



<b>Policy No.</b> 307	<b>Subject:</b> On-the-Job Training (OJT) and Externship
<b>Section:</b> Services	<b>Revised:</b> 03/2020
<b>Signature:</b> Brandy McOmber, Resource Manager	<b>Version:</b> FINAL

**1. DEFINITIONS**

**Externship:** A training opportunity in a competitive integrated employment setting where a Community Rehabilitation Partner (CRP) is considered the employer of record and pays the job candidate a training wage during the job candidate’s training period. Liability is held by the CRP.

**OJT:** A training opportunity in a competitive integrated employment setting in which the job candidate is an employee of the business and the business is compensated a percentage of the job candidate’s wages. Liability is held by the business.

**2. SCOPE OF SERVICES**

The services listed in this policy are tools to assist job candidates in preparing for employment in a competitive integrated work environment. IVRS does not supplant the work that is the legal responsibility of another entity.

*Process Specific to Externship:*

- a. For job candidates receiving SSI/SSDI benefits, the job candidate meets with the Benefits Planner to discuss how the training wage paid will impact these benefits. Externships are considered earned income and should be reported to Social Security prior to commencing so the job candidate’s Social Security check is appropriately reduced. Failure to do so could result in an overpayment.
- b. IVRS staff complete the [IVRS Pre-Screening for Employment](#) form. This assures the job candidate is able to work in the field they are training in and understand the requirements of the job.



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- c. The job candidate's [Individualized Plan for Employment \(IPE\)](#) is written or amended to include the Externship. If additional training is required (e.g. soft skills), IVRS staff will arrange for, or provide this.
- d. IVRS staff partners with the business to explain the process and make arrangements for the Externship. Staff and business understand this is a training and not to take the place of a paid employee.
- e. IVRS staff works with the business site to complete the [Job Analysis](#) and discuss the training needs of the job candidate. Included in this discussion is an identification of the length of the training necessary to assist the job candidate in reaching the specified competencies as well as the start and end dates for the Externship. The job analysis and review with the job candidate ensures the anticipated Externship tasks are consistent with the functional abilities of the individual and the training can be safely conducted, meeting the needs of the job candidate and the business in a safe work environment.
- f. IVRS staff complete the [Training Plan](#). The plan should be written to reflect the job candidate's unique training needs. This includes the level of skills required for the identified position. The [Externship Agreement](#) is completed as well.
- g. IVRS will submit a referral to the CRP which includes the CRP responsibilities, start and end dates for the Externship, and the job candidate's contact information. IVRS also submits a signed [R-407 Release of Information](#). Additionally, IVRS completes the necessary forms for employment with the job candidate, including the [19, Iowa Form W-4](#), and [IRS Form W-4](#) and submits them to the CRP. Upon acceptance of the Externship, the CRP signs the referral form indicating they agree with the responsibilities and returns the referral to IVRS. The CRP then acts as the fiscal agent for the duration of the Externship. The CRP also assigns a contact that will communicate with IVRS regarding the Externship. If additional items are needed (e.g. tools, uniforms), IVRS staff must refer to the appropriate IVRS policies for the requirements of those purchases.
- h. The job candidate begins the training and the CRP places the job candidate on their payroll.
- i. The IVRS staff communicates with the business and gathers information on the job candidate's competencies on a weekly basis. The timesheet is provided by IVRS staff to the CRP weekly. The CRP may pay the job candidate based on their normal payroll

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process. This process should be clearly communicated by the counselor and understood by the job candidate. The job candidate is paid according to the Menu of Services Externship service rate.

- j. At a minimum, at the end of each month of the Externship, the IVRS counselor will communicate with the job candidate, the job candidate's guardian (as applicable), the business representative, the CRP financial vendor, and the IVRS supervisor to discuss competencies and progress. If it has been determined that the job candidate has additional competencies to achieve, new tasks will be identified on the [Training Plan](#). Once the new tasks are listed, signatures are required on the form prior to an authorization being issued by IVRS. IVRS supervisor approval is required to move forward. This can occur with a case note entered by the supervisor.
- k. The Externship ends once competency is achieved, by completion of the training plan, or prior to or equal to a total of 320 hours, whichever comes first.
- l. If the job candidate is not hired, the IVRS counselor will work with the business to determine if the job candidate's skills are transferable and if the business supervisor will act as a reference for the job candidate.

