

Internship/Temporary Work

Updated: **November 2016**

Purpose

To communicate to DVR staff under what circumstances and what considerations are necessary in use of Internship/Temporary Work as a service for a DVR consumer.

Rationale/Why

Many consumers can benefit from having some experience with work prior to permanent employment. This guidance will assist DVR staff in consistent use of this service to better serve DVR consumers and establish relationships with employer/businesses.

Internship/Temporary Work (work experience) is defined as a time-limited paid work. Internship/Temporary Work is designed to impart in-depth knowledge of day-to-day work requirements in a real job, and, therefore, differs from temporary employment offered through private employment agencies (i.e., Kelly Services). DVR, however, can use private employment agencies as a resource to assist consumers in finding employment.

In some types of business, temporary work assignments are called Internships; in other settings, the term Temporary Work may be used.

There is no expectation that the participant will be hired permanently at the site, although he/she may be hired at the discretion of the employer/business. Labor standards apply in Internship/Temporary Work where an employee/employer relationship exists, as defined by the Fair Labor Standards Act. Overtime is not allowed as part of an Internship or Temporary Work arrangement. The maximum number of hours a consumer can work per week while participating in an Internship/Temporary Work is 40 hours. Any time worked over 40 hours in one week is considered overtime. If overtime occurs, Management should be consulted on how best to proceed. In Wisconsin, DVR has contracted with an Employer of Record service to assist in providing wages and coverage of insurance.

Internship/Temporary Work differs from on-the-job training (OJT) in that an OJT agreement is worked out with an employer/business to hire an individual with DVR paying a training fee or wage subsidy due to the need for extra training time beyond what is typical for that job. The hire is probationary, and the employee is expected to achieve permanent status upon successful completion of the OJT. Businesses in discussion regarding an Internship/Temporary Work situation should also be provided information about the use of an OJT.

For information about the specific roles/responsibilities of DVR Service Providers, please see additional guidance and procedures on the Internship/Temporary Work Page:

- http://dwd.wisconsin.gov/dvr/service_providers/internship/default.htm

- [Providing Internship/Temporary Work as a Service](#)
- [Work Permit Requirements and Guidelines](#)
- [Length of Internship/Temporary Work as a Service](#)
- [Providing Internship/Temporary Work in Conjunction with Other Services](#)
- [Comparable Benefits and Alternative Resources](#)
- [Progress Reporting](#)
- [Service Provider Role in Internship/Temporary Work](#)
- [Other Resources/Strategies for Setting up Internship/Temporary Work](#)
- [Connecting with Employer/Businesses](#)
- [Connecting with Temporary Employment Agencies](#)
- [Payment of Internship/Temporary Work](#)
- [Impact of Internship/Temporary Work on Social Security Benefits](#)
- [Impact of Internship/Temporary Work on Child Support or Other Benefits](#)
- [Eligibility for Unemployment Benefits](#)
- [Eligibility for Open Enrollment for Benefits](#)
- [Related VR Services](#)

Providing Internship/Temporary Work as a Service

Internship/Temporary Work can be provided as a service to a consumer when it is necessary and appropriate for the achievement of the employment goal. The Internship/Temporary Work site must be in an integrated community work site consistent with consumer's interests and employment goal. Wages paid to the individual must be commensurate wages paid to others performing the same or similar work.

The purposes of providing Internship/Temporary Work as a service will vary depending upon the individualized needs of the consumer.

Internship/Temporary Work services ***should not*** be provided for the purpose of maintenance (i.e., to meet the financial needs of the consumer).

Based on identified consumer needs, appropriate purposes of Internship/Temporary Work may include:

- **Assessment** - Provide the participant, employer/business and DVR counselor with an opportunity to evaluate the participant's interest, suitability, job accommodation needs, productivity and other worker traits in a real work environment. Often called "On-the-Job Evaluation" or "Work Trial", this is generally provided for up to 10 work days. Use of Internship/Temporary Work may be provided prior to creation of an Individualized Plan for Employment (IPE).

