

Transitional Jobs Policy

Effective Date

10/5/2026

Purpose

The purpose of this policy is to establish local requirements for the use of Workforce Innovation and Opportunity Act (WIOA) Title I Adult and Dislocated Worker funds for Transitional Jobs (TJB).

Transitional Jobs are intended to provide individuals with barriers to employment who are chronically unemployed or have an inconsistent work history with a time-limited, subsidized employment experience combined with career and supportive services. The goal of a Transitional Job is to assist the participant in developing the skills, work history, and workplace behaviors necessary to obtain and retain unsubsidized employment.

Program Purpose and Strategy

Transitional Jobs may be used as part of the local area's service delivery strategy to assist eligible participants in:

- Learning workplace expectations and appropriate workplace behaviors;
- Addressing barriers that interfere with obtaining or retaining employment;
- Establishing a work history and employment references;
- Demonstrating the ability to succeed in a work environment;
- Developing occupational and employability skills that support entry into and retention in unsubsidized employment; and
- Establishing connections to additional education and training opportunities.

Transitional Jobs shall not be provided as a stand-alone service. Each Transitional Job must be combined with appropriate career services and supportive services based upon the participant's individual needs.

NEIWDB local plan includes the following initiatives to support Transitional Jobs:

Individuals facing multiple barriers to employment may initially benefit from engaging in less intensive activities, such as transitional jobs. These roles serve as a time-limited work experience coupled with comprehensive employment and supportive services. Tailored for those with barriers to employment, chronic unemployment, or an inconsistent work history, transitional jobs aim to help individuals establish a positive work record, showcase success in a work setting, and cultivate skills necessary for acquiring and



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maintaining unsubsidized employment. This work-based learning initiative is designed to provide a supportive pathway for individuals overcoming obstacles on their journey toward sustained employment success.

Policy

PARTICIPANT ELIGIBILITY AND ASSESSMENT

Transitional Jobs may be provided to eligible WIOA Title I Adult and Dislocated Worker participants who:

1. Have one or more barriers to employment; and
2. Are chronically unemployed or have an inconsistent work history.

For purposes of this policy:

- **Chronically Unemployed** means an individual who has been unemployed for 13 consecutive weeks or longer, or who has experienced recurring periods of unemployment that create a barrier to obtaining or retaining unsubsidized employment. The participant's employment history and the basis for this determination must be documented in IowaWORKS.
- **Inconsistent Work History** means an individual who has experienced a pattern of intermittent, short-term, or unstable employment that creates a barrier to obtaining or retaining unsubsidized employment. The participant's employment history and the basis for this determination must be documented in IowaWORKS.

The determination must be based on the participant's individual circumstances and employment history and supported by the assessment and documentation in the participant's case record.

Prior to placement in a Transitional Job, an individualized assessment must demonstrate that the service is appropriate for the participant and is reasonably expected to assist the individual in progressing toward unsubsidized employment.

The participant's Individual Employment Plan (IEP) must identify the need for the Transitional Job and describe how the activity, together with career and supportive services, supports the participant's employment goals.

Participant circumstances, barriers, employment history, and the basis for determining the appropriateness of the Transitional Job must be documented in IowaWORKS.

FUNDING LIMITATION

The Northeast Iowa Workforce Development Board (NEIWDB) may use up to ten percent (10%) of its combined WIOA Adult and Dislocated Worker program funds to provide Transitional Jobs, in accordance with applicable federal and State requirements.



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The cost of each Transitional Job must be reasonable, necessary, and based on the participant's individualized employment needs. Costs will be determined by the approved wage rate, scheduled hours, and duration of the Transitional Job.

NEIWDB may establish additional limitations on wages, hours, or total expenditures when necessary to ensure responsible and equitable use of WIOA funds.

WORKSITE AND EMPLOYER ELIGIBILITY

Transitional Jobs are time-limited, subsidized work experiences and may be provided through eligible:

- Private-sector employers;
- Nonprofit organizations; or
- Public-sector employers.

Worksites must provide a safe, appropriate, and meaningful work environment in which the participant can develop employment skills and experience that support progression toward unsubsidized employment.

A participant may not be placed in a Transitional Job with an employer where the participant is already employed in an unsubsidized position.

