

Chapter 2 – Youth at Work Allowable Activities

Summary

Minnesota Statute (116L.562) authorizes the Youth at Work Equity grant program directing DEED to “award grants to eligible organizations for the purpose of providing workforce development and training opportunities to economically disadvantaged or at-risk youth ages 14-24.” Youth at Work funding is available on a biennial basis and awarded to eligible organizations/applicants in a competitive request for proposal process.

Relevant Laws, Rules, or Policies

[Minnesota Statute 116L.562](#)

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Youth at Work website: <https://mn.gov/deed/programs-services/office-youth-development/special/grants/>

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Overview:

The Youth at Work program provides organizations with flexibility as it relates to program service delivery models and allowable activities. This policy chapter is intended to provide overarching guidance on activities that are allowed under the Youth at Work program. This policy will provide broad examples of allowable activities and highlight the activities that are not allowed under the Youth at Work Program. There are no specific activities that are required to be provided to all Youth at Work participants as the type and level of services may vary from program to program. There are certain allowable activities, that if utilized, will trigger additional requirements. For example, if your organization is providing participants with a stipend or incentives, an organizational-level policy will be required (see the stipends and incentives section for more details).

This policy will also provide “best practices” around elements of the Youth at Work program that are not required. The best practice examples come directly from youth workforce development programs in Minnesota as well as nationally recognized best practices.

Allowable Activities:

The Youth at Work program allows for a broad spectrum of youth employment and education related activities. It is understood that the needs of a 14-year-old participants may vary greatly from the needs of a 22-year-old participant. The following list is not exhaustive but provides examples of allowable activities under the Youth at Work program. Services may be provided in-person or via virtual methods.

- Career awareness and exploration activities like career aptitude tests, career fairs, industry tours, job shadows, career camps, labor market information seminars
- Resume development, cover letter writing, mock interviews
- financial literacy training, mentoring (adult/participant and peer-to-peer)
- Support youth in achieving educational goals such as earning academic and/or service-learning, academic tutoring, basic skills development.
- Support youth in earning high school diploma or GED.
- Support youth with exploring, applying to, and accessing post-secondary education opportunities that lead to industry recognized credentials (i.e. certificate, credential, diploma).
- Covering tuition, fees, books, and licensing fees. **Note: Youth at Work funds should be used after other methods like financial aid and scholarships are leveraged.**
- Provide youth with paid private sector work experiences and public sector employment opportunities. These can include internships, pre-apprenticeships, apprenticeships, and On-The-Job Training (OJT) opportunities. Wages or a stipend can be provided to youth for work experiences. See [Work Experiences](#) section for additional details. **Note: Best practice is to offer a wage with a paystub rather than a stipend.**
- Work-based learning and career pathways programming focused on in-demand industries such as healthcare and information technology. See [Career Pathways](#) section for additional details.
- Support services for youth. See [Support Services](#) section for additional details.
 - a. Support to complete driver’s education course(s) and/or obtain driver’s license.

- b. Necessary tools, equipment, or clothing to enter or maintain educational training and/or a job. This could include work boots for a construction site or non-slip shoes for a culinary position.
- c. Gas cards or bus passes to enter or maintain educational training and/or a job.
- Providing youth with stipends or incentives tied to participation in the local Youth at Work program. **See section on Stipends and Incentives** for more details.

NOTE: Youth at Work grant funds can be used to pay for food or meals for participants in limited circumstances. Grantees are highly encouraged to leverage other funds or partner with other organization to provide food or meals to participants before using Youth at Work funds for food or meals.

Work Experiences

From Workforce Innovation and Opportunity Act (WIOA) 20 CFR 681.600):

- (a) Work experiences are planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience may be paid or unpaid, as appropriate. A work experience may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists. Work experiences provide the youth participant with opportunities for career exploration and skill development.
- (b) Work experiences must include academic and occupational education.
- (c) The types of work experiences include the following categories:
 - (1) Summer employment opportunities and other employment opportunities available throughout the school year;
 - (2) Pre-apprenticeship programs;
 - (3) Internships and job shadowing; and
 - (4) On-the-job training opportunities as defined in WIOA sec. 3(44) and in § 680.700.

Career Pathways

From the federal Workforce Innovation and Opportunity Act (WIOA):

The term “career pathway” means a combination of high-quality education, training and other services that:

- a) align with the skills of industries in the region;
- b) prepares an individual to be successful in any of a full range of secondary or post-secondary education options, including registered apprenticeships;
- c) includes counseling to support an individual in achieving the individual’s education and career goals;
- d) includes education offered concurrently with workforce preparation activities and training for a specific occupation or occupational cluster;

- e) organizes education, training and other services to meet the particular needs of an individual in a manner that accelerates the education and career advancement of the individual to the greatest extent possible.
- f) Enables an individual to attain a secondary school or its recognized equivalent, and at least one recognized post-secondary credential;
- g) Helps an individual enter or advance with a specific occupation or occupational cluster.