Note: When Internship/Temporary Work is being used as an assessment, it may be included in the consumer's IPE. It is important to include in the case record the specific purpose and parameters for the Internship/Temporary Work.

- **Career Exploration** - Learning about an occupational area or work environment of interest.
- **Work Hardening** - Improve physical, mental or emotional capacity to work.
- **Work Adjustment** - Learn about basic work behavior and workplace requirements regardless of the specific job goal. This can include the use of assistive technology.

- **Skill Enhancement** - Develop skills in a specific occupation or brush up on existing skills.
- **Reference Development** - Obtain a current positive employment record to assist in resume building.
- **Job Try Out** - Many DVR participants need to approach working with as little stress as possible. These participants often benefit from a limited commitment to the employer/business. Also, some employers/businesses may not be ready to commit to a permanent hire, but they are willing to offer temporary employment on a trial basis. Both the consumer and employer/business can try each other out.

Note: There may be some occupations where an Internship/Temporary Work is not possible due to the level of work-related safety risk. The Employer of Record provider may not allow certain placements of this type and will not support any Internships/Temporary Work involving driving positions or any paid time spent in a vehicle, including travel between job sites. Some construction and farm jobs may be included in categories considered "high" risk. If a consumer wishes to complete an Internship/Temporary Work in one of these excluded occupations, all safety concerns must be fully addressed by the WDA in consultation with the Bureau Director of Consumer Services. If a consumer has an employment goal of this type, use of an OJT is encouraged so that the site business can review and be responsible for any associated safety risk.

Work Permit Requirements and Guidelines

If under the age of 18, consumer is required to have a work permit before beginning the I/TW.

Work permits are valid for three years. If there is a break in service/employment, a new work permit must be obtained if the employee is still under 18 when he/she starts working again.

The work permit cost is reimbursable and should be added to the purchase order for the work experience. If summer employment is at the same work site as the previous summer, a new work permit is needed in order to be compliant with labor laws.

Work permits should list the Employer of Record as the employer, not the work site or DVR.

Length of Internship/Temporary Work as a Service

The duration and the number of Internship/Temporary Work opportunities must be based upon the individualized needs of the consumer and the purpose of the service. The duration of Internship/Temporary Work typically ranges from one week to three months. Three months is not a maximum timeframe, but generally the purpose of the Internship/Temporary Work will have been achieved within 90 calendar days. When the Internship/Temporary Work ends, a review can occur with the consumer and determination made if the service should be extended or if an additional Internship/Temporary Work experience is necessary. If it is necessary, efforts should be made to secure an Internship/Temporary Work in a new position or site. A supervisory exception to the 90 day timeframe is required.

Efforts should continue towards finding a permanent position if the consumer is seeking employment at the time of the Internship/Temporary Work. The participation in an Internship/Temporary Work should not delay other efforts at job development.

Providing Internship/Temporary Work in Conjunction with Other Services

Internship/Temporary Work may be used in combination with other DVR employment services as appropriate - including such services as On-Site Job Coaching, Supported Employment and Job Development. (See [DVR Technical Specifications](#) for descriptions of these services.)

Possible examples:

- Job coaching to assist in learning the assigned tasks of the Internship/Temporary Work.
- Job development while the consumer is completing an Internship/Temporary Work for the development of references.

If the individual has accommodation needs which can be addressed through provision of assistive technology devices, assistive technology services, or personal attendant care services, those must be addressed when Internship/Temporary Work is provided. This is also an opportunity for the consumer and DVR to begin to determine the rehabilitation technology needs of the consumer for work. While it is important to consider which needs a person may have, you may not know the full extent of accommodation needs until the consumer has begun the assignment. Depending upon the purpose and length of the Internship/Temporary Work, rehabilitation technology items could be rented, borrowed, or purchased.

