agreement shall be subject to either partial or total de-obligation.

- **Employer Termination**
At times employers experience changes within the business that impact the availability or viability of training; where it becomes necessary for the Employer to terminate the agreement. The employer may terminate the agreement by contacting SENEDIA.

Agreement Extensions

If a training activity cannot be completed within the agreed period, the employer may request an extension by emailing SENEDIA. The request must be sent prior to the agreement end date. The employer should provide a detailed explanation for why the training could not be completed within the agreement period and include the new training completion date. SENEDIA will review the request and determine the appropriate extension. An agreement modification form must be signed by both the employer and SENEDIA.

Reimbursement Process

Payments are made on a cost reimbursement basis, in which the employer pays the costs of the training up-front and requests reimbursement after the cost being incurred.

Employers may request reimbursement one time per the duration of the agreement. Unexpended funds beyond this payment will not be available for payment.

SENEDIA will send a link to the Incumbent Worker Training Request for Reimbursement form when the agreement is awarded. The Request for Reimbursement form will prompt you to identify the items below and upload verification documents sequentially for each training.

Please refer to your application to verify that the proper training names and amounts are consistent with your reimbursement request. To ensure timely payment, the Request form must be filled out completely and correctly.

Final invoices, including all applicable expenditures, must be submitted within 60 days of the agreement end date. Any invoices submitted beyond the 60-day

period will be reimbursed upon availability of funds and at the discretion of the program director.

SENEDIA will review the invoice(s) and determine if the expenses submitted for reimbursement agree with the agreed scope of work. If the documentation is appropriate, the expenses will be processed for payment.

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

Supporting Documents

If any of the items listed below are not present, payment will not be issued for that training cost.

1. Incumbent Worker Training Request for Reimbursement form

SENEDIA will send a link to the Incumbent Worker Training Request for Reimbursement form when the agreement is awarded. The Request for Reimbursement form will prompt you to identify the items below and upload verification documents, sequentially for each training. Please refer to your application to ensure the proper training names and amounts are consistent with your reimbursement request. To ensure timely payment, the Request form must be filled out completely and correctly. Note that you will need the Agreement Number to complete the form. This number will be provided to you on the initial agreement.

2. Verification of Payment

Itemized invoice or receipt from each training vendor and supplier – for each training – certifying the cost of each expense and verifying that the expense was paid. Acceptable forms of verification include:

- **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.
- **Supplies and Other Materials:** Provide an itemized invoice with processed check or receipt of payment. Note: Purchase order forms or hand-written notes are not accepted.

3. Training Dates

Training dates are required for each training offered. The actual dates of training must be identified for each training. Acceptable verification documents include:

- Registration receipt
- Course agenda
- Invoices for training supplies and materials
- Certificate of completion
- Sign-in sheet with date, time, and location

Email 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.

4. Verification of Course/Training Completion

For each Incumbent Worker Training participant, provide verification from the training vendor that the activity was successfully completed or attended.

Allowable Costs

Reimbursable training activities cannot begin until an application is 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.

Allowable Costs

- Tuition and course fees
- Training provider fees
- Training materials and supplies
- Software (that is directly used for training activities)

Unallowable Costs

- Graduate or Post-Graduate tuition costs
- Equipment (including hardware and software) that is not for the exclusive use of the training.
- Lost worker productivity
- Agreement 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
- Training costs for activities occurring outside of the agreement period.

Performance Reporting

Final Report

At the completion of the agreement, a final report on the training is to be included with any reimbursement requests. Performance reports are completed using an online form. Program staff will provide a link to this report at the time of the employer's final reimbursement request. Once the report is received, the final reimbursement is released.

Ongoing Communication

Program staff expect to have ongoing communication with employers regarding the progress of training. If training is taking place 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 employers are expected to have some form of communication with SENEDIA staff on a quarterly basis. This may include emails or phone calls to discuss the progress of training and, potentially, any delays or hinderances. If no communication has occurred, SENEDIA will reach out to the employer to inquire about the status of the training project. If no contact is made over a three-month period, this may render the agreement null and void.

Technical Assistance

SENEDIA staff are available to provide technical assistance throughout the process, from the application stage through contract execution, monitoring, and fiscal closeout. An individual or organization may assist an employer or group of employers in the application process.

Frequently Asked Questions

- **Where can the training take place?**
Training may be conducted at the employer's own facility, at a public or private training provider's facility, or 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, or subject matter experts.
- **How and when will I be reimbursed?**
If all paperwork is submitted correctly and in full, reimbursement may be expected in 60 days.
- **Can my reimbursement payment be expedited?**
No.
- **My application was not approved. Do I have any recourse?**
If an application is denied for any reason, the employer will receive an email outlining the reason for denial. Employers are encouraged to remedy identified issues and reapply if denied for the following reasons:
 - **Eligibility Denial**
If the applicant employer is not eligible for the grant program, they will be apprised of the reason. They may be encouraged to remedy any eligibility issues and informed of their ability to reapply.
 - **Unallowable Training**
If training is determined to be unallowable, the employer will be informed of their ability to appeal this determination to the Executive Director of SENEDIA.
 - **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 SENEDIA match will be limited to \$5,000.
- **How can I appeal a decision?**
Appeals must be filed within 10 business days of initial notification of determination and addressed to the Executive Director – SENEDIA. Appeals

are accepted electronically by email to training@senedia.org or by mail to SENEDIA, 2 Corporate Place, Suite 203, Middletown, RI 02842.

All appeals must include:

- Name of requestor, employer name, address, and contact number
- A description of the proposed training and how it demonstrates a clear and distinct benefit to both employer and employee based on eligibility requirements.

- **When will I know the decision of an appeal?**

The Executive Director will issue a decision within 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 start 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 necessarily extends the vetting process. While SENEDIA regrets any inconvenience this delay may cause, these procedures are in place to protect the program recipients and cannot be abbreviated. If an appeal is approved; the training start date would have to be delayed for those expenses to be eligible for reimbursement.

- **If I receive an Incumbent Worker Training Reimbursement, will there be tax implications?**

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

- **How is the Incumbent Work Training Program funded?**

The program is funded through a Department of Defense contract awarded to SENEDIA.

- **How long does an employee have to work for my company before being eligible for the program?**

Anyone employed by your company is eligible for training, regardless of how long they have worked for your company.