**Tennessee Talent Employer Incumbent Worker Reimbursement Policy**

## Overview

Tennessee faces a growing talent gap as major investments in manufacturing, nuclear energy, and AI infrastructure create demand that outpaces the pipeline of trained workers. The Tennessee Talent program, a pillar of the broader Tennessee Talent Accelerator, provides employers with outcomes-based reimbursement for eligible incumbent worker training costs workers. The goal of this program is to support the state of Tennessee in developing employer-first, highly consultative, priority talent pipelines, while increasing employer scale and satisfaction in this reimbursement-based program.

This program is funded by the Industry-Driven Skills Training Fund Grant (Project: Tennessee Talent, awarded to the TN Department of Labor & Workforce Development), and is 100% supported by the U.S. Department of Labor with an award totaling $5,000,000.

This program is administered by Guild, with strategy, oversight, and monitoring from TN Works and the TN Department of Labor & Workforce Development.

## Program Eligibility

**Employer Eligibility:** An employer is eligible if it meets all of the following:

- Operates in the state of Tennessee
- Operates in one of three target sectors: Nuclear Energy, AI Infrastructure, or Advanced Manufacturing.
- Demonstrates good standing (certificate of existence) in the state
- Provides a valid FEIN and W9
- Is pre-approved and onboarded as an eligible employer before eligible enrollments begin
- Commits to enrolling a minimum of 2 participants

Operating in an eligible sector is defined as alignment to one of the following eligible NAICS codes below, and provided justification.

Advanced Manufacturing

- 3111 Animal Food Manufacturing
- 3112 Grain and Oilseed Milling
- 3113 Sugar and Confectionery Product Manufacturing
- 3115 Dairy Product Manufacturing

- 3116 Animal Slaughtering and Processing
- 3117 Seafood Product Preparation and Packaging
- 3118 Bakeries and Tortilla Manufacturing
- 3119 Other Food Manufacturing
- 3121 Beverage Manufacturing
- 3212 Veneer, Plywood, and Engineered Wood Product Manufacturing
- 3219 Other Wood Product Manufacturing
- 325 Chemical Manufacturing
- 326 Plastics and Rubber Products Manufacturing
- 3311 Iron and Steel Mills and Ferroalloy Manufacturing
- 3312 Steel Product Manufacturing from Purchased Steel
- 3313 Alumina and Aluminum Production and Processing
- 3314 Nonferrous Metal (except Aluminum) Production and Processing
- 3321 Forging and Stamping
- 3322 Cutlery and Handtool Manufacturing
- 3323 Architectural and Structural Metals Manufacturing
- 3324 Boiler, Tank, and Shipping Container Manufacturing
- 3325 Hardware Manufacturing
- 3326 Spring and Wire Product Manufacturing
- 3328 Coating, Engraving, Heat Treating, and Allied Activities
- 3329 Other Fabricated Metal Product Manufacturing
- 3331 Agriculture, Construction, and Mining Machinery Manufacturing
- 3332 Industrial Machinery Manufacturing
- 3333 Commercial and Service Industry Machinery Manufacturing
- 3334 Ventilation, Heating, Air-Conditioning, and Commercial Refrigeration Equipment Manufacturing
- 3339 Other General Purpose Machinery Manufacturing
- 3341 Computer and Peripheral Equipment Manufacturing
- 3344 Semiconductor and Other Electronic Component Manufacturing
- 3345 Navigational, Measuring, Electromedical, and Control Instruments Manufacturing
- 3346 Manufacturing and Reproducing Magnetic and Optical Media
- 3351 Electric Lighting Equipment Manufacturing
- 3353 Electrical Equipment Manufacturing
- 3359 Other Electrical Equipment and Component Manufacturing
- 3361 Motor Vehicle Manufacturing
- 3362 Motor Vehicle Body and Trailer Manufacturing
- 3363 Motor Vehicle Parts Manufacturing
- 3364 Aerospace Product and Parts Manufacturing
- 3366 Ship and Boat Building
- 3369 Other Transportation Equipment Manufacturing

Nuclear Energy and Supporting Industries

- 221113 Nuclear Electric Power Generation
- 221121 Electric Bulk Power Transmission and Control
- 221122 Electric Power Distribution

- 212290 Other Metal Ore Mining
- 325180 Other Basic Inorganic Chemical Manufacturing
- 332410 Power Boiler and Heat Exchanger Manufacturing
- 333611 Turbine and Turbine Generator Set Units Manufacturing
- 335312 Motor and Generator Manufacturing
- 335313 Switchgear and Switchboard Apparatus Manufacturing
- 334517 Irradiation Apparatus Manufacturing
- 334519 Other Measuring and Controlling Device Manufacturing
- 237130 Power and Communication Line and Related Structures Construction
- 236220 Commercial and Institutional Building Construction
- 237110 Water and Sewer Line and Related Structures Construction
- 238912 Non-residential Site Preparation Contractors
- 238122 Nonresidential Structural Steel and Precast Concrete Contractors
- 238192 Other Nonresidential Foundation, Structure, and Building Exterior Contractors
- 238212 Nonresidential Electrical Contractors and Other Wiring Installation Contractors
- 238222 Nonresidential Plumbing, Heating, and Air-Conditioning Contractors
- 238292 Other Nonresidential Building Equipment Contractors
- 541330 Engineering Services
- 541715 Research and Development in the Physical, Engineering, and Life Sciences
- 541380 Testing Laboratories and Services
- 541690 Other Scientific and Technical Consulting Services
- 562211 Hazardous Waste Treatment and Disposal
- 562910 Remediation Services

