



**CTECS STUDENT
WORKFORCE**
REAL JOBS FOR REAL CUSTOMERS IN CT.

WORK-BASED LEARNING

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1. Purpose Statement

The CTECS Student Workforce is a program designed to give students practical, hands-on experience and real-world application of learned theoretical skills. It consists of two programs, Work-Based Learning and Production. Student Workforce experiences provide students a competitive advantage in their chosen industry.

2. Work-Based Learning (WBL)

Work-Based Learning is part of the Connecticut Technical Education and Career System (CTECS) Student Workforce that allows students to work for an employer, during their trade instructional time. Students not only receive credit toward their career technology, but also get paid. WBL is offered at all CTECS schools as a way for students to gain real-world experience, work in teams, solve problems and meet employer expectations. Through partnerships with local companies, students gain hands-on career development experiences that will help them through the transition from school to work and give them an advantage in the competitive workforce.

Through a close relationship between the Connecticut Department of Labor and CTECS, students 16 and older are permitted to work in all trades, including high-hazard trades. WBL is offered at all schools in the CTECS district, as a way for students to gain real-world experience, work in teams, solve problems and meet employer expectations. Each school has a dedicated WBL Coordinator to promote and provide support for student and industry partners throughout the process.

The objectives of the Work Based Learning Program are as follows:

- To expand and enhance the student's learning through planned career experiences in a real-life work setting.
- To help the student make the transition from school to work and career.
- To provide students with experience in the workplace environment.
- To increase the student's awareness and appreciation of the relevance of academic subjects as they apply to their trade.
- To provide the student with opportunities for potential career placement in their trade.
- To build a strong, collaborative relationship between CTECS students and local CT business and industry partners.

3. Eligibility Requirements

- Work Based Learning (WBL) may be provided to any student of not less than sixteen (16) years of age who meets the criteria of the Work Based Learning Program.
- Students may be admitted any time after the completion of the sophomore year.
- Students must have and maintain an overall marking period grade average of 70 or above, with no failures, and a minimum grade of 70 or above in their trade area.
- Students must receive Trade Department Head approval to ensure WBL participation is appropriate.
- Students must be able to comply with both school and workplace expectations regarding attendance and behavior.
- Final decision of eligibility rests with the school Principal in consultation with the Trade Department Head, Guidance Department, and WBL Coordinator.

4. Placement Policies

- Students under the age of 18 who are enrolled in a Work Based Learning Program are permitted to work in most age restricted and hazardous occupational areas (Connecticut General Statutes, Section 31-23).
- Placement in a business owned by a parent or relative is not permitted.
- Students participating in a licensed occupation, must be registered with the State of Connecticut as a pre-apprentice.
- When school is in session, no student shall be assigned to a job which will require driving more than forty-five miles from the school or the student's home.
- Students under the age of 18 are prohibited from driving an employer's vehicle. Students age 18 and over are permitted to drive an employer's vehicle if verification of insurance is provided to the school.
- If school is canceled due to inclement weather, participation in WBL is not required for that day due to safety concerns for student travel.
- Students may be withdrawn from the program by request of the student's parent/legal guardian, the school, the employer, or the student.
- A student can identify WBL employment opportunities in a variety of ways.
 - Students may reach out to local employers on their own,
 - the technical high school may have a list of employers looking for WBL students,
 - employers may contact the school throughout the year noting placement opening.
- Students are encouraged to work with their trade-area Department Head or school's WBL Coordinator on securing employment.

5. Hours of Employment

- While school is in session;
 - Juniors may be released no more than 14 school hours per week and no more than 25 school hours per nine (9) day cycle.
 - Seniors may be released no more than 21 school hours per week and no more than 38 school hours per nine (9) day cycle until the beginning of the second semester after which there is no restriction on hours as long as shop theory, trade related electives, and graduation requirements are met.
 - Post-secondary student participation is limited to 21 school release hours per week until the mid-point of the second semester after which there is no restriction on hours, with WBL providing training in enhanced skills.
 - The ability to participate in WBL continues while the student is in the academic cycle. As such the student can legally work during early release, after school, and weekend/holidays with all WBL benefits and protection.
- When school is not in session (summer vacation, school vacations, Saturday and Sundays) students may work the legal per day/per week maximum established by state statute and the Department of Labor.
- Provisions shall be made to ensure that students in the program will have a minimum of ninety hours of shop theory per year, the fulfillment of time to be determined by individual schools.
- Final decisions, relative to hours of participation up to the established maximum for all students, rest with the school Principal in consultation with the Trade Department Head and the WBL Coordinator.

