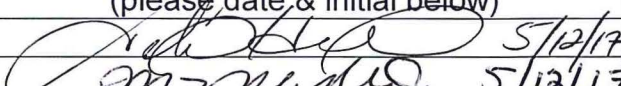
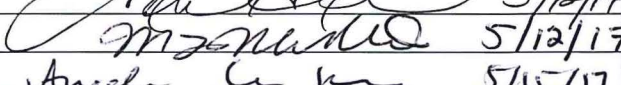
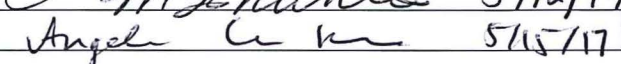




Defining Success. Driving Growth.

## POLICY OF EMPLOYINDY

|                                |  |
|--------------------------------|--|
| <b>Policy Name</b>             | Youth Work Experience Fiscal   |
| <b>Policy Number</b>           | 2017-008   |
| <b>Program Funding Stream</b>  | WIOA Youth   |
| <b>Executive Team Approval</b> | (please date & initial below)  |
| CFO                            |  5/12/17 |
| COO                            |  5/12/17 |
| <b>President Approval</b>      |  5/15/17 |

| REV | Description of Change | Author     | Effective Date | Sunset Date |
|-----|-----------------------|------------|----------------|-------------|
|     | Initial Release       | J. Schlake | Upon Approval  | 6/30/2018   |
|     |                       |            |                |             |
|     |                       |            |                |             |

### 1. Purpose

To provide clarification around the requirement that 20% of WIOA Youth funds are utilized for work experiences.

### 2. Scope

This policy applies to EmployIndy staff and service providers and how they should account for expenses related to WIOA Youth work experiences.

### 3. Summary of the Law, Rules, and Governing Policies

WIOA Sec. 129(c)(4) requires a Workforce Development Board to spend “not less than 20 percent of the funds allocated” for youth on “paid and unpaid work experiences that have as a component academic and occupational education.”<sup>1</sup>

20 C.F.R. § 681.600 discusses “What are work experiences?”

20 C.F.R. § 681.590 discusses “what is the work experience priority and how will local youth programs track the work experience priority?”

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<sup>1</sup> 29 U.S.C. § 3164(c)(4)

U.S. DOL TEGL 23-14<sup>2</sup> provides further guidance on Youth Programs generally and the 20% work experience requirement specifically.

U.S. DOL TEGL 08-15 explains allowable work experience expenditures.<sup>3</sup>

Indiana Department of Workforce Development "MEMORANDUM: Interim Guidance on WIOA Title I Youth Work Experience" provides additional guidance on the work experience requirement.

#### **4. Responsibilities**

EmployIndy's Finance Department is responsible for monitoring staff time, service provider time, and direct client expenditures.

Each Department is responsible for appropriately identifying how to classify their time.

#### **5. Policy Statement**

EmployIndy is required to ensure that 20% of applicable WIOA Youth funds (In-School and Out-of-School) received by EmployIndy are spent on work experiences.<sup>4</sup> These experiences may include the following:

1. summer employment opportunities and other employment opportunities available throughout the school year;
2. pre-apprenticeship programs;
3. internships and job shadowing; and
4. on-the-job training opportunities.<sup>5</sup>

The work experience may be paid or unpaid.<sup>6</sup> All work experiences must include some form of academic or occupational learning as a component of the program element. The academic or occupational learning could occur before, during, or after the work experience, but, the learning must occur within a reasonable timeframe for relevancy in the work experience placement.<sup>7</sup>

##### Qualifying Expenditures

Program expenditures that can be included in the 20% work experience requirement include the following:

1. Participant related costs for wages or stipends;<sup>8</sup>
2. EmployIndy and service provider staff-related costs for the development and management of work experiences, including processing timecards, monitoring and site visits, and outreach to employers;<sup>9</sup>

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<sup>2</sup> [https://wdr.doleta.gov/directives/attach/TEGL/TEGL\\_23-14.pdf](https://wdr.doleta.gov/directives/attach/TEGL/TEGL_23-14.pdf)

<sup>3</sup> [https://wdr.doleta.gov/directives/attach/TEGL/TEGL\\_08-15.pdf](https://wdr.doleta.gov/directives/attach/TEGL/TEGL_08-15.pdf)

<sup>4</sup> 29 U.S.C. § 3164(c)(4)

<sup>5</sup> 29 U.S.C. § 3164(c)(2)(C); 20 C.F.R. § 681.460(a)(3)

<sup>6</sup> 29 U.S.C. § 3164(c)(2)(C)

<sup>7</sup> Indiana Department of Workforce Development, "MEMORANDUM: Interim Guidance on WIOA Title I Youth Work Experience," [http://www.in.gov/dwd/files/Policy\\_Youth\\_Work\\_Experience.pdf](http://www.in.gov/dwd/files/Policy_Youth_Work_Experience.pdf)

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*



3. EmployIndy and service provider staff time spent identifying potential work experience opportunities;<sup>10</sup>
4. EmployIndy and service provider staff time working with employers to develop the work experience;<sup>11</sup>
5. EmployIndy and service provider staff time working with employers to ensure a successful work experience;<sup>12</sup>
6. EmployIndy and service provider staff time spent evaluating the work experience;<sup>13</sup>
7. Participant work experience orientation sessions;<sup>14</sup>
8. Classroom training;<sup>15</sup>
9. The required academic education component directly related to the work experience;<sup>16</sup>
10. Orientations for employers.<sup>17</sup>

Supportive services including incentives, clothing, or transportation assistance, are not included in the work experience related costs.<sup>18</sup>

### Administrative Costs

Administrative costs are not subject to the 20% percent work experience requirement.<sup>19</sup> Therefore, EmployIndy must spend 20% of the Youth funds after administrative expenses have been removed from the total Youth allocation.<sup>20</sup>

## **6. Exceptions**

There are no exceptions to this policy.

## **7. Definitions**

None.

## **8. Related Policies and Documents**

*EmployIndy Work-Based Learning for Youth and Young Adults Policy*

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<sup>10</sup> U.S. Department of Labor, "TEGL 08-15: Second Title I WIOA Youth Program Transition Guidance," [https://wdr.doleta.gov/directives/attach/TEGL/TEGL\\_08-15.pdf](https://wdr.doleta.gov/directives/attach/TEGL/TEGL_08-15.pdf).

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

<sup>18</sup> Indiana Department of Workforce Development, "MEMORANDUM: Interim Guidance on WIOA Title I Youth Work Experience," [http://www.in.gov/dwd/files/Policy\\_Youth\\_Work\\_Experience.pdf](http://www.in.gov/dwd/files/Policy_Youth_Work_Experience.pdf)

<sup>19</sup> 20 C.F.R. § 681.590

<sup>20</sup> See U.S. Department of Labor, "TEGL 23-14: Workforce Innovation and Opportunity Act (WIOA) Youth Program Transition" for an example of how to handle the exclusion of administrative costs for the 20% requirement. [https://wdr.doleta.gov/directives/attach/TEGL/TEGL\\_23-14.pdf](https://wdr.doleta.gov/directives/attach/TEGL/TEGL_23-14.pdf)