
CTI Work-Based Learning Manual

for

**Career Technical Instruction
Support Services**

Georgia Department of Education

Kathy Cox

State Superintendent of Schools

John Barge

Director of Career and Technical Education

Virginia Turner

Program Specialist – Intervention Services

2004

ACKNOWLEDGEMENTS

Sincere appreciation is expressed to the following individuals for their contributions to the development of the CTI Work-Based Learning Manual for Related Vocational Instruction Support Services.

Project Facilitator

Karen H. Jones, Professor
The University of Georgia

Project Staff

Desirae M. Domenico, Doctoral Assistant
Sheila S. Hudson, Senior Secretary
The University of Georgia

A special thank you is extended to the following Related Vocational Instruction Coordinators for their expertise in the writing and editing of this document.

Development Team

Lydia Blakey
Chapel Hill High School
Douglas County

Hal Brickle
Northview High School
Fulton County

Billie Cain
Dawson High School
Dawson County

Bridget Paul
Madison County High School
Madison County

Ross Sullivan
Douglas County High School
Douglas County

Abner F. "Chip" Underwood
Warren Technical Institute
DeKalb County

TABLE OF CONTENTS

Introduction.....	1
Rationale.....	3
Criteria for Work-Based Learning.....	4
Student Selection.....	4
Minimum Requirements.....	5
Legal and Labor Requirements for Work-Based Learning Experiences.....	6
Responsibilities of Work-Based Learning Personnel.....	7
Legal Requirements.....	8
Affirmative Action.....	8
Americans with Disabilities Act (ADA).....	9
General.....	9
Auxiliary Aids.....	9
Physical Barriers.....	10
Employment.....	10
Confidentiality/Privacy.....	10
Licensure and Certification.....	11
Racial Harassment.....	11
Sexual Harassment.....	12
Safety and Health.....	12
Social Security.....	13
Transportation.....	14
Labor Requirements.....	15
Wages.....	15
Age Requirements.....	18
Working Hours.....	19
Hazardous Occupations.....	19
Workman’s Compensation Insurance.....	21
Unemployment Insurance.....	22
Design Approaches.....	23
Apprenticeships.....	23
Cooperative Education.....	24
Clinical Experiences.....	25
Field Trips.....	25
Internships.....	25
Long Term Job Shadowing.....	26
School-Based Enterprise.....	26
Suggestions for Special Populations Enrolled in Work-Based Learning.....	27
Get to Know Students, Parents/Guardians, and Communities.....	28
Conclusion.....	30
Appendices.....	

Introduction

The Georgia Department of Education (GADOE) determined a need to provide a manual detailing the principals and practices appropriate for implementing successful Work-Based Learning Programs and produced the manual, *Standards and Guidelines for Work-Based Learning Programs in Georgia* (1997). The Career-Technical Education Support Services within the GADOE determined a need for an *CTI Work-Based Learning Manual* that would assist Coordinators with the implementation of Work-Based Learning experiences within their support services. This manual is based on information contained in the *Standards and Guidelines for Work-Based Learning Programs in Georgia*, but places emphasis on the needs of students with disabilities who receive CTI support services.

According to the *Standards and Guidelines for Work-Based Learning Programs in Georgia*, Work-Based Learning programs are structured educational experiences that integrate classroom learning with productive, planned work experiences, which are related to a student's career goal. Most programs are dependent upon local businesses and industries to provide either paid or non-paid work experiences for students and on the abilities and skills of a Work-Based coordinator who has the responsibility for managing the specific Work-Based Learning program.

Over the last decade, there has been increased acceptance of Work-Based Learning programs by local educational institutions because of their contribution to both the intellectual and career development of secondary students, including those with disabilities. The common goal of Work-Based Learning programs is to prepare students for the world of work through the integration of academic and occupational curricula. Students with disabilities need opportunities to receive academic and occupational skills necessary for entering the workforce and/or postsecondary education.

Combining school and work experiences is a key element of Work-Based Learning programs. The integration of school and work serves two purposes. First, it helps students learn skills and knowledge to qualify for employment. Second, it allows students to use work to foster their own learning, thus, contributing to their change and continued growth. Students should be given opportunities to receive academic and occupational skills necessary for entering the workforce and/or postsecondary education.

Work-Based Learning programs must include a school-based learning component (classroom instruction in both academic and occupational areas), a work-based learning component (structured work), and a connecting activity component (career development activities). In addition, Work-Based Learning includes:

- Work experience opportunities for students, either paid or non-paid.
- Job training and work experiences coordinated with both academic and occupational learning in school-based programs that are relevant to students' programs of study, lead to the award of a secondary diploma and entrance criteria to a postsecondary institution.
- Workplace supervision.
- Instruction and activities in academic and occupational workplace competencies, including positive work attitudes, employability, and practical skills.
- Broad instruction, to the extent reasonable, in all aspects of the industry, including safety.

Sample forms are included in the appendices of this manual to assist CTI Coordinators with the implementation of Work-Based Learning experiences for students with disabilities. They are organized according to use by CTI Coordinators, students and their parents, and employers. These forms serve as a guide and may be edited to suit the needs of your students and county. However, **your county may have other regulations and specific forms, and these should be used when appropriate.**

Rationale

Having work experiences during school are associated with better employment outcomes for individuals with disabilities. Educational institutions must make reasonable accommodations for students with disabilities in the Work-Based Learning opportunities they offer. Specific work-based accommodations for students with disabilities will vary according to a student's needs, the worksite, and the job requirements. Students with disabilities will often require the same accommodations or modifications present in the school environment to be used at the worksite. Employability skills must be taught during high school to ensure student success in the adult world. Data from studies such as the National Longitudinal Transition Study verify that students with disabilities need intensive employability skills training, self-advocacy training, referral to adult agencies, and immediate, on-going job support to obtain and maintain employment over time.

