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**EMPLOYERS' TRAINING RESOURCE**

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**POLICY BULLETIN: ETR #23a-25**

TO: ETR Staff and WIOA Youth Service Providers  
FROM: <sup>BJE</sup> Brandon J. Evans, Chief Workforce Development Officer  
DATE: January 8, 2026  
SUBJECT: Youth Work Experience Policy

**This Policy Bulletin Supersedes Any Previously Issued Policy Statements  
Concerning Youth Work Experience**

**PURPOSE**

Workforce Innovation and Opportunity Act (WIOA) requires that each Workforce Development Board adopt a written policy governing youth work experience. The Kern, Inyo and Mono Workforce Development Board (KIM WDB) has developed this policy to ensure that allowable and appropriate work experience is provided to Youth participants in the KIM WDB service area. This policy applies to all WIOA funded in-school youth (ISY) and out-of-school youth (OSY) programs and participants.

**BACKGROUND**

WIOA places a priority on quality work experience for youth participants. Youth service providers should develop and place youth and young adults in work experiences which support their chosen career pathways and facilitate their transition into employment and industries that are in demand. This policy supports that objective.

With the goal of engaging WIOA youth participants in meaningful work experiences, federal legislation requires Local Workforce Development Areas (LWDAs) to utilize a minimum of 20 percent of their program funding for work experiences. Recognizing that engaging youth in the labor force is an indicator of future success, WIOA defines work experience as a planned learning experience that takes place for a limited amount of time. It can be paid or unpaid, and take place in the private sector, non-profit sector, or public sector. Work experience must include both occupational and educational elements. All Fair Labor Standards Act (29 U.S.C. 201, et. seq) regulations, WIOA Section 181(b),

Equal Opportunity (WIOA Section 188) guidance, and - where applicable - Child Labor Laws apply to WIOA work experiences.

## **POLICY**

WIOA outlines four types of work experience suitable for the development and placement of enrolled youth and young adults. These include:

- Work Experiences available throughout the year, including Summer employment;
- Internships and Job-Shadowing;
- Pre-Apprenticeship programs; and
- On-the-Job Training (OJT).

Every youth placed in a work experience must have a training plan which outlines the participant's job duties on the worksite and the skills to be learned. Case notes must accompany the development and the placement of a youth in a work experience activity. The participant's Individual Service Strategy (ISS) should document the need for work experience, as well as the participant's career interests, and the training plan should be consistent with the ISS.

WIOA requires that academic and occupational education be a component of a youth's work experience, and that these take place within the same timeframe and connect to training in a specific occupation, occupational cluster, or career pathway. These activities may include, but are not limited to workforce preparation activities, basic academic skills, or hands-on occupational training. With that in mind, youth service providers must take steps to ensure that work experiences are designed to support the participant's education and career goals. Although the workforce system realizes that placing young people in employment is central to their long-term success, it is with the recognition that the development of academic skills is critical to preparing young people for tomorrow's job market.

KIM WDB recognizes that a "one-size fits all" approach to work experience is neither practical nor desirable, and that our subcontracted youth programs may place a varying degree of emphasis on work experience depending on the size and structure of the program and its target population. For example, the amount of work experience offered to younger, in-school youth may be significantly less than that offered to older, out-of-school youth.

The type of academic and occupational education in which the youth participate will vary based on the participant's academic skill level. Youth who are enrolled in high school, adult education and literacy classes, post-secondary education and occupational skills training concurrent with placement in work experience have met the academic and occupational education work experience requirement. However, there is no prohibition of enrollment in additional educational programs if the youth meets the eligibility requirements. The youth service provider should assist the youth in obtaining industry-

recognized certifications that are integral steppingstones to their identified career pathway and to reach the goals identified on their ISS.

Youth service providers must adhere to all the requirements regarding work experience contained in Exhibits A of their Subgrant Agreement, including, but not limited to work site agreements, work site supervision, time records, minimum wage, labor and child labor laws (as applicable) including the Affordable Care Act and the Healthy Workplace Healthy Family Act of 2014. *While the amount of work experience made available to participants may vary, each youth service provider must establish their own maximum duration and maximum hour limit for work experience for each of their programs.*

## **WORK EXPERIENCES, INCLUDING SUMMER EMPLOYMENT**

The WIOA youth activity, “summer employment opportunities”, and “other employment opportunities available throughout the school year”, is considered one service. This is an important distinction from previous Workforce Investment Act legislation which divided work experience and summer work experience into separate program activities. Youth Service Providers should always seek to place youth participants in an employment opportunity that supports the career pathway documented on their ISS. It is important to note, however, there may be instances where this is not possible, or it is a youth’s initial venture into the labor force. In those circumstances, providers may find it necessary and practical to place the youth at a worksite where the participant would not only secure employment and earn wages but also facilitate the development of job readiness skills fundamental to success in the workplace.