6. Roles and Responsibilities

a. Student

- Students under the age of 18 must obtain a Promise of Employment Certificate (working papers).
- The student shall obtain written consent from his/her parent and/or legal guardian.
- The student is responsible for maintaining grades and attendance as outlined in the Eligibility Requirements.
- The student shall comply with the rules and regulations of the employer and of CTECS.
- The student will keep a daily record (form provided) of the skills and jobs performed, and the record will be signed by the worksite mentor. At the completion of each week, the student shall return this record along with the student performance evaluation to the shop instructor for evaluation.
- If the student does not report to school when scheduled to do so, the student shall also not report to work.
- If a student does not report to work when scheduled to do so, they must notify their employer prior to the start of work and their Department Head prior to 8:00 am.
- The student is responsible for transportation to and from the job site.

- For a student to work in a licensed occupation, he/she must be registered with the State of Connecticut as a pre-apprentice. It is the responsibility of the employer to register students with the Dept. of Labor (DOL), but the student must be in possession of a pre-apprenticeship card while on the worksite. The student shall not be released to a WBL employer until a copy of the DOL pre-apprenticeship registration card is obtained.

b. Employer

- An employer wishing to participate in the Work Based Learning Program shall comply with all applicable employment and labor laws.
- The employer affirms that it will not discriminate or permit discrimination against any person or group of persons on the basis of race, color, religious creed, sex, age, national origin, ancestry, marital status, sexual orientation, gender identity or expression, disability, genetic information, veteran status, or any other basis prohibited by law.
- The employer will take necessary action to prevent any harassment, sexual or otherwise, of students, and to promptly investigate and resolve any complaints.
- The Employer acknowledges that CTECS reserves the right to conduct background checks on employers and mentors who may have direct contact with students.
- To protect the student in the event of injury, the employer shall provide documentation in the form of a certificate of insurance that the employer has worker compensation coverage, as well as liability insurance. Students 18 years of age and older may be permitted to drive employer vehicles if the employer provides documentation of automobile insurance that includes coverage of the student for both personal injury and liability. Copies of these certificates shall be issued to the school and must be renewed if the insurance expires before the end of the WBL agreement period.
- Students under the age of 18 shall not be permitted to drive an employer's vehicle or their own personal vehicle as part of their assigned course of duties.
- Wages paid to the student shall not be less than the Connecticut minimum wage.
- The employer, in collaboration with the school, will choose a qualified employee that has been screened as a mentor for the student for specific and related on-the-job training and career experiences. The assigned employee will provide instruction to the student in the areas of learning mutually established by the school and employer.
- The employer agrees to instruct the student in safety procedures and safe work practices while involved in on-the-job training, and comply with all federal, state and local laws.
- In the event of any accident or injury sustained by the student on the job, the employer will notify the school immediately.
- The employer will assign jobs relevant to growth of the student's technical education in their specific trade area, as approved on the WBL paperwork.
- The employer will notify the Trade Department Head or WBL Coordinator of any student absence as soon as possible on the day of absence. Tardiness and absenteeism should be notated on the Student Performance Evaluation.
- The employer will register students with the State of Connecticut as a pre-apprentice, where applicable.
- At the end of each workweek, the worksite mentor will sign the Daily Work Record and Student Performance Evaluation forms indicating the student's training progress.

c. School

- The school principal is responsible for ensuring that WBL and associated activities are operated in accordance with the policies and procedures promulgated by the Superintendent.
- The school Work-Based Learning Coordinator is responsible to facilitate and monitor WBL and associated activities, in accordance with the CTECS policies.
- The school Principal, in consultation with the Superintendent, determines whether a Work Based Learning Program shall be offered and may not necessarily offer the program every year or to every student.
- The school will use the following guidelines to approve a Work Based opportunity for students.
 - The proposed work experience will provide enhanced career experiences to the student's course of study.
 - Worksite learning will be coordinated to the theory/trade being instructed in the school or as appropriate to the student's learning plan.
 - The employer meets the training requirements and all the responsibilities as outlined in the Work Based Learning Agreement.
 - The guidance coordinator or counselor may consult with the WBL coordinator and provide student placement recommendations.
 - Trade department heads will provide the WBL coordinator with placement recommendations for their students.
- The school Trade Department Head, and/or the WBL Coordinator will work closely with the employer to achieve an understanding of the purpose and objectives of the Work Based Learning Program and to define the skills and training the student will be required to complete during the assigned period of employment.
- The WBL Coordinator will review and verify all requirements and keep a central file with copies of all Work Based Learning documents as listed:
 - LED-75-1 or AT-7 (as required)
 - Workers Compensation and Liability (and vehicle as required) insurance certificates
 - Liability Insurance registration
 - Pre-apprenticeship Card (as required for licensed trades)
 - Conduct background checks on employers and mentors who may have direct contact with students.
- In all apprentice-able trades, authorization for an adult student to register as a part-time apprentice must be verified by the WBL Coordinator and from the State Apprenticeship Council, before the WBL agreement is finalized. Establishment of the part-time apprentice program is the responsibility of the employer.