Career Technical Instruction (CTI) support services in Georgia provide assistance to students with disabilities in technology/career education classes. In addition, CTI Coordinators structure transitional services to assist students with postsecondary goals and job placement. One extension of CTI support services, Work-Based Learning, offers students numerous learning opportunities beyond the classroom by allowing them to explore career options by working with businesses and organizations. As future employees, students with disabilities may face unique challenges such as lower incomes, inadequate training, lack of skills, and lower retention rates. Practical applications that students gain through Work-Based Learning experiences help them focus on their career interests and provide them with real work experience.

The implementation of Work-Based Learning experiences through CTI support services can be a win-win situation for both students and employers. Students with disabilities can gain

basic workplace skills such as communication, teamwork, problem solving, and social skills. They may gain knowledge of specific occupational skills, as well as an understanding of different industries in order to make informed career choices. Successful participation in CTI Work-Based Learning experiences may lead them to acquire jobs at high wages after graduation. Students may exhibit more positive habits and attitudes about work, while learning to identify their own specific needs in terms of accommodations and supports. In addition, students may develop an increased awareness of their own needs in relation to their future employment. Students will ideally develop a strong work ethic that fosters positive attitudes necessary to overcome many of the challenges people with disabilities often encounter.

Employers benefit from Work-Based Learning experiences by having a better-trained, more productive workforce. Businesses may also realize that participating in Work-Based Learning promotes efficient recruitment and helps develop a network of qualified workers within their communities. Employers have the opportunity to learn firsthand how students with disabilities can contribute to the success of their company or industry. Businesses can cultivate their next generation of qualified workers and attract new customers. In addition, participation is a skill developer for a business's current employees, as they serve as trainers and mentors for CTI students.

Criteria for the CTI Work-Based Learning

Student Selection

A student enrolled in CTI support services must be legally identified as a student with a disability and eligible for Special Education Services. Placement into CTI support services does not require a separate action; it is done through the IEP process. Work-Based Learning can be a component of CTI support services. Secondary students must meet age requirements for work

established by the U. S. Department of Labor Employment Standards Administration. Information regarding age as a requirement for work is located on page 18 of this manual.

Students enrolled in a Community Based Instruction (CBI) Program may be eligible to participate in an CTI Work-Based Learning experience if the student meets minimum requirements and competencies. This decision can be determined at the student's IEP meeting.

Criteria for placement into a Work-Based Learning experience through CTI consist of: a) competencies the student must possess and, b) an understanding of the responsibilities that will be placed on a student enrolled in such a work experience. Class and work expectations should be addressed to students, parents, and employers, documented by the CTI Coordinator, and included in student files. Students and their families are encouraged to be advocates for accommodations that are required to ensure successful participation.

Minimum Requirements

According to the *Georgia CTI Handbook*, several student competencies should be considered before CTI students are placed on the job.

Student Competencies for Job Placement
<ul style="list-style-type: none">✓Have a career objective (although it may change) based on results of technology/career assessment closely aligned to the worksite selected.✓Have an acceptable attitude toward work and a receptive attitude toward training.✓Be physically, emotionally, mentally, and morally capable of performing assigned duties.✓Be willing to accept responsibility and able to follow instructions.✓Possess entry-level skills.✓Meet minimum age requirements.✓Be adequately groomed and possess a satisfactory personal appearance.✓Understand the importance of a good school and work attendance record.✓Be responsible for transportation to and from a training station.✓Obtain and maintain employment status with minimal assistance from the CTI Coordinator.✓Be able to work sufficient hours to make training meaningful and realistic.✓Have a written training agreement, signed and agreed to by student, parents, employer, and Coordinator.✓Have a training station related to his or her technology/career and career goal.

The Georgia Department of Education's *Standards and Guidelines for Work-Based Learning Programs* highlights several key components necessary for Work-Based Learning programs to be successful. This includes student's responsibilities in an CTI Work-Based Learning experience. These responsibilities are summarized in the following chart.

Student Responsibilities for Job Placement
<ul style="list-style-type: none">✓ Meet the criteria for job placement.✓ Maintain regular attendance, both in school and on the job.✓ Exhibit honesty, punctuality, courtesy, a cooperative attitude, proper health and grooming habits, appropriate attire, and a willingness to learn.✓ Conform to all rules and regulations of the employer.✓ Complete all necessary forms and reports required in the experience.✓ Provide transportation to and from the Work-Based Learning site.✓ Provide proof of accident insurance coverage.✓ Remain in the Work-Based Learning position unless there is prior knowledge and consent by the CTI Coordinator.✓ Maintain satisfactory educational performance in academic and career/technology classes.✓ Consult the worksite supervisor and CTI Coordinator about any work-related issues or concerns.✓ Exhibit proper conduct in school as well as on the job.

The decision to involve a student in an CTI Work-Based Learning experience should be determined in the student's IEP meeting whereupon all of the following criteria should be taken into consideration:

- Student competencies.
- Student's course history- diploma type and completion of graduation requirements.
- Results of an interest inventory or similar assessment.
- Completed application by the student into the CTI Work-Based Learning experience.
- Results of a student interview.
- Approval of the CTI Coordinator.

