



Governor's Local Workforce Areas  
WORKFORCE INNOVATION AND OPPORTUNITY ACT

# YOUTH WORK-BASED LEARNING PROGRAM GUIDELINES

REVISED NOVEMBER 2022



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# BACKGROUND

## I. Introduction

The Governor's Local Workforce Area (GLWA) which includes North Alabama Works, East Alabama Works, West Alabama Works, Central Alabama Works, and Southeast Alabama Works Local Workforce Development Areas operates a Work-Based Learning (WBL) Program for Workforce Innovation and Opportunity Act (WIOA) eligible young adults. Those eligible, ranging in age from 16 to 24 years old, earn between \$7.25 and \$19.66 per hour for up to 390 hours. The hourly rate varies by Local Workforce Area and the type of employment. The Work-Based Learning Program is funded through the federal Workforce Innovation and Opportunity Act's (WIOA) Youth Funds.

The WBL program targets young adults who meet the requirements of the WIOA out-of-school or in-school youth program. Local Area policies may designate different age ranges for program participants and/or serve both in-school and out-of-school youth.

These guidelines describe policies and procedures for the Work-Based Learning Program. Program operation is the responsibility of the Alabama Career Centers located in the five local workforce areas in the GLWA. Any questions regarding program policies should be addressed to the Alabama Department of Commerce/Governor's Local Workforce Area at [youth@commerce.alabama.gov](mailto:youth@commerce.alabama.gov).

## II. Goals and Objectives

The goal of the program is to promote the development of good work habits and basic work skills by participation in a structured and paid work-based learning activity. Objectives include:

- Improving a participant's work readiness skills through meaningful work-based learning assignments and proper supervision; and/or
- Improving a participant's occupational skills through worksite instruction and well-supervised job tasks; and
- Enhancing a participant's academic and other basic skills through relevant worksite experience.

The participant should complete the Work-Based Learning Program activity with enhanced work readiness skills and a better understanding of future employment and/or training options (such as career goals, or occupational skills training). Each participant's work-based learning job assignment will be reviewed and evaluated with respect to the above goals and objectives.

### III. Work-Based Learning Activity Development

The organizations responsible for the Work-Based Learning Program activity are summarized below:

#### A. Alabama Department of Commerce/Governor's Local Workforce Area

The Alabama Department of Commerce/Workforce Development Division/Governor's Local Workforce Area (GLWA) is responsible for the overall management of the program by providing operational oversight to local Career Centers to ensure compliance with GLWA policies, procedures, and quality service delivery. GLWA develops and issues operating instructions for the program and provides work-based budget allocations for each Career Center.

The Governor's Local Workforce Area is also responsible for the fiscal management of the five local areas: North AlabamaWorks!, East AlabamaWorks!, West AlabamaWorks!, Central AlabamaWorks!, and Southeast AlabamaWorks! Local Workforce Development Areas. Sirius Workforce LLC is the contracted payroll vendor for management of the participant payment system. Staff assigned to the Governor's Local Workforce Area are responsible for providing technical assistance to ensure participants are receiving the appropriate services and on-site monitoring. Staff periodically monitor this activity to include desk reviews of Career Center participant files, reviewing Career Center and Worksite employer files and interviewing participants. Monitoring reports for each on-site visit are provided to the GLWA Programs Manager for review and distribution.

#### B. Alabama Career Centers

Alabama Career Centers located in the GLWA are responsible for recruiting young adults, determining WIOA eligibility, and completing and maintaining participant records of those enrolled. Through an

assessment of the applicant's interests and aptitudes, Career Center staff assist with career exploration to determine which work experiences are related to the individual's career interests. Career Center staff solicit, review, and select appropriate Worksites for the participant. Case Managers also provide case management activities including providing basic counseling as necessary, linking the participant to support services, worksite visits to monitor job performance, and resolving work-related problems.