7. Internships

What is an Internship?

CTECS encourages students to participate in a structured internship as part of the WBL program. The main objective of an internship is to expose students to a particular job, profession or industry in the work setting. An internship is any carefully monitored work or service experience in which a student has intentional learning goals and reflects actively on what he/she is learning throughout the experience. Internship circumstances vary widely. Internships provide an opportunity for students to network with working professionals, gain hands-on experience, and build professional skills while still in high school. Common characteristics include:

- A typical duration of three to nine months
- A part-time commitment
- Paid or unpaid opportunities
- Connection to the CTECS educational program with academic credit, or not connected to earning credit

a. Pertinent Laws

Internships enable students to gain work experience and develop skills without being employed for compensation. The Fair Labor Standards Act (FLSA) defines the term “employ” very broadly as including to “suffer or permit to work.” Individuals who are “suffered or permitted” to work must be compensated under the law for the services they perform for an employer. Internships in the “for-profit” private sector will most often be viewed as employment, unless the test described below relating to trainees is met. Interns in the “for-profit” private sector who qualify as employees rather than trainees typically must be paid at least the minimum wage and overtime compensation for hours worked over forty in a workweek.

There are some circumstances under which individuals who participate in “for-profit” private sector internships or training programs may do so without compensation. The Supreme Court has held that the term “suffer or permit to work” cannot be interpreted so as to make a person whose work serves only his or her own interest an employee of another who provides aid or instruction. This may apply to interns who receive training for their own educational benefit if the training meets certain criteria. The determination of whether an internship or training program meets this exclusion depends upon all of the facts and circumstances of each such program.

The following six criteria must be applied when making this determination:

1. The internship, even though it includes actual operation of the facilities of the employer, is similar to training which would be given in an educational environment;
2. The internship experience is for the benefit of the intern;
3. The intern does not displace regular employees, but works under close supervision of existing staff;
4. The employer that provides the training derives no immediate advantage from the activities of the intern; and on occasion its operations may actually be impeded;
5. The intern is not necessarily entitled to a job at the conclusion of the internship; and
6. The employer and the intern understand that the intern is not entitled to wages for the time spent in the internship.

If all of the factors listed above are met, an employment relationship does not exist under the FLSA, and the Act's minimum wage and overtime provisions do not apply to the intern. This exclusion from the definition of employment is necessarily quite narrow because the FLSA's definition of "employ" is very broad. It is the employer's responsibility to determine whether the internship complies with federal and state laws.

b. Eligibility requirements, placement and hours

- Internships may be provided to any student of not less than sixteen (16) years of age who meets the criteria of the Work Based Learning Program.
- Students may be admitted any time after the completion of the sophomore year.
- Students must have and maintain an overall marking period grade average of 70 or above, with no failures, and a minimum grade of 70 or above in their trade area.
- Students must receive Trade Department Head approval to ensure WBL participation is appropriate.
- Students must be able to comply with both school and workplace expectations regarding attendance and behavior.
- Final decision of eligibility rests with the school Principal in consultation with the Trade Department Head, Guidance Department, and WBL Coordinator.

8. Job Shadowing

Job Shadowing provides students who express an interest in a specific trade with the option of visiting a shop or business that is aligned with their course of study. This experience is intended to give the student a brief, all-inclusive overview of the daily workings of the business as a precursor for training and eventual employment in that trade.

Job Shadowing opportunities should be provided early in the student's high school program. Ideally Job Shadowing occurs during the second or third phase of the exploratory program or early in the sophomore year however, students in all grades are eligible.

a. Eligibility Requirements

Students visit the worksites under the following conditions:

- The placements are short term, 1 or 2 days maximum per site
- Students are not compensated for the visit
- Students do not participate in any hands-on work experiences
- Experience is observational only

In most cases the experience reinforces the student's career choice. In every case the experience enlightens the student to aspects that will assist in making a better career decision.

