CEES Handbook
Collaboration for Employment and Education Synergy Project

University of Cincinnati
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Executive Director
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Christina R. Carnahan comes to the University of Cincinnati as assistant professor of special education. Dr. Carnahan earned her Ed.D. from the University of Cincinnati in education with a focus on autism, improving outcomes for individuals with significant disabilities, and teacher training. While receiving her degree she served as a consultant for school districts seeking to improve services for children with autism and significant learning needs. Prior to starting her doctorate, Dr. Carnahan was a special education teacher in both elementary and middle school. She has also published and given a number of talks in the areas of classroom and instructional design for students with intense disabilities, supporting classroom staff, and promoting positive behavior for students with disabilities. Her research interests include improving learning and life outcomes for students with autism and significant learning needs by increasing teacher efficiency and effectiveness.

Management Staff

Jazmine Bowman  Program Director
Sadie Everett  Community and Employment Relations Director
Carla Schmidt  Research Coordinator
WELCOME

Welcome to the CEES operated by the University of Cincinnati Special Education Department. CEES is designed for high school students with intellectual and developmental disabilities ages 14-21. CEES offers a 12-week individualized transition curriculum to help young adults with intellectual disabilities determine how their interests and abilities can be applied in the workplace as they also learn the necessary life skills that enhance their ability to live and work more independently.

This handbook has information about CEES, services and supports offered by the staff of CEES. If you have questions about services offered, call any of the management staff listed at the end of this handbook and they will be glad to help.

MISSION

CEES aims to create community integrated employment experiences that incorporate meaningful social interactions with peers and employers and provide families with the support to develop high expectations and actively engage in the transition process.

CEES LOCATION

The CEES is located on the main campus of the University of Cincinnati located in Clifton. CEES will use various facilities throughout campus and organizations off site to access resources in nearby neighborhoods. Additional information about community partners will be given to participants and families before CEES begins. The main office for CEES is located at:

CEES
University of Cincinnati
2610 McMicken Circle
Cincinnati Ohio 45221-0105
(513) 556-0297
**CEES Services**

The anticipated impact of CEES is to change the Quality of Life (QoL) for individuals with intellectual and developmental disabilities. Specifically, through CEES, students will develop the following skills or opportunities associated with QoL:

a. Employment skills necessary for integrated community work
b. Social communication skills necessary for social interactions and soft skills for employment

- ATS Employment Continuum provides job opportunities for a continuum of abilities. Some of our internship sites provide highly structured, highly supported settings. Other internship sites are highly inclusive and low supported settings.

- CEES specifically targets the “Vocational Exploration” component of the ATS Employment Continuum
Vocational Exploration Outcomes:

1. Students will gain hands-on experience in a variety of vocational settings.
2. Students will establish an understanding of appropriate work habits and attitudes.
3. Students will develop workplace responsibility and learn about workplace realities.
4. Students will develop a capstone project (i.e., poster board presentation) on their internship experiences at the University of Cincinnati.

Vocational Exploration:
- Collection of baseline data: Employability skills
- Time Frame (per DOL req.)
- Vocational Experiences total of 5 hours per job experience
- Vocational Assessments: 90 hours per work experience
- Vocational Training: 120 per work experience
- Providing vocational exploration activities for a continuum of abilities.
- All internship sites utilize EBP to scaffold towards independence.
- Some internship sites (i.e., Brehaut’s Dog Bones) provides a highly structured work environment for participants with more significant needs.
- Other internship sites (i.e., ATS Delivers) are community integrated and have fewer supports.

Vocational Refinement:
- On-going data collections with prompt hierarchy towards independence.
- Through the analysis of data participants will either continue with vocational exploration for a determined amount of time or move towards paid employment.
- Utilization of EBP to scaffold towards independence.

