

Youth Work Experience Policy

Effective: July 1, 2016; Revised June 1, 2020 & December 5, 2019

Background

WIOA Section 129 (c) (2) (C) and 20 CFR 681.600 address work experience and define it as: planned, structured learning experience that takes place in a workplace for a limited period. Work experience may be paid or unpaid as appropriate. A work experience may take place in the private for-profit sector, the non-profit sector or the public sector. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or, where applicable, State law. Work experiences provide youth with opportunities for career exploration and skill development. Work experiences must include academic and occupational education to enhance a trainee's prospects for long-term labor market attachment.

Policy

The Oswego County Workforce Development Board will make available work experiences to provide opportunities for young adults (ages 16-24) to:

- Acquire skills, including, but not limited to: work readiness, transferrable and/or job specific)
- Explore career interests
- Improve work history and
- Develop local character and/or employment references

Work experiences may be developed with a public, non-profit or private employer. The program will provide opportunities for trainees to learn skills and interact with experienced workers in a structured work environment. Up to 100% of the wages paid to a trainee may be paid by the program. Wage payments may be directly by the provider agency to the trainee, or as reimbursement to participating employers who pay wages directly to the trainee (e.g. Internships or employer wage reimbursement programs).

Labor standards apply in any work experience where an employee/employer relationship exists, as defined by the Fair Labor Standards Act or applicable State Law. Trainees will be paid the current State minimum wage or the prevailing wage as documented by the employer or local labor market information. Consistent with section 20 CFR 680.840 of the same chapter in the Federal Register, funds provided for work experiences may not be used to directly or indirectly aid in the filling of a job opening that 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 experiences may be seasonal or available year-round, including, but not limited to:

- Employment/Internships, Not Limited to Summer
- Job Shadowing
- On-the-Job Training *
- Pre-apprenticeship Programs
- Summer Youth Employment/Internships, Summer Only
- Other Work Experience

*Trainees in on-the-job training will follow the agency On-the-Job Training policy.

Training Period

Duration of training will be determined by the needs of the trainee and the skills required to prepare for labor market attachment as documented in the trainee's Individual Service Strategy (ISS). A training period of 13 weeks or 390 hours will be the standard training duration. However, waivers up to 26 weeks or 780 hours may be granted by the Director of Employment and Training, or designee, to accommodate the following circumstances:

- Personal or family medical leave of absence
- An opportunity to transition to a private sector job

- Extra time needed to complete an employment prerequisite or job specific skill (e.g. OSHA or similar certification or licensure)
- A learning disability
- A physical disability
- To allow exposure to/acquisition of additional skill sets consistent with the employment goal identified in the ISS

Expenditure Requirements

At least 20% of the WIOA Youth program year allocation (less administrative funding) must be spent on Work Experience. Allowable work experience expenditures include the following:

- Wages/stipends paid for participation in a work experience;
- Staff time working to identify and develop a work experience opportunity, including staff time spent working with employers to identify and develop the work experience;
- Staff time working with employers to ensure a successful work experience, including staff time spent managing the work experience;
- Staff time spent evaluating the work experience;
- Trainee work experience orientation sessions;
- Employer work experience orientation sessions;
- Classroom training or the required academic education component directly related to the work experience;
- Incentive payments directly tied to the completion of work experience; and
- Employability skills/job readiness training to prepare youth for a work experience.
- Virtual engagement services, at the discretion of the Director of Employment and Training or designee, to administer work readiness skills, which may include occupational training and/or academic training.

Procedure

To complete a work experience placement, youth provider staff will:

- Determine eligibility of youth under the Workforce Innovation and Opportunity Act (WIOA).
- Provide and document occupational and work readiness skills training using the Job Zone, Career Zone and/or similar training modalities (e.g. workshops).
- Complete an Individual Service Strategy (ISS) documenting the employment goal, and work experience needs (e.g. work readiness, transferrable, and/or job specific skills)
- Identify and document the required academic training relating to the work experience (e.g. Metrix, HS, TASC preparatory or HSE classes, Vocational education or similar relevant academic education)
- Identify an appropriate placement based on trainee needs as outlined in the ISS
- Refer the trainee to a work site. Referrals may include a pre-placement interview and/or orientation as appropriate to trainee needs and work site protocols.
- Prepare a worksite agreement outlining roles, responsibilities and expectations for the worksite supervisor, the trainee and provider agency staff. The work site agreement will include:
 - o A job description and the transferable (a.k.a. – “work maturity competencies”), work readiness and/or job specific skills to be learned.
 - o General terms and conditions including evaluation and termination forms and procedures
 - o A work schedule, sample time sheet, payroll schedule, and time sheet processing instructions.
 - o A job specific skills competency/training plan
 - o A work maturity competency validation worksheet
 - o Youth services provider contact information
 - o A participant contract which outlines behavioral expectations for the trainee

- Enter the start date and planned end date of service into OSOS within 5 days of the actual start of service.

Waivers or variations to this process may be granted by the Director of Employment and Training or designee in the following circumstances, and will be documented in the case notes in the One Stop Operating System (OSOS):

- Regulatory or legal changes from the State, Federal or local government
- Extraordinary or special needs of a trainee

Occupational education (e.g. Job Zone / Career Zone) and Academic education (e.g. Metrix) may occur prior to or concurrent with a work experience. Documentation of both occupational and academic education is placed in the trainee file and recorded in OSOS comments.