## **INTERNSHIPS AND JOB SHADOWING**

Internships are planned, learned experiences that are designed to be conducted in the workplace for a specific period of time. WIOA youth and young adults can be placed at an internship site in the private, non-profit, and public sector. It can be paid or unpaid work experience. There are specific U.S. Department of Labor Wage and Hour Division guidelines for unpaid internships, based on the Fair Labor Standards Act [29 U.S.C. 201 et. Seq]. Only place youth in unpaid internships that meet the criteria in the Division’s Fact Sheet #71 [FS 71; January 2018; <https://www.dol.gov/agencies/whd/fact-sheets/71-flsa-internships>]. With an internship, participants are exposed to a work environment, have an opportunity to develop occupational skills, and increase their future employability. Internships allow youth to utilize their academic experience in the work environment and prepare themselves for entry-level positions within a specific career pathway. A training plan for an internship should be developed and agreed upon by the participant, employer, and career counselor. An internship must be designed for a participant based on an identified career and occupational goal. While securing employment following the completion of the internship is desirable, it is not a requirement.

Job shadowing is workplace-based career exploration. It allows the youth an opportunity to follow and observe a professional employee who is working in the youth participant’s chosen career field. Job shadowing is an effective mechanism to enable a youth the

opportunity to gain exposure to a specific occupation or industry for which they have expressed an interest. In some instances, job shadowing can be a facet of a quality internship opportunity. Yet it also serves as a tool for the youth and is offered to provide them with a more adequate representation of the knowledge and capabilities required to perform a job.

## **PRE-APPRENTICESHIP PROGRAM**

Pre-Apprenticeship is defined at 20 CFR 681.480 (and in Training & Employment Notice No. 23-23) as a program that includes a set of strategies developed to prepare individuals to enter a Registered Apprenticeship program and has a documented partnership with at least one Registered Apprenticeship program. WIOA highlights the characteristics required for a Pre-Apprenticeship program. They include:

- Training and curriculum that aligns with the skill needs of employers in the economy of the State or region involved;
- Access to educational and career counseling and other supportive services;
- Hands-on meaningful learning activities that are connected to education and training activities, such as exploring career options, and understanding how the skills acquired through the coursework can be applied toward a future career;
- Opportunities to attain at least one industry-recognized credential; and
- A partnership with one or more registered apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship program in a registered apprenticeship program.

Pre-Apprenticeships are a viable method to expose youth participants to formal training that can lead to an in-demand occupation. Although the skilled trades represent industries in which to establish a Pre-Apprenticeship program, youth service providers are encouraged to explore relationships with industries not traditionally served through an Apprenticeship model. Participation in a Pre-Apprenticeship may meet the academic and occupational requirements for work experience in those instances where a youth is required to raise literacy levels to enter a Registered Apprenticeship.

## **ON-THE-JOB TRAINING (OJT)**

OJT is a work experience that consists of occupational training provided to a participant through a contract with an employer. The employer receives reimbursement for the costs associated with the training and supervision of the employee. The reimbursement can amount to 50 percent of the participant's wages while working for the OJT employer. OJT contracts with an employer are limited to the duration necessary for the participant to become competent in the skills required to perform the position.

All OJT contracts must be written by Employers' Training Resource (ETR). If an employer who works with a youth service provider wishes to participate in OJT with a youth, the youth service provider should contact their assigned Analyst who will then work with ETR's OJT coordinator, the employer, the youth service provider and the participant to determine whether the OJT is appropriate and whether there should be a transfer/activity

change or an exit from the youth program before the OJT can begin. Youth service providers may not contract directly for OJTs.

Participants in subcontracted, comprehensive, youth-only training programs are generally not considered for participation in an OJT unless they have completed the objectives and obligations of their youth program and are ready for full-time employment.

### **ACTION REQUIRED**

This policy is effective immediately. Youth service providers should ensure that the WIOA youth work experiences discussed within this policy are incorporated within their programs. This guidance should be distributed to all parties with responsibility for and oversight of youth work experiences.

Please direct comments or questions regarding this policy to your assigned Analyst.

### **REFERENCES**

- Workforce Innovation and Opportunity Act of 2014 (Pub. Law 113-128) and the U.S. Department of Labor's Final Rules (20 CFR Parts 675–688, effective October 18, 2016)
- Training & Employment Notice No. 23-23 – Quality Pre-Apprenticeship Programs
- Employment Development Department Directive WSD17-07 – WIOA Youth Program Requirements