Support Services:

The Youth at Work program does **not** require grantees to offer or provide support services to youth participants. However, it is generally a best practice to offer supportive services to youth participants to help ensure successful completion of programming.

Items that are necessary for a youth to participate in the program, such as transportation, clothing, tools, childcare, housing/rental assistance, school-related expenses, etc. These expenses may be paid directly to the youth or to a third-party vendor.

The Youth at Work program does **not** require grantees to provide support services. However, if your organization offers and/or provides supportive services to participants a support services policy **must** be in place. **Example Support Services policies can be found here:** <https://mn.gov/deed/programs-services/office-youth-development/resources/>.

Food or Meals for Youth at Work Participants:

The purchase of food for program participants is that on a limited basis and in certain situations, food at a reasonable cost may be provided to youth program participants as a supportive service.

- Food provided to all participants at a recruiting event, for example, would not be allowed.
- Food **may** be provided to eligible youth when it will assist or enable the participant to participate in allowable youth program activities and to reach their employment and training goals, thereby achieving the program's overall performance goals.

The use of Youth at Work funds for food should be limited to reasonable and necessary purchases that are coordinated, when possible, with other community, state, or federal services that provide food for low-income individuals. For additional guidance see [Appendix A](#) enclosed in this policy.

Youth at Work grantees **must** have written policies and procedures in place for purchasing and distributing food to ensure consistent treatment of these types of expenses. The policy must be submitted to the Youth at Work Grant Manager for approval. When developing written policies and procedures, please review an example support services policy found here: <https://mn.gov/deed/programs-services/office-youth-development/resources/>.

Use of Stipends and/or Incentives

Stipends:

Youth at Work Grantees are allowed to provide stipends to youth participants. Often, stipends are provided to youth while they are completing classroom training, on-the-job training, occupational training, or other training activities. Additionally, stipends may be offered to youth in place of a wage.

Youth at Work grantees that decide to offer stipends **must** have a stipend policy in place. **Note: stipends are considered taxable income to program participants and participants must be notified of IRS implications.**

If stipends are being offered, a copy of the local-level stipend policy must be provided to the Youth at Work Program Manager.

Incentives:

Incentives may also be provided to Youth participants. In line with federal regulations, incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. The local program must have written policies and procedures in place governing the award of incentives outlined in writing before the commencement of the program that may provide incentive payments; align with the local program's organizational policies.¹ Incentive payments must not include entertainment, such as movie, sporting events, tickets, or gift cards to movie theaters or other venues whose sole purpose is entertainment.

Incentive payment must be connected to recognition of achievement of milestones in the program tied to work experience, education, or training. Incentives provided for achievement could include the acquisition of a credential or other successful outcome.

Incentive policies must include type of achievement, paper documentation of achievement, and amount payable. For example:

Type of Achievement	Paper Documentation	Amount Payable
Completion of GED test (incentive can be offered for each test completed)	Copy of official document showing passed test	The successful completion of each test = \$20.

If incentives are being offered, a copy of the local-level incentive policy **must** be provided to the Youth at Work Program Manager.

Example stipend and incentive policies can be found here: <https://mn.gov/deed/programs-services/office-youth-development/resources/>.

Subgranting Youth at Work Funds

Youth at Work grantees are allowed to subgrant a portion or all of their funds to another organization to carry out allowable Youth at Work activities. Grantees that choose to subgrant Youth at Work funds are

¹ Workforce Innovation and Opportunity Act (WIOA) [20 CFR § 681.640](#).

required to complete fiscal and program reviews of sub-recipient(s) at least annually for subawards of \$50,000 or more. Fiscal reviews include completing a financial reconciliation of the sub-recipient(s).

Appendix A:

When is food allowed?

Food can be provided to participants in specific situations. It is allowed only if it directly helps them take part in your program's activities, such as:

- Attending training sessions
- Participating in work experience programs
- Meeting employment or education goals
- Participant is in Career Exploration per State Program Contract Workplan

2. What are the limits?

Providing food should be:

- Reasonable: This means keeping costs moderate and necessary for the activity.
- Limited: Use food as a supportive service only when it helps the participant to achieve their goals per the youth's Individual Service Strategy (ISS) or Individualized Education Plan (IEP).
- Coordinated: If possible, try to work with other community programs that offer food assistance to low-income individuals.

3. Why is this important?

By providing food when appropriate, you're helping participants stay focused on their training and work activities, which in turn helps them succeed in the long run.

4. What should you have in place?

Your organization must have a written supportive services policy and procedures about purchasing and distributing food. This ensures to handle food expenses consistently and in line with State of Minnesota regulations. NOTE: This policy must be approved by your Youth at Work Grant Manager.