Comparable Benefits and Alternative Resources

There are “no cost” options to assist consumers to participate in work activity. Some of these include internships, apprenticeships, temporary jobs, job placement opportunities programs through WIA partners, displaced worker programs, and Coop jobs through a university. Listed below are descriptions of possible programs and links to find out more about each opportunity to assist your consumers.

WIA Partner Opportunities:

WIA programs are found in Job Center locations across Wisconsin, and there are a number of training opportunities provided including apprenticeship and internships.

<http://www.wisconsinjobcenter.org/training/>

Federal Student Internships:

Various opportunities for federal internships.

<http://www.makingthedifference.org/federalinternships/>

State Student Internships TOP JOBS:

The Targeted Opportunity Program (TOPjobs) provides students with practical, on-the-job experience, training, and exposure to the Wisconsin Civil Service System. Many of the interns have succeeded in obtaining employment in state government as limited term or permanent state employees.

<http://oser.state.wi.us/category.asp?linkcatid=342&linkid=28>

Student Internships with Business and Government:

Various opportunities for internships: student, summer, full-time, etc.

<http://www.internweb.com>

Apprenticeships with WI Tech Colleges:

Apprenticeship participants can earn college credit in specific Wisconsin Technical College programs while enrolled in tech school or high school. <http://www.wistechcolleges.org/your-education/types-degrees-and-diplomas/apprenticeship>

Apprenticeships with DPI Guidelines:

Wisconsin's Youth Apprenticeship program is designed for high school students who want to experience hands-on learning at the worksite in conjunction with classroom instruction.

<http://dwd.wisconsin.gov/youthapprenticeship/>

Indeed.com

Search engine for all types of employment including internships.

<http://www.indeed.com/>

Job Placement Assistance for Specific Groups covered by other DWD Programs (Non-Traditional Occupations, Older Workers, Youth and Employment, Veterans, Dislocated Workers). Job Center site can also be used to search for employer/businesses, jobs and internships:

<http://www.wisconsinjobcenter.org/>

Progress Reporting

Internship/Temporary Work services should be included in a consumer's Individualized Plan for Employment (IPE) unless the purpose is assessment. Progress measures should be developed along with the consumer based upon the purpose or intended outcome of the service and specific job duties. Sample questions to assist in the development of progress measures:

- What is the purpose or expected outcome of the Internship/Temporary Work?
- What do you hope to gain from the Internship/Temporary Work (e.g., stamina, soft skills)?
- What skills will you learn?
- What are the employer/business's expectations of you?
- By who and how will progress be measured?

The counselor and consumer should closely monitor the Internship/Temporary Work to ensure it is contributing to the achievement of the IPE goal. Feedback from the site Employer/Business may be included to develop further services or build on hard skill sets.

Connecting with Employer/Businesses

On the Job Training (OJT) should always be presented as an option prior to the sharing information about Internship/Temporary Work. Internship/Temporary Work should be arranged directly with an employer/business.

Prior to contacting the employer/business, the consumer, DVR staff, and other agency representatives, service provider and/or family members, as appropriate, should discuss and identify the following:

- Purpose of the Internship/Temporary Work
- Hours, wages, geographical area, job duties, employment settings, etc.
- Assistive technology needs
- Barriers to participation, (i.e., transportation, that need to be addressed which are necessary for participation)

Service Provider Role in Internship/Temporary Work

Service Provider directly and in person contacts employers on behalf of the consumer and DVR to obtain develop Internship/Temporary Work for the consumer. Each site should be developed on an individual basis for each consumer based on their skills, interests and the stated purpose of the Internship/Temporary Work. The duration of the Internship/Temporary Work must be based upon the individualized needs of the participant and the purpose of the service.