Unlike On-the-Job Training (OJT), a Transitional Job does not require a commitment or expectation that the worksite employer will retain the participant following completion of the activity. When appropriate, however, transition to unsubsidized employment with the worksite employer may be encouraged.

When developing Transitional Job opportunities, the service provider shall identify quality public, private-sector, or nonprofit employers and other appropriate work-based learning opportunities that provide participants with meaningful work experience and support progression toward unsubsidized employment. Opportunities should support career advancement, connections to in-demand occupations, further education or training, and, when appropriate, pathways to Registered Apprenticeship.

All placements must comply with applicable WIOA requirements governing work-based learning activities, including requirements related to displacement of current workers and other applicable employment protections.

Employer Screening

Prior to entering into a Transitional Job agreement, the service provider must assess the suitability of the employer and worksite. At a minimum, the review must consider:

- Whether the employer has employees on layoff from the same or a substantially equivalent position;

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- Whether the Transitional Job would displace a currently employed worker, result in a reduction in the hours or benefits of existing employees, or otherwise impair existing employment opportunities;
- Whether the position is vacant because of a hiring freeze, termination of a regular employee for the purpose of filling the position with a Transitional Job participant, or other circumstances that would result in improper displacement;
- The employer's history with prior WIOA or other workforce-funded work-based learning placements, when applicable, including compliance with agreements, quality of the work experience provided, participant outcomes, and any identified performance or monitoring concerns;
- The employer's ability to provide appropriate supervision, a safe work environment, and meaningful opportunities for the participant to develop the skills and competencies identified for the Transitional Job; and
- Any other information relevant to determining whether the employer can provide a quality work experience consistent with the participant's employment goals and the purposes of the Transitional Job.

Employers with unresolved compliance, performance, safety, or monitoring concerns may be determined ineligible for new Transitional Job placements until the concerns have been satisfactorily addressed.

All Transitional Job placements must comply with applicable WIOA requirements and other federal, State, and local laws and regulations governing work-based learning activities and employment protections.

WAGES AND BENEFITS

Transitional Job participants are employees and must be compensated for all hours actually worked.

Participant wages shall be no less than the higher of the applicable federal or State minimum wage. Wages should be appropriate for the position and consistent with wages paid for comparable work at the worksite.

Participants shall not be compensated for scheduled hours they do not work unless payment is otherwise required under applicable law.

In Transitional Job arrangements, the WIOA Title I service provider will serve as the employer of record. The employer-of-record arrangement must be clearly identified prior to the start of the activity.

Each participant must be covered by Workers' Compensation in accordance with State law or by adequate on-site medical and accident insurance.

Transitional Job participants are exempt from unemployment compensation insurance. Accordingly, unemployment compensation costs are not allowable WIOA Transitional Job costs.



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All other applicable federal, State, and local laws and regulations governing employment must be followed.

DURATION

A Transitional Job agreement at one worksite may be established for a maximum of 13 calendar weeks. When the Transitional Job is part-time and consists of fewer than 520 hours, the activity period may be extended to a maximum of 26 calendar weeks.

The duration and scheduled hours of each Transitional Job must be based on the participant's individual circumstances, employment goals, barriers to employment, and the skills and experience to be gained through the activity.

The total number of hours and duration must be approved prior to the start of the Transitional Job. Any modification to the approved hours or schedule must be reviewed and approved by NEIWDB or its designee prior to implementation and must remain within the maximum duration established by this policy.

Individualized Hours Adjustments

The number or scheduling of training hours may be adjusted based on the participant's individual circumstances, including, but not limited to:

- A disability or need for reasonable accommodation;
- A documented need for a reduced work schedule;
- Significant barriers affecting the participant's ability to complete the planned activity within the standard timeframe; or
- Other documented circumstances demonstrating that an adjustment to the approved training hours or schedule is necessary for the participant to achieve the objectives of the Transitional Job.

Any adjustment must be based on the participant's individual needs, documented in the participant's case record and Individual Employment Plan (IEP), and approved in accordance with established local procedures prior to implementation.

An adjustment to training hours does not extend the maximum allowable duration of the Transitional Job established by this policy.

An adjustment may not be used solely to extend subsidized employment when the participant has already achieved the objectives of the Transitional Job.

