**WorkforceGPS**

**Transcript of Webinar**

**Let's Chat: What Counts Towards the Work Experience Expenditure Requirement WIOA Youth Program**

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JONATHAN VEHLOW: You can type in your questions or comments at any time. Welcome to "Let's Chat: What Counts Towards the Work Experience Expenditure Requirement WIOA Youth Program." Without further ado, I'd like to kick things off to our moderator today, Maisha Meminger, workforce analyst, Youth Policy and Performance, Employment and Training Administration with the U.S. Department of Labor. Maisha?

MAISHA MEMINGER: Thank you so much, Jon. Good afternoon and good morning, colleagues from around the country. I am so happy to be a part of this webinar today to clarify what counts as a work experience expenditure. We're not going to stay long here. We have our speaker, Evan Rosenberg. Sara Hastings, had to be pulled away. So we have Evan with us today to answer your questions. We are very excited to clarify this content for you today. Really quickly, we want to make sure we define what a work experience is.

We want to make sure we review what counts as a work experience expenditure. We want to make sure we cover pre-submitted questions. Now, many of you, we thank you so much. You sent us your pre-submitted questions. We went through those questions. It helped actually design our side deck. Again, we also want to entertain and answer live questions. What I'm going to ask you all to do – we're going to keep the chat closed, which means that only myself, Jon, and Evan can see on our end.

So what we're going to make sure that we do is we ask you all to please submit your question and also put your email address in there so that if we have to respond back to you all, we can do that at a later date if we didn't get to your question today. So please put your email address with us as well. We're going to get started with our first polling question in trying to get your brains going a little bit. Oh, okay.

We're going to ask the question, which of these is a type of work experience? Number 1, year-round employment; 2, on-the-job training opportunities; 3, internships and job shadowing; 4, summer employment; 5, pre-apprenticeship programs; or 6, all of the above? We're going to give you guys an opportunity to fill this in. And we see that you guys are coming back. Jon, can I ask you a question? Do you still hear an echo with me?

MR. VEHLOW: No. I'm not hearing an echo with you. If you are experiencing an echo right now, you might be logged in twice. So make sure that you have just one webinar room logged in. If you have two webinar room log-ins, you're going to hear an echo. Just check your browser and tab to make sure that you're not logged in twice.

MS. MEMINGER: OK. So I'm going to keep talking. And don't forget, ladies and gentlemen, that this will be recorded. And you can also view this at a later date if you cannot hear me or Evan. So I apologize for any issues. Evan, we're going to stop here because I think that folks overwhelmingly said, all of the above. So can you please go through these and let us know a little bit more about this question and its answer?

MR. ROSENBERG: Absolutely. Thanks, Maisha. And hi, everybody. So it looks like the vast majority of you all got the answer right, which is all of the above. Everything included year-round employment, on-the-job training, internships, job shadowing, summer employment, pre-apprenticeship programs – those are all considered types of work experience in the WIOA Youth Program. So congratulations to the 88 percent of you – at least right now – that got that one correct.

And I'll talk about these different types of work experiences shortly and our definition of work experience. All right. So let's take the poll down and I'll go to the next slide. So I'll talk about the definition of a work experience. This is the definition directly from our WIOA final rule – Work experience is a planned, structured learning experience that takes place in the workplace for a limited period of time. So that is a pretty broad definition. And that's why it includes all those different types of work experience.

It's broad and can be anything from a very short week-long job shadowing to a much more intensive year-round subsidized employment opportunity and lots of things in between. Work experience can be paid or unpaid. It can take place in the private for-profit sector, the nonprofit sector, or the public sector. And labor standards do apply in any work experience where an employer-employee relationship exists. You can get more information on that in the Fair Labor Standards Act or in your state law.

So the other component that is important to know – and this has implications for our topic today of what you can count as a work experience expenditure – is that as required by the Act and the final rule for WIOA, work experiences must have an academic and occupational education component. And we discuss that in our Training and Employment Guidance Letter 21-16 and give some examples of what those academic and occupational education components look like. And we can even talk about that today if you like.

But that is one required piece for a work experience. Work experiences may include summer employment, other opportunities throughout the school year, pre-apprenticeship programs, internships and job shadowing, and on-the-job training. And that's just the list that is in the Act for types of work experiences. That doesn't mean it's just limited to that. We actually have a Q&A that I'll talk about later that goes even beyond that list of what work experiences may include.

But you'll notice that list is pretty similar to our polling question we just had a minute ago. And I should also say, feel free while I'm presenting if you have questions that come up, type them in the chat now. We won't get to those live questions until the end of the webinar. But as questions come up and you're thinking of them, please enter them into the chat.

MS. MEMINGER: And, Evan, if I can jump in right here, please make sure you're putting your email address next to your question. Just in case we do not get to it today, we can always email you at a later date to respond to your question if we can. And also, if there's a question about the PowerPoint, the PowerPoint today is under the file share button. So you should be able to get the PowerPoint on copy right now if you click on file share. It says, "Today's PPT." Thank you, Evan.

EVAN ROSENBERG: Thanks, Maisha. Just a couple other notes about when you put your questions in. Please keep your question specific to our topic, which is work experience. And then also, if I happen to see a question come in the chat based on a slide I'm doing, I might quickly jump in and answer it. For example, I see someone asking about what was the TEGL number that talked about the academic and occupational education component. It was TEGL 21-16. I'll try if I see questions that are relevant to the slide I'm on. If I can see them to answer them, I'll do that.

OK. So now the work experience priority – as hopefully, most of you know, in WIOA, there is a specific priority on our work experience program element. So just a reminder, there are 14 WIOA youth program elements. And only 1 of them is called out as having a priority – and that is work experience. So work experience could arguably be said is our most important program element. And the priority is that not less than 20 percent of local area WIOA youth funds must be used to provide youth with paid and unpaid work experiences.

And we go through that more in the final rule at 681.460. So in multiple TEGLs, we discuss this priority and how to calculate it. I can talk about that if people have questions later in the webinar. But local programs must track funds spent on work experience, both paid and unpaid. And that includes wages and staff costs for development and management of the work experience. The slide coming up, I'll talk about all the different things that you can count towards it. And local areas must also report those expenditures as part of our financial reporting.

Prior to WIOA, we did not require local areas to track expenditures on work experiences. But under WIOA, given this priority, we added that line to our financial reporting. And so since WIOA was implemented shortly after, local WIOA youth programs have had to report on work experience expenditures. So the way the calculation works is that it's based on total local area funds expended for work experience. And it's not calculated separately for in school and out of school.