Career Center staff are responsible for verifying time and attendance with worksite supervisors and approving timecards. Other responsibilities include entering participant eligibility and services information into the data system, uploading WBL forms to the participants document folder in AlabamaWorks! (AW!), and up to twelve months of follow up services for participants after they exit WIOA services. Work-Based Learning is one of many activities in a system of services that young adults should receive while enrolled in WIOA. In AW!, work-based learning is entered as **activity code 425 Work Experience – Paid and the provider is Sirius Workforce LLC.**

### **C. Youth Providers**

Youth Providers may have a budget line item that allows them to pay the wages of WBL participants. When this is the case, the responsibility of recruitment, completing and maintaining participant/employer records, and the interest and aptitude assessments falls on the youth provider. The youth provider must collect all necessary paperwork from the worksite and participant and upload their documents into AlabamaWorks!. The AW! **activity code is 425 Work Experience – Paid and the provider is the youth provider.**

### **D. Worksite**

The Worksite is responsible for supervising participants engaged in the work-based learning activity. A Worksite Agreement and WBL Training and Evaluation Plan is developed between the Worksite representative and the Career Center Case Manager. Both parties will sign the Worksite Agreement and discuss the WBL Training and Evaluation Plan. The Training and Evaluation Plan must be attached to the original Worksite Agreement and subsequent copies.

## IV. Appropriate Worksites

Work-Based Learning worksites may be either public (governmental), not-for-profit agencies (non-profit), or private (for-profit) worksites. Participant placements at worksites earn \$7.25 to \$19.66 per hour depending on the job assignment and the Local Workforce Development Area. A chart with local area wage ranges is available in the AlabamaWorks! Staff Online Resources. The participant's rate of pay should be comparable to the worksite's entry level rate paid to new employees performing the same job tasks. Case Managers will document the participant is being paid the customary entry level pay for the WBL job assignment.

Before assigning participants to a Worksite, the Career Center should consider whether the location and training assignment will meet the participant's needs. Worksite selection should be flexible; however, the following points should be considered:

- 1) Worksites should provide experiences that enhance the participants' potential to achieve the program's outcomes and their goals.
- 2) Work-Based Learning participants should be treated in the same manner as any other worksite employee.
- 3) Meaningful training assignments related to the occupational interests of the participants should be provided whenever possible.
- 4) Participants should be exposed to materials, processes, tools, and technology that correspond with those used by similar businesses.
- 5) Worksites should utilize the participants' time productively.
- 6) Participant should develop work readiness skills and basic occupational skills through their assignment.

### **Child Labor Laws**

WBL Worksites who wish to employ youth under the age of 18 must obtain a Child Labor Certificate. The cost of the certificate is \$15. The application can be completed online at the Child Labor Division of the Alabama Department of Labor website: <https://labor.alabama.gov/uc/childlabor/child-labor.aspx>.

## V. Worksite Training Hours

Career Center staff work with the Worksite Supervisor to develop a work schedule for the participant. Case Managers must explain prior to the assignment that **WBL participants cannot work fulltime**. Participants may work up to **a maximum of 32 hours per week**. If the jobsite prefers an individual who can work fulltime (40 hours per week), **the participant should be moved to the On-the-Job Training (OJT) program by the Career Center or hired fulltime by the worksite**. The maximum total number of hours for Work-Based Learning is 390. Weekly work hours may be flexible based on the preference of the Worksite employer as long as they do not exceed 32 hours. If the Worksite fails to adhere to GLWA policy and allows the participant to work over 40 hours per week or over 390 total hours, *the Worksite is responsible for paying the participant's wages for these hours. **The Worksite must compensate the participant when the overtime occurs.** Any overtime hours paid by the employer to the participant should not be listed on the participant's Avionte timesheet.*

## VI. Work-Based Learning Payroll Vendor and Wage Payments

GLWA has contracted with Sirius Workforce LLC as the employer of record/payroll vendor for the Youth WIOA Work-Based Learning Program for the five local areas (North, East, West, Central and Southeast.)

