

Comprehensive Case Management & Employment Program (CCMEP)
Temporary Assistance for Needy Families (TANF)
Paid and Unpaid Work Experience Policy

I. SUBJECT: Paid and Unpaid Work Experience

II. PURPOSE: This policy governs the terms and conditions associated with the provision of Paid and Unpaid Work Experience as one of the fourteen (14) youth elements and services available through CCMEP. In addition to this policy, Summit County Department of Job and Family Service (SCDJFS), in procuring and contracting with its OMJ operators, partners, and providers shall determine pursuant to which terms and conditions Youth Work Experience will be made available to individual Youth.

III. ADOPTED: November 27, 2017

IV. REVISED: October 16, 2019

V. DEFINITIONS:

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 he or she is engaged in productive work in a job that provides knowledge and skills essential to full and adequate performance of the job.

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

Summer employment: a work activity conducted during the summer months which must provide direct linkages to academic and occupational learning.

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Subsidized employment (all year): an activity in which a program participant is employed by a private or public sector employer who receives a subsidy from TANF, WIOA, and/or some other public funding mechanism to offset some or all of the participant's wages and costs.

Unsubsidized employment (all year): an activity that includes full or part-time employment of a participant in the private or public sector that is not subsidized from TANF, WIOA, and/or some other public funding mechanism to offset some or all of the wages and costs.

Work Experience Program (WEP): a work activity that is performed in return for cash assistance and provides a program participant an opportunity to acquire the general skills, knowledge, and work habits necessary to obtain employment. Participation in this activity is limited to work eligible individuals in the Ohio Works First program.

VI. BACKGROUND:

Under the State of Ohio's CCMEP policy, paid and unpaid work experience is an allowable service and one of the fourteen (14) CCMEP services required to be competitively procured when selecting youth service providers.

VII. REQUIREMENT:

A. General Requirements.

Work experience is a planned, structured learning activity that takes place in a workplace setting for a limited period of time and it has an academic and occupational education component. Work experience may be paid or unpaid.

Work experience helps CCMEP youth participants understand workplace expectations and what is necessary to obtain and retain employment. Work experiences should enable youth to gain exposure to the working world and its requirements. Work experiences can serve as a stepping stone to unsubsidized employment and is an important step in the process of developing a career pathway for CCMEP participants.

Work experience must be based on identified needs of the individual youth but does not have to be tied to the youth's individual career or employment goal. Use of work experience as a CCMEP service must be based on an objective assessment and identified on the youth's Individual Opportunity Plan (IOP).



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Type of Work Experience

- i Internship
- i Job Shadowing
- i On-the-job Training
- i Pre-apprenticeship programs
- i Summer employment
- i Subsidized employment
- i Unsubsidized employment
- i Work experience program

B. Requirements Regarding Work Experience Providers.

SCDJFS Youth providers should strive to utilize work experience providers that are committed to helping participants receive the experience and training that is required for employment beyond the work experience period. Work experience providers should be willing to work closely with the provider's program staff and be flexible in working with youth who have barriers to employment.

Attention must be given to ensure that work experience arrangements do not unfavorably impact the work experience provider's current employees and do not impair existing contracts for services or collective bargaining agreements. Work experience, including internships, in the private for-profit sector must be structured so as not to appear to be subsidizing private for-profit operations. The work of the participant should not materially impact the profit margin of a private-for-profit company.

C. Paid Work Experience Requirements Regarding the Employer of Record.

Except where the work experience is an unpaid internship and/or unpaid job shadowing, the work experience must be a paid program, and some entity must serve as the employer of record of the Youth. The Youth's employer of record shall assume all of the responsibilities associated with being the employer of record of the Youth, including but not limited to assuming the duties and liabilities associated with:

1. the contribution to and withholding of payroll taxes;
2. provision of worker's compensation coverage;
3. child labor laws for those ages 18 and younger (see attached Appendix One) for a summary of Ohio's child labor laws); and



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4. all other duties assumed by an employer under applicable federal, state, and local laws.

Youth providers must utilize the employer of record set forth by SCDJFS.