Paid Employment:
- Individualized work placement based on participant interest and skills within the competitive workforce.
- Addition or fading of supports to retain employment.
- On-going flexible support needed (example, transportation and employer communication).
**Targeted Appropriate Work Habits:**

1. Clocking in/out of work
2. Cleans work area/puts materials back observing safety rules
3. Caring for work equipment
4. Exhibits appropriate safety behaviors in the work environment
5. Continues working with distractions
6. Works independently
7. Responds appropriately to corrections/feedback
8. Follows written and verbal directions
9. Attends to instructions/refrains from interruptions
10. Notifies supervisor if help is needed
11. Notifies supervisor when work is finished
12. Communicates appropriately the need to use the restroom / and uses restroom appropriately
13. Secures person's attention appropriately
14. Conducts self appropriately during break/lunch
15. Uses appropriate manners
16. Maintains appropriate social interactions in the workplace
17. Uses appropriate sanitary habits
18. Grooms appropriately/ dresses age and work appropriately

**Data Collection:**

Each participant will have individualized objectives during CEES institutes. The objectives will target social communication and employment. Additionally, we will develop a set of site specific goals for which all participants will receive instruction. Within CEES, we will measure impact through adolescent achievement of the individualized and site specific objectives.

**Transition Assessments:**

Additionally, we will complete the following transition assessments to support the development of individualized goals and in the creation of the Individualized support plans.

1. Pre and Post Social Skills Assessments based off Work Readiness Curriculum
2. Baseline Data based on Vocational Exploration Sites
3. Employability/Life Skills Assessment
4. Parent Transition Survey
5. SIS-A
6. Community Based Skills Assessment
INDIVIDUALIZED SUPPORT PLANS

Following the completion on CEES, each participant will receive an individualized support plan. This document will include data collected on employment and social skills goals, evidence based practices used to support participants in employment and social settings, and recommendations concerning next steps for each participant.

CEES Guidelines

Conduct at CEES
The staff at CEES are here to help support the individuals with any issues that may arise throughout the day. We want to foster an environment that demonstrates respect for everyone. It is our hope and expectation that the individuals will also extend to others the same respect shown towards them. We will work with individuals to help them express their needs and concerns in socially appropriate means. There may be times when the team meets to develop a behavior support plan that address especially difficult issues the person may present.

Calendar
CEES’s calendar is approved by the Executive Director and sent out at the first of the year. CEES is closed on the following holidays: New Year’s Day, Martin Luther King Day, Spring Break: usually a week in March, Memorial Day, 4th of July, Labor Day, Veteran’s Day, Thanksgiving Day, Friday following Thanksgiving (Columbus Day observed), and Christmas Day and President Day. (CEES Calendars are attached)

Hours
CEES hours are 9 a.m. to 1 p.m. Please do not arrive early (unless prior approval given) as the staff have other responsibilities before 10:00 and no one will be available to support you before that time.

Arrival and Departure
School Districts, participants and families will be notified of Drop-off and Pick-up location prior to CEES beginning. Locations may be changed based on student’s needs.

Attendance
Unless you are ill, you should come to CEES each day you are scheduled to attend. Medical and dental appointments, whenever possible should be scheduled at times that you are not
scheduled to be at CEES due to the duration of the program. **It is important that you advise the staff of any changes in your schedule, days you will be absent. This information can come directly from the families or the district.** If you are going to be absent, you should call Jazmine Bowman (614)-537-2429.

**Dress**
How you dress is important. You need to dress for the activities of the day and remember, you most likely will be walking the campus getting to and from different buildings…so dress for the weather. Participants are asked to not wear sweat pants, shorts, skirts or open toed shoes. Students should wear either jeans or black slacks and tennis shoes. Work shirts will be provided at some internships. If a student is required to wear a work shirt, it will be sent back with them to their home district. We ask that school staff make sure that they student changes into their work shirt before arriving to campus.

**Personal Items**
You are responsible for the items you bring to CEES. Please label coats, hats, lunches, etc., with your name. Keep valuable items at home and only bring things you really need.

It is your responsibility to provide any and all personal care items you may need throughout the course of the day. These items might include: Adult Attends and extra change of clothing. We will have a place for you to store your belongings.

**Lunch and Break**
Participants will need to pack their lunches for the entire 12 week program. A cooler will be provided from CEES to keep lunches’ cold. Try not to bring food that needs to be heated, we most likely will not have access to a microwave. It is up to the home district as to whether or not students are able to buy lunch on campus.