Sirius provides:

- Workforce Development Placement Form which is used to virtually onboard work-based learning participants.
- Automated timesheet process
- Automated payroll process
- Weekly payment options
- Workers' compensation coverage
- Weekly payroll reports

### **On-boarding and Placement Form**

Once eligibility is complete the Case Manager fills out the Sirius Workforce Development Placement Form for the participant and it is emails it to Scott Hotard at Sirius [shotard@siriusworkforce.com](mailto:shotard@siriusworkforce.com) with a copy to [Leslie.christ@siriusstaffing.com](mailto:Leslie.christ@siriusstaffing.com). If a background search or drug test is required for the job, it can indicate on the placement form. For the start date enter ASAP. This allows Sirius to do E-verify and any necessary screening before on-boarding. Once the employee is on-boarded, the worksite will be asked for the start date. There is a list of approved jobs on AlabamaWorks! but additional jobs can be added upon request.

- The placement form must be submitted at least 5 days before the start date.
- For the Start Date: **Put ASAP. The worksite will be asked for the start date once participants are onboarded.**
- Timesheet Approver **#1: The Worksite Supervisor.**
- Timesheet Approver **#2: The Career Center Case Manager.**
- Invoicing/Funding Source: Include the **Local Area Number** and whether the youth is **In-School** or **Out-of-School**

Once the placement form is submitted, a link to Avionte and login instructions to approve timecards is sent. Timesheet Approvers will not have access to participants until they have been assigned to you. After the participants are assigned, the Career Center Case Manager can review the total number of hours worked each week to make sure participants don't exceed a total of 390 hours. WDD also sends a weekly manhour report from Sirius that list all active WBL participants, how many hours they worked the previous week, and how many hours total they have worked. This report is the most accurate way to keep up with WBL hours. If you are not receiving the report, email [youth@commerce.alabama.gov](mailto:youth@commerce.alabama.gov) to be added to the mailing list.

**Case Managers must notify the Worksite Supervisor when participants have 40 hours left in their work-based learning assignment.**

- **Once participant hours total 350, send the Worksite Supervisor an official "WBL Notification of Participant Hours" email listing the participants with 40 hours remaining out of the 390-hour maximum.**
- **Remind the Worksite if they allow the participant to work over 390 hours, the Worksite is responsible for paying all wages over 390.**
- **If the Worksite fails to pay the participant's overtime upfront, they will have to reimburse Sirius Workforce LLC.**
- **The [youth@commerce.alabama.gov](mailto:youth@commerce.alabama.gov) email address must be copied on this notification.**

*If the worksite business fails to reimburse Sirius, the business including all locations/worksites will be barred from receiving any WIOA funding for at least two years.*

If the Career Center Case Manager fails to comply with the GLWA WBL policies, the Work-Based Learning program could be removed from the Career Center. With each Local Area mandated by WIOA to spend at least 20% of their Youth funds on WBL, having the program removed from one Career Center could result in the entire local area failing to meet the expenditure goal and being non-compliant with the WIOA law.

**WBL participants must have an email address for on-boarding and communication with Sirius.** If the participant does not have an email address, the case manager should help them create one.

**WBL participants must have all paperwork submitted before their start date.** Participants are not considered employees of Sirius until all paperwork is submitted. *Sirius cannot pay participants who are missing paperwork.*

Some participants may need help submitting paperwork. WBL case managers should assist these participants with submitting paperwork online to Sirius.

Once participants are enrolled into the payroll system both the worksite and participants are notified by email from either Scott Hotard at [shotard@siriusstaffing.com](mailto:shotard@siriusstaffing.com) or from the Avionte payroll system at [notifications@myavionte.com](mailto:notifications@myavionte.com).