Coordination of student participation occurs through the WBL Coordinator but can be structured by either the shop or guidance departments. The student's participation should be referenced in the student's Success Plan.

b. Guidelines

1. Student participation in Job Shadowing is a privilege.
2. Students are selected for participation based on their program performance and compliance with school attendance and discipline policies.
3. Parental consent must be obtained prior to a student's participation.
4. Students are assigned to a designated location, and students do not leave the designated location.
5. The location shall be a safe environment, in compliance with OSHA standards.
6. Students and their Job Shadowing assignments must be entered into PowerSchool under the Job Shadowing section.
7. The sponsoring company understands that CTECS reserves the right to conduct a background check on all mentors or employees that have direct contact with the student participating in the job shadowing assignment.

9. Student Health Insurance

Employers are expected to be fully insured with workers' compensation and general liability insurance. The employer's insurance is the first contact for coverage of any damages should a student experience an injury at the work-based learning placement. CTECS' schools do not pay for medical expenses associated with injuries that a student may experience in their trade or during work-based learning, internships or job shadowing. If parents do not have health insurance for their student, they are strongly urged to purchase it. Student health insurance applications are provided at the beginning of the school year and may also be obtained from the school nurse.

10. Claims Against the School for Accident or Injury

CTECS and its schools are part of the State of Connecticut. CTECS' schools cannot be sued for monetary damages without the permission of the state. This is due to sovereign immunity, a legal doctrine that protects the state from liability for any damages or injury it causes. If, for example, a student is injured during work-based learning, internship or job shadowing and a parent wishes to file a claim for monetary damages against the school, the claim must be submitted to the Office of the Claims Commissioner. The Claims Commissioner There are time limitations for the presentation of a claim. Directions on filing a claim may be obtained from the Office of the Claims Commissioner by calling (860) 566-2024 or visiting their website.

11. Forms Definitions

- **LED - 75** – this form is used for any WBL placement that is not a pre-apprentice trade. Upon completion, this must be signed by student, parent/guardian (if student is a minor), Trade Department Head, WBL Coordinator, Employer Mentor and Administration prior to sending to District WBL Coordinator. Final approval will be completed by the District WBL Coordinator and the Department of Labor.
- **AT - 7** – this form is used for any WBL placement in a pre-apprentice or licensed trade. The WBL Coordinator will facilitate a meeting with a DOL representative, student, and parent/guardian to complete this form. Final approval will be completed by the District WBL Coordinator.
- **WBL- 1** – This form may be used to confirm student eligibility for WBL. This form is only a tool and does not need to be part of the application that is sent to Central Office.
- **WBL- 2 – The Student Procedures and Tasks Checklist** form is a guide of the key procedures that students must complete to participate in WBL. This form is only a tool and does not need to be part of the application that is sent to Central Office.
- **WBL- 3** – This form may be used to collect the needed information to complete a LED 75-1 or AT-7. Students and employers can input all information so the WBL coordinator can fill out the LED 75-1 or AT-7. This form is only a tool and does not need to be part of the application that is sent to Central Office.
- **WBL- 4 – The Weekly Work Record & Performance Evaluation** form is used to document student performance while participating in WBL. Students and employers must complete their appropriate section, sign and return this form to the Trade Department Head each week and or trade cycle. This form is used for both WBL work placement and internship placement hour recording.
- **WBL-5- The Internship Participation Agreement** form is used for documentation of the agreement between CTECS, a work site and a student to participate in an internship experience.
- **WBL- 6 The Job Shadowing Agreement** form is signed by all parties engaged in providing a structured job shadowing experience for the CTECS student. The school administrator’s review and signature serve as the final approval to place students in a shadowing experience. The date of the shadowing experience must be included on this form.

12. CTECS Procedure

WBL Coordinator facilitates the following

1. Verify eligibility (WBL-1)
2. Discuss WBL policies and procedures with student (Manual & WBL-2)
3. Obtain all information needed for LED 75-1 or AT-7 (WBL-3)
4. Conduct background check on mentor
5. Obtain copy of employer’s insurance
6. Complete the LED 75-1 or AT-7 and obtain all appropriate signatures

7. Send the District Work-based coordinator the following
 - a. LED 75-1 or AT-7, with all appropriate signatures
 - b. A copy of the employer's insurance
 - c. A copy of the mentor's background check
8. Once approval email is received, meet with student to discuss expectations
 - a. Review policies and procedures
 - b. Weekly Work Record/Evaluation Form

13. Legal References:

Connecticut General Statutes

10-15d, Applicability of education statutes to the Technical Education and Career System

10-20a, Connecticut career certificate programs

10-20b, Connecticut career certificate. Compliance with state and federal laws and regulations. Student and employer requirements. Compensation

10-95, Technical Education and Career School System. Board. Chairperson. Superintendent