The duration and scope of the Internship/Temporary Work is negotiated with the site employer and, in most cases, should not exceed 90 calendar days. A supervisory exception to the 90 day timeframe is required. When an Internship/Temporary Work site is developed, the service provider submits a proposal to the consumer and DVR for approval. The service provider will submit all the completed and necessary paperwork to the Employer of Record 2 weeks prior to the consumer's start date. A service provider would also be brought on after the development of the Internship/Temporary Work by a DVR staff or consumer to facilitate the Employer of Record. If the consumer does not want a service provider involved, consult with your WDA Director/Supervisor on how best to proceed.

Once the Internship/Temporary Work begins, the service provider will maintain regular contact with the DVR consumer, DVR counselor, site employer and Employer of Record. The service provider will assist the employer when agreed to, to verify wages and assist the DVR consumer in resolving issues related to retention of employment and will contact DVR at any time for technical assistance or intervention needed, when requested by the site employer/business, or when there are proposed changes in the agreed to work hours and dates on the Internship/Temporary Work agreement. The service provider shall monitor the consumer's work hours to ensure that neither the consumer nor the site employer exceeds the authorized hours. Hours worked over the weekly hours authorized is not allowed.

Payment of Internship/Temporary Work

Internship/Temporary work must be in a community-based competitive and integrated workplace where the consumer is paid at or above minimum wage, but not less than the prevailing and customary wage and level of benefits paid by the site employer. Payment of wages is to be provided via an Employer of Record service and is a separate transaction/service to the consumer.

The Employer of Record provider should be provided the set-up fee for each individual position set up for a consumer.

The service provider may obtain the payment for the job development hire fee in full if the Internship/Temporary Work evolves into a permanent job placement.

Other Resources/Strategies for Setting up Internship/Temporary Work

(These are only some suggestions. You will develop other resources and strategies as you contact the employer/business.)

- Telephone book yellow and white pages.
- Hold meetings to brainstorm a potential list of employer/businesses to contact. Include the consumer, family members, and other program providers, as appropriate.
 - Involve other DVR staff by including this brainstorming activity as part of your regular DVR team meetings.

- Job Center resources:
 - <http://www.wisconsinjobcenter.org/>
 - Locally maintained employer/business files located at the Job Center
 - Local Job Center personnel for suggestions
- Local Chamber of Commerce.
- Contact companies who have provided Internship/Temporary Work in the past.
- Cold Calling: If the company you contact has no opportunities, ask for suggestions about other local companies to call. Get a specific contact name, if possible, and ask if you can let the company know who recommended calling them.
- Contact companies who have had positive experiences with Internship/Temporary Work and ask if they would be willing to work with you to develop a fact sheet on their experiences that could be shared with other employers/businesses.
- Send out mailings to businesses that includes a description of Internship/Temporary Work, and follow-up with a phone call.
- If a member of the local Chamber of Commerce, include an article in the Chamber newsletter on Internship/Temporary Work with an emphasis on the benefits to the employer/business.
- Attend after hours business gatherings such as those organized by the Chamber of Commerce and other service organization meetings (e.g., Optimist Club) where you can interact socially with business people to build connections.

Consumer Set-up of Internship/Temporary Work Site:

In some cases, consumers themselves can develop their own Internship/Temporary Work site. These are some possible steps for consumers:

- Consumer identifies an employer/business they are interested in working with.
- Identify if the employer/business has internships opportunities already in place. If so, go through the established process.
- If not, look at directories of companies of interest, and identify an appropriate person over the department of interest to contact.
- Have consumer send email explaining they are with a state program that can pay their wages for a Work Experience/Internship/Temporary Work including information on desire to work for company, experience, related training, and letters of recommendation as appropriate, counselor information to contact for more information.
- Have letter attached to email that explains Internship/Temporary Work.
- Determine follow-up, as appropriate.