Monitoring

Youth provider agency staff will monitor trainee attendance (i.e. days / hours of work), performance (e.g. punctuality, attitude, communication, etc.) and job specific skills acquisition (i.e. progress to successful completion of skills training) at work sites periodically throughout the work experience and record observations and / or corrective actions (i.e. guidance, counseling, etc.) in the OSOS case notes.

Work sites will have the opportunity to complete an evaluation of work performance along with the record of attendance at the end of each pay period. These interim evaluations are a section at the bottom of each time sheet.

Trainee performance will also be evaluated by the work site supervisor and provider agency staff at the end of the 2nd week, midpoint and end of the work experience assignment. A checklist and schedule of evaluations is included as part of each training contract. Each evaluation will be reviewed by agency youth staff with the trainee and work site supervisor to identify and address or correct any behavioral or performance concerns.

Contract Termination

Work site contracts may be terminated upon (a) mutual agreement of both parties, or (b) The unilateral action of the Director of Employment and Training or designee, when and if the employer is not providing services in accordance with the training contract.

Concerns regarding training work site performance will be reported by youth provider agency staff to the Director of Employment and Training or designee. In the event a training work site is not performing satisfactorily, a written report will be submitted to the work site addressing the areas of concern, the corrective action needed and a timeframe for improvement. The work site will be given an opportunity to explain issues impacting their ability to meet established goals and discuss concerns, and to reach agreement on a plan for corrective action. If a work site is not successful in meeting agreed on outcomes (e.g. work readiness, transferrable, or job specific skills acquisition by trainee), the youth provider agency may discontinue contracts with that provider. Trainees may be transferred to alternate work sites or placements may be suspended pending the outcome of corrective action plans at the discretion of the Director of Employment and Training, or designee.

Trainees will be encouraged throughout the training program to seek conventional employment and/or educational opportunities.

Trainees who do not enter conventional employment during or immediately subsequent to work experience will meet with their employment specialist to update their ISS and address any barriers to labor market attachment (e.g. career guidance, resume and interview assistance, or other appropriate additional training). Trainees will also be counseled to utilize the One Stop Career Center services and access additional employment and training resources to progress to greater socio-economic self-sufficiency (e.g. workshops, job fairs, job banks, etc.).

Trainees who do succeed in entering unsubsidized employment during or subsequent to a work experience will be informed regarding the availability and types of follow up services available (e.g. supportive services like clothing allowances or other services required to maintain employment).

Incentives may be provided to trainees for training achievements or benchmarks as outlined in the Youth Incentive policy (e.g. job specific skills mastery).

Definitions

Transferable skills, also known as “work maturity competencies,” are qualities that can be transferred from one job to another. Work maturity competencies are behaviors associated with knowledge, skills and attitudes that result in positive work performance, and thereby enhance a youth’s potential to retain employment. Examples include but are not limited to: Being consistently punctual; Maintaining regular attendance; Demonstrating positive attitude; Presenting appropriate appearance; Good interpersonal relationships; Completing tasks effectively

Job specific skills or “hard skills”, are typically observable activities involving use of tools, equipment, or the performance of activities specific to a particular workplace or job. For example: Grounds keeping job specific skills may include: Cuts lawns, using hand mower or power mower; Trims and edges around walks, flower beds, and walls, using clippers, weed cutters, and edging tools; Prunes shrubs and trees to shape and improve growth or remove damaged leaves, branches, or twigs, using shears, pruners, or chain saw; Sprays lawn, shrubs, and trees with fertilizer, herbicides, and insecticides, using hand or automatic sprayer; Rakes and bags or burns leaves, using rake; Cleans grounds and removes litter, using spiked stick or broom; Shovels snow from walks and driveways. Spreads salt on public passageways to prevent ice buildup; Plants grass, flowers, trees, and shrubs, using gardening tools; Waters lawn and shrubs, using hose or by activating fixed or portable sprinkler system.

Work Readiness Skills – A broad range of skills which demonstrate a higher level of socio-economic self-sufficiency. Work experience encourages and provides opportunities for exposure to and acquisition of work readiness skills. The scope and type of skills will vary depending upon the needs of the trainee. Examples include but are not limited to the ability to:

- Organize activities and create schedules
- Understand how to build personal skills and access education/training
- Get to work/appointments using the best form of transportation
- Be dependable
- Anticipate problems and identify possible solutions
- Obtain necessary personal documents
- Understand requirements and responsibilities of contracts
- Open bank account
- Access community resources
- Establish independent living arrangements
- Explore career options
- Use labor market information to decide upon career
- Use variety of job search techniques
- Complete a job application
- Write a cover letter
- Prepare a resume
- Develop interview skills
- Develop telephone skills
- Follow-up after interview
- Understand employment laws and regulations
- Understand employer’s expectations for attendance and punctuality

- Understand expectations for timeliness of task completion
- Be able to work without supervision
- Have a positive work ethic
- Manage multiple tasks
- Recognize problems, identify causes, create solutions
- Recognize and apply new knowledge and skills
- Develop higher order thinking skills
- Develop decision making skills
- Specify goals, generate alternatives to accomplish goals, consider risks, evaluate solutions, choose best plan of action