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**DATE:** January 21, 2026  
**TO:** Youth Committee  
**FROM:** Noramah Burch, Youth Program Manager  
**RE:** **Revised Work Experience Policy – Revision #2 (Proposed)**

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## **RECOMMENDATION**

That the Youth Committee approve the Revised Work Experience Policy #01-26 v.2.

## **BACKGROUND AND CURRENT SITUATION**

The Workforce Innovation and Opportunity Act (WIOA) required Local Boards to develop work experience policies that (at minimum) address:

- the types and duration of work experiences
- appropriate incentives and stipends and/or wages (if any)

Although WIOA allows work experience to be paid or unpaid, as appropriate, the WDBCCC Youth Committee took the stance that all WIOA Youth WEXs needed to be paid. RFPs and contracts with providers reflect this.

While the existing policy meets WIOA requirements, draft updates were presented at the November 19, 2025 Youth Committee meeting that warranted further discussion.

Proposed revisions:

1. Specify that a work experience may be virtual/remote.

*Justification: The pandemic prompted the Department of Labor (DOL) to clarify that a work experience may be virtual. This revision incorporates DOL guidance and creates more opportunities for WIOA Youth.*

2. Add a reference to Internal Revenue Service (IRS) requirements.

*Justification: The addition of this information serves as a reminder that WIOA requires adherence to all laws and federal guidance. It aligns with EDD WSD17-07 WIOA Youth Program Requirements [wsd17-07.pdf](#) and [WorkforceGPS - Our Journey Together: Work Experience Activities Brief](#).*

3. Outline types of participant payments commonly found in WIOA Programs (wages, stipends, and incentives) and their most appropriate use.

*Justification: DOL and 2 CFR 200 (Uniform Guidance) both require appropriate classification of payments. The additional details in the Revised WEX policy highlight the difference between these three types of payments to WIOA participants.*

4. Clarify the distinction between programmatic policy requirements and work experience expenditure reporting.

*Justification: WIOA Work Experience falls primarily under 20 CFR Part 681 (Youth Activities). § 681.600 defines work experience as a programmatic element/service for youth. § 681.590 pertains to fiscal reporting and outlines the 20% work experience expenditure requirement.*

5. Remove additional work experience subsidy requirements for private sector host worksites.

*Justification: Removing additional restrictions for private sector work experiences expands equitable access for youth with barriers, who often lack traditional employment pathways. WIOA does not view work experience as an employer subsidy. It is a required WIOA Youth Element designed to benefit the participant. WIOA guardrails, such as Objective Assessment and alignment with occupational goals, ensure work experiences remain a purposeful, effective strategy in the development of a youth's individualized career pathway."*

Work Experience Policy Revision #2 incorporates stronger language reflecting WIOA's intent, which establishes the expectation that WEX placements support the youth's career pathway.

To inform these updates, staff conducted a comparison of Contra Costa's WEX policy with those of other East Bay workforce boards.

## **ATTACHMENTS**

- A1a** Department of Labor's Paid and Unpaid Work Experience Brief
- A1b** WEX Policy Revision 2
- A1c** WPB #01-16 Youth WEX (current)

For any questions, please contact Noramah Burch, Youth Program Manager, at [nburch@ehsd.cccounty.us](mailto:nburch@ehsd.cccounty.us).