TRANSITIONAL JOB AGREEMENT

A written Transitional Job agreement must be completed and signed by the appropriate parties before the participant begins the work activity.

At a minimum, the agreement and supporting documentation must identify:

- The participant and worksite;
- The employer of record;
- The job title and description;
- The beginning and ending dates;
- The planned work schedule and anticipated hours;
- The wage rate;
- The skills, competencies, and workplace behaviors to be developed, including documentation of the participant's skill level at the beginning of the Transitional Job and a final evaluation of progress and skills gained upon completion;
- The responsibilities of the participant, worksite, and service provider;
- Applicable insurance and workplace protections;
- Procedures for documenting attendance and hours worked;
- Procedures for addressing performance, attendance, or other concerns;
- Conditions under which the agreement may be modified or terminated; and
- Recordkeeping and monitoring responsibilities.

Any modification affecting the terms of the Transitional Job must be documented and approved prior to the effective date of the change.

CAREER AND SUPPORTIVE SERVICES

Career and supportive services are an integral component of a Transitional Job and must be provided based upon the participant's individual needs.

Career services may include, but are not limited to:

- Career planning;
- Employment counseling;
- Job-search and job-readiness assistance;
- Résumé and interviewing assistance;
- Occupational or skills assessments;

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- Referrals to education or occupational training;
- Job development and placement assistance; and
- Follow-up services, as appropriate.

Supportive services may be provided when necessary to enable the participant to successfully participate in the Transitional Job and must comply with the NEIWDB's applicable Supportive Services Policy.

Examples may include transportation, dependent care, work-related clothing or supplies, and other allowable assistance necessary to support participation.

PARTICIPANT PROGRESS AND TRANSITION TO UNSUBSIDIZED EMPLOYMENT

Service provider staff shall maintain regular contact with the participant and worksite throughout the Transitional Job to evaluate progress, identify and address barriers, and determine whether career or supportive services should be modified.

Progress documentation should address, as applicable:

- Attendance and reliability;
- Development of identified job skills and competencies;
- Workplace behaviors and employability skills;
- Progress toward IEP goals;
- Barriers or concerns requiring intervention;
- Additional career or supportive service needs; and
- Plans for transition to unsubsidized employment, additional training, or education.

As the Transitional Job approaches completion, staff shall work with the participant to identify appropriate next steps toward unsubsidized employment. This may include employment with the Transitional Job worksite, employment with another employer, Registered Apprenticeship, occupational training, or other education or career advancement opportunities.

DOCUMENTATION AND RECORDKEEPING

Transitional Job services and activities must be accurately recorded in IowaWORKS in accordance with State requirements.

The service provider must maintain an accurate record of cumulative hours worked and WIOA expenditures for each participant throughout the Transitional Job to ensure compliance with approved hours, duration, and funding limitations.

The participant record must contain documentation sufficient to establish eligibility for and appropriateness of the Transitional Job and to support all expenditures associated with the activity.

Documentation shall include, as applicable:

- Assessment and IEP documentation supporting the need for the Transitional Job;
- The signed Transitional Job agreement;
- Job description and training or skill-development information;
- Timesheets or other documentation verifying actual hours worked;
- Wage and payroll documentation;
- Documentation of career and supportive services;
- Progress reviews and case notes;
- Modifications to the agreement;
- Documentation supporting any individualized adjustment to training hours or duration; and
- Documentation of completion and the participant's transition plan or employment outcome.

Records must be maintained in accordance with applicable federal, State, Board, and WIOA record-retention requirements and must be available for monitoring and review.

EQUAL OPPORTUNITY

Transitional Jobs shall be administered in accordance with WIOA nondiscrimination and equal opportunity requirements. Auxiliary aids and services shall be made available upon request to individuals with disabilities.

REFERENCES

- Workforce Innovation and Opportunity Act (WIOA), Section 134(d)(5)
- 20 CFR § 680.180 – Work Experience and Transitional Jobs
- 20 CFR § 680.190 – Transitional Jobs
- 20 CFR § 680.195 – Use of Funds for Transitional Jobs
- 20 CFR § 680.150 – Career Services for Adults and Dislocated Workers
- 20 CFR § 680.900 – Supportive Services
- Applicable Iowa Workforce Development policies and guidance
- NEIWDB Supportive Services Policy