

Policy Number/Name: POL 2026 Work Experience Effective Date: Immediately

Policy Impact: Title I WIOA Services Provider

Revision Date: May 2026

Work Experience

PURPOSE: The purpose of this policy is to describe the requirements governing work experiences for adults, dislocated workers, and youth, including internships and transitional jobs for adults and dislocated workers and youth work experience activities, in accordance with the Workforce Innovation and Opportunity Act of 2014 (WIOA), its implementing regulations, applicable Training and Employment Guidance Letters (TEGLs), and Arkansas Workforce Connections policy (WIOA §§ 129(c)(2)(C), 129(c)(4), 134, 181(d), and 188(a)(3); 20 CFR Parts 680, 681, and 683; Arkansas Workforce Connections WIOA Title I Policy Manual, including Policy 3.8 Work Experience).

REFERENCE:

WIOA §§ 129(c)(2)(C), 129(c)(4), 134(c)(2)(A)(xii)(VII), 134(d)(5), 181(d), and 188(a)(3)

20 CFR 680.150, 680.180, 680.190, 680.195, 680.530, 680.830, and 680.840

20 CFR 681.460, 681.590, 681.600, and 681.610 through 681.630; 20 CFR 683.200(g), 683.255, 683.260, 683.270, and 683.280

29 CFR Part 2, Subpart D; Fair Labor Standards Act

TEGL 19-16, Change 1

TEGL 21-16

TEGL 21-19

Arkansas Workforce Connections WIOA Title I Policy Manual, including Policy 3.8 Work Experience, Policy 4.2 Case Management and Participant Files, and Form 4.1 Standardized Pre-Award Review Criteria.

POLICY

Work experiences, including internships, that are linked to an individual's career and employment goals are individualized career services that must be available for adults and dislocated workers when such services are determined appropriate to assist the individual in obtaining or retaining employment. Transitional jobs are a type of paid work experience available to eligible adults and dislocated workers with barriers to employment who are chronically unemployed or have an inconsistent work history. Paid and unpaid work experience is also a required youth program element under WIOA.

Work Experience for Adults and Dislocated Workers

For adults and dislocated workers, an internship or work experience is a planned, structured learning experience that takes place in a workplace for a limited period of time. Such work experiences may be paid or unpaid, as appropriate and consistent with the Fair Labor Standards Act and other applicable laws, and may be arranged within the private for-profit, nonprofit, or public sector.

Transitional jobs are a type of paid work experience designed to establish work history, demonstrate success in an employee-employer relationship, and develop skills that lead to unsubsidized employment.

Transitional jobs are available only to individuals with barriers to employment who are chronically unemployed or have an inconsistent work history, as determined by the LRWDB. The duration of each adult or dislocated worker work experience must be identified in the participant's Individual Employment Plan (IEP), worksite agreement, and training plan. Adult and dislocated worker work experience activities, including year-round activities, may be authorized for a period not to exceed six months.

Participants in adult and dislocated worker work experience may be scheduled for no more than eight hours per day and no more than 32 hours per week. The planned schedule must be documented in the IEP, worksite agreement, and training plan, and must reflect the participant's service strategy, worksite needs, and applicable labor standards.

Unlike on-the-job training, there is no requirement that the employer retain the individual upon completion of the transitional job, though retention is preferred when appropriate. Transitional jobs must be combined with comprehensive career services and supportive services, as outlined in local supportive services policy. The LRWDB will use no more than 10 percent of its combined Adult and Dislocated Worker allocations for transitional jobs, excluding comprehensive career and supportive services from that cap.

The maximum funding threshold for adult and dislocated worker year-round work experience is \$9,000 per participant for the six-month activity period, inclusive of wages and allowable associated work experience costs unless an approved local exception applies. Any exception must be documented and approved on a case-by-case basis in accordance with local procedures.

Work Experience for Youth

For youth, work experience is a planned, structured learning experience that takes place in a workplace for a limited period of time. Youth work experience may occur as summer employment opportunities and other employment opportunities available throughout the school year, pre-apprenticeship programs, internships and job shadowing, and on-the-job training. Youth work experience may be paid or unpaid, as appropriate and consistent with the Fair Labor Standards Act and other applicable laws. Work experiences for youth must provide opportunities for career exploration and skill development and must be connected to the participant's Individual Employment Plan (IEP) and identified career pathway goals. Each youth work experience must include academic and occupational education, as

applicable, and the work experience assignment must support the employment goals, service strategy, and career pathway documented in the IEP.