D. Unpaid Work Experience.

CCMEP Youth providers for SCDJFS may enroll Youth within unpaid work experience programs, which are limited to internships and/or job shadowing, under the following conditions:

1. The training, even though it includes the performance of work for the host business is essentially a training experience similar to a vocational school.
2. The participant is primarily the beneficiary of the experience.
3. Regular employees are not displaced and the experience is closely supervised/observed.
4. The work experience provider that hosts the experience derives no immediate or significant advantage (and may even be adversely impacted).
5. The participant is not guaranteed a job at the conclusion of the experience.
6. The Youth's work experience does not involve the Youth doing any manual or physical work, and the work environment is set within an office or professional setting, and is not set outside or within a manufacturing or production environment.
7. The Youth is not allowed to operate any type of motor vehicle as part of the work experience other than traveling to and from the site of the experience as part of their work experience commute.

Except where all of the above conditions are satisfied, Youth may not be enrolled into the unpaid work experience program.

E. Work Experience Provider Agreement

Prior to the commencement of any paid or unpaid Work Experience, a written Work Experience Provider Agreement must be entered into that details terms and conditions of paid and unpaid work experience and the expectations of the parties to the agreement. The written agreement must be signed by the participant, the participant's parent or guardian (if the participant is under 18 years of age), the work experience provider, the Youth provider, and the employer of record.



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The written agreement, must include at a minimum: the duration, remuneration, tasks, duties, supervision, health and safety standards, and other conditions of work experience such as consequences of not adhering to the agreement, and a termination clause. Some or all of these requirements can be met with a full, accurate job description or the closest applicable O*NET Online summary job report. The work experience provider, the employer of record, and the youth provider should all be given a copy of the agreement. The agreement must be available for audit and monitoring purposes. A copy of the Agreement to be used is attached as Appendix Two.

VIII. DOCUMENTATION TO BE MAINTAINED

Documentation of the work experience must be maintained in the participant's file. All of the following documentation will be kept in the Youth participant's file:

- i An objective assessment and IOP indicating a need for work experience.
- i Justification for wage reimbursement (time card, time sheets, etc.).
- i A copy of the agreement between the employer of record, the work experience provider, and the youth provider, including any attachments to the agreement, such as a training plan.
- i Time sheets, attendance sheets and performance records, as appropriate, and;

CCMEP Youth providers shall forward these documents, as appropriate, to SCDJFS.

IX. TRACKING YOUTH WORK EXPERIENCE.

SCDJFS will cap youth work experience expenditures at \$8,000.00 gross wages, per youth, per enrollment period in CCMEP.

X. MONITORING

SCDJFS will conduct oversight and monitoring of the implementation of all CCMEP TANF programming.

Youth providers are required to monitor paid and unpaid work experience providers. Youth Providers shall monitor all paid work experience programs. A Youth provider's monitoring of a work experience provider shall at a minimum include all of the following:

1. Review all applicable statutes as required for a complete monitoring review.
2. Perform a desk top audit of the participant's file and the affected contract.
3. Compile a listing of any questions from the desk top review prior to the monitoring visit.
4. Make an on-site monitoring visit at least once during the training period, or shortly thereafter its completion. Preferably the on-site visit will occur as close



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to as possible, when the customer has completed anywhere from 25% to 75% of his or her training. However, the on-site visit may occur after the training is over. The on-site visit will be waived if an on-site visit has already occurred for another employee doing the same work with the same employer within the six (6) months prior to the time that the individual is set to complete his/her training.

5. Complete a Monitoring Report with special attention to the following:
 - a. Completely review the Agreement, including any/all modifications, and obtain all required signatures.
 - b. Review the IOP, justification for training, and the training outline.
 - c. Visually inspect the proof of Worker's Compensation insurance and record the account number and effective dates of coverage.
 - d. Review the participant's time and attendance, payroll, and personnel records.
 - e. Perform a visual inspection of the training area to ensure safe and sanitary conditions.
 - f. Note any comments and any corrective action that may be needed.
 - g. Make sure all required signatures are obtained.
 - h. Report any/all discrepancies to an immediate supervisor no later than 5:00 p.m. on the business day following the visit.
 - i. Construct a corrective action plan, if required, including anticipated dates of completion and review. This action must be completed within five (5) working days.
 - j. Problem sites/customers will be reviewed for follow up no later than ten (10) days after corrective action is initiated ,or, sooner if the situation warrants.
 - k. Follow up reports are to be submitted to the provider Program Managers within three (3) days to determine the effectiveness, continuation, or closeout.
 - l. The provider Program Manager shall effect the final action as determined from information derived from follow-up reports.

XI. TECHNICAL ASSISTANCE.

Questions and requests for technical assistance regarding this policy or issues regarding administration of CCMEP TANF Work Experience may be directed to CCMEP@jfs.ohio.gov.



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Appendix One
Ohio Minor Labor Laws



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