

WORKFORCE DEVELOPMENT BOARD OF VENTURA COUNTY (WDB)
LOCAL POLICY BULLETIN #2016-01: Policy on Youth Work Experience and Expenditure Requirements

Effective date: July 1, 2015

(This policy revises and supplants #2015-16 and incorporates additional guidance on appropriate expenditures)

SUBJECT: Policy on Youth Work Experience and Expenditure Requirements

PURPOSE: The Board must establish local policy and procedures for youth work experience no later than January 1, 2016, to cover (1) the duration of the work experience assignment, (2) the limitations on the number of hours and (3) appropriate incentives and stipends, including limitations on the types and dollar amount. Note that the third of these items is already covered by the existing Local Policy Bulletin #2015-06: Policy on Incentives for Youth Programs (effective July 1, 2015; original effective date: February 10, 2012).

REFERENCE: Workforce Services Directive WSD15-03 (September 16, 2015), from California's Employment Development Department (*WIOA Youth Program Requirements*); *Federal Register*, Vol. 80, No. 73/Thursday, April 16, 2015/Proposed Rules: Sections 681.640 & 681.600; ETA TEGL 23-14 (March 26, 2015); 2 CFR, 200,220,225, 230; 29 CFR, 95,97

POLICY:

(1) Work experience, as one of the 14 required program elements specified for youth in WIOA 129(c)(2), is to be understood as a planned, structured learning experience taking place in a workplace to provide youth participants with opportunities for career exploration and skill development. Such experience includes academic and occupational education and may be paid or unpaid, as appropriate. It may include the following types of work experiences:

- Summer employment opportunities and other employment opportunities available throughout the school year
- Pre-apprenticeship programs
- Internships and job shadowing
- On-the-job training

The duration of the work experience assignment and any limitation of the number of hours depend, in the first instance, on the amount of funds available to each provider. Ordinarily, work experience, whether for IS or OS youth, will be in the form of a paid internship lasting no more than 125 hours for any one participant (exceptions may be granted on an individual basis); and the wage will be the California minimum prevailing at the time the participant starts work. OS youth may be issued an ITA, and the terms of the ITA will prevail. The assignment must be completed before the participant exits the program.

Elements of work experience may include:

- Completion of the National Work Readiness Credential and Computer Literacy coursework to develop and improve work-related skills, including soft skills

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- Career Technical Education (CTE) in preparation for specific career paths, and associated internships
- Workforce preparation

(2) Local areas must spend at least 20 percent of their WIOA youth formula allocation on work experience (WIOA Section 129[c][4]). The work experience expenditure rate is calculated after subtracting funds spent on administrative costs. Additionally, the expenditure rate is not applied separately for IS and OS youth.

For example:

Total Youth Formula Allocation	Administrative Costs of the Grantee (WDB)	Total Available for All Youth Program Expenditures	Total 20% Work Experience Requirement
\$1,000,000	\$100,000 (10%)	\$900,000	\$180,000

The 20% figure can include (1) educational expenses needed to prepare the clients for particular jobs and (2) the wages and staffing costs for the development and management of work experience.

Necessary and appropriate expenses for IS and OS youth work experience will be, collectively, a particular subset of the following general invoice categories:

- Administrative Costs
- Staff Salaries
- Staff Benefits
- Staff Travel
- Consumable Supplies/Equipment
- Tuition/Vocational Training
- Participant Support Services
- Participant Wages (any form of subsidized employment)
- Participant Benefits

Supportive services provided to youth in the course of their involvement in work experience (and counted toward the 20% expenditure of WIOA youth funds include, but are not limited to:

- Fees for certificates or licensure
- Transportation and communication services for the time spent in work experience
- Fees and materials required for successful completion of the work experience
- Tools, uniforms, etc., required for participation in work experience

Expenditures must be in accordance with *Uniform Administrative Requirements*, and incentives may not include gift cards for entertainment.

INQUIRIES: The WDB administrative staff in charge of contracts for youth services, which can be reached at 805-477-5306, will answer questions regarding this policy, which will be revised as need arises.