Legal and Labor Requirements for Work-Based Learning Experiences

Work-Based Learning experiences move students from the confines of the school building and classroom to a work-based environment. This move necessitates an awareness of the legal and labor concerns and responsibilities for working with youth on Work-Based

Learning sites. The Work-Based Learning personnel, as well as business partners engaging students in Work-Based Learning experiences, must adhere to all applicants.

Responsibilities of Work-Based Learning Personnel

Teachers, CTI Coordinators, and other school personnel who administer Work-Based Learning experiences are not expected to be the enforcement officers of fair labor standards and legal rules and regulations. They should, however, be expected to inform their school administrators and participating employers when possible violations of laws and regulations regarding the placement of students in Work-Based Learning situations occur. It is important for every individual involved with the CTI Work-Based experience to understand the legislation pertaining to these placements. The following laws and regulations apply to students and the businesses where they are placed.

Laws & Regulations Applying to Students and Businesses Involved in WBL	
<ul style="list-style-type: none">• Child labor laws.• Civil Rights legislation.• Labor standards.• Work experience and career-exploration guidelines.	<ul style="list-style-type: none">• Occupational safety and health laws.• Social Security rules and regulations.• Wage and hour rules and regulations.• Worker’s Compensation rules and regulations.

In addition to these and other federal regulations, there may be local and state rules and regulations that apply to the employment of students. If an employer does not comply with the law, Work-Based Learning personnel should terminate the employment arrangement and seek another Work-Based Learning placement for the student. Failure to comply with legislation in instances where a student’s health and safety are in jeopardy may result in legal action against the employer, and/or the CTI Coordinator and school system. Additionally, such violations damage the image of the CTI support services and are best avoided by selecting appropriate

employment and training sites. By preparing written training agreements that specify conditions that ensure compliance with current rules and regulations, these types of adverse situations may be avoided.

Legal Requirements

Information presented below is designed to inform Work-Based Learning personnel about legal policies and regulations. This information is a guide to CTI Coordinators who offer Work-Based Learning activities and experiences and illustrates the types of concerns that should be addressed.

Affirmative Action

Federal Executive Order 11246 (as amended) protects defined groups from discriminatory practices in the workplace. Educational institutions and employers must refrain from discrimination on the basis of any of the following reasons:

- Age
- Disability
- Ethnicity
- Gender
- Marital Status
- National Origin
- Race
- Religion
- Sexual Orientation
- Veteran Status

Discrimination is prohibited in admission, recruitment, treatment of students, academic requirements, financial and employment practices, nonacademic services, and health, welfare, and social services. Protected groups are those persons who have historically been most disadvantaged by discriminatory practice formally sanctioned by law. Protected minority groups are defined in the following chart.

Protected Minority Groups
<ul style="list-style-type: none">◆ African American◆ Asian American◆ Hispanic American◆ Native American◆ Women

Affirmative employment efforts are also required for the following:

- Persons with disabilities
- Vietnam-era veterans

Americans with Disabilities Act (ADA)

The Americans with Disabilities Act (ADA) of 1990 (PL 101-336) prohibits discrimination on the basis of disability in public services, employment, public transportation and accommodations, and telecommunications. Public and private sector organizations must comply with requirements outlined in this act. Basic requirements within this act that directly affect Work-Based Learning experiences fall into four basic areas: General, Auxiliary Aids, Physical Barriers, and Employment.

General

- All government facilities, services, and communications must be accessible.
- Public accommodations (e.g. restaurants, hotels, retail stores, etc.) may not discriminate on the basis of disability.
- Reasonable changes in policies, practices, and procedures must be made to avoid discrimination.

Auxiliary Aids

- Auxiliary Aids and services must be provided to persons with vision or hearing impairments or other persons with disabilities, unless an undue burden on the business would result.
- Companies offering telephone service to the general public must offer telephone relay service to individuals who use telecommunication devices for the deaf (TDDs) or similar devices.

Physical Barriers

- Physical Barriers in existing facilities must be removed if removal is readily achievable. If not, alternative methods of providing the services must be offered, if they are readily achievable.
- All new construction in public accommodations, as well as in commercial facilities such as office buildings, must be accessible.

Employment

- Employers may not discriminate against a person with a disability in hiring or promotion if the person is otherwise qualified for the job.
- Employers can ask about a person's disability to perform a job, but cannot inquire if someone has a disability or subject a person to tests that tend to screen out persons with disabilities.
- Employers will need to provide "reasonable accommodation" to persons with disabilities. This includes steps such as job restructuring and modification of equipment.
- Employers do not need to provide accommodations that impose an "undue hardship" on business operations. An undue hardship is generally defined as excessive or disproportionate costs compared to the organization's ability to pay for the accommodations.

Confidentiality/Privacy

Student records and information are protected from public disclosure under the Federal Rights and Privacy Act. In order to release personal information about a student (e.g. classes taken, grades, social security number) to employers, permission must be given by the student, if he/she is over the age of 18. If the student is under the age of 18, then the student's parent(s) or legal guardian(s) must give permission for the information to be shared.

Work-Based Learning personnel should have students complete application forms and provide any and all necessary information for the employer in regard to the employment process. This ensures that the student, rather than the CTI Coordinator, provides the employer with any confidential information that may be requested. It is important that the CTI Coordinator not

provide employers with student records, including social security numbers, for identification or record keeping purposes unless the appropriate releases have been signed by the student or the parent/guardian. **Use your local school system's release form to obtain this information.**

Licensure and Certification

Under state authority, laws are enacted setting forth the minimum qualifications for persons and the standard to be met for practicing in an occupation. The mandatory regulations of these occupations under state licensure laws best serve the public interest. Employers rely upon the legal licensing agency for assurance that a practitioner is qualified in the field. Professional societies endeavor to improve the quality of services provided by supportive personnel in certain fields through voluntary certification of individual employees.