AI Infrastructure, Technical Infrastructure, and Supporting Industries

- 518210 Computing Infrastructure Providers, Data Processing, Web Hosting, and Related Services
- 541511 Custom Computer Programming Services
- 541512 Computer Systems Design Services
- 541513 Computer Facilities Management Services
- 541519 Other Computer Related Services
- 541715 Research and Development in the Physical, Engineering, and Life Sciences
- 513210 Software Publishers
- 519290 Web Search Portals and All Other Information Services
- 334111 Electronic Computer Manufacturing
- 334112 Computer Storage Device Manufacturing
- 334118 Computer Terminal and Other Computer Peripheral Equipment Manufacturing
- 334413 Semiconductor and Related Device Manufacturing
- 334416 Capacitor, Resistor, Coil, Transformer, and Other Inductor Manufacturing
- 334417 Electronic Connector Manufacturing
- 334418 Printed Circuit Assembly (Electronic Assembly) Manufacturing

- 334419 Other Electronic Component Manufacturing
- 335911 Storage Battery Manufacturing
- 335912 Primary Battery Manufacturing
- 333415 Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment Manufacturing
- 221112 Fossil Fuel Electric Power Generation
- 221114 Solar Electric Power Generation
- 221115 Wind Electric Power Generation
- 221118 Other Electric Power Generation
- 221121 Electric Bulk Power Transmission and Control
- 221122 Electric Power Distribution
- 335313 Switchgear and Switchboard Apparatus Manufacturing
- 333611 Turbine and Turbine Generator Set Units Manufacturing
- 236220 Commercial and Institutional Building Construction
- 237130 Power and Communication Line and Related Structures Construction
- 238212 Nonresidential Electrical Contractors and Other Wiring Installation Contractors
- 238222 Nonresidential Plumbing, Heating, and Air-Conditioning Contractors
- 238292 Other Nonresidential Building Equipment Contractors
- 238912 Non-residential Site Preparation Contractors
- 238120 Structural Steel and Precast Concrete Contractors
- 561621 Security Systems Services (except Locksmiths)
- 561210 Facilities Support Services

Per USDOL, Advanced Manufacturing is defined as the use of innovative technologies to create existing products and the creation of new products, including production activities that depend on information, automation, computation, software, sensing, and networking.

Companies in other NAICS codes that support these three sectors can provide additional justification and will be reviewed by TN Works for program eligibility.

**Training Program Eligibility:** Any employer-sponsored training program tied to an eligible role qualifies that advances upskilling or reskilling is eligible. Programs should be aimed at improving job performance or helping an employee move into a new role.

Only trainings with start dates after the company onboards to Guild, after program launch November 2, 2026, are eligible. While prior trainings are not eligible, new cohorts for existing programs could be eligible. To attain full reimbursement, training must be completed by December 2028, subject to fund availability.

The training strategy is fully employer-driven, so employers play the lead role in identifying skill needs and determining the appropriate training program, and training can come from a range of Tennessee providers and formats (e.g., Tennessee Colleges of Applied Technology (TCATs), Tennessee Board of Regents (TBR), technical skills (e.g., nuclear safety procedures, robotics programming, data infrastructure maintenance), employability skills (e.g., teamwork, critical thinking, workplace behavior).

Training does not need to lead to a formal credential. Eligible training may be non-credentialed and sourced from TCATs, TBR institutions, private training providers, industry associations, or employer-designed programs.

**Learner Eligibility:** An individual learner is eligible if they meet all of the following:

- Works for the approved employer, verified by I-9 or other employer-provided documentation
- At least 17 years old, verified by date of birth provided on I-9
- Works in Tennessee, verified by attestation from the employer
- Not concurrently enrolled in high school, verified by attestation from the employer
- Not enrolled in more than one training program at a time

To participate and deliver required USDOL reporting, employers must share each participant's Social Security Number, plus other identifying information, including but not limited to:

- Student name
- SSN, with supporting employer-provided documentation such as I-9
- DOB
- Gender
- Race/ethnicity
- Veteran status
- Attestation that learner is not currently dual-enrolled
- Attestation of new hire (<6 month tenure) or incumbent worker (6+ month tenure)
- Training provider name
- Program name and code
- Program cost
- Tuition amount
- Expected start date
- Expected completion date
- Verified completion date, with supporting employer-provided documentation
- Proof of tuition payment, with supporting employer-provided documentation
- Proof of 6-month retention, with supporting employer-provided documentation

In addition employers may be required to share additional participant or employer information that is required by TDLWD.

**Reimbursement Structure**

Employers are reimbursed for actual eligible training costs incurred, up to the following caps:

- Per student: $5,000
- Per employer (FEIN): $250,000

Students may participate in more than one training program, but must complete one program before enrolling in the next. Employers must submit milestones for each training.

Reimbursement is disbursed in steps, tied to the data collection stages below:

- Step 1, Create your request: Before the start date, submit trainings and participants for review. This ensures you understand requirements, training begins after your onboarding date to the program, and enables spend forecasting.
- Step 2, 40% Reimbursement: disbursed upon proof of payment and proof of program completion. This may be submitted up to 12 months after the training completion date.
- Step 3, Additional 40% Reimbursement: disbursed upon proof of payment and proof of retention. This may be submitted up to 6 months after the training completion date, and could be submitted alongside step 2 if relevant.

**Eligible Expenses**

Covered (reimbursable) costs are actual direct training costs, including:

- Tuition
- Academic fees
- Books
- Course supplies or equipment
- Exam preparation courses
- Other costs that directly support the training activity

Expenses that are not covered:

- Wages
- Travel and per diem
- Supportive services
- Equipment costs

This program does not require any additional employer match or cost share.

Employers may combine this reimbursement with other funding sources (e.g., a state training credit) for the same training, but total reimbursement from all sources combined cannot exceed 80% of the actual training cost, and other funding cannot be used to cover any portion the employer is expected to carry itself.

For questions, please contact tntalent@guild.com