**Health and Safety**
Your health and safety is very important. You will get regular training about how to stay safe and healthy at CEES. Be sure to follow safety rules. Always wash your hands thoroughly after using the rest room and before eating. The staff people who work with you will give you more information if you have questions.

**Weather/Program Closures**
CEES may be closed because of weather conditions. Listen to the radio or TV for information concerning the University of Cincinnati. Whenever classes on the main campus are cancelled or
delayed due to inclement weather or other emergency, CEES will follow the same schedule.
CEES may also be cancelled if your school district is closed for weather conditions, please check
with you school districts. In planning for this, CEES will have a “make-up” week at the end of
April.

**Transportation Rules**

1. CEES does not provide transportation. This is left up to the family / care providers and
   School districts to arrange reliable transportation.
2. We ask that individuals do not arrive before 10am and report directly to their assigned
   location.
3. At the end of the day, all individuals need to be promptly picked up by 1pm. If you are
   experiencing an emergency and will be late in picking the individual up, please call
   (614)-537-2429 to notify the staff.

**Medical Information and Nursing Services:**

CEES **does not** provide nursing services, CEES **does not** have a nurse on duty to dispense
medication, provide treatment, or assist with medical needs. If any individual who is attending
CEES has a medical condition and/or a history of medical condition(s), this must be disclosed
and specific information about the condition needs to be explained on the *University Medical
and Release Form*. Furthermore, specific training must be given to the CEES staff by the school
district if there is something that needs to be administered and/or medical service provideThe
plan and training for this needs to be described on the *University Medical and Release Form*, as
well.

Your good health is important. Please remember to get proper nutrition and sleep. Good hand-
washing is very important before eating and before and after using the bathroom.
It is a good idea to perform a quick health check each morning before leaving for the campus.
For your health and the health of others, do not come to CEES if you are sick. The following
examples are valid reasons to stay home:

- Cough
- Sore Throat
- Complaints of pain (Ears, Headache, etc.)
- Fever of (99.6°)
- Rash
- Swollen Glands
- Vomiting
- Diarrhea
Red Discharging Eyes
Unidentifiable Rash
Headache

If you get sick or are hurt while at CEES the staff who are certified in first aid will assist you. The staff will determine the seriousness of the illness or injury. If the staff determine it is best for you to go home, your family or care provider will be called to pick you up. Some of the reasons the staff may think you should go home include:

- Fever of (99.6°)
- Vomiting or Diarrhea
- Pain (Earache, Headache, etc.)
- Unidentifiable Rash
- Inflamed eyes

If you are sent home with a fever, please stay home for 24 hours after the fever has subsided to ensure you are well and not exposing others to a communicable illness.

When a staff member finds symptoms of sickness of a child/camper, he/she is required to call 911, in case of emergency, and bring child to nearby hospital. If it is not an emergency situation, staff member(s) is required to report the symptom(s) to the Director of Camp Activity.

In case of an emergency, you may go to a hospital. The director may go with you to the hospital. Your family member or care provider will be asked to meet you there. Should you require hospitalization or emergency treatment, please get a physician’s statement to return to work, either with or without restrictions and/or medication changes or additions noted. A special team meeting may be required prior to your return if the supports you require have changed.
Important Information

Eligibility

To receive transition services from CEES you must:

- Have diagnosis of an intellectural or developmental disorder
- Enrolled in high school

In-take Process

1. Recommended to CEES through school district/ family member/ SSA
2. Participants completed application is sent to Jazmine Bowman
3. Informal Observation is scheduled
4. Invite to Vocational Assessment Day is sent
5. Student participates in Vocational Assessment Day
6. CEES begins
7. Follow up meetings are scheduled with CEES staff, school based teams, participants and families, and outside agencies (if appropriate)

Payment

1. Private pay will be made through a paper check made out to the University of Cincinnati. The check will be given directly to the program director
2. Program participation is $1,200 per participant per semester

Self Determination

Self Determination means that you have control of the resources needed for your support as well as responsibility for your decisions and actions. You have the power to make decisions and truly control your life. You will get regular training about what self-determination means and how to exercise it while at CEES.