Standards pertaining to education, experience, and personnel qualifications are determined by the professional association, usually in cooperation with the auxiliary group that is subject to the certification procedures. Applicants wishing to become certified under these standards must apply to the certifying board of the specific association and comply with the certificate standards.

Racial Harassment

A single incident that is sufficiently severe may establish a racially hostile environment.

Racial harassment is physical or verbal conduct relating to an individual's race when the conduct:

- Has the purpose or effect of creating an intimidating, hostile, or offensive work or academic environment.
- Has the purpose or effect of substantially or unreasonably interfering with an individual's work or academic performance, or
- Otherwise adversely affects an individual's employment or academic opportunities.

Sexual Harassment

Sexual harassment is verbal and/or physical action aimed at the sexual identity of a person, either male or female, and affects the person's self-esteem and productivity. There are two basic types of sexual harassment:

- Quid pro quo (something for something)
- Hostile environment

Quid pro quo sexual harassment occurs when submission to a sexual advance is a condition of employment or when submission to or rejection of such conduct is used as a basis for employment decisions affecting an individual. A hostile environment exists when an unwanted behavior interferes with job performance or creates an intimidating or offensive work environment.

Examples of Sexual Harassment in the Workplace
<ul style="list-style-type: none">◆ Commenting on physical attributes.◆ Crude or offensive language.◆ Discussing sexual activities.◆ Displaying sexually suggestive pictures.◆ Giving job favors to employees who participate in consensual sexual activity.◆ Ostracism of workers of one gender or another.◆ Sexually provocative or crude gestures.◆ Unnecessary touching.

Refer to the Department of Labor webpage for the latest information on harassment in the workplace.

Safety and Health

The Occupational Safety and Health Administration (OSHA) within the Department of Labor is the federal agency with primary responsibility for setting and enforcing standards to promote safe and healthful working conditions for all workers. Provisions under the Williams-

Steiger Occupational Safety and Health Occupations Act of 1970 (PL 91-596) apply to every employer with one or more employees engaged in a business affecting interstate commerce.

This act requires employers to maintain employment conditions free of recognizable hazards causing, or likely to cause, death or physical harm to employees. OSHA standards may require specific conditions in the workplace or the use of specific practices, methods, or processes to promote safe work. Employers are responsible for becoming familiar with standards that apply to their facilities and for ensuring a safe work environment.

Training in safety and health protection is particularly important for students in Work-Based Learning experiences that are assuming new duties and responsibilities. Safety training is most effective when incorporated into job performance training. Employers have a responsibility under the law to properly supervise employees in the conduct of activities that pose a foreseeable risk of injury. Training agreements should require the employer to assume responsibility for supervising a Work-Based Learning student's on-the-job activities.

Occupational Safety and Health Administration regulations do not apply to schools since they are public employers. However, if a student's school experience includes a work component, either paid or unpaid, OSHA workplace regulations are relevant and must be followed by the student.

Social Security

All students should have been assigned a Social Security number upon birth. Upon placement at a Work-Based Learning site, each student will be required to complete a W-4 form listing his or her Social Security number and the number of dependents claimed for tax information. In compliance with the Patriot Act, students also need to provide documentation to submit federal I-9 forms.

In January of a new calendar year, each employer is required to provide the student with a copy of a W-2 form. This form includes a statement of Social Security contributions deducted from his or her pay as well as the amount of wages and other contributions that are withheld from the student's pay. Receipts document the amount of wages that count for social security. In most situations, wages paid in forms other than cash (e.g. the value of meals) must be included in the report from the individual submitting the W-2 form.

Most student workers are entitled to benefits under the provisions of the Social Security Act. Major groups of persons not covered are government employees and employees of certain non-profit organizations. The Social Security Act does not provide for children less than 21 years of age who are employed by either parent.

Students currently receiving Social Security benefits have limitations on the income they are allowed to earn without reduction in benefits. If such students participate in the Work-Based Learning experiences, the CTI Coordinator should contact the local Social Security Administration office to obtain up-to-date information on limitations.

Transportation

In general, the party responsible for transportation is also liable for injuries that occur while a student is being transported from one site to another. Under certain circumstances, however, going to and from a job is considered part of one's "work" and may be covered by the employer's workers compensation insurance. If the school is transporting students, Coordinators should confirm whether the district's insurance covers the students. Employers who provide transportation to and from the worksite bear the risk for the time the student is under their supervision. If a student drives the family car, the individual family insurance covers accident risks.

Labor Requirements

Child labor laws were enacted to protect minors from injury in the workplace and to prevent work from interfering with education. The Fair Labor Standards Act (FLSA) was enacted in 1938 to regulate labor practices. Most states had enacted child labor laws prior to the FLSA and many have continued to provide a higher level of protection to workers. Where both State and Federal standards have been enacted with respect to an issue, the stricter standard must be observed. In addition, businesses with annual sales of more than \$500,000 as well as other organizations are subject to FLSA. These organizations are listed in the following chart.

Organizations Subject to FLSA
<ul style="list-style-type: none">◆ Elementary and secondary schools.◆ Higher education institutions.◆ Hospitals.◆ Preschools.◆ Public agencies.◆ Schools for children who are mentally or physically disabled or gifted.◆ Schools whose primary purpose is care of disabled or aged persons residing on the premises.