Critical considerations when developing Internship/Temporary Work experiences:

- Be prepared to address objections – concerns about liability, working with state government, etc. Take time to ask questions to obtain an accurate understanding of the objection.
- Presentation to employer/business should always focus on the benefits to the employer/business and how the consumer can meet their needs (e.g., wages covered by DVR, no commitment to hire required, worker who is able to perform the needed job duties, providing meaningful and realistic training and skill development to job seekers, availability of DVR staff to provide consultation and support to address issues that arise).

- Follow-through on everything you say you will do in a timely manner.

Connecting with Temporary Employment Agencies

Internship/Temporary Work can be arranged through temporary employment agencies. There are many companies that provide this service to employer/businesses. Your local WDA colleagues may have information about local providers that have placed consumers in meaningful temporary employment to build their skills.

Impact of Internship/Temporary Work on Social Security Benefits

Earned income from Internship/Temporary Work may affect Social Security benefits such as Trial Work Period (**triggered at \$810.00 per month in 2016**) or Extended Period of Eligibility for SSDI beneficiaries working above the Substantial Gainful Activity level. The potential impact on benefits should be discussed with the consumer during the IPE planning process. For possible impact on a specific case, consumers should be referred to Social Security Administration or for benefits analysis as appropriate.

Impact of Internship/Temporary Work on Child Support and Other Benefits

Consumers may have wages garnished for child support or have other benefits impacted by Internship/Temporary Work. The impact on these should be looked at on a case-by-case basis.

Eligibility for Unemployment Benefits

Under certain circumstances, an individual may be able to receive unemployment benefits from an Internship/Temporary Work job. In general, eligibility for Unemployment Insurance benefits is based on work in covered employment that meets certain earnings criteria in a "base period". The base period is normally the first four of the previous five full calendar quarters before filing for UI. An alternative base period may be required to establish eligibility, and this is the previous four full calendar quarters.

Eligibility for Open Enrollment for Benefits

An individual participating in an Internship/Temporary Work (I/TW) working at least 30 hours/week and for more than 90 calendar days is eligible for Open Enrollment for Benefits through the Employer of Record (EOR). There is a 90 day wait period for coverage and coverage does not apply to individuals working less than 90 calendar days regardless of the number of hours worked/week.

All individuals participating in an I/TW on or after 03/01/2016 are required to complete the Benefit Election Form regardless of the hours and duration of I/TW and current level of insurance coverage. Individuals are to select whether they are waiving or electing the benefit plan. This will need to be turned in with each I/TW packet prior to employees beginning an I/TW.

If an individual is receiving insurance through the EOR during an I/TW, coverage ends once the I/TW has been completed and an individual has been removed from the EOR's payroll.

If an individual is waiving the plan, the following should be completed:

1. Fill out Employee Information section
2. Indicate one of the three options available for the reason for waiving the medical coverage
3. Sign and date the Benefit Election Form

If an individual is electing the plan, the following should be completed:

1. Review the Open Enrollment Benefits Guide and Benefit Options
2. Fill out employee Information section
3. Fill out Dependents You are Enrolling section if applicable
4. Choose Medical Plan and Optional Benefits if applicable
5. Sign and date the Benefit Election Form

If employees/guardians have questions they may call (866)301-9375 or email ask@myvba.biz

Related VR Services

- **Mentoring Experiences** - Arranging for a person with experience in the participant's area of career interest to participate in team meetings and to provide periodic advice regarding job requirements and career planning.
- **Job Shadowing** - A brief unpaid experience designed to impart knowledge of specific job functions and conditions. These are generally a day or two in length.
- **On-the-Job Training** - An OJT agreement is worked out with an employer/business to hire an individual with DVR paying a training fee or wage subsidy due to the need for extra training time beyond what is typical for that job. The hire is probationary and the employee is expected to achieve permanent status upon successful completion of the OJT. Please see related information - <http://dwdworkweb/dvr/ojt.htm>.
- **Paid Work Options** - Occupational Skill Training or Disability Related skill training. Please see related guidance: http://dwd.wisconsin.gov/dvr/info_ctr/services/paid_work_options_use.pdf