Confidentiality

The information on participants is kept private. Except where required by law; only people who work with participants may read files unless you sign a specific time-limited release of information request form.
FAQ Regarding Work-Based Learning

Who may participate?

1. Which students may participate in work-based learning (WBL) programs under the policy guidelines for nonpaid, non-employment relationships?

All students may participate; however, many states have specific guidelines for special education students allowing them to participate in extended WBL activities if it is determined appropriate for them.

2. How is it determined which students might need to participate in a WBL program?

The determination should be based on the individual student’s needs, taking into account the student’s preferences and interests. WBL would be considered a major change in placement for most students and would require a change in the IEP. The education agency must invite the student to any meetings considering transition services or participation in work-related training.

3. Does the term “physical and mental disabilities” mean that students with learning disabilities are excluded?

No. Learning disabilities can have their origin in physical or mental disabilities. However, participation in WBL programs should not be determined by disability group but rather by individual needs and preferences.

4. The policy guidelines indicate that nonpaid, non-employment work-related training is for individuals for whom employment is “not immediately obtainable.” What does this mean?

The “not immediately obtainable” language was placed in the guidelines to ensure that students would not have extended placements in the career exploration, career assessment, or work-related training components of WBL programs if they were capable of obtaining employment at or above the minimum wage level. Work-based learning is an organized set of educational and skill-building activities intended to prepare students for paid employment while they are in school.

5. The guidelines also indicate that work-related training is intended for students who will need “intensive ongoing support” to perform in a work setting. Does this mean that it is intended for students with more severe disabilities?

While work-related training is intended for those students with more severe disabilities, it is appropriate for students with low to moderate disabilities when the intent is to move the student to paid employment as soon as the student is ready. Assessment of students’ needs must be based on skills and behaviors necessary to function in a work setting. Examples of ongoing support services include job redesign, job coaching to retain employment, environmental adaptations, personal assistance services, transportation, and social-skills training (Rehabilitation Act Amendments, S. Rep. 102-357, 1992).

6. What vocational options should be available to students who do not need intensive ongoing support?

Work-based learning programs are not intended to replace career and technical education, work study, or other vocational training and employment programs. WBL is intended as an option made available to students to expand the capacity of education agencies in assisting each student to achieve employment objectives. Collaboration with all programs/agencies can provide a student with the best opportunities.

What Documentation Is Required?

7. What type of documentation is needed?

It is important that WBL programs document that all participants, including the student, the parent(s) or guardian(s), the employer, and instructional staff, understand that:

- If at any point the WBL activity is no longer a learning experience and the seven criteria for a nonpaid/volunteer WBL experience cannot be met, the activity is not a nonemployment relationship;
- Students are not entitled to wages or other compensation for the time spent in the learning experience; and
- Students are not automatically entitled to employment at the worksite at the completion of the WBL experience.
Three types of documentation must be used to meet the requirements of these guidelines:

1. An IEP reflecting instruction and training goals and objectives relevant to the work-related training experience;
2. A written individual training agreement outlining the U.S. Departments of Labor and Education requirements listed above and signed by all participants along with attached individual training plan; and
3. Records of student experience (i.e., log of hours spent in WBL activities, progress reports, observation reports, safety training, and performance evaluations).

8. Is there any additional documentation needed for the paid cooperative work experience component?

Yes, in addition to the documents listed in Question 7 above, the following records should be kept on file:

- Hours and wage earnings;
- Copy of the employer’s workers’ compensation insurance verification; and
- A statement of assurance declaring compliance with FLSA and state laws governing working restrictions and hazardous occupations. The employer and work-based learning coordinator sign this document.

9. Do the policy guidelines supersede individual state departments of labor regulations?

No. WBL programs must comply with both U.S. Department of Labor regulations and state department of labor regulations. Where the two differ, the regulations with the most stringent requirements for protecting individuals in work settings must apply.

