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# **EASTERN AREA WORKFORCE DEVELOPMENT BOARD**

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## Eastern Area Workforce Development Board

### Workforce Innovation and Opportunity Act Policy 3-20 Work Experience

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Contact: Inquiries regarding this document should be directed to Administrative Staff of the EAWDB at (575)208-2210.

## REFERENCES:

WIOA §129(c)(4), 20 CFR §681.590, §681.600, & §681.610, TEGL 8-15, TEGL 21-16, EAWDB supportive services policy and youth program design TAG.

### 1. PURPOSE:

To provide information and direction for the service providers and Workforce Innovation and Opportunity Act (WIOA) career coaches on the requirements and delivery of work experience activities for youth.

### 2. BACKGROUND:

The WIOA prioritizes work experience as for youth enrolled in WIOA youth programs. It is a valued component of a holistic approach to building the skills a youth needs to be successful in the workforce.

### 3. Work Experience:

#### A. ACTIVITY REQUIREMENTS

A Work Experience is a planned, structured learning experience in a workplace for a limited period of time. Work experience may be paid or unpaid, as appropriate. A Work Experience provides participants with opportunities for skill development and must include academic and occupational education concurrently or sequentially. A work experience is an opportunity to connect youth with a mentor in a career ladder of their interest and develop appropriate social and communication skills to make them a desired employee that is competitive in the labor market.

A Work Experience can include:

- Summer Employment Opportunities;
- Employment opportunities available throughout the year;
- Internships and job shadowing;
- Pre-Apprenticeship programs; and
- On-the-Job training opportunities— *WIOA Youth only, this is considered a “training service” for WIOA Adults or Dislocated Workers.*

The **academic and occupational component** of work experience refers to contextual learning that includes information needed to understand and work in specific industries or occupations and accompanies a work experience. This component may occur prior to, concurrently, or after the work experience and on or off the worksite. It can be provided by the employer or may be provided separately in the classroom or through other means.

#### i. **Occupational Learning Component of Work Experience**

This is learning tied to the occupations and industries and includes occupational exploration related to the work experience. Example: If a youth is working in a hospital,

the occupational learning could be about different types of jobs in a hospital e.g. phlebotomist, radiology tech, nurse, physical therapist, social worker etc., and the training requirements and average wages for those occupations.

**ii. Academic Component of Work Experience**

The academic component refers to the academic knowledge necessary to work in those occupations. Using the hospital example a phlebotomist would need to know certain things such as why blood type matters, what veins/arteries are best to draw blood from and a physical therapist would need to know the functions of tendons and ligament and the various names of the bones of the body.

**B. EXPENDITURE REQUIREMENT**

WIOA prioritizes work experience as a vital component of a youth program. As such it requires that a minimum of twenty percent (20%) of local funds must be spent on Work Experience activities. Program expenditures for this may include more than just the wages paid to the youth while they are participating in the activity. Allowable expenditures toward the work experience program element may include:

- Wages or stipends paid for participation in a work experience;
- Participant work experience orientation sessions;
- Employer work experience orientation sessions;
- Classroom training or the required academic education component training that is directly related to the work experience;
- Employability skills or job readiness training to prepare a youth for work experience;
- Incentive payments tied to the successful completion of all work experience components; and
- Staff time spent on work experience activities:
  - ✓ Working to identify and develop work experience opportunities and develop the work experience;
  - ✓ Staff time spent working with employers to ensure a successful work experience e.g. training the worksite on the requirements and addressing tools for working with youth or the individual that will be assigned to the worksite;
  - ✓ Staff time spent evaluating the work experience; and
  - ✓ Staff time spent managing the work experience, e.g. attendance tracking, timesheet processes and reviewing evaluation and progress reports with the worksite and youth.

Note: Information on allowable staff time charges are included in section I of this document. Supportive services are a separate program activity and cannot be counted toward the work experience expenditure even if directly related to participation in the work experience activities.

**C. DURATION**

Paid and unpaid work experience training should be tied to the youth's employment goals included on their Individual Service Strategy (ISS). The duration of the work experience is based on the training plan developed between the youth, the employer and the career coach. Training

plans for the work experience must outline the skills to be developed (including soft skills as appropriate), provide an estimate of the required training time needed for the skill and must be completed on the EAWDB's Work Experience Training plan document or its subsequent replacement.

When determining the appropriate duration of the work experience the training plan should be based on the ONET standards for learning the skills required for the occupation in which the youth is placed and reviewed with the employer to ensure the training plan accurately depicts the skills to be developed. The maximum duration of a work experience will be tied directly to the SVP value for the corresponding or most closely related occupation and cannot exceed 1040 hours in the same occupation unless there are extenuating circumstances that necessitate additional time for the youth to learn the skills e.g. disability.

A youth can be placed on multiple work experiences if the youth is continuing to expand and develop their skills making them more employable. This must be addressed in the ISS and a new work experience agreement and training plan completed.

#### **D. WAGES**

A work experience may be paid or unpaid. The ISS must address the need and benefit associated with the work experience placement. A nonpaid work experience may be used to address specific challenges in the soft skills development of a youth e.g. reporting to work on time, appropriate workplace communication, hygiene etc. Work experience placements focused on gaining occupational skills should be paid work experiences even though they may also include addressing occupational skill development.

Wages for work experience activities on a worksite are compensated according to federal, state, or local minimum wage standards whichever is higher. Attendance records and progress reports are required for each period the youth is paid for. The service provider must have internal processes adequate to pay the youth in a timely manner. Youth that submit payroll information after the due date may be paid on the next payment processing date. Providers may also hold back the first attendance record for payment in the following process period to allow sufficient time for review and submission of documents.

#### **E. STIPENDS & INCENTIVES**

The intended use of stipends and/or incentives must be described in the participants ISS. Stipends may be paid for attendance and participation in allowable work-related activities listed in section 3.B. above (Expenditure Requirements). Stipends for these activities are applied to the required work experience expenditures. Tracking of time and progress for these activities must be maintained.

Incentives may be paid for the successful completion of work experience activities. Payment of the incentive is only allowable upon the completion and documentation of all the components of the work experience including the academic and occupational learning components. Incentives must comply with the stipend/incentive portion(s) of the EAWDB Supportive services policy or its subsequent replacement.

## **F. EMPLOYER ELIGIBILITY**

Work Experience related placements may be within the private for-profit sector, the non-profit sector, or the public sector, ideally within a high priority or demand occupation or career ladder leading to a demand occupation.

Because the work experiences must be planned, structured learning experiences, the worksite hosting the work experience must designate an appropriate employee to provide supervision and feedback to the participant and career coach at regular intervals during the course of the training.

The employer is under no obligation to offer regular employment to the participant subsequent to the conclusion of the training, although the training is intended to provide employers with a pool of skilled applicants for the positions being trained during participation.

Participating employers must agree to cooperate with monitoring requirements as required by the WIOA. Labor standards apply to any work experience setting. Work experience and/or internships will not be made available to directly or indirectly aid in the filling of a job opening which is vacant because the former occupant is on strike or is being locked out in the course of a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving a work stoppage.

Work experience placements cannot be made in sectarian or marijuana related organizations. E.g. houses of worship, marijuana farms or marijuana distribution facilities.

## **G. WORKSITE AGREEMENTS (aka the work experience contract)**

All work experiences sites must have a worksite agreement. Worksite employer orientation should include review the requirements of the worksite agreement. Each agreement must be signed by the worksite and the appropriate WIOA youth program personnel. The agreement should be maintained by both the worksite and the youth program as part of the participant electronic file. A worksite that hosts multiple youth in the course of the year need not complete a new agreement for each youth but must complete a new agreement annually. Career coaches must upload the current/active worksite agreement to all related participant files. The worksite agreement used should be the EAWDB worksite agreement or its subsequent replacement document.

Worksite agreements and orientation activities must occur prior to beginning work experience training. The worksite orientation need only be repeated for a worksite if the responsible parties at the worksite location have changed.

## **H. EVALUATION OF WORKSITES**

Work experience activities should be evaluated by the youth program to ensure the activity is addressing the needs of the participant and is providing quality training and adequate supervision/direction to the participant.

Items to be evaluated include:

- Appropriateness of the placement for the participants;

- Quality of work experience in teaching good work habits or job skills;
- Quality of outcomes and other benefits to the participants; and,
- Adequacy of work site supervision in assuring compliance with fair labor stands and program goals.

The evaluations may be conducted through worksite visits, or video conferencing/ telephone interview with the employer that is conducted with or supported by interviewing of the participant.

State and local monitors may also request to interview youth and employers to evaluate the quality of the placement in accordance with monitoring policies.

**I. CALCULATION OF STAFF TIME CHARGES AGAINST WORK EXPERIENCE**

WIOA allows for staff time costs to be apportioned to the work experience expenditure requirement. Staff time spent on the following are allowable for application against work experience expenditures:

- ✓ Working to identify and develop work experience opportunities and develop the work experience;
- ✓ Staff time spend working with employers to ensure a successful work experience e.g. training the worksite on the requirements and addressing tools for working with youth or the individual that will be assigned to the worksite;
- ✓ Staff time spent evaluating the work experience; and
- ✓ Staff time spend managing the work experience, e.g. attendance tracking, timesheet processes and reviewing evaluation and progress reports with the worksite and youth.

The EAWDB has capped the maximum amount of staff time costs to be charged to the work experience activity at 30%. In order to simplify reporting requirements for EAWDB staff and youth providers the EAWDB has developed a Cost Allocation Plan (CAP) to create a methodology to apportion staff time against work related activities. Providers of youth services must track individuals participating in any work-related activity.

The formulation for the calculation of staff costs are based on the percentages of the caseloads involved in work experience activities.

| <b>Percentage of entire caseload in work related activities</b> | <b>Percentage of total staff time allowed to be charged against work experience</b> |
|---|---|
| 0-25%   | 15% of staff time   |
| 26-50%  | 20% of staff time   |
| 51-75%  | 25% of staff time   |
| 76-100%   | 30% of staff time   |

Activity reports from the WCOS system may be utilized to identify the percentage of caseload engaged in work related activities during the billing period.

Example:

The youth program has 100 participants and 56% were engaged in related work activities then 25% of the staff costs for the reporting period may be applied to the work experience.

The allowance for application of staff time is limited to staff directly engaged in the allowable activities and not to indirect staff or program managers.

**J. BEST PRACTICES FOR YOUTH PROGRAMS IN ENGAGING YOUTH IN WORK EXPERIENCE**

- Youth programs prepare youth for work experience through training and guidance in soft skills. Youth programs engage young adults in training or class activities that develop these soft skills. This may include learning about professional work culture, working in teams, interpersonal skills, critical thinking and problem solving, and communication.
- Youth programs may also train youth in technical skills or hard skills needed for specific career pathways or work settings. Youth will learn skills specific to an occupational sector.
- Program staff devote significant time to developing and maintaining relationships with employers. Dedicated staff may handle all aspects of employer relations from making the initial inquiry to responding to employer concerns during the work experience.
- Programs clearly communicate what is expected of employers, youth and families before the start of a work experience to include mentoring of the youth and providing feedback. Some programs address the importance of work in life, explain how the program helps provide opportunities for them to become successful when transitioning to employment, addresses employer expectations and appropriate workplace behaviors such as interacting with employers and other employees.
- Programs carefully match the participant to the work experience based on interests, skills and needs. Making the right match increases the success of the experience by ensuring the youth are motivated from the start to participate fully.
- Programs provide ongoing support to the youth and employers throughout the experience. To ensure a work experience is successful for everyone involved, programs maintain communication with the youth and the employer from the beginning to the end.
- Programs ensure that an employer is truly committed to investing time, energy and expertise in developing the emerging workforce.
- Work related activities involve a high level of learning.
- Programs visit the worksites while the youth are working demonstrating the commitment of the program to quality learning experiences for the youth.