As I'm sure all of you know, we also have an out-of-school expenditure requirement. That's completely separate from work experience. The two don't relate to each other. So work experience expenditure just looks at the total funds for your WIOA youth program. And whether you spent the fund in school or out of school is irrelevant to the work experience expenditure requirement. And you have to spend a minimum of all of those WIOA youth local area funds on work experience.

The only thing that is not subject to that minimum are administrative costs, as you see in the next bullet. For example, if you had $1,000,000 in your WIOA local area, you would subtract out the 10 percent administrative cost – so $100,000 – and you're left with $900,000 of program funds for WIOA youth. And then it's the percentage of program funds of that $900,000 you spend on work experience.

So if my quick math in my head is correct, that would mean you would need to spend at least $180,000 of those $900,000 in local area funds in my example in order to be at that 20 percent. So what counts as a work experience expenditure? I'll spend a little bit of time on this because this is kind of the bulk of today's webinar.

In TEGL 21-16 – that same TEGL I referenced before – it lists a number of bullet points of what you can count as a work experience expenditure. And this is most of those bullets summarized. So the first bullet is pretty obvious – any wages or stipends paid for participation in a work experience. And these are WIOA youth local area funds that are paid. So let's say you develop a relationship with an employer where you're splitting the cost of wages. And the employer is paying half and you are paying half in the local area.

You obviously can't count the employer contribution in the calculation – you're just counting WIOA youth local area funds of the calculation. But any wages or stipends spent with WIOA local area funds are counted in the work experience expenditure. Staff time on the work experience – whether it's to develop the work experience, staff time spent managing the work experience – for example if your case manager contacted the employer to check in and make sure the youth is doing well, or going through the work site to check on the youth or check with the employer – all of that work the case manager's doing that's related to managing the work experience, that can be reported as a work experience expenditure.

And then staff time spent evaluating the work experience – how well did it go, is this an employer they want to use in the future? Anything you can tie staff time directly to the work experience, you can count as an expenditure. In addition, orientation sessions for a work experience can count. A lot of times local programs have an orientation session for participants to talk about what a work experience is and prepare them for it. And then often, you'll have orientation sessions for the employers who were participating as an employer in the work experience.

Any staff time spent doing those orientation sessions or planning for them, developing, them, etc., that counts. Classroom training or the required academic education component directly related to the work experience can count as an expenditure. So I spoke earlier about that academic and occupational education component. If you're doing that component, you can do it lots of different ways. It can happen in a classroom setting. It can happen while they're actually on the job in a work experience.

You have lots of flexibility in determining how to do that educational component. But if you choose to do that educational component in a classroom – for example, let's say the way you structure your summer job is 4 days a week they're on the summer job site, and 1 day a week they're in a classroom learning about the occupations that they're working in – that classroom portion can count towards a work experience expenditure. Another thing that can count are incentive payments directly tied to the completion of the work experience.

Incentives are permitted in the WIOA Youth Program. And our final rule says they are permitted for work experience. And so you can choose – this should be on state or local policy – you can choose to offer an incentive to a young person for successfully completing the work experience.

If you do that, you can count that incentive payment as a work experience expenditure. And then lastly, employability skills or job readiness training workshops that are preparing youth for the work experience can also count.

The key here that needs to be related to a work experience. And I know a lot of programs have general employability skill workshops that maybe they put all of their WIOA youth in. But the key here is the employability skills or job readiness training workshop needs to be for someone going into a work experience and that is preparing them for the work experience. So if you're running every youth through employability skill but only a portion of those youth are then going into a work experience, you should allocate the expenditures based on the portion of youth that are going into the work experience.

So this isn't something you can count as an expenditure just automatically for doing those workshops – it has to be tied to a young person going into a work experience. All right. So now I'm going to turn it over to Maisha to talk about some technical assistance resources we have related to work experience. And then we'll come back and we'll start answering some questions that you previously submitted.

MS. MEMINGER: Thank you so much, Evan. We want to share with you some of the – keep those questions coming – thank you guys so much for that – some technical assistance resources. We shared these resources on the meeting invitation, the webinar invitation. But just to share with you guys, we have some great tips sheets and briefs that we created over the years to help you with this work experience expenditure. And the first one is the forms of payment for WIOA youth program participants. This is a fairly new document that we just launched in March. And it goes over, what is a wage? What is a stipend?

A question came in, what is a stipend? We define it in this document here. What is a stipend? What is a wage? How to identify an employer-employee relationship. How to award an incentive. There was a question about incentivizing the young people. So make sure that you look at that. And what are the policies governing payment? So this is a very important document. If you have not seen it, please check it out. It's about two months old. And it's an amazing document. We thank our colleagues for working on that for us.

We also have Our Journey Together webinar. It's a webinar and also a brief. It's a podcast. So it provides a summary of policies regarding working with local program operators who are developing work experiences. So please check that out when you get an opportunity. It was created in 2018. Again, we're referring to TEGL 21-16. It's about a 30-page document. It's an amazing TEGL that when we first kind of created it based upon WIOA passing. So this is something that you want to make sure that you know about.

And we're just referring to TEGL 21-16 again. We have a TEGL, Training and Employment Guidance Letter. That is policy. So therefore, please make sure you have that as a desk reference for yourself. And we also have a recent document that we created called, Tracking and Reporting Youth Expenditures. Again, this talks about – it's a tracking tool – it shows you how states and local areas can track and report the 75 percent out-of-school youth requirement, as well as the 20 percent work experience expenditures.

So, please, when you get an opportunity, go to WorkforceGPS Youth Connection. And that will be an opportunity for you guys to get these wonderful tools. In addition, we are working on an upcoming technical assistance series called, Voice of Experience. And we will be actually talking to persons who are at the local level, including young people and including employers and persons who work in the one-stop system, who will be providing examples and models of experience.

And we're going to be talking to folks about those different types of work experiences you can have, including apprenticeship, pre-apprenticeship, and job shadowing, summer, in-person summer, as well as virtual work experience. This time last year, we were all talking about how to do virtual work experiences. And we want to make sure that we also share how those can continue as well. So thank you so much for reaching out to us. When you need something, we have it for you. And we also have these upcoming webinars as well.

So we have one more polling question. And it asks the question, which of these does not count as a work experience expenditure? So let's get you guys voting. Is it supportive services, incentive payments directly tied to the completion of the work experience, staff time spent on conducting an employer orientation for employers who provide work experience, all of the above, or none of the above?

So I see you guys are voting feverishly. A lot of folks are saying supportive services. Let's see. What does not count as a work experience expenditure? I'm going to give it 10 more seconds. I know you guys are still putting your questions in, which is great. Thank you so, so, so much. And, Evan, do you want to jump in here and tell us what the right answer is?

MR. ROSENBERG: I do. I have been very busily reviewing the many wonderful questions that you've been submitting trying to prepare myself to answer them a little bit later. But now let me come back and look at what people said. The vast of majority of you got this correct. Supportive services does not count as a work experience expenditure. And we specifically chose to put up this question because that is something we get asked about a lot is, can one count a supportive service that is to help a youth participate in a work experience?

For example, transportation cost to get youth to a work experience or child care supportive services while a youth is in a work experience. And while those are both allowable costs and very important to provide, they are a different WIOA Youth Program element. They're supportive services. Therefore, they do not count towards a work experience expenditure.

The other items we listed there – incentive payments, as I talked about earlier in the webinar – that does count. The staff time spent on conducting employer orientation does count. So supportive services do not count as a work experience expenditure. All right. You can take the poll down, Jon. And I will move –

MS. MEMINGER: Thank you for that clarification. I'll be moving the next slide over. We're going to actually go into a portion of the pre-submitted Q&A questions. A lot of the questions that you guys are asking in the Q&A are going to be answered right now. So keep your ears open. As we go into the pre-submitted Q&A, we want to thank those who pre-submitted those questions to us. We really do appreciate you taking the time out for us. First question, can the work experience definition and/or work experience expenditure minimum be relaxed during COVID-19? Evan?

MR. ROSENBERG: The short answer to that is, no. We do not have plans to relax the work experience expenditure minimum of 20 percent during the pandemic. Hopefully, we're in a place now where the pandemic is winding down and it'll continue to decrease cases that will lessen the impact on our WIOA Youth Programs and all of our youth and everyone else. But we do recognize that it has had an impact on providing services and the ability to provide work experiences. We have Q&A. And that's what is below. This was on our COVID Q&A.

This is directly from our COVID FAQ sheet where we clarified that virtual work experiences are allowable. And you can do virtual work experiences. And hopefully, that helps during the pandemic when everything was virtual for youth to be in a work experience. We heard from lots of places around the country. They were creative in creating virtual work experiences, including virtual job shadowing, virtual internships. And I absolutely recognize that's an issue. And we will take that into account when our regional offices monitor for compliance.

So that is absolutely at the forefront of our minds when we're doing monitoring. And we recognize that it might have been and may still be an issue during COVID. But we're not going to change the work experience expenditure minimum because of the pandemic, because work experience is still an absolute critical service for our young people.

And we have seen our local programs who always adapt and figure out ways even in global pandemics to get youth the services they need. The vast majority of the country was able to do that. And we were really impressed with how quickly our programs adapted and created work experience opportunities virtually in a pandemic. All right. Let's go to the next one.

MS. MEMINGER: Are virtual work experiences allowed? And will they continue to be allowed after the end of the COVID-19 pandemic? Must there be a specific circumstance in place in order to do a virtual work experience?

MR. ROSENBERG: That was just what I was talking about. Yes. Virtual work experiences are allowable under WIOA. The italicized portion of this question came directly from our COVID FAQs. And we said, due to the rural nature of a local area or during times of a pandemic, such as COVID-19, if it's not possible to provide work experiences on a work site, it is acceptable to provide remote or virtual work experiences for youth.

And, you know, honestly, I think probably a lot of you have the same insight that we've had, is that there were some real lessons learned during the pandemic that we can apply to our future programming even when we're not in a global pandemic. So we're really trying to take a look at how services were offered during the pandemic and figure out if there's applicability to them in the future. And I think this is one of those areas, which is virtual work experience.

We still believe it's most ideal for a youth participant to be at the workplace interacting in person with the employees in the workplace and doing the work experience. That's the ideal. But there is also a lot of value in doing virtual work experiences. Particularly in rural areas where we have heard this issue in that past, it's really hard in some rural areas to find employers.

Or maybe a youth is interested in doing a work experience in a field that just isn't in the local area, whether it's a rural or not a rural place. In those cases, if you can connect the young person to a very specific work experience that's somewhere too far for them to travel to, it's great to put them in a virtual work experience if that's something you can set up. So you'll see in the red there that we do anticipate virtual work experiences will continue to be allowed post pandemic.

And there are not special circumstances that must be in place in order to do a virtual work experience. In that COVID ethic, we talked about specifically rural nature of a local area in times of a pandemic, but there are even other examples where a virtual work experience would be reasonable and beneficial for a young person.

MS. MEMINGER: Evan, can I jump in here? There's a question that came up I think is really relevant to this piece here. There was a question about how do you monitor or supervise a young person who is in a virtual work experience? We had a summer series that's out right now on WorkforceGPS that speaks to this very much. One of our speakers actually shared their tracking sheet with us.

And I'll have to get the link for you guys in a second, but there are some ways that other local areas have tracked successfully virtual work experiences for young people. And the webcast series is called, the Mini Summer Webcast Series. So there are some tools that were shared on that as well. So that was important. Of course, I know I can jump in and say that.

MR. ROSENBERG: Yeah. Perfect. Thank you, Maisha. If you have additional information like that, feel free to jump in and share.

MS. MEMINGER: I sure will do. And is there a maximum number of hours a participant can be in a work experience in a program year?

MR. ROSENBERG: There is no maximum number of hours a participant can be in a work experience. This is a local program decision. So from the Federal Department of Labor perspective, we do not have a maximum number of hours. I do hear from local areas. And I even saw a question come up in the chat that related to the Affordable Care Act and the implications of having a youth in a work experience above the threshold where the Affordable Care Act requires health insurance.

So local programs may want to make decisions about hours in work experience based on things like that. But it is very much a local decision. And it is up to the local area to determine what that maximum number of hours is. The Department of Labor does not have a threshold for a maximum number of hours.

MS. MEMINGER: OK. Thank you, Evan. Next question. There was an example that was provided here about staff time and a question that was pre-submitted. I'm going to give you the actual question. If that time allowed to be charged to work experience, can they charge expenditures to work experience if that expenditure is not spent on a client?

MR. ROSENBERG: The answer to this is yes. Absolutely. Staff time spent on work experience counts towards the work experience expenditure rate even if the expenditure is not spent on a client. And I've spent a lot of time discussing that when showed the slide – I think it was slide 11 – about what can count towards a work experience expenditure. And it definitely includes staff time.

I think we got this question from someone who monitors or audits local area spending. And I just want to make sure for any of the auditors out there it is absolutely permissible for local programs to charge staff time work experience expenditure because the staff members working on a work experience.

MS. MEMINGER: Thank you, Evan. Are incentives allowed for a work experience? Is there a maximum incentive amount a participant can receive for successfully completing a work experience?

MR. ROSENBERG: Yeah. As I mentioned before, incentives are permitted. This first incentive comes directly from our WIOA youth final rule incentives are permitted for recognition and achievement directly tied to training and work experience. So within that benefit, yeah, directly tied to the work experience means you can use an incentive. And the incentive should be for recognition of an achievement. So just participating in a work experience would not call that achievement.

Successfully completing a work experience – I would call that an achievement. So it needs to be an achievement. So you should have an incentive policy in place that specifically says what the achievement is that you're providing the incentive for. And the Department of Labor does not have a maximum incentive amount a participant can receive for successfully completing a work experience. So we don't have a maximum amount. But you should in your state or local policy have a maximum incentive amount.

When I join the regions for monitoring – which I sometimes do – that is one of my favorite parts of my job is when I get to go out in local areas and meet the folks running the programs and the youth in your programs. When I get a chance to do that and I'm looking at local policies, I often see a specific policy that lists the types of incentives that a local area awards and the maximum amount awarded. So you should have specific policies in place on that. As you can see at the end of this answer that the incentives must be in accordance with requirements in 2 CFR Part 200.

And policies and procedures should define the parameters or limitations to establish reasonableness. When we go out monitor we're looking for reasonableness. If you're paying $2,000 for a youth to complete a work experience, I would not call that reasonable. But if you're paying $100 or $50, I would call that reasonable. Again, it's a local policy that you should set, put in place. And the policies may establish dollar thresholds on how much either per participate or total for your local program to spend on incentives.

MS. MEMINGER: Thank you, Evan, so much. Next question, for pre-apprenticeship training, are those required to be on the approved training provider directory? Are there specific qualifications to consider a training a pre-apprenticeship? And I believe you have [inaudible]? Right.

MR. ROSENBERG: A lot of words on this slide. I'm not going to read them all. The short answer is that pre-apprenticeships are considered a work experience, and not a training, in the WIOA Youth Program. And I talked about this earlier. If you look in WIOA under our 14 program elements, the work experience program element lists types of work experiences. And it includes pre-apprenticeship. And we interpreted that to mean that for youth, WIOA categorizes pre-apprenticeship as a work experience, and not a training. So they're two different types of activities.

We have another program element, the occupational skills training. But for whatever reason, WIOA determined that pre-apprenticeship was a work experience, and not a training. So there's no requirement to be on the approved eligible training provider list. You don't need any sort of qualification to be an approved pre-apprenticeship as it relates to ETPL. And then we pasted in there, we have a final rule on the definition of pre-apprenticeship. It's 681.480. I'm not going to read it, but that lists the 5 elements that must be included to consider something a pre-apprenticeship for the WIOA Youth Program.

MS. MEMINGER: Thank you, Evan. I'm going to move forward. Again, a copy of these slides are available to you guys all in the file share area, even including a copy of the slides along with us. Can expenses for registered apprenticeship count towards the 20 percent work experience expenditure requirement?

MR. ROSENBERG: I saw this one also come in the chat, so I'll answer it here. Don't have to worry about answering it in the chat later. Short answer is yes. This is something that we were asked about fairly recently. As I'm sure you're all very aware, registered apprenticeship is and continues to be a priority. For the Department of Labor, registered apprenticeship is a wonderful opportunity – particularly for young people – because it's a chance to do on-the-job training and work experience and get paid on subsidized wages for a great outcome. So we're hoping to see lots more registered apprenticeships, particularly for young people.

And so the short answer is yes, that while it's not explicitly recognized in WIOA as a type of work experience under that list in the program elements – the one that we had on the previous slide – registered apprenticeship certainly is a type of work experience. It's more than just a work experience. But it is a type of work experience, both work experience and training. So the key here is that is the registered apprenticeship happening during their active participation in the program, or after exit?

Anytime they're in a registered apprenticeship during a participant's participation in the program while they're still active, you can count expenses for the registered apprenticeship towards the work experience expenditure requirement. But once they exit the program and they're in follow-up, then you cannot count those work experience for those registered apprenticeship expenses for the work experience expenditure requirement. The reason for that is because our final rule explicitly states that there are only certain youth program elements that are permitted during follow-up.

There are only 5 of them, and 1 of them is not work experience. So if they are in follow-up and they've exited the program and they're still in a registered apprenticeship – which is a very likely scenario because registered apprenticeship can take anywhere from a year to two years to three years to even four years in some cases depending on the apprenticeship, and we wouldn't expect you to keep them actively enrolled in the program that whole time.

But a lot of times, what we see at the youth program helping someone get into registered apprenticeship, continue to provide them some services for a little while, make sure they're doing well in that apprenticeship, and then they exit the program. The period of time they're in that apprenticeship while they're an active program participant before exit, you can count expenditures for the registered apprenticeship. But once they exit, you cannot count those expenditures anymore.

MS. MEMINGER: Thank you for the clarification, Evan. So this is an example where we got this example in regarding wages and stipends. So I'm going to read the actual question. Because there was not an employer-employee relationship and therefore wages were not paid, we thought we could not justify that our program met the federal definition of a work experience. And therefore, none of the funds spent for staff time or youth expenses were charged to our 20 percent work experience requirement. Evan, do you want to clarify that?

MR. ROSENBERG: Absolutely. We put up this entire example because I wanted to make sure that everyone – but particularly the person who submitted this question – understood that you can count all of this as a work experience expenditure. And I am sorry to hear that your interpretation is you couldn't. That was not a correct interpretation. What this described was there was a youth in six-week virtual work readiness and career exploration program. And the description of the virtual talent tours presentations with a variety of employers – that is job shadowing. That's exactly what job shadowing is.

As you saw earlier, job shadowing is a type of work experience. And I talked earlier about the intensity of work experiences can be very different. Work experience is a very broad thing. And job shadowing is not that intensive. And I think it's great that you were doing virtual job shadowing. I think job shadowing can really lend itself to virtual. If possible, you can probably get more job shadowing opportunities if you were doing some form of virtual job shadowing than you could if they were all in person.

So this sounded like a really great job shadowing experience for youth. And I just want to make sure that everyone, including the person who asked this question, understands that that described program activity is job shadowing. Job shadowing is a type of work experience. And all the costs associated with the described program activity – which was job shadowing – can be counted towards the work experience expenditure requirement.

MS. MEMINGER: Thank you so much, Evan. Thank you so much, Alice, for your complement.

MR. ROSENBERG: Actually, sorry, Maisha. One more thing going back to that slide. And I just want to hit on that comment that there was not an employer-employee relationship so they thought they couldn't count it.

There does not have to be an employer-employee relationship in order to count something as a work experience expenditure. For some work experiences – the more intensive ones – there may be that employer-employee relationship. But for some of the less intensive ones, like job shadowing, there will not be an employer-employee relationship. That is not a prerequisite for counting something as a work experience expenditure.

MS. MEMINGER: OK, Evan. I'm going to move to the next question. We have some questions coming in. Two questions have to do with the TEGL 21-16. This is a question to clarify what program element 3, paid and unpaid work experience, is under the leveraged resources cannot be used to fill any part of the 20 percent minimum. Can you please clarify this?

MR. ROSENBERG: Yes. I was referring to this earlier. Only local area WIOA Youth funds are included in the work experience expenditure calculation. So additional leveraged funds are not part of that calculation. And that's what this sentence refers to in TEGL 21-16. For example, let's say you were sharing the cost of wages for work experience with the employer. And the local area was paying half. And the employer was paying half. The local area half gets included in the work experience expenditure calculation.

But the employer share – which is a leveraged resource – it's not a WIOA youth resource – it's leveraged – does not count. So all this means is that non-WIOA youth local area funds that are being provided for the work experience are great. And we very much encourage you to try and leverage funds outside of our funding, particularly from employers. They don't count. Those employer funds or any over leveraged funds don't count towards the expenditure requirement.

MS. MEMINGER: Thank you, Evan. And the second question, again, is a clarification of the TEGL of the same portion, program element 3. And I think Evan, do you want to go through these individually based upon this piece about the class in training or required academic education component directly related to the work experience? Do you want to go through these?

MR. ROSENBERG: Yeah. Absolutely. So this person is asking about that academic or occupational education component we talked about earlier, and asking about employability skills or job readiness training that we also talked about earlier. And they have four questions related to that. So I'll go through them quickly. Number one, can you please provide examples of those? Sure. I'm happy to.

Examples of the academic and occupational education component – which can also be found in TEGL 21-16 – could include, like if there was a classroom training on intro to health care and then they were doing a health care-related work experience in a hospital. That would be a good example of the classroom training for the occupational education. And then employability skills workshop – I think all of you know what that is – working on team work, time management, proper attire for being in a work experience.

As long as it's directly connected to a work experience – like they do the employability skills workshop and then go into a work experience – then you can count it. But if they're just doing the employability skills workshop and never go into a work experience, then you cannot count that employability skills workshop expenditure for that participant.

Next question, are employability skills workshops offered through an American Job Center? An example of what's allowable. I just talked about this. The answer is yes, if directly tied to the work experience. Again, if they're not going into a work experience, you cannot count that. But if they were doing it and then going into the work experience and it was part of your work experience program model, then you could count it.

Kind of a similar question, as it relates to preparing for work experience, is participation and completion of short-term training such as ServSafe and OSHA an example of what's allowable? Same answer as the one above – yes, if directly tied to a work experience. So if someone is going into a work experience in the food industry and they need ServSafe to do that, then yes. You can count that. But if you're automatically putting everyone through ServSafe and they're not all going into a work experience that would need ServSafe, you should only count the portion of the expenditures for the young people that need it to be a part of that work experience.

And same would apply for that OSHA 10-hour training related to safety on a construction site or whatever the workplace is. If they need it for the workplace where they're doing a work experience, it can be counted. If they're not, it cannot be counted as a work experience expenditure. And just to clarify, those two short-term trainings are an allowable use of WIOA youth funds always. I'm just clarifying when they can be counted as a work experience expenditure.

And then the last one, are hours spent in adult education classes an example of what's allowable? The answer to that is no. If someone is in basic literacy skills training, that wouldn't be directly tied to the work experience. It's super important for youth who don't have a high school diploma or equivalency to be working towards a high school diploma or equivalency, including an adult education class. But that would not directly relate to a work experience. Therefore, you could not count that as a work experience expenditure.

MS. MEMINGER: Thank you, Evan. So what I'm going to do now is I'm going to ask if you could point a personal privilege while Evan goes into the database of the numerous questions you guys are asking. He's trying to pull out some questions now. I am going to ask you all in the chat. This is an amazing webinar. We have a good 40 minutes left with you guys to answer your questions. But as a TA lead for the Division of Youth Services, I'm going to ask you all to spend some time just letting me know, are there any upcoming technical assistance topics you would like us to cover?

As we prepare, we're going into 2021. We want to make sure that we address all your technical assistance concerns. So while Evan is kind of mulling through these questions, getting ready to answer them, I'm just going to take about 2 minutes to ask you all if there's any technical assistance questions or answers and topics you want us to cover. Please let me know now. We'll get that list together and attack that as needed. I see a lot of typing. Please keep going. And Evan is going through those people. And I know I'm hearing a lot about virtual experiences.

I apologize. My internet's not working correctly, everybody. But there is a webcast series called, Summer Mini Webcast Series on the WorkforceGPS. It's right there on our main page. I apologize. I can't pull the link for you guys right now. But it's there. And that's the title of it. So you guys are typing. We appreciate you. Evan, let me know when you're ready to rock and roll, and then we can get some questions answered.

MR. ROSENBERG: I wouldn't say I'm ready, but let's just go ahead and get started. I haven't looked at all the questions yet. We are up to 75 questions we've received. So I'm going to go through as many of them as quickly as possible. I'll try not to speak too quickly. But I do want to get through as many questions as possible. And we still do have a good chunk of time. And keep those questions coming. And hopefully, I'll get to them. I cannot promise I'll get to everyone, but I'll do the best I can.

Someone asked, can work experience be in the government sector? The answer is yes. Government sector is the same as public sector. I said earlier work experiences can be in the public sector. Can youth work experiences be paid using WIOA funds, or does the employer have to pay the work experience? Work experiences can absolutely be paid using WIOA youth funds. That's allowable use of WIOA youth funds. Someone asked about getting a copy of the reference document that provides examples of the academic component. That is in TEGL 21-16. Maisha, if you could pull that and paste it into chat, that would be great –

MS. MEMINGER: I'm having internet issues. However, colleagues, if you guys go to the invitation for this particular webinar, it is actually a hyperlink to that TEGL on the invitation. And I do apologize. I can't pull that, Evan. I'm having issues –

MR. ROSENBERG: And you can also, if you just google TEGL 21-16, that's enough information for Google to find the TEGL. That's actually how I find them on mine all the time. It's quicker than scrolling through our DOL website.

MS. MEMINGER: I do the same thing, Evan.

MR. ROSENBERG: Google TEGL 21-16. Next question, do apprenticeship programs count? I did talk about that one. During the program prior to exit, you can count registered apprenticeship expenses towards the work experience expenditure. Can you provide a few examples of what is expected in a case note or an employer agreement regarding academic aspects of the work experience? That's a good question. I talked about the academic component.

I would say I think a case note is acceptable for that. If you put it in the employer agreement, that would be even better. But just talking about what academic or occupational education learning takes place in the work experience in a case note would be ideal. So if they're in a work experience in a hospital, maybe talk about education that they're receiving either during that work experience or prior to if it's classroom. And you know, as I'm thinking out loud here, you could even make this kind of a youth learning thing.

Ask the youth how they are learning on the job. How are they learning the educational pieces of it? And maybe the youth can give you a few sentences as kind of a homework assignment from their work experience of, here's how I learned about the work experience. You could put that in the case note. I always like getting the youth involved in the learning piece, so maybe that's a good way.

I just thought of that off the top of my head now. Someone asked about example of academic and educational component of the work experience. We talked a bunch about that. I'll refer you to TEGL 21-16 for that one. Here's an interesting one – on a recent webinar, boards were speaking about paid work experiences that was only a classroom workshop type setting where youth were learning work readiness skills, etc. and not actually placed in a work setting. Is this allowed in the work experience? And can it count toward the 20 percent requirement?

I would not call a work readiness skills workshop only a work experience at all. That is definitely not a work experience. That is a component of a work experience if they're doing either virtual or in-person experience on a work site. But as I read the definition earlier of work experience, the very first part of that definition is "a planned, structured learning experience that takes place in the workplace for a limited period of time." You can think of the "in" part as virtual or in person. We're living in a different world now and virtual is certainly acceptable, as we talked about.

But employability skills or work readiness training workshops, that's not a workplace. And it needs to be virtual or in person in a workplace. So this is just a component. It concerns me a little bit that on a webinar board we're talking about that as a work experience. Perhaps they were talking about it as just one component of a work experience before the youth goes into the actual work experience, either on the work site or virtually at the work site. But you have to either be in person or virtual on a work site for it to count, whether it's job shadowing or summer employment or anything. That's the key to it.

That's the real benefit to the youth is being exposed to a workplace and people who work in that workplace. Sitting in a classroom learning about employability skills is super important, but that is not a work experience in and of itself. There's a question about is it true work experience hours should be limited to 29 hours to a board avoid the requirements of any health insurance under the Affordable Care Act? I referenced this before. You know, this one, again, we don't have federal rules for that. That's a local decision if you want to do that.

The question of whether youth in a work experience even is subject to that Affordable Care Act requirement really depends on the circumstances of the work experience and if there's employer-employee relationship. And that's a determination that you need to make in conjunction with health from the Department of Labor's Wage and Hour Division or the IRS. This is obviously a tricky issue of, is it an employer-employee relationship or not? But that's where that comes in. Many youth and work experiences may not even be subject to that requirement. It really depends on the nature of the work experience.

But that's certainly something you could think about. If you determine that it is an employer-employee relationship and that that Affordable Care Act provision applies, then you may want to consider to limit it to under the threshold. You know, when I see examples of work experiences, they typically aren't 40 hours a week anyway. You know, I see them for maybe 4-6 hours a day for a week. So I think it's pretty typical for it to be more like between 20 and 30 hours. So it's certainly reasonable to have work experience under that threshold. Again, that's a local decision.

Who determines whether the work experience is paid or unpaid? The answer to that is you do. You, meaning the local WIOA Youth Program, whether that is a policy from the local board, a policy at the state level, a decision at the youth service provider level. That's all for you all to figure out and make that decision – not for us. But there are definitely benefits to both. We see lots of paid and unpaid work experiences. It is certainly very helpful for our population to receive paid wages, given that the majority of our program participants are low-income.

So wages are a very good thing for you. But there is absolutely benefit to any work experience, whether it's paid or unpaid. So that is a decision that you all make. This question I'm not quite following. It says, the incentive part is only for work experience component. I'm gathering they're asking about does the incentive apply for the work experience component maybe as opposed to the classroom training portion. And keep in mind, the incentive should be based on an accomplish – not attendance of something.

So you can't give an incentive for just attending an employability skills workshop. The incentive is for accomplishing something, which the most obvious example for work experience is successfully completing the work experience. So this gets into questions around payments to participants. And we actually have a really great TA resource related to payment to participants we just released not too long ago. And Maisha highlighted that on slide 13. And there is a link to it about when something is an incentive versus a stipend.

Stipends are allowable for attending classroom training. But an incentive is not allowable for participation. An incentive is for successful completion of something, an accomplishment. Next question, what are the repercussions for state and locals not meeting this metric? It's a great question. It's something we get asked often. Hopefully, that will never happen and every local area in the country will meet the 20 percent minimum. And particularly after this webinar, when you've heard of all the things that can count towards the work experience expenditure, 20 percent really shouldn't be an issue for local areas.

If a local area does not meet it, then that is the state's responsibility in monitoring the local areas and monitoring their expenditures about the repercussions for that. Often, the first step is technical assistance. And that is what we currently recommend is technical assistance to help a local area get up to that 20 percent in helping them to make sure youth get the 20 percent. We're not about repercussion so much as trying to help you get your programs to a place where they need to be in order to help our young people.

Because we're all in this for helping the young people, and we believe work experiences are super beneficial for young people. So we want to help you get there; so do our regional offices and states. If a local area continued year after year not meeting that work experience expenditure minimum, there could be more repercussions. There could be disallowed costs, things like that. But that is the state-local relationship for a local area.

Next question, a work experience is a limited period of time. Is there a maximum amount of time for work experience? Or is it case-by-case basis? There is not a maximum amount of time. It is a case-by-case basis. And it is up to you in the local area to set a local policy on that. For different things they could be short. Job shadowing could be a couple hours a week. For summer employment, it could be full-time 40 hours. It could be 20 hours. I've seen all different amounts of time for work experiences. It really depends. And it's up to you all. I am going to take a break for a couple seconds – because I'm talking real fast – to have a sip of water. Hold on.

MS. MEMINGER: That's okay. Evan needs some water, guys. Give us a break for 2 seconds. I just put a link in the chat, and I don't know if I can share that broadly regarding some opportunity to reimagine. Thank you, Carmen [ph], for your help in finding the link to the summer webcast that talks about monitoring to providing virtual work experience. I just put that in our chat, Jon.

MR. VEHLOW: I can send that out to everyone right now.

MS. MEMINGER: Thank you. Again, ladies and gentlemen, we're getting the same questions about recording. Of course, the recording will be ready for us in a week on the same page where the invitation was. A copy of today's PowerPoint is available under the file share button. And if you have TA suggestions, put your email address next to them, as well as there are some questions that are coming that are not specific to today's topic.

If they're not specific to today's topic, please make sure you put your email address so we can follow up with you at a later date. And some people are asking for more intensive help with some issues and areas that we probably will not be able to address today. So we just want to make sure that we can follow up with you and we can contact you via your email. So please help with that. I'm going to take a couple of these questions I can answer, Evan, while you get some water –

MR. ROSENBERG: I'm back. I'm ready –

MS. MEMINGER: You're back. OK. You don't trust me, Evan?

MR. ROSENBERG: That's not what I'm saying at all. Of course, I trust you. Maisha and I (inaudible) –

MS. MEMINGER: All right, Evan. Take over –

MR. ROSENBERG: – over the years, so we joke around a lot. OK. Next question. Our agency had a program that had both academic and occupational training in the IT field. It was deemed not a fit for WIOA by Vocational Rehabilitation Program because the students earned industry-recognized certification. Would this program work under DOL standards? So that sounds like more of an allowable cost issue in general for WIOA youth. The answer is absolutely. This is an allowable use of Title I WIOA youth funds if the individuals are eligible for the WIOA Youth Title I Program.

The one you were describing sounds very much like the types of programs that our programs fund. So I would encourage you to work with your local WIOA Youth Title I Program on that. I'm assuming this person asking the question was from the vocational rehabilitation world. In terms of whether what you're describing counts as a work experience expenditure, I would need more information. But that can absolutely be something that falls under WIOA Title I Youth.

A question about the type of academic component documentation required for work experience. We talked a little bit about this before. I think someone asked about case notes. I think case notes are a really good suggestion. For that, I would probably document the case notes, how you're doing it. That'd be the best way to do it. Next question, can WIOA youth funds be used to pay business staff time for supervising, providing training to youth in the work experience? Absolutely.

Whatever staff are working on this, you can allocate their work time to work experience expenditure. The key is it has to be WIOA Title I youth fund, because if you think about the calculation, the denominator is Title I youth fund. So if those business service reps are funded by a different funding source and you're using their staff time and they're not funded at all by WIOA Title I youth, then that is a leveraged resource and you can't count it because it's not Title I youth fund.

But I've seen lots of examples where program staff are funded by different funding streams. So maybe they're funded in part by the WIOA adult funding stream and part by the WIOA youth funding stream because they are providing services for both adult and youth participants. I've seen this in business service reps before. And if that's the case and WIOA Title I youth funds are spent on that individual, then yes, the time they are using supervising the work experience can be counted.

Someone asked about the 15 percent taken off the top for administrative costs. And it sounds like they were confused when I said the 10 percent administrative costs that we take out for the calculation. I think this individual is confusing the 15 percent governor's statewide reserve funds that are taken off from a state allocation. What I was referring to is local area funds. So the way our funding allocations work is we give WIOA youth funds to the state. The state can take up to 15 percent of those funds and use it for statewide activities. Those are called the governor's reserve fund.

And then the remaining 85 percent of the fund goes to each local area in the state. So the funding we're talking about for work experiences is that remaining 85 percent. And then of that remaining 85 percent, local areas can use up to 10 percent of it for admin. And what I'm saying is that 10 percent in the local area that is used for admin and subtracted from the denominator of the work experience expenditure calculation, it does not count. And we've had examples of that calculation in our past WIOA youth TEGLs.

Next question, has DOL thought about increasing the wage limit of $10 per hour for work experiences? Many youth are finding jobs for a much larger pay rate leaving counties with money because of the $10 limit. So it sounds like this person is maybe thinking DOL federal level has a $10 limit, which we do not. But it sounds like that must be a policy at your state or local level.

As I mentioned before, there is no maximum that we set at the Department of Labor for wages paid for a youth work experience. What we recommend is that youth receive at least the minimum wage in your state or in your local area. What we find these days with minimum wage is that different states and different cities have different minimum wages. And you should pay at least your minimum wage, is our recommendation. But there isn't a maximum wage from the Department of Labor. At the federal level, there is no $10 maximum.

So I would check with your state. I would check with your local board, find out where that $10 limit is coming from. And talk to whomever has that limit about the need to provide more funds to young people. Hopefully, you can work with whoever has that limit. Next question is kind of similar. Given the current economic conditions an employer demands for workers, do agencies need to justify offering a higher work experience wage to youth to remain competitive comparative to direct employment opportunities?

Again, this is very much a local decision, state-local decision – not a Federal Department of Labor decision. So I put this question back on you. Ask your state, ask your local board what justification they need for you to offer a higher work experience. Typically, you'll have a policy at your local level of what your maximum work experience expenditure wages. If you believe it's not high enough, talk to your local board. Or have your local board talk to the state workforce agency about increasing that limit if you think it's too low to remain competitive with unsubsidized employment.

Next question, you said you can count stipends. Can you please advise where stipend is defined. I will again give a commercial for one of our technical assistance resources. We recently posted on slide 13, there's a technical assistance resource link for our payment to participants technical assistance resource. And stipends are defined there. Next question, what about supportive services directly related to the paid work experience and time spent on that? As I mentioned before, supportive services cannot be counted towards the work experience. That is a different program element.

We do have a policy that the supportive services cannot count toward the work experience expenditure requirement. Next question, how much staff time is allowed to be charged to work experience? Again, we don't have a maximum amount. Perhaps your state or local area has a policy on this. But we do not have a maximum amount of staff time that can be charged. Like I said before, we encourage paid work experiences where possible. We also encourage you to leverage wages paid from employers.

So we could see the amount of work experience expenditures being staff time all over the board depending on whether you're able to leverage funds to pay the work experience. But it's not concerning to us if we see a lot of the work experience expenditure on staff time if you're able to leverage paid work experience from other funds. Next question, would the vocational rehabilitation on-the-job training be counted as incentive payment? I think this question might be confusing something.

Incentives are paid for successful accomplishment, completion of something. They're not paid for activities. So on-the-job training is not an incentive. Maybe the question is, would vocational rehabilitation paying wages to the participant be counted as a work experience expenditure? Again, that would be a leveraged resource – not WIOA Youth Title I funds. So that would not be counted toward the work experience expenditure.

Next question, very similar to the one I just answered two questions ago. Can the entire 20 percent work experience expenditure minimum be allocated to staff time? Again, there is no maximum, no rule on that. Theoretically, yes, it could be. I don't often see that it is, because typically there are some WIOA youth dollars spent on wages for participants. But it's possible if you were able to leverage over funds to pay the wages for paid work experience, all of it could be staff time. There's nothing that is incorrect about that. And that is possible.

MS. MEMINGER: Evan, I just want to let you know we have 10 more minutes. And you are traveling through these questions. You're halfway there.

MR. ROSENBERG: OK. Thanks, Maisha. At this pace, I'm probably not going to get through all the questions. I'm on question 29 right now of my list of now 83 questions. So I won't get through all of them, but I'll do my best. Does classroom mean tuition portion? is the next question. I'm assuming they're asking about the classroom training portion. I probably need more information on this question. When we're talking about classroom training, we don't mean broadly any type of occupational skills training or postsecondary education where tuition is paid.

This is more classroom training directly tied to the work experience. And those types of classroom training, typically it's not tuition-based training for a formal occupational skills training or postsecondary education class. I guess it's theoretically possible that they could be in some type of postsecondary education class directly related to the work experience. And in that case, it might be possible. But I think most times the classroom portion of a work experience is not something that is tuition-based

When traveling to/from employers and/or work sites for work experience activities, is mileage for this activity allowed as an expenditure? If we're talking about the staff person, then yes, because they are traveling related specifically to the work experience. If the question is about a young person in a supportive service to pay their transportation cost, the answer is no. I talked about that before. Supportive services don't count. But for staff time or staff transportation for a work experience, yes. You can count that towards work experience expenditure.

Next question, could staff cost be included in the 20 percent if they were working on developing work experience placements for funds other than WIOA? For example, we have a WIOA eligible enrolled youth who are able to participate in the summer work experience activity that are funded through the CARES Act or funded through TANF funding sources. I love this question. This is a great question. I've actually never seen this one before. And I'm thinking about the answer to that as I'm thinking about this question because I literally just read this now.

And yes is the short answer. I think that is reasonable. So I would think about it this way, as long as it's a WIOA youth enrolled and they are participating in a work experience. It doesn't matter who is funding the work experience – if you're leveraging CARES Act funds or employer funds or TANF funds for the work experience. I think what matters is that you're reporting and you're performance reporting that the youth is in a work experience.

Those of you who know me probably know I do a lot of work on performance and reporting. So just a reminder for the WIOA Youth Program, you report all the activities WIOA youth do during their participation regardless of funding source. So someone who is co-enrolled in TANF and WIOA youth, you would report that work experience even if funded by TANF or funded by CARES Act, as long as they're in the WIOA Youth Program.

And then if the staff is doing work to develop the work experience placement for a work experience funded by another funding source, you could definitely count that staff time working on that work experience as long as you're reporting in our performance reporting system that the youth is in a work experience activity. And that's a really good and interesting question, so thanks for that.

MS. MEMINGER: Evan, we have five more minutes. I'm going to ask colleagues – since Evan will probably be able to take maybe two more questions – if you're thinking that your question was later on in the flow of the presentation and it's a burning question, we have our email address up here for you: youth.services@dol.gov. You can send your questions there. We also as a team will receive the entire chat where we have your questions there as well. We will look at the questions and see how we want to approach this.

Later on we may want to come back and have another second part of this. We don't know yet. Just work with us. So if you don't hear from us immediately, I will acknowledge that we received your email if you have a question for us and get back to you as soon as we can because we'll have to parse this out as a team of six of us.

And so Evan, I would encourage you for two more questions maybe. If you could scroll the questions on your favorite question you want to answer. If your question was not answered today, please leave email to us or we also will go through the chat.

MR. ROSENBERG: I pick this on my 1:25 stop time I can get more than two in. Are local areas able to incentivize attendance in a work experience? As I talked about it before, incentives can only be paid for achievement – not attendance. So you cannot pay an incentive in order for someone to participate in a work experience. But you can incentivize their participation by saying, if you complete the work experience you will get paid an incentive. So to me, that is incentivizing them to participate in the work experience by telling them what they'll get at the end of it.

But the incentive can't be paid for participation. It has to be paid for successful completion. Can you count employability skills job readiness training as an expenditure if it's running in concurrence with the work experience? Yes. You can. As long as it's directly tied to the work experience – whether it's before or concurrently – that is allowable. Next question, our state uses the TANF Block Grant for youth programming to find work experience. Are we able to use this towards the 20 percent requirement?

So the actual TANF fund that you're spending, they don't go into the calculation for the work experience expenditure requirement. That would be a leveraged resource. And as I talked about before, we don't count leveraged resources. It's just WIOA Title I youth funds that go in the calculation.

However, as I just talked about in a previous response, any WIOA youth fund Title I dollars spent on developing that TANF work experience for WIOA youth-eligible employees – that staff time or any of the other things surrounding the work experience – maybe an employability skills workshop related to that work experience – that can be counted towards the work experience expenditure requirement.

But the TANF funds themselves are not counted because that is a leveraged resource, and not our dollars. I'm just scrolling through your questions. If a participant is in academic training for their GED, would that count as meeting the academic requirements for the work experience? No. As I mentioned before, working on your GED, working on high school equivalency, that is not specific to the work experience and the academic part. When we talk about the academic education related to the work experience, it's learning about the work experience.

So if you're in a health care occupation for work experience, learning about different things related to health care occupations. And that learning can happen on the job we talk about or on the work experience. We talk about this in TEGL 21-16. But the academic part isn't like going to school or going to adult education or doing high school equivalency classes. And those things don't count towards the expenditure and don't meet the requirement for the academic education. The academic education is related to specifically to the work experience.

A bunch of people asked about virtual work experiences. Someone said they don't understand one. How would it work? Maisha, we have lots of resources related to virtual work experiences. And I believe they were included in some of the TA resources you had on the slide, correct –?

MS. MEMINGER: Yes. (Inaudible) – are summer reimagined. There are some examples of virtual work experiences. Also, if you all just type in "virtual" under our youth connections community of practice, we have two pages of virtual engagement tools, including information about virtual work experiences, as well as our careeronestop.org site had numerous resources on virtual work experiences, virtual job fairs. So we have a bunch of tools on virtual work experience.

We're learning about them as well. And people are still playing around with the idea. Also have mass with the tool of virtual experiences over the last 12 months. So yes, we have examples on careeronestop.org, as well as our youth community of practice where you all received this invitation. So just run the word, "virtual," and there are some tools and tips there. And we're also going to be – (inaudible) – to stop also as upcoming TA on Voices of Experience.

We will also be talking about virtual work experiences as well. And also, June of this month WorkforceGPS is highlighting youth. And we will be having some videos coming up speaking to young people the last year about their virtual work experiences opportunities. And those will be coming out in the next two weeks. So we have some great stuff coming up as well.

MR. ROSENBERG: All right. Well, unfortunately, we are out of time. You had wonderful questions – (inaudible) – was helpful to you. And like Maisha said, we'll look at the questions we didn't get to today and hopefully be able to provide some responses to those.

So with that, I am going to say thank you so much for your participation and turn it over to Jon to close us out.

MR. VEHLOW: Thank you, Evan. And I just want to thank all of our participants.

(END)