10. What safety regulations apply to students in the workplace?

The Occupational Safety and Health Act (OSHA) regulations that apply to a workplace also apply to a student participating in any WBL activity, whether nonpaid or paid. All students must be provided workplace safety training, protective equipment as required, and health and safety considerations.

11. Is special or extra liability coverage for students required for a nonpaid, nonemployment relationship?

Work-based learning is considered part of the student’s individualized education program. In nonpaid, nonemployment relationships, the worksite is perceived as an extension of the school. In other words, the student is pursuing instructional objectives in a work setting. Since these students are not employees, they are not eligible for the usual workers’ compensation or insurance coverage provided to employees.

If the student’s participation in workplace activity can be considered instructional and part of a nonemployment relationship, then the school may be responsible for liability coverage. Generally, the same insurance and liability policies that apply to other off-site school experiences (i.e., athletic events, field trips) should apply. Each school district must work out their own policies regarding liability.

12. What liability issues arise when a student is in a paid, cooperative work experience?

When the student is a paid employee of a business, then the employer is responsible for offering him or her the same liability coverage offered to other employees, including coverage under the employer’s workers’ compensation plan.

13. Do reports have to be made to the U.S. Department of Labor and/or the U.S. Department of Education?

No. Reports to the U.S. Department of Labor or the U.S. Department of Education are not necessary. However, adequate records documenting your program’s compliance with the guidelines for WBL activities, particularly nonpaid, work-related training and paid community work experience, must be maintained. In the event of a Department of Labor investigation of your program, this information must be made available to the Department of Labor.

14. Can we share information from the WBL program with vocational rehabilitation agencies?
Yes. Information from the WBL program can be shared with other agencies as long as confidentiality procedures are followed. In fact, rehabilitation services counselors may be actively involved in the process of WBL through consultation or funding.

15. How should issues regarding confidentiality be addressed?

Work-based learning programs should adhere to procedures typically followed regarding confidential information. These procedures are outlined in section 300.560-300.577 of the IDEA regulations and are incorporated into both state and local policies and procedures.

Curriculum Guidelines:

21. Is a formal career assessment required to determine a student’s interests and preferences?

A formal career assessment may not be required to ascertain a student’s preferences and interests if other alternatives are appropriate. However, as part of the overall decision-making process, needs for support services or assistive technology should be identified. These needs may be determined through ongoing assessment procedures within the various components of a WBL program.

22. Is it necessary that the program follow sequential order (i.e., exploration, assessment, and training)?

No. WBL activities do not need to follow a prescribed order. Given the nature of a student’s needs, any of the three components may be excluded. The WBL program, however, must follow logical, generally agreed-upon instructional best practices. For example, assessment and exploration usually would not follow training in any single job classification.

23. Is it necessary that the WBL goals and objectives in the IEP specify exact site placements?

No. It is possible for the IEP to identify only general goals and objectives to be pursued (e.g., job clusters to explore, assessments of general work behavior skills, or training in a specific occupation). The IEP should, however, expressly limit the time students will spend at any one site or in any one job classification. Additional written agreements (i.e., individual training agreements, individual training plans) with parent(s) or guardian(s), students, and employers should reflect the exact location of WBL and document the specific nature of the education and training involved.

24. Does the IEP team have to reconvene to approve multiple career explorations, career assessments, work-related training, and cooperative work experience?

No. The transition IEP objectives and goals can be written broadly enough to incorporate these experiences.

25. What is meant by the phrases “clearly distinguishable occupation” and “clearly distinguishable job classification”?

The word occupation refers to a specific profession or career generally engaged in as a source of livelihood. Occupation and job classification are meant to be synonymous. Examples of occupations are shipping and receiving clerk, custodian, and painter. Often occupations are confused with specific work tasks that may be integral components of specific occupations. For example, work as a custodian involves sweeping, emptying trash, and mopping. Each of these work tasks must be considered as part of the clearly distinguishable occupation of custodian. If a student has received all allowable hours of nonpaid, work-related training in the job of school custodian, s/he should not be moved to a new site for another experience as a nonpaid, office-building custodian.

