



Work Experience for Youth Policy

Approval Date: September 5, 2025

Purpose

The purpose of this policy to provide guidance on paid and unpaid work experience for the youth program under Title I of the Workforce Innovation and Opportunity Act (WIOA).

Rationale

Under the Workforce Innovation and Opportunity Act, paid and unpaid work experience is an allowable activity and one of the fourteen (14) youth program elements required to be competitively procured when selecting a youth service provider for this activity.

Definitions

Incentive: remuneration to participants for successful participation and achievement of expected outcomes as defined in the individual service strategy (ISS) or Individual Opportunity Plan (IOP) under the state's Comprehensive Case Management and Employment Program (CCMEP).

Internship: a system of gaining on-the-job experience by placement in a work environment for a period of time with the goal to build technical and job awareness skills. Internships may be paid or unpaid.

Job shadowing: a short-term unpaid activity which introduces a participant to the workplace and provides exposure to occupational areas of interest to increase career awareness. Job shadowing is limited and allows youth to observe only.

On-the-job training (OJT): training by an employer that is provided to a paid participant while engaged in productive work in a job that:

- Provides knowledge or skills essential to the full and adequate performance of the job;
- Is made available through a program that provides reimbursement to the employer of a percentage of the wage rate of the participant; and
- Is limited in duration as appropriate to the occupation for which the participant is being trained, considering the content of the training, prior work experience of the participant, and the service strategy for the participant.

Pre-apprenticeship programs: programs or set of strategies designed to prepare individuals to enter and succeed in Registered Apprenticeship programs and have a documented partnership with at least one, if not more, Registered Apprenticeship programs.

Stipend: a fixed and regular small payment such as an allowance.

Summer employment opportunities: an activity conducted mainly during the summer months which involves work experience as the primary strategy and must provide direct linkages to academic and occupational learning.

Work experience: a planned, structured learning activity that takes place in a workplace setting for a limited period of time.

Goal of the Work Experience - Work experience is designed to aid eligible youth in a structured environment, learning good work habits with the focus on career exploration.



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Background

Work experience is one of the fourteen (14) required program elements that must be made available to all registered youth and should be offered throughout the program year. It is a planned, structured learning activity that takes place in a workplace setting for a limited period of time, and has an academic and occupational education component. Work experience may be paid or unpaid.

The primary intent of work experience is to help the youth understand proper workplace behavior and what is necessary to attain and retain employment. Work experiences should help youth acquire the personal attributes, knowledge, and skills needed to obtain a job and advance in employment. Work experience can serve as a stepping stone to unsubsidized employment and is a key step in the process of developing a career pathway for youth. All work experiences should expose youth to realistic working conditions and tasks as much as possible. Work experience also includes work-readiness classes. Work experience must be based on identified needs of the individual youth. Use of work experience situations must be based on an objective assessment and identified on the youth's Individual Opportunity Plan (IOP).

Paid and unpaid work experience must include academic and occupational education. The types of work experiences may include, but are not limited to, the following categories:

- Traditional work experience;
- Internship and job shadowing;
- Summer employment opportunities;
- On-the-Job training; and
- Pre-apprenticeship programs.

Work experience may be conducted in the private-for profit, private non-profit and public sectors. Although a business, public agency or non-profit (hereafter collectively referred to as "work experience provider") may also receive some benefit from work experience in the form of work being done or recruiting a potential new employee, the primary goal of work experience is to benefit the participant.

Eligibility Requirements

Participant Eligibility- All youth participants enrolled in WIOA or TANF services are eligible for participation in work experience activities, provided the activities are deemed in line with the individual's career plan and service strategy.

General Work Experience Employer Eligibility - Potentially eligible companies able to participate in youth work experience contracting include: private for-profit businesses, private non-profit organizations, and public-sector employers. Priority will be given to employers that meet Greater Cleveland Works' job quality standards. Contracted youth providers are responsible for ensuring that the on-site supervisors



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of all youth participants placed in paid or unpaid work experience have all applicable child abuse and criminal background check clearances.

Paid Work Experience Employer Eligibility - The provider organization with which the youth is enrolled serves as the employer of record and is responsible for ensuring that wages are paid on time and in full. Non-profit, for-profit, and public entities are eligible to serve as paid work experience sites. A company will not be eligible to host a youth participant for work experience if:

1. The company has any other individual on layoff from the same or substantially equivalent positions.
2. The youth paid work experience would infringe upon the promotion or displacement of any currently employed worker or cause a reduction in their hours.
3. The same or a substantially equivalent position is open due to a hiring freeze
4. The employer is a private for-profit employment agency, i.e. temporary employment agency, employee leasing firm, or staffing agency.

Work Experience Agreements

Contracted providers must execute a Work Experience Agreements with each individual worksite that is utilized. A signed copy of the Work Experience Agreement is given to the worksite to ensure that the expectations are fully understood. The Worksite Agreement can be posted along with other required postings (i.e. Grievance Procedures, Equal Opportunity Is the Law, Abstract of the Child Labor Laws, Minimum Wage Poster and Fact Sheet, etc.). A copy of the Agreement shall be maintained in the participants case file. Note: agreements should be individualized for participants. While there can be a master agreement containing general work conditions, there needs to be an individualized plan document noting specific goals for that participant.