**Case Managers must notify Scott Hotard [Shotard@siriusworkforce.com](mailto:Shotard@siriusworkforce.com) and Leslie Christ [Leslie.christ@siriusstaffing.com](mailto:Leslie.christ@siriusstaffing.com) on the participant's last day of work and the reason why they are no longer working.** Sirius will close out the participant assignment and document the reason for ending the assignment. (Ex. Completed internship, terminated by worksite, quit etc.)

### **Automated Timesheet Process**

Participants have access to their timesheets 24/7 and can update timesheets daily or weekly through a secure web-based submittal. They also have access to view paystubs and W2's, download tax forms and update personal information. Once the timesheet is complete, the timecard approvers are notified through the same web-based program and through email.

- *Employees must submit their timesheet by 10:00 a.m. on Monday.*
- *Timesheet Approver #1 or #2 must approve the timesheet by 10:00 a.m. on Tuesday.*
- Employees are paid weekly through direct deposit or pay cards.
- If they do not have a bank account a pay card can be mailed to them, or they can get one from a store and it can be loaded weekly with their paycheck.
- No paper checks are mailed.

### **Approving Timesheets**

**As Timesheet Approver #1, Worksite Supervisors are responsible for reviewing the timesheet for errors such as comparing the participant's hours with their work schedule and verifying total work hours do not exceed 32 hours weekly before approving the timesheet. Career Center Case Managers, as Timesheet Approver #2, are responsible for reviewing the weekly timesheet for errors as well as the participant's total WBL hours to ensure the participant does not work over 390 total hours.**

**If the Worksite Supervisor finds any discrepancies between the participant's timesheet and work schedule, the timesheet must *not* be approved! The Supervisor must ask the participant to correct any minor errors. If there are several discrepancies between the timesheet and work schedule the Worksite must contact the Career Center Case Manager who will speak with the participant to determine the reason for the errors and if it was intentional.**

**Participants who falsify their timesheets should be immediately terminated from WBL. This policy is included in the Work-Based Learning Program Requirements and Expectations Brochure received by all participants with a signed receipt form uploaded in their case file. The participant is the only person allowed to enter their work hours or complete their timesheet.**

Worksite Supervisors should always verify the hours entered on the participant's timesheet with their work schedule before approving the timesheet. **Worksite Supervisors that fail to verify participant hours and approve falsified timesheets could have their worksite removed as a WBL Worksite effective immediately.** The Worksite's responsibility for accurately

reporting the WBL participant's time is in the Worksite Agreement (VII) and Worksite Supervisor Handbook.

The Governor's Local Workforce Area has contracted with Sirius Workforce LLC to be the WBL payroll vendor. Because Sirius pays their wages, participants are considered Sirius employees even though they are enrolled in a WIOA youth service funded by federal funds. As the payroll vendor, Sirius must comply with the Affordable Care Act (ACA) healthcare law which requires businesses with 50 or more fulltime employees (with fulltime being 30 hours or more per week) to provide healthcare coverage to employees that work fulltime for 90 days or more. Sirius' contract does not allow for WBL participants to work over the maximum number of hours or to be considered a fulltime employee of their company. WBL participant hours, both weekly and the total number, must be enforced by Career Center Case Managers. **All WBL participants working longer than 90 days should not exceed 29 hours per week.**

#### **On-the-Job Injuries**

Sirius has an agreement with Med Corp to assess injuries if a participant is injured while on a WBL job assignment. WBL participants receive instructions on these procedures once the on-boarding process is complete.

## VII. Worksite Job Description

A Worksite Job Description is developed and attached to the Worksite Agreement. The Worksite maintains a copy of both. The Career Center uploads the Worksite Agreement and the Worksite Job Description into the participant's documents in AlabamaWorks!. If a participant's job duties change, the Worksite Job Description should also be changed to reflect the new work assignment.

#### **Workers' Compensation**

Sirius provides a list of jobs approved by their workers compensation coverage. The Sirius WBL Common Job Placement List is available in AlabamaWorks! under Staff Online Resources. If a participant is interested in a job not that is not on the list, the career center can contact Sirius to inquire if workers compensation insurance allows the job assignment.