26. Given the policy guidelines, could an employer move students around to different work stations or occupational areas not specified in their written agreement?

No. As stated earlier, general goals and objectives for the student are outlined in the IEP, and written training agreements and training plans between the student, parent(s) or guardian(s), employer, and school personnel detail specific activities for the WBL experience. Thus, WBL can be considered a valid educational experience under the supervision of school personnel. Employers must feel free to remove students from any work activity if they determine that removal is necessary for safety or other reasons. However, under no circumstances should the student be placed in a work station or occupational area not specifically outlined in the written training agreement. In the event there is a need for a new worksite or occupation, a new training agreement and training plan must be written and signed prior to placing a student in the new worksite or occupation.
27. Can students work as volunteers or in service learning in a nonpaid, nonemployment relationship?

Yes, however it must be at a public agency site where the intent is to donate their services for the public good. These sites include charitable not-for-profit organizations, governmental agencies, hospitals, and nursing homes. Commercial businesses may not have unpaid volunteers. The student must choose to volunteer, all participants must agree this is voluntary, and all participants must agree the student is not entitled to wages.

28. How will students receive academic credits for WBL?

How students receive academic credit for occupational and work-related skills acquired in WBL programs is up to state and local education agencies. Many education agencies allow course credit for these community experiences since they help students achieve the transitional goals and objectives identified in their IEPs. Generally these experiences include concurrent classroom instruction by qualified personnel at the educational agency. Frequently, the policy for academic credit in WBL programs will be consistent with the one used for career and technical education programs available to the general population.

29. Do the policy guidelines refer to programs under special education and/or career and technical education?

It does not matter whether the WBL program is offered through special education or career/technical education. However, participants in WBL programs under the seven criteria for nonpaid, nonemployment relationships must be youth with disabilities as defined by the IDEA.

30. Do the guidelines apply to work during the summer?

Yes. These guidelines may apply to summer WBL programs if they are under the general supervision of school personnel. Many students have IEPs that call for an extended-year educational program. Other students may simply elect to enroll in summer school.

Educational Relationship vs. the Employment Relationship:

31. What is the difference between an educational relationship and an employment relationship?

In an employment relationship such as cooperative work experience or youth apprenticeship, the student is providing services that benefit the employer. The student may be completing tasks normally completed by regular employees. As a result of the student’s work, vacant paid positions in the business may remain unfilled, and regular employees may be displaced or relieved of their normally assigned duties. In an educational relationship such as work-related training, the student engages in work tasks as part of an organized educational activity designed to benefit the student. The guidelines on implementing WBL programs consistent with the FLSA outline the distinction between an employment relationship and a valid educational experience. If a student’s involvement in WBL activities constitutes an employment relationship rather than part of an organized educational activity, then the participating business or school may be responsible for full compliance with the FLSA regulations. This would include compliance with the FLSA’s minimum wage and overtime pay provisions.

32. What is the distinction between benefit to student versus benefit to employer?

A number of distinctions have been made between benefit to the employer and benefit to the student with regard to WBL programs. Benefit to the employer occurs when the employer recognizes an immediate advantage by having the WBL student working on the premises. An immediate advantage is increased profitability or production for the business. Benefit to the student occurs when the WBL program is a valid educational experience for the student. For WBL to represent an educationally valid experience the following instructional practices should be implemented:

- Students receive adequate orientation and instruction before performing new tasks.
- Students’ goals and objectives for the WBL program are clearly defined.
- Activities in the workplace setting relate directly to students’ goals and objectives.
- Students’ activities in the WBL program are closely monitored.
- Records of students’ progress are maintained.
- The necessary support and time for students to develop proficiency at new tasks is provided.

(In both situations, the student will benefit, however, the most important decisive factor is whether or not the employer or business receives any benefit.)

33. What is the educator’s role in assuring that regular employees will not be displaced by the student trainee in the workplace?

The WBL experience must be primarily for the student’s benefit. Also, regular employees must not be displaced or relieved of assigned duties, and vacant positions should not go unfilled. Two strategies are available to educators to ensure this criterion is met. First, the educator can confirