



WORKFORCE IMPLEMENTATION GUIDANCE (WIG) LETTER

DATE: August 31, 2021
NO: WIG PS-16-004R
TO: LOCAL WORKFORCE SYSTEM STAKEHOLDERS
FROM: Kristin Laarhoven, OWD Executive Director
SUBJECT: **Guidance Regarding Youth Work Experience**

- 1. Purpose.** To provide updated guidance for Youth Work Experience.
- 2. References.** [WIOA – Section 129](#)
[TCSG OWD Policy Manual](#)
[20 CFR § 681.590 & 681.600](#)
[TEGL 21-16](#)
[WIOA Desk Reference “Work-Base Learning Overview”](#)
- 3. Definitions.**
WIOA – Workforce Innovation and Opportunity Act.
WEX - Work Experience
TEGL - Training and Employment Guidance Letter
LWDA – Local Workforce Development Area
OWD – TCSG Office of Workforce Development
ISY – In-School Youth
OSY – Out-of-School Youth
IEP – Individual Employment Plan
ISS- Individual Service Strategy
- 4. Background.** WIOA was signed into law on July 22, 2014 and shifts the primary program focus of Title I youth formula funds to support educational and career training opportunities for youth. Under WIOA, LWDA's are required to spend at least 20% of their program funding on youth Work Experience (WEX). Local area administrative costs are not subject to the 20% minimum work experience expenditure requirement (TEGL 21-16).
- 5. Qualifying Work Experience Programs.** WIOA defines work experience as a “planned, structured learning experience that takes place in a workplace for a limited period of time.” The goal of youth work experience should be to expose individuals to opportunities that provide further career exploration or skill development. These opportunities are available for both in-school (ISY) and out-of-school (OSY) youth, and



may be paid or unpaid, full-time or part-time, as determine appropriate. Although the majority of work experience activities occur with youth participants, adults and dislocated worker participants may also take advantage of these services, especially if such individuals have barriers to employment (e.g., disabilities, English language learners, etc.).

Youth work experience must include an academic and occupational component, which may occur concurrently or sequentially depending on the qualifying work experience program. The academic and occupational education component refers to contextual learning that accompanies a work experience. It includes the information necessary to understand and work in specific industries and/or occupations. For example, if a youth is in a work experience in a hospital, the *occupational education* could be learning about the duties of different types of hospital occupations such as a phlebotomist, radiology tech, or physical therapist. Whereas, the *academic education* could be learning some of the information individuals in those occupations need to know such as why a blood type matters, the name of specific bones in the body, or the function of specific ligaments. The academic and occupational component must be taught within the same timeframe and connected to training in a specific occupation, occupational cluster, or career pathway.

Local programs have the flexibility to determine the appropriate type of academic and occupational education necessary for a specific work experience. LWDAs are encouraged to define this component such that it aligns with the available programs and work experience opportunities in the region. Examples of academic and occupational education components include, but are not limited to, certifications as part of a pre-apprenticeship program, specific knowledge and skill instruction that leads to successful completion of occupational tasks, academic classroom instruction, and hands-on occupational skills training, among others. Additionally, the academic and occupational education component may occur inside or outside the work site. The work experience employer can provide the academic and occupational component or such components may be provided separately in the classroom or through other means. Additional guidance on academic and occupational education component can be found in TEGL 21-16.

WIOA identifies four categories of work experience in order to determine a qualifying youth work experience program:

1. Summer Employment and other Employment Opportunities available throughout the school year:
Paid temporary employment opportunities that provide individuals with work experience relevant to an individual's career path while further contributing to their career or skills development. LWDAs may, but do not have to, provide summer employment opportunities. Under WIOA, summer employment is incorporated into work experience. LWDAs have the flexibility to decide which work experiences are provided, as long as they meet the 20% Youth WEX expenditure requirement. Summer employment and other employment opportunities that are not relevant to the educational or occupational skills and



goals of the individual do not meet the requirements for Youth WEX nor count toward the 20% youth WEX expenditure requirement.

2. **Pre-apprenticeship Programs:**

Programs that provide individuals with the necessary skills and knowledge to enter and succeed in a registered apprenticeship program. A pre-apprenticeship program includes:

- Training and curriculum that aligns with the skill needs of employers in the economy of the State or region;
- Access to educational and career counseling, and other supportive services;
- Hands-on, learning activities connected to education and training activities, such as exploring career options and understanding how skills acquired through coursework can be applied to a future career;
- Opportunities to attain at least one industry-recognized credential; and
- A partnership with one or more registered apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship into a registered apprenticeship program.

3. **Internships and Job Shadowing:**

a. *Internships* is a work experience option that can be paid or unpaid and provide individuals with the opportunity to apply classroom learning to a work-based environment with the intention of furthering their learning through professional experience. Internship opportunities must be relevant to the educational or occupational skills and goals of the individual. As any other work experience opportunity, the learning goals for the internship should be address in the youth individual service strategy plan.

b. *Job shadowing* is a work experience option where youth learn about a job by walking through the workday as a shadow to a competent worker. The job shadowing work experience is a temporary, unpaid exposure to the workplace in an occupational area of interest to the participant. Job shadowing is designed to increase career awareness, help model youth behavior through examples, and reinforce in the youth the link between academic classroom learning and occupational work requirements.

4. **On-the-job Training (OJT):**

Training provided by an employer to a paid participant (treated as a regular employee) that involves actively participating in productive work that offers the participant relevant skills and knowledge to fully and adequately perform the duties of the job upon completion of the training program.

In addition to wages and classroom expenditures directly related to the provision of work experience, LWDA's may report staff time developing, supporting, and evaluating work experience opportunities towards the 20% requirement. LWDA's are encouraged to explore year-round or non-traditional timeframes for these categories, particularly for OSY. Other allowable work experience expenditures include the following:



- Wages/stipends paid for participating in a work experience;
- Participant work experience orientation sessions;
- Employer work experience orientation sessions;
- Incentive payments directly tied to the completion of the work experience; and
- Employability skills/job readiness training to prepare youth for a work experience.

Supportive services are a separate program element and cannot be counted toward the work experience expenditure requirement even if supportive services assist the youth in participating in the work experience.

- 6. Work Experience Policy Components.** LWDA's must establish local policies regarding work experience. At a minimum, these policies need to address the following:
- a. How the hourly rate is determined;
 - b. Maximum training hours;
 - c. How a participant's need for work experience is determined;
 - d. A process to evaluate the performance of the work experience participant and assessment methods(s); and
 - e. Appropriate incentives and limitations on the amounts must be address either in the local work experience policy or in the local youth incentive policy.
 - f. The local definition of the following key work experience components:
 1. Work Experience
 2. Wages
 3. Stipends
 4. Incentives
 5. Academic and Occupational Component
- 7. Work Experience Agreements.** Work Experience opportunities are provided based on a formal, written agreement between the LWDA, a private, non-profit or public sector employer and a participant. Work Experience agreements must be fully executed prior to the beginning of a participant's training. LWDA's are required to complete a Work Experience agreement with each worksite that is utilized. It is important to remember that Work Experience agreements must include parental/legal guardian signature for those youth participants under the age of 18.

At a minimum, Work Experience agreements should include the following elements:

- a. Names and contact information for all parties;
- b. The names and titles of all worksite staff that are authorized to sign the timecard for the Work Experience participant(s);
- c. The participant's Work Experience start and end date;
- d. Responsibilities and expectations of the participant, the worksite employer, and the local workforce development area (LWDA).
- e. The job title, pay, duties, and goals for each Work Experience participant. WIOA funds shall not be used for overtime wages, holidays, sick leave, or vacations;



- f. A statement informing the worksite about worksite monitoring, as well as regular visitations by LWDA staff to check on the progress of the work experience participants;
- g. Other information relevant to the specific Work Experience activity; and
- h. Signatures and dates for all applicable parties, including parents/legal guardians for those participants under the age of 18.

Participant Agreement

If the participant is not part of the worksite agreement, the LWDA must execute an agreement with the participant to define expectations.

At a minimum, the participant agreement must address the following elements:

- i. Worksite address, supervisor, and telephone number
- j. Start and end date
- k. Responsibilities and expectations of the participant, the worksite employer, and the LWDA
- l. Job title, pay, duties, and goals
- m. Participant signature and date. If participant is under age 18 parent or legal guarding signature is required.

8. Action Requested. OWD requires that local areas review their policies and procedures to include work experience programs for ISY and OSY, including the local definition for academic components. Work Experience agreements must include the details of the educational portion and how the experience opportunity supports the IEP or ISS. Additionally, LWDA's should continue to report the dollar amount and percentage of youth funds expended on WEX as part of the monthly Financial Status Reports.

9. Inquiries. Inquiries regarding this guidance should be directed to WIOAprograms@tcsge.edu.

10. Attachment.

Attachment 1 Sample Work Experience Agreement
Attachment 2 Samples of Work Experience Timesheet

11. Expiration. Continuing

12. Authorization.