At a minimum, the Worksite Agreement shall include the following elements:

1. Names and contact information of all parties;
2. Responsibilities and expectations of the participant, and worksite employer;
3. Compliance with Child Labor Laws;
4. The job title, supervision, duties and goals for work experience participants;
5. Identification of the legal requirements that must be met per the above. In addition, it can include worksite safety requirements and provisions related to the avoidance of sexual harassment;
6. A statement informing the worksite that they will be subjected to worksite monitoring by both State and Local representatives, as well as visitations by case management staff to check on the progress of work experience participants;
7. Provisions for termination of the agreement for non-performance and/or failure to meet any of the requirements of the agreement/contract;
8. Duration and remuneration;



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9. Other information, relative to the specific work experience activity; and,
10. Signatures and dates from worksite representative and the contracted provider representative.

Workplace Guidelines

1. Fair Labor Standards Act (FLSA) The provisions of the FLSA apply to all youth participants engaged in a paid work experience under WIOA, as do Federal/State hourly minimum wage laws.
2. Unpaid work experiences and internships can be offered in limited cases based on a participant's Individual Employment Plan (IEP), and when combined with other services. Unpaid work experience is not recognized as a best practice by Greater Cleveland Works. It is expected that work experience will be paid in most cases.
3. Non-Discrimination and Equal Opportunity WIOA Section 188 (a)(2) prohibits discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation or belief. An organization that accepts a work experience participant is advised of obligations imposed by WIOA Law, and ensures that agency services are provided to all individuals that are eligible, and not discriminate based on circumstances that might limit the population served. For example, a faith-based organization that operates an emergency food distribution center must serve all individuals that are eligible to receive those services and not discriminate based on a religious preference.

Child Labor Laws

The employer must comply with all applicable federal laws and with state child labor laws if the participant is less than 18 years of age. The Fair Labor Standards Act (FLSA); Ohio Revised Code (O.R.C.) Chapter 4109 Employment of Minors, and Chapter 3331 Age and Schooling Certificates; and Ohio Administrative Code (O.A.C.) Chapter 4101:9-2 Employment of Minors in Occupations Hazardous or Detrimental to Health and Well-Being, are primary legislation which governs the employment of minors at the federal and state levels.

Proof of age and parental consent must be given for both paid and unpaid work experience. Minors participating in a work experience while school is in session also require a work permit. Minors who are under 16 also must have an Age and Schooling Certificate (work permit).

Evaluation and Monitoring

Pre-Evaluation of Worksites - The contracted provider shall determine the appropriateness of utilizing the employer for work experience. The determination components shall include the key legal provisions of the worksite agreement such as safety, labor law requirements, status of layoffs, etc. In addition, the contracted provider shall determine the age appropriateness and level of exposure to work readiness and job skills, type of supervision available, as well as review the previous work experience placements at the same location.



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Potential worksite employers must demonstrate a commitment to helping participants receive the experience and training needed to meet their Individual Opportunity Plan (IOP) goals. As part of participation, employers must be willing to work closely with program staff, especially when accepting participants that have barriers to employment. Proper worksite supervision must be one of the factors that are reviewed prior to placement of the participant in the work experience activity.

Worksite Monitoring - Contracted provider staff shall monitor the worksite and activities described in the work experience agreement to ensure that the legal and performance requirements, as well as the work experience goals are being met by all parties. Additional items to review when monitoring worksites shall include:

1. Appropriateness of work experience for participants;
2. Quality of work experience in teaching good work habits or job skills;
3. Quality of outcomes and other benefits to participants; and,
4. Adequacy of work site supervision in assuring compliance to legal requirements and program goals.

Greater Cleveland Works Monitoring - As part of the routine monitoring performed no less than annually by Greater Cleveland Works, there will be a review to ensure the contracted provider is monitoring the worksite and activities described in the work experience agreement. Greater Cleveland Works reserves the right to additionally conduct monitoring at the work experience worksite.

Unemployment Insurance (UI) Benefits

An individual receiving work training, such as a WIOA work experience, is not considered “employed” for the purposes of qualifying for Unemployment Insurance (UI) Benefits, even though they might be on a regular payroll, receiving wages, and are considered employed under FLSA. Therefore, a participant completing a work experience and then filing for UI will not qualify for UI on the basis of the work experience.

Duration of Work Experience

In-School Youth: Participants can be assigned up to twenty hours per week in work experience during the school year. For summer work experience, in-school youth can work up to forty hours a week for each year they are enrolled in the WIOA program.

Out-of-School Youth: Participants can be assigned up to forty hours per week in work experience. The total number of work experience hours shall not exceed 960 hours per participant.

Incentives

Unpaid work experience participants may receive remuneration in cash or non-cash incentives. The incentive should equate to an achievement, and should be tied to training and education, a work readiness skill attainment and/or an occupation skill attainment goal identified in the IOP.



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Incentives for youth may include plaques, certificates, gift certificates, recognition ceremonies for participants, caps and gowns, class pictures, class rings, school supplies and/or calculators, or a check. Incentive payments for Work Experience must be in accordance with Greater Cleveland Works' Incentive Policy and be:

- Tied to the goals of the program;
- Outlined in writing before the commencement of the work experience