Most businesses, including non-profit organizations, are required to follow FLSA guidelines. It is usually best to assume that a business engaging a student in a Work-Based Learning situation is subject to FLSA regulations.

Wages

The Fair Labor Standards Act (FLSA) also requires payment of federal minimum wage. When there are differences between federal or state laws or regulations, the stricter standard applies. For instance, if a state has no minimum wage law, the federal minimum wage applies. If a state has a minimum wage that is higher than the federal minimum wage, then the state's minimum wage applies.

Employers subject to the FLSA must pay the applicable federal minimum wage and overtime rates unless the state minimum wage is higher. In most states, minors must be paid at least the minimum wage and applicable overtime rates established by the U.S. Department of Labor (no less than 1 ½ times the regular rate of pay for each hour of work in excess of 40 hours a week).

In 1996, the FLSA was amended to provide for an increase in the minimum wage. The current federal minimum wage rate is \$5.50 per hour effective in September 2000. Coordinators should check the current minimum wage rate for adherence to all applicable laws. Where state law requires a higher minimum wage, the higher standard applies. Minors who are high school graduates or hold a higher certificate of proficiency must be paid the same as adults when they perform the same quantity, quality, and classification of work. This is true even when the wage rate is above the minimum wage. Also, all wages are subject to taxes. Employers must compensate men and women equally for jobs that involve the same degree of responsibility, skill, and effort, and are performed under similar working conditions.

The amended FLSA sets the employer's cash wage obligation at not less than \$2.13 an hour. This replaces the former provision requiring that tipped employees be paid at least 50 % of the minimum wage in cash. However, if an employee's tips combined with the employer's cash wage of \$2.13 an hour do not equal the minimum hourly wage, the employer must make up the difference. An employer may credit a certain amount of the gratuities received by tipped employees (e.g. waiters and waitresses) against the employer's minimum wage obligation when certain conditions are met.

There may be times when students will have to be employed at less than minimum wage to prevent curtailment of employment opportunities. Federal exemptions and required sub-

minimum wage levels do exist for trainees and student learners, although individual state laws may override them. Employers are prohibited from displacing employees in order to hire youth at the sub-minimum wage.

The U.S. Department of Labor Employment Standards Administration provides for the payment of sub-minimum wages to people aged 16 or older who are:

- Student-learners in a Career and Technical training program as defined in Title 29, Section 520 of the U.S. Code of Federal Regulations.
- Full-time students working in retail establishments, in service establishments, or in institutions of higher learning where they are enrolled.
- Students with disabilities participating in cooperative career and technology education.

According to the U.S. Department of Labor, the key determinant of the level and form of appropriate payment is whether the student is a regular employee, a trainee, or a student gaining work experience as part of his or her education and the percentage of sub-minimum wage workers employed in any business. Employers must file a sub-minimum wage certificate request for each CTIWork-Based Learning student they will employ at less than the minimum wage. Student-learners employed on a part-time basis pursuant to a bona fide employment program may be paid at 75% of the current minimum wage. Full-time students employed in retail, service establishments, or institutions of higher learning may be paid 85% of the minimum wage. These sub-minimum wage rates would apply to any disabled student employed as a student learner or full-time student. The local Wage and Hour Office of the Department of Labor can provide additional information regarding these provisions.

In accordance with federal law, to qualify as a student learner and therefore be exempt from certain occupational and wage regulations, a student must evidence a written agreement that provides for safety instruction, supervision, and a schedule of organized work processes.

States often go beyond this, requiring that minors obtain a work permit (“working paper”), usually from the school district prior to gaining employment.

Age Requirements

Federal law establishes that a minor must be at least 14 years of age to be employed in specified occupations outside of school hours, for limited periods of time each day and each week, and only during certain times of the day. Students who are ages 14 and 15 may be employed in jobs such as office and clerical work, cashiering and selling, bagging and carrying out customers’ orders, errand and delivery work (by foot, bike, or public transportation), cleanup work, maintenance of grounds, kitchen work, and work connected with cars and trucks (car washing and polishing). New federal guidelines prohibit a teenager under the age of 18 from dispensing gasoline into cars and trucks.

Sixteen years of age is the basic minimum age for employment in any occupation that is not declared hazardous by the U.S. Secretary of Labor. The law defines persons who are at least 18 years old as adult workers.

The Federal Labor Standards Act (FLSA) requires employers to keep on file the date of birth of every employee under the age of 19. Employers should obtain an official age certificate that validates the date of birth. The certificate may be a:

- (1) federal certificate of age, issue by the Wage-Hour Division, or
- (2) state certificate, known as an age, employment, or working certificate or permit, issued by the appropriate state agency or local educational institution.

The possession of an age certificate certifying that the employee meets minimum age requirements for the work being performed will protect the employer from liability in the event the employee is, in fact, too young to be engaged in such work.

Working Hours

Some states limit the number of hours and times of day that a student under 18 years of age can work in a single day or week. Federal law limits these hours only for those students under the age of 16. Students enrolled in career and work exploration programs may be exempt from some minor hour provisions of federal and state laws.

These are specific hour limitations that apply to 14 and 15 year olds (8th grade and up) employed in non-farm jobs. The hours these minors may work are contained in the chart below.

Hour Limitations for 14 & 15 Year Olds
<ul style="list-style-type: none">✓ Outside school hours.✓ No more than 3 hours on a school day.✓ No more than 18 hours in a school week.✓ No more than 8 hours on a non-school day.✓ No more than 40 hours in non-school weeks.✓ Between 7 a.m. and 7 p.m. (between June 1 and Labor Day they may work as late as 9 p.m.).

Hazardous Occupations

In order to comply with federal hazardous occupation regulations and to help ensure the safety of students, Work-Based Learning personnel should be familiar with the agricultural and non-agricultural (non-farm) hazardous occupation orders. The Fair Labor Standards Act provides a minimum age of 18 years for any non-agricultural occupations, which the Secretary of Labor “Shall find and by order declare” to be particularly hazardous for 14, 15, 16, and 17 year old persons or detrimental to their health and well-being.

Federal child labor laws prohibit many jobs that are especially hazardous to individuals not considered to be adults. Minors may perform all work except in 17 occupations that are considered too hazardous for all youth under the age of 18. Hazardous Occupations Orders are contained in the following chart.

Hazardous Occupations Orders (HOs)
HO 1: Manufacturing and storing explosives.
HO 2: Motor-vehicle driving and outside helper, including driving motor vehicles or working as outside helpers on motor vehicles or driving as a part of any occupation.
HO 3: Coal Mining.
HO 4: Logging and saw milling.
HO 5: Work using power-driven woodworking machines, including the use of saws on construction sites.
HO 6: Work involving exposure to radioactive substances.
HO 7: Work involving the operation of power-driven hoisting devices, including the use of fork lifts, cranes, and non-automatic elevators.
HO 8: Work using power-driven metal forming, punching, and shearing machines, boring machines (However, HO 8 permits the use of a large group of machine tools used on metal, including lathes, turning machines, milling machines, grinding machines, boring machines, and planers).
HO 9: All mining other than coal mining, including work at gravel pits
HO 10: Work involving slaughtering or meat-packing, processing, or rendering including the operation of power-driven meat slicers in retail stores.
HO 11: Work involving the operation of power-driven bakery machines.
HO 12: Work using power-driven paper-products machines, including the operation and loading of paper balers in grocery stores.
HO 13: Work in the manufacturing of brick, tile, and kindred products.
HO 14: Work involving the use of circular saws, band saws, and guillotine shears.
HO 15: All work involving wrecking, demolition, and ship-breaking.
HO 16: All work in roofing operations.
HO 17: All work in excavating, including work in a trench as a plumber.

Seven Hazardous Occupations (numbers 5, 8, 10, 12, 14, 16, and 17 above) permit the employment of student-learners in Career and Technical Education programs under certain conditions. Student-learners in Work-Based Learning experiences meet the student-learner exemption if the student is employed under a written agreement providing that:

- All hazardous work will be performed under the direct and close supervision of a qualified and experienced person.
- Safety instructions will be given by the school and reinforced by the employer with on-the-job training.
- The job training follows a schedule that reflects organized and progressive skills development.

- The work in the hazardous occupation is intermittent and for short periods of time, is under the direct and close supervision of a qualified and experienced person, and is a necessary part of training.

The employer and CTI Coordinator or school principal must sign the written agreement (i.e., Work-Based Learning training plan). Copies of the agreement must be kept on file by both the school and the employer.

In addition to the Hazardous Occupations listed above that are prohibited for minors under the age of 18, 14 and 15 year olds may not work in the following occupations:

- Cooking, other than at lunch counters and snack bars, and within the view of the customer.
- Manufacturing, mining, processing.
- Work in warehouses and workrooms.
- Construction jobs, except in the office.
- Any job involving hoists, conveyor belts, power-driven lawnmowers, and other power-driven machinery.

Occupation limitations are strictly enforced for 14 and 15 year old youth, with no exceptions. Student-learner provisions applicable to some Hazardous Occupations for youth 16 and 17 years of age do not apply to minors under the age of 16.

Workers' Compensation Insurance

Workers' compensation insurance covers medical expenses and lost income for employees injured on the job. Students in Work-Based Learning experiences must be insured at school and work. If the student is considered employed under state or federal rules and regulations, workers' compensation insurance must be obtained. Workers' compensation is furnished and paid for by the employer; no deductions are withheld from the employees' wages for this coverage.

If the student is paid or unpaid, but still considered a "worker" under state or federal laws, he or she is considered an employee of the firm and comes under the employer's workers

compensation coverage. Employees may need a special workers' compensation insurance rider to cover students who are engaged in substantive, unpaid work. If the student is paid through a program intermediary, the intermediary may also be liable and must provide workers' compensation insurance coverage. However, a student in an observer role at the workplace is, in effect, still an extension of the school, and no additional insurance coverage is necessary. Insurance for in-school activities does not require a special policy, because it is included in the regular liability arrangements for the school.

Private insurance companies may not deny workers' compensation insurance coverage to an employer because 16 to 18 year olds are employed. If the employer has a record of claims, however, he or she may have to pay an assigned risk premium. These assigned risks premiums are not related to the age of the company's employees, but rather to past history of injury claims.

Unemployment Insurance

The unemployment insurance system was designed to give employers some degree of financial security by providing income support when they lose jobs through no fault of their own. Both state and federal law govern the system. The Social Security Act created the Unemployment Trust Fund in which each state has an account, established requirements for the administration of state unemployment systems, and provides funding to help the states administer their systems. The Federal Unemployment Tax Act (FUTA) requires state unemployment insurance laws to meet certain standards and determines which employers and what payments are subject to the federal employment tax.

Students in Work-Based Learning experiences are exempted from unemployment insurance under federal and most state laws, by virtue of the students' status as part-time employees. To claim the exemption, an employer must receive certification from the CTI

Coordinator and the educational institution in which the student is enrolled that the Work-Based Learning experience is an integral part of the student's educational program.

Design Approaches

The goal of CTIWork-Based Learning initiatives is to provide structured Work-Based Learning experiences for students with disabilities. Work-Based Learning means activities that involve actual work experience or connect classroom learning to work. Work-Based Learning is a broad-based initiative that seeks to prepare students for the world of work through a structured combination of coursework and work-related experience. Work-Based Learning experiences are divided into two primary categories: paid experiences and non-paid experiences. Work-Based Learning may involve a variety of different approaches to teach students tasks, skills, and responsibilities associated with the workplace today. A variety of approaches provide a broad range of quality Work-Based Learning options. The most common Work-Based Learning experiences available to facilitate the preparation of youth for transition to work include:

a) apprenticeships, b) cooperative education, c) clinical experiences, d) field trips, e) internships, f) long-term job shadowing, and g) school-based enterprises. Safety training is required and should be completed prior to the student's placement. It is your responsibility to assure that students meet the minimum age requirement for the selected design approach(es).

Some students with disabilities require the same accommodations at a worksite that they utilize to complete academic work. For example, a student with mobility impairments may need an accessible workstation and/or adaptive technology to complete computer-related job duties.

Apprenticeships

Apprenticeships are relationships between an employer and employee during which the worker, or apprentice, learns an occupation in a structured program. These apprenticeships are

sponsored jointly by employers and labor unions or operated by employers and employee associations. Students should be 16 years of age or older and in the 11th or 12th grade. Students must be enrolled in the related course concurrently (at the same time) with the Work-Based Learning experience. The Work-Based Learning experience may not substitute for the required five hours of instruction per week. Each student's school experiences and work-based activity must be coordinated together if both are to contribute to the student's education and employability.

Cooperative Education

Cooperative Education (Co-op) is a method that connects school-based and paid work-based learning. Students are enrolled in a related course, which is a part of their focused course of study. Students are also placed in employment related to their course of study and career goal. The school coordinates both experiences so they contribute to the preparation of the student for postsecondary study or to meet immediate career goals. Students receive course credit for their in-class instruction and work component. Students must be 16 years of age or older and in the 11th or 12th grade. Students should be currently or previously enrolled in a course related to their Work-Based Learning experience. The Work-Based Learning experience may not substitute for the required five hours of classroom instruction per week.

According to the *Georgia CTI Handbook*, students *must* be enrolled in a CTE course to receive CTI support services. However, the Work-Based Learning experience might not be directly related to the content area of the CTE course they are currently enrolled in. For example, a student could obtain a Work-Based Learning placement at a garden center for the current semester even though he/she might have taken an agricultural course the previous school year. Sometimes a student might even be placed in a work setting for which there is no program

in any of the schools in the system. For example, a student may be placed in a hospital yet the school system may not offer Health Occupation courses.

Clinical Experiences

Clinical experiences are school-based or work-based placements usually in the health science area in which students are taught academic and occupational skills from school or employee instructors who supervise and evaluate their work. The areas of clinical experience may include, but are not limited to, health services, dental health, veterinary medicine, childcare, counseling, food services, law, and social services. Students must be 16 years of age or older and in the 11th or 12th grade.

Field Trips

Field trips to the worksite involve classes or small groups of students visiting appropriate worksites in local businesses and industries. These activities are supervised and designed to promote career exploration in variety of jobs or postsecondary education opportunities. Field trips may provide students with insight into a particular industry or occupational field that they may not have previous exposure to. This learning experience may provide students with the opportunity to make informed decisions about important life choices.

Internships

Student internships offer the opportunity to study a program directly related to his or her career interest and to participate in a workplace setting by performing duties related to the occupation being studied. Internships, as a component of a related course, are intended to be short-term activities and are designed to meet the needs of students in the technical path. Long-term, for credit experiences, must be pursued through cooperative education. The major purpose of the internship learning experience is for the intern to receive broad instruction in workplace

expectations, confirm, narrow, or expand choices of career interest, develop an understanding of the connection between school-based theory and content and work-based application, and increase awareness of the workplace, career opportunities, and community resources.

Long Term Job Shadowing

Job shadowing is typically a part of career exploration activities in late middle and early high school grades. A student follows an employee at a business for one or more days to learn about a particular occupation or industry. Job shadowing can help students explore a range of career objectives and select a career major for the latter part. Middle school to early high school is appropriate for shadowing experiences. Job shadowing may be a part of a class activity or a school activity. Typically, students job shadow for a period of one to five days. However, for a secondary student to qualify for the CTI Work-Based Learning component, the job shadowing experience needs to be long term in one setting. For example, a student could job shadow one or two days per week for the duration of the school term. Transportation to and from the job is the responsibility of the parent/guardian and the student.

School-Based Enterprise

A school-based enterprise is an experience in which students as part of their school program produce goods and services. School-based enterprises typically involve students in the management of a project that may involve the sales of goods for use by others. They normally involve students in all aspects of the business to the extent practicable. They may be conducted on or off the school site but must be a part of the student's regular school program. Students should be currently or previously enrolled in the related class(es).

Regardless of the approach that is individualized for each student, the CTI Coordinator must be mindful of scheduling difficulties that may evolve when enrolling students in a Work-

Based Learning class. An example of a scheduling conflict is a number of students may be participating in a variety of Work-Based Learning approaches at the same time. For instance, a Coordinator may have one student enrolled in a co-op and another student enrolled in an apprenticeship. Both time slots are for fourth period. A Coordinator may simply want to label the classes as Workplace Readiness (RVI) - then individualize design approaches with students according to the student needs and IEP within the Coordinator's filing system.