## POLICIES AND PROCEDURES

### I. Eligibility for Work-Based Learning

The Work-Based Learning Program is designed for young adults who are eligible for and enrolled in WIOA Out-of-School or In-School Youth services. Out-of-School youth must be between the ages of 16 to 24. In-School must be between the ages of 16 to 21 and meet low-income criteria. WIOA Work-Based Learning should be one of a series of services the young adults may receive while enrolled in the WIOA program. Applicants receive full eligibility certification, comprehensive assessments, assistance in developing their Individual Service Strategy, **which includes setting short-term and long-term goals**, Case Management and Follow-Up Services for up to twelve months.

### II. Assessment

Career Center staff determine a participant's need for work-based learning during the assessment process. This process includes an objective assessment that contains academic and skills assessments of basic skills, occupational skills, employability, aptitudes, and interests. *Youth who are basic skills deficient (test below 8.9 grade level in reading and/or math) should be remediated prior to entering WBL.* Information collected during the assessment process assists in developing the participant's short term and long-term goals on his Individual Service Strategy (ISS) as well as documenting their need for work-based learning. WBL should be an integral part of a long-term plan and is designed to assist young adults in obtaining work experience or for those with work experience, unsubsidized employment. There should be a reasonable expectation of unsubsidized employment at the completion of the work-based learning activity.

All participants should have work readiness skills training prior to beginning WBL. These skills include attendance and punctuality, time management, being groomed and dressed appropriately for the worksite, verbal, non-verbal and written communication skills, attitude and being a team player.

Note: *Ideally, work-based learning participants should not be Basic Skills Deficient (BSD), but if the participant's assessment and case notes document that the young adult is prepared to benefit successfully from participation in work-based learning, the individual may be enrolled by Career Center staff. The assessment should be uploaded, and case notes entered in AlabamaWorks!.*

### III. Orientation and Requirements and Expectations Brochure

Prior to enrolling participants, the Career Center Case Manager should provide an orientation **and determine the youth's commitment to completing the work assignment.** The orientation must include the purpose of the assignment, review of the WBL Requirements and Expectations brochure which includes payment procedures, grievance procedures, safety guidelines, grounds for termination, and the rules and regulations of the assigned Worksite. Each participant must sign the Requirements and Expectations Receipt form acknowledging receipt of the information.

### IV. Worksite Selection

Career Center staff should consider the following guidelines during the Worksite selection process:

- 1) Worksite selection should correspond, when possible, with a participant's expressed interest and objectives found on the ISS. The site should enhance career exploration.
- 2) The worksites are public (governmental), not-for-profit agencies (non-profit) or private (for-profit) worksites.
- 3) Worksites that employ individuals under the age of 18 must comply with Alabama Child Labor Laws.
- 4) **Participants cannot be placed in a WIOA work-based learning assignment if a member of their immediate family would directly supervise the participant.**
- 5) Participants may work weekends, nights, or holidays if it is required by the Worksite, but supervision must be provided.
- 6) Prior to making a final worksite selection, schedule an on-site visit with the participant. The assigned supervisor should meet with the participant to explain the assignment and worksite expectations.
- 7) Decisions for worksite selection should include the Career Center Case Manager, the Worksite Supervisor, and the participant.
- 8) Worksite staff must have a thorough understanding of their responsibilities and agree to comply with guidance provided in the Worksite Supervisor Guidelines. This includes adhering to the maximum number of work hours allowed per week and the total number of hours allowed.
- 9) Worksite Supervisors should utilize the WBL Training and Evaluation Plan to assess participant employability, workplace, and career specific skills progress. **These evaluations are required and are part of participant's skills**

development. Worksites are non-compliant if these evaluations are not completed. Case managers must upload each participant's evaluations into their AW! documents.