Youth summer work experience may be authorized for a period of up to eight weeks. Youth non-summer or year-round work experience may be authorized for a period not to exceed six months. Each youth assignment must include clear start and end dates, worksite supervision, measurable learning objectives, and the identified academic or occupational education component.

Youth participants may be scheduled for no more than eight hours per day and no more than 32 hours per week, subject to school schedules, child labor laws, and safety considerations. When school is in session or where educational participation would otherwise be impaired, local staff may impose a lower schedule consistent with the participant's IEP and local procedures.

The maximum funding threshold for youth summer work experience is \$3,000 per participant. The maximum funding threshold for youth non-summer or year-round work experience is \$9,000 per participant for the six-month activity period, inclusive of wages and allowable associated work experience costs unless an approved local exception applies.

Not less than 20 percent of the youth funds allocated to a local area, minus local administrative costs, must be spent to provide in-school youth and out-of-school youth with paid and unpaid work experiences. Countable expenditures include wages or stipends and related employment costs such as FICA match and workers' compensation; staff time to identify, develop, manage, and evaluate work experiences; participant and employer orientation sessions; classroom training or required academic education directly related to work experience; incentive payments directly tied to completion of work experience; and employability skills or job readiness training that prepares youth for work experience.

Wage, Payroll, and Documentation Requirements

Paid work experience participants must be compensated at no less than the current applicable federal or Arkansas minimum wage. A higher rate of pay may be approved on a case-by-case basis using applicable industry standards, the participant's experience level, and the duties of the placement. Payroll for both summer and year-round work experience will be administered by the LRWDB finance function. Participants or case workers must submit timesheets by 10:00 a.m. each Friday, and payment will be made weekly by check on the following Friday, subject to approval of the timesheet and verification of hours worked.

Required documentation for each work experience must include, at a minimum, the worksite agreement, training plan, timesheets, and evaluation forms, together with all other eligibility, case management, and payroll records required by state and local policy. No participant may begin work experience until the required documentation has been completed and retained in the participant file.

Worksite Eligibility, Safety, Monitoring, and Performance

Employer and worksite eligibility criteria for work experience are the same as the criteria used by the LRWDB for the eligible training provider list, as applicable to the worksite review process. In addition, each proposed worksite must be reviewed before placement and must be able to provide a safe,

supervised, and meaningful learning environment, appropriate work assignments, and a supervisor able to evaluate participant performance.

The LRWDB will ensure workers' compensation coverage, liability coverage, and safety procedures for work experience participants. Prior to the start of any paid work experience, the entity responsible must verify coverage and provide documented safety and workplace expectations orientation to the participant and worksite supervisor.

The local area will monitor worksites and participant progress through regular calls and check-ins, with site visits conducted as needed if issues surface. Monitoring activity must be documented, and worksite supervisors must complete periodic evaluations using locally approved forms.

Worksite supervisors are responsible for establishing and communicating performance expectations for each participant. At a minimum, participants are expected to report as scheduled with no absenteeism or tardiness, perform assigned duties and tasks, and work effectively with colleagues as part of a team. The weekly timesheet must include space for the supervisor to document participant progress, areas for improvement, issues, and any disciplinary activity. Case managers must review supervisor comments each week and conduct week-by-week follow-up with the participant and, when appropriate, the worksite supervisor to address performance, attendance, and work readiness concerns.

No funds may be provided to employers for work-based training or other work experience to be used directly or indirectly to assist, promote, or deter union organizing, or to fill a job opening that is vacant because of a strike, lockout, or other labor dispute-related work stoppage. No participant may be placed in work experience in violation of relocation, displacement, nepotism, sectarian activity, or other applicable WIOA restrictions.

Contact Person	Expiration Date
W. J. Monagle, Executive Director	Indefinite
Authorized By	
Eddie Davis, Chair  / SECRETARY	6/25/24

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