Specific guidelines for each Work-Based Learning experience are available from the Georgia Department of Education. Since Work-Based Learning must meet certain federal and state guidelines concerning the placement of minors into work-based environments, the local Coordinator must be knowledgeable about employment certificates, the Fair Labor Standards Act, wage and hour regulations, fringe benefits, prohibited hazardous occupations, and a host of other regulations.

Suggestions for Special Populations Enrolled in Work-Based Learning

Legislation mandates that students with disabilities must be included to the fullest extent in school and in the workplace. Therefore, when implementing Work-Based Learning experiences for students with disabilities, there are several essential elements that must be present to ensure effective and successful experiences. Maintaining proper and consistent documentation is another key component to a successful Work-Based Learning experience. Requirements for effective placements are summarized in the following chart.

Essential Requirements for an Effective Placements	
✓ Assessment and Evaluation	✓ Training Plan
✓ Educational Training Agreement	✓ Work-Based Learning Site
✓ CTI Coordinator	✓ Worksite Supervisor

Get To Know Your Students, Parents/Guardians, and Communities

In an effort to best meet the needs of a particular student, it should be a primary responsibility of the CTI Coordinator to get to know their students. CTI Coordinators need to establish and encourage a collaborative effort from parents, co-workers, employers, and members of the local school community. This effort will help to ensure that CTI students enrolled in the Work-Based Learning experience are best prepared to meet their employment and/or postsecondary school goals. CTI Coordinators need the support of students, parents, and communities to form a partnership that will ensure CTI students are prepared to obtain employment and/or enter postsecondary education. CTI Coordinators should obtain student information through an application process, the Individual Education Plan, and/or an informal interview. It is important for CTI Coordinators to actively participate in the referral for CTI Work-Based Learning services and their placement into an CTI Work-Based Learning experience. The CTI Coordinator should assess and establish the best method of communication between a student, parent/guardian, and employer. It is most effective if the students and/or parents are able to openly voice their needs, concerns, and input into the goals and development of their own Work-Based Learning activities. A variety of methods should be used when contacting parents, employers, and/or students. Coordinators should determine the most appropriate method of communication between employers and/or parents. Remember to take into consideration factors that may inhibit the communication process. Particularly important is to determine the employer's or worksite supervisor's preferred type and time of communication, and their ability to be responsive when called on.

CTI Coordinators are advocates for their students, services, departments, school, and community. Interviewing parents/guardians and reviewing the Individual Education Plan will

help build a working relationship with parents/guardians. Interviews are often invaluable and have the potential to provide clues and insight into a student's family dynamics or structure. Students with disabilities along with their parents deserve and are entitled to be similar to their non-disabled peers in regard to wanting to feel autonomous, and able to be a responsible contributor to the community. Parental responsibilities in the Work-Based Learning experience are summarized in the following chart.

Parental Responsibilities in Work-Based Learning Experiences
<ul style="list-style-type: none">◆ Be involved in their child's participation in the Work-Based Learning experience.◆ Share responsibility for the student's conduct on the job and while in the Work-Based Learning experience.◆ Sign education training agreement and parental permission forms.◆ Provide transportation for the student to and from the Work-Based Learning site.◆ Provide documentation of responsibility for accident insurance coverage and automobile insurance coverage.◆ Encourage student to perform both classroom and Work-Based Learning responsibilities in an efficient and effective manner.◆ Contact CTI Coordinator about concerns and inquires rather than the Work-Based Learning site.

CTI Coordinators seek committed business leaders to support, promote, and participate in Work-Based Learning experiences for students with disabilities. Work-Based Learning experiences allow schools to go beyond the classroom and into the community to develop student competence. It is essential for CTI Coordinators to be knowledgeable about businesses and industries in the community. Coordinators should stay current and up-to-date with industry standards and labor statistics. Potential Work-Based Learning sites should be recruited, screened, and monitored to ensure they include and value diversity and are free of any racial or sexual harassment, bias, or discrimination. Establishing a good working relationship with the

Department of Labor (DOL) through Vocational Rehabilitation Counselors is strongly recommended. CTI Coordinators should also form and maintain positive working relationships with local technical colleges and appropriate personnel at each of these institutions. These relationships will aid with future contacts for field trips, job shadowing, postsecondary options, and future enrollment for students with disabilities.

Conclusion

CTI Coordinators must maintain positive and professional relationships with a variety of individuals on a regular basis in order to appropriately deliver services. Teachers, counselors, administrators, secretaries, custodians, and food service workers often hold valuable keys which can help unlock doors for CTI students. The individual responsible for scheduling will play an especially important part when planning off-campus experiences for students. On the local school district level, it is extremely important for CTI Coordinators to collaborate with administration to clearly establish and agree on guidelines and expectations that are essential in developing and implementing an effective Work-Based Learning experience. Ensure that your local administration is aware and knowledgeable of the goals and accomplishments of the Work-Based Learning component of CTI support services.

Promote CTI Work-Based Learning experiences within the school and community. Faculty and staff can advocate for CTI students and support services and are often the best source of potential employers or worksites in the community. As students are transitioning from high school to postsecondary options, it is important to include a Vocational Rehabilitation Counselor who could serve as a liaison in the transition process. This individual will introduce possible opportunities and initiate services that may be needed to ensure student success.

Appendices are included to assist CTI Coordinators with the implementation of Work-Based Learning activities and experiences. These appendices are organized into three sections for use by Coordinators, students/parents, and employers. Select only the forms you need and adapt them to suite the specific circumstances of your school and community.