## V. The Worksite Agreement / Training and Evaluation Plan

Career Center staff must review the following terms of the Worksite Agreement (available in the Staff Online Resources in AlabamaWorks!) with the Worksite representatives. The Worksite agreements must be completed, and the **youth certified eligible for the WIOA program before a participant can begin the job assignment.**

- 1) Only one Worksite Agreement should be completed for each Worksite regardless of the number of participants assigned to the site.
- 2) The Worksite job description will be developed and agreed upon between the Worksite Supervisor and the Career Center Case Manager for each participant. The job description will be on the Training and Evaluation Plan and will be uploaded before the participant begins work. Prior to job placement, the Career Center staff will check the list of allowable jobs from Sirius or contact Sirius to see if the job can be added.
- 3) Work-Based Learning Program activities are performed under the following terms of agreement:
  - i. Participants will be placed in assignments that provide meaningful employment and follow Federal, State, and Local laws.
  - ii. Work-Based Learning participants must always be supervised. In addition to supervision, Worksite supervisors should: (1) provide an orientation to workstations and safety rules associated with work performance, (2) **accurately review and approve participant timesheets in a timely manner**, (3) immediately notify Sirius Workforce and the Career Center in the event of a work-related accident or injury, and (4) immediately notify the Career Center if a participant fails to report to work.
  - iii. Participants in the Work-Based Learning program must not result in the displacement of current employees, including partial displacement, such as reduction in hours of overtime work, wages, or employment benefits.
  - iv. Participant work assignments shall not discriminate on the grounds of race, disability, sex, political affiliation, religion, creed, or national origin.
  - v. The Worksite will designate a full-time employee as a contact

- person who will be responsible for answering inquiries at the Worksite and be available for assistance with resolution of Worksite problems.
- vi. Participants are covered by Workers' Compensation Insurance through Sirius Workforce LLC in the event of a work-related accident and/or injury associated with Work-Based Learning Program activities.
  - vii. The Worksite agrees if a WBL participant should accidentally damage equipment or property, no damages will be chargeable to the participants, the Career Center, or Sirius Workforce LLC. However, the participant may be held responsible for the willful destruction of equipment/property.
  - viii. The assignment to a Worksite shall not exceed 390 total hours (**32 hours** is the **maximum** number allowed per week.) Worksites are not required to hire the participants upon completion of the training assignment. However, employers should be encouraged to transition the participants who are performing well in their WBL assignment into an On-the-Job Training contract.
  - ix. Worksite supervisors should assist in ensuring that Work-Based Learning is beneficial to the participants in gaining workplace knowledge, including enforcement of time and attendance policies. The Worksite supervisor should offer instruction to the Work-Based Learning participants as they would any of their other full-time employees.
  - x. At least one Supervisor must be at the participant's assigned worksite during the WBL work schedule.

## VI. The Work-Based Learning Participant Evaluation and Training Plan

The Work-Based Learning Participant Training and Evaluation Plan must be completed by the Worksite Supervisor to evaluate a participant's progress in acquiring employability, workplace, and career specific skills. The first review is to be done at the midpoint of training or 195 hours. **The final review should be completed at 360 hours the week before the participants' WBL schedule ends. Completed copies of both evaluations must be received by the Case Manager and uploaded into the participant's documents in AWI.**

## VII. Required WBL Forms

The Career Center Case Manager is required to upload WBL forms to the participant's documents in AlabamaWorks! before the participant can begin working. These forms include the following:

1. Sirius Workforce Development Placement Form
2. Worksite Agreement
3. WBL Training and Evaluation Plan
4. Participant Requirements and Expectations Receipt Form

## References

### GLWA Memos

20-02 Change 1

21-08

21-08 Change 1

21-08 Change 2

22-02

GLWA-CAW 21-01

GLWA-EAW 21-01

GLWA Memos are available by Local Area at Alabama's WIOA website:

<https://wioa-alabama.org/>