*Process Specific to OJT:*

- a. For job candidates receiving SSI/SSDI benefits, the job candidate meets with the Benefits Planner to discuss how the training wage paid will impact these benefits. OJTs are considered earned income and should be reported to Social Security prior to commencing so the job candidate's Social Security check is appropriately reduced. Failure to do so could result in an overpayment.
- b. IVRS staff complete the [IVRS Pre-Screening for Employment](#) form. This assures the job candidate is able to work in the field they are training in and understand the requirements of the job.
- c. The job candidate's [IPE](#) is written or amended to include the OJT. If additional training is required (e.g. soft skills), IVRS staff will arrange for, or provide this.
- d. IVRS staff partners with the business to explain the process and make arrangements for the OJT.
- e. IVRS staff signs the [R-407 Release of Information](#) to the business, and works with business site to complete the [Job Analysis](#) and discuss the training needs of the job



- candidate. Included in this discussion is an identification of the length of the training to assist the job candidate in reaching the specified competencies as well as the start and end dates for the OJT. Also included is a discussion regarding the employee benefits. As the job candidate is considered an employee, their benefits must be similar to that of other employees in the same, or similar, job classifications.
- f. IVRS staff complete the [Training Plan](#). The plan should be written to reflect the job candidate's unique training needs. This includes the level of skills required for the identified position. The [OJT Agreement](#) is completed as well.
  - g. After development of the paperwork listed above, IVRS staff will authorize 50% of the training wages. The business is required to submit the payroll stub to IVRS with each pay period for reimbursement. IVRS staff may email [ivrs.vendor@iowa.gov](mailto:ivrs.vendor@iowa.gov) for assistance in setting up the business as a vendor.
  - h. At the end of each month of the OJT, the IVRS counselor will communicate with the job candidate, the job candidate's guardian (as applicable), the business representative, and the IVRS supervisor to discuss competencies and progress. If it has been determined that the job candidate has additional competencies to achieve, new tasks will be identified on the [Training Plan](#). Once the new tasks are listed, signatures are required on the form prior to an authorization being issued by IVRS. IVRS supervisor approval is required to move forward. This can occur with a case note entered by the supervisor.
  - i. The OJT ends once competency is achieved, once the employee is removed from their probationary period, or prior to a total of 320 hours, whichever comes first.

### 3. AGENCY EXPECTATIONS

- a. The purpose of the Externship and the OJT is to develop skills to work in a competitive integrated work environment. This should be discussed with the job candidate so that the job candidate and counselor are in agreement with the IPE services.
- b. IVRS does not assume liability, worker's compensation or unemployment for OJTs. For the Externship, the CRP acts as the fiscal agent and for the OJT, the employer acts as the fiscal agent.
- c. When it is indicated that work expenses (e.g. work clothing, tools) are necessary for an OJT, IVRS staff will communicate with the business to identify whether or not



- these items are provided by the employer for other employees. If they are normally provided by the employer, then IVRS would not assist with the cost of these items as it would be the responsibility of the employer to provide them. If they are not provided by the employer, then IVRS staff should refer to the appropriate policies to identify how to assist with those items.
- d. IVRS assumes responsibility for regular communication with the job candidate, the business, and (when applicable) the CRP fiscal agent. For Externships, the CRP has no responsibility to contact the business site. The CRP has no responsibility to contact the job candidate unless the CRP requires paperwork to be signed.
  - e. For the Externship, IVRS staff must explain to the job candidate that they are not entitled to a job with the business site at the end of the training. For OJT, the expectation is that if the job candidate performs satisfactory work, they will be retained by the employer.
  - f. For the Externship, if competency is achieved prior to the scheduled ending date of the [Training Plan](#), the business will be given one-week notice of the pending termination of the Externship. Communication should be at least weekly with the job candidate and business site so that IVRS staff are aware of the job candidate's progress and to ensure a smooth transition of training completion.
  - g. Trainings may be full-time or part-time, depending on the needs of the job candidate and the business.
  - h. Rarely, an OJT or an Externship may be combined with job coaching. This is considered an exception. Applicable policies (i.e. [Supported Employment Services](#) and [Non-Supported Employment Job Coaching](#)) still apply based on the specific needs of the job candidate.

#### 4. EXCEPTIONS

- a. Providing an Externship for a high school student.
- b. Providing an Externship for a job candidate attending post-secondary training when an internship is an expectation of the program and counts towards college credit.
- c. Providing an OJT or Externship and providing job coaching simultaneously.
- d. Providing more than one Externship per job candidate.
- e. Exceeding the 320 hours of an Externship or an OJT.



**5. APPLICABLE FORMS/DOCUMENTS**

- a. [Externship Agreement](#)
- b. [Externship Checklist](#)
- c. [Externship Liability Insurance](#)
- d. [Externship/OJT Hours Tracker](#)
- e. [Externship Referral and Agreement IVRS/CRP](#)
- f. [Externship Time Card](#)
- g. [I9](#)
- h. [Iowa Form W-4](#)
- i. [IRS Form W-4](#)
- j. [IVRS Pre-Screening for Employment](#)
- k. [Job Analysis](#)
- l. [Non-Supported Employment Job Coaching Policy](#)
- m. [OJT Agreement](#)
- n. [OJT and Externship Internal Control](#)
- o. [OJT Checklist](#)
- p. [OJT/Externship Brochure](#)
- q. [R-407 Release of Information](#)
- r. [Supported Employment Services Policy](#)
- s. [Training Plan](#)