31-23, Employment of minors prohibited in certain occupations. Exceptions

31-58, Definitions

Conn. Gen. Stat. § 31-23. Employment of minors prohibited in certain occupations. Exceptions

(a) No minor under sixteen years of age shall be employed or permitted to work in any manufacturing, mechanical, mercantile or theatrical industry, restaurant or public dining room, or in any bowling alley, shoe-shining establishment or barber shop, provided the Labor Commissioner may authorize such employment of any minor between the ages of fourteen and sixteen who is enrolled in (1) a public school in a work-study program as defined and approved by the Commissioner of Education and the Labor Commissioner or in a program established pursuant to section 10-20a, or (2) a summer work-recreation program sponsored by a town, city or borough or by a human resources development agency which has been approved by the Labor Commissioner, or both, and provided the prohibitions of this section shall not apply to any minor over the age of fourteen who is under vocational probation pursuant to an order of the Superior Court as provided in section 46b-140 or to any minor over the age of fourteen who has been placed on vocational parole by the Commissioner of Children and Families.

(b) (1) Notwithstanding the provisions of subsection (a) of this section, a minor who has reached the age of fourteen may be employed or permitted to work as a caddie or in a pro shop at any municipal or private golf course, and a minor who has reached the age of fifteen may be employed or permitted to work in any mercantile establishment, as a bagger, cashier or stock clerk, provided such employment is (A) limited to periods of school vacation during which school is not in session for five consecutive days or more except that such minor employed in a retail food store may work on any Saturday during the year; (B) for not more than forty hours in any week; (C) for not more than eight hours in any day; and (D) between the hours of seven o'clock in the morning and seven o'clock in the evening, except that from July first to the first Monday in September in any year, any such minor may be employed until nine o'clock in the evening. (2) (A) Each person who employs a fourteen-year-old minor as a caddie or in a pro shop at any municipal or private golf course pursuant to this section shall obtain a certificate stating that such minor is fourteen years of age or older, as provided in section 10-193, and (B) each person who employs a fifteen-year-old minor in any mercantile establishment pursuant to this subsection shall obtain a certificate stating that such minor is fifteen years of age or older, as provided

in section 10-193. Such certificate shall be kept on file at the place of employment and shall be available at all times during business hours to the inspectors of the Labor Department. (3) The Labor Commissioner may adopt regulations, in accordance with the provisions of chapter 54,¹ as the commissioner deems necessary to implement the provisions of this subsection.

(c) No minor under the age of eighteen years shall be employed or permitted to work in any occupation which has been or shall be pronounced hazardous to health by the Department of Public Health or pronounced hazardous in other respects by the Labor Department. This section shall not apply to (1) the employment or enrollment of minors sixteen years of age and over as registered apprentices or registered preapprentices in a bona fide registered apprenticeship program or registered preapprenticeship program in manufacturing or mechanical establishments, technical education and career schools or public schools, (2) the employment of such minors who have graduated from a public or private secondary or technical education and career school in any manufacturing or mechanical establishment, (3) the employment of such minors who are participating in a manufacturing or mechanical internship, registered apprenticeship or registered preapprenticeship in any manufacturing or mechanical establishment, or (4) the enrollment of such minors in a cooperative work-study program approved by the Commissioner of Education and the Labor Commissioner or in a program established pursuant to section 10-20a. No provision of this section shall apply to agricultural employment, domestic service, street trades or the distribution of newspapers. For purposes of this subsection, (A) "internship" means supervised practical training of a high school student or recent high school graduate that is comprised of curriculum and workplace standards approved by the Department of Education and the Labor Department, (B) "cooperative work-study program" means a program of vocational education, approved by the Commissioner of Education and the Labor Commissioner, for persons who, through a cooperative arrangement between the school and employers, receive instruction, including required academic courses and related vocational instruction by alternation of study in school with a job in any occupational field, provided these two experiences are planned and supervised by the school and employers so that each contributes to the student's education and to his employability. Work periods and school attendance may be on alternate half days, full days, weeks or other periods of time in fulfilling the cooperative work-study program, (C) "apprentice" means a person (i) employed under a written agreement to work at and learn a specific trade, and (ii) registered with the Labor Department, and (D) "preapprentice" means a person, student or minor (i) employed under a written agreement with an apprenticeship sponsor for a term of training and employment not exceeding two thousand hours or twenty-four months in duration, and (ii) registered with the Labor Department.

(d) Each person who employs a minor under the age of eighteen years shall obtain a certificate stating the age of such minor as provided in section 10-193. Such certificates shall be kept on file at the place of employment and shall be available at all times during business hours to the inspectors of the Labor Department.