



<b>Title:</b>	Work Experience/Internship Policy	<b>Effective Date:</b>	6/8/2017
		<b>Revised Date:</b>	5/21/2025

### **Purpose**

The purpose of this policy is to establish guidelines for the development and implementation of Work Experiences and/or Internships through the Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, and/or Youth programs. These activities present opportunities where an eligible participant will be able to learn employment related skills or qualify for an occupation through demonstration and practice.

### **References**

- Workforce Innovation and Opportunity Act (WIOA) Public Law 113-128
- 20 CFR 663 and 664
- Virginia Workforce Letter (VWL) No. 19-07, Change 2
- Fair Labor Standards Act
- 20 CFR 680
- 20 CFR 681.600
- TEGL 19-16
- TEGL 21-16, Change 1

### **Policy**

It is the policy of the Greater Roanoke Workforce Development Board (GRWDB) to provide the option of Work Experience/Internships to WIOA Title I Adult, Dislocated Worker, and/or Youth program participants, where applicable and beneficial. Work Experiences/Internships are planned, structured learning experiences that take place in a workplace or related location with employer interaction for a limited period of time. Work Experiences/Internships may be paid or unpaid, as appropriate, and may be in the private for-profit sector, the non-profit sector, or the public sector. Funds provided for these activities 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. The GRWDB is an Equal Opportunity Employer/Program. Auxiliary aids and services are available to individuals with disabilities. Interpreters are available upon request to allow program participation in services, such as a Work Experience/Internship.

### **Procedure**

#### **Participant Eligibility**

Eligible participants in the WIOA Title I Adult, Dislocated Worker, and/or Youth programs can participate in a Work Experience/Internship activity once an assessment of skills, abilities, and interests has been completed and an Individual Employment Plan (IEP) has been successfully developed. In accordance with the IEP and assessment, there must be a justified, substantial need for a Work Experience/Internship,



and can be provided to offer opportunities for career exploration and/or skill development. Work Experiences/Internships will be combined with comprehensive career and supportive services, as needed.

### Host Eligibility

An eligible host for a Work Experience/Internship must meet the following criteria:

- May be in the public, private non-profit, or private sector.
- Must have adequate personnel to provide enough supervision and training for the Work Experience/Internship participants.
- Must provide, to the participants, working conditions at the same level and to the same extent as other trainees or employees working a similar length of time and doing the same type of work.
- Must not use assignments to displace regular employees, or to replace any employee on layoff.
- Must provide an opportunity for the WIOA Title I participant to gain experience and/or skills that lead to occupations identified as high-demand and determined to be of priority in the GRWDB's Local Plan.

Staff may request a waiver for participants that are interested in opportunities outside of these target sectors and occupations. Waivers must be requested, with all required documentation, and approved by the Executive Director or their designee prior to approving funding for the participant. Waiver documentation must include, at a minimum:

- Justification within the participant's IEP identifying occupation interest and/or aptitude
- Barriers to employment and/or training in the target sectors and occupations
- Local labor market information including LMI data as well as at least 3 different current job openings paying a self-sufficient wage (as defined in GRWDB policy) for the occupation connected to the training.

Work Experiences/Internships may not be provided within a Virginia Career Works Center (American Job Center) unless approval from the Executive Director of the GRWDB has been received in writing prior to the start date of the Work Experience/Internship.

These items must be attached to the waiver request form to a GRWDB Director.

### Work Experience/Internship Implementation

Because the Work Experience/Internship activity is considered a pre-vocational service, the relationship between the WIOA Title I participant and the host for the Work Experience activity does not constitute an employer/employee relationship. A review of the host will ensure that there is currently or expected to be enough work to provide the service for the participant. An on-site or virtual visit by staff will be conducted to ensure that the host has the necessary equipment, materials, and supervision to host the Work Experience/Internship participant.



Payments to WIOA Title I participants that are participating in Work Experience/Internship opportunities are stipends provided for progress and attendance in an intensive service, not compensation for work performed for an employer. Payments to participants for classroom-based training, such as high school equivalency training, are only allowable if tied to a work experience. An educational component such as a high school equivalency program with no ties to a work experience activity is not an allowable cost. All WIOA Title I participants that participate in a Work Experience/Internship opportunity will be provided a 1099 MISC by January 31st documenting the prior calendar year stipends received. All WIOA Title I participants will receive information on requirements to file income taxes and resources to assist them with filing at little to no cost, if applicable.

A Work Experience/Internship agreement will be completed between the host site, WIOA Title I participant, and the GRWDB. This agreement must be limited to the period required for a participant to complete career exploration activities and/or become proficient in the skills that have been identified in the IEP that are needed for job development. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the job, the academic and occupational skill level of the participant, prior work experience, and the participant's IEP. Work Experiences/Internships must include an academic component of some nature related to the industry of placement, whether that be to learn work readiness, a specific skill, update or increase math skills, etc. This must be documented within the Work Experience/Internship agreement and must be completed either prior to or during the Work Experience/Internship.

Prior to the development of the Work Experience/Internship agreement, a job description will be provided for the opportunity and a concise outline of the tasks to be learned and the approximate hours of training required for each task. If this is not formally available, GRWDB staff will work with the host to develop the outline and assign hours for Work Experience/Internship. Once this is completed, GRWDB staff will determine the length of the training period that will be covered by the agreement. Work Experience/Internship participants will be paid a stipend at a rate of \$15 per hour that the participant successfully attends and participates in the Work Experience/Internship. A Work Experience/Internship may not last longer than 8 weeks nor exceed \$4,800 in stipends, whichever comes first. Funds allocated to a participant for a Work Experience/Internship will count towards the maximum expenditure per participant of \$5,000 per year. Waivers to the time maximums outlined here may be authorized on a case-by-case basis by the Executive Director or their designee, if requested and approved in advance of exceeding these limitations.

Timesheets shall be submitted to the GRWDB on a biweekly basis documenting the hours that the participant attended the Work Experience/Internship. This timesheet must be signed by the participant and the Work Experience/Internship supervisor. GRWDB staff will also contact the participant at least once a month to ensure that if additional career services and/or supportive services are needed, they are provided to the participant to ensure successful completion of the Work Experience/Internship activity. This will also be an opportunity for GRWDB staff to update the IEP and assess the participant for additional needs/services.



### Summer Work Experience Bootcamp Opportunities

Special summer work experience opportunities, built around the summer break of school schedules, that are organized in a bootcamp format, may be available to eligible participants during the traditional May through September period. These summer experiences may vary in hours and schedule depending on local program design and the availability of hosts. Generally, these are operated in a more condensed manner than other work experience opportunities. Because of the variety and inconsistency in scheduling during the summer months, participants in a summer work experience boot camp may not be paid an hourly stipend, as outlined above. However, should they not receive the hourly stipend, they will receive an incentive upon successful completion of the boot camp in the amount of \$100.

### Funding Priorities

While all WIOA Title I programs may provide Work Experience/Internship opportunities for enrolled participants, there is a requirement in federal law that a minimum of 20% of WIOA Title I Youth program year funds must be spent on Work Experience/Internship opportunities and associated activities. Activities and expenditures that can count toward the calculation of Work Experience/Internship expenditures include the following:

- Payments provided for participation in a Work Experience/Internship
- Staff time working to identify and develop a Work Experience/Internship opportunity, including staff time spent working with employers to identify and develop the opportunity.
- Staff time working with employers to ensure a successful Work Experience/Internship, including staff time spent managing the opportunity.
- Staff time spent evaluating the Work Experience/Internship
- Participant Work Experience/Internship orientation sessions
- Employer Work Experience/Internship orientation sessions
- Classroom training or the required academic component directly related to the Work Experience/Internship
- Incentive payments directly tied to the completion of the Work Experience/Internship
- Employability skills/job readiness training to prepare WIOA Title I Youth for Work Experience/Internship opportunities.
- Supportive service expenses needed for a WIOA Title I Participant to participate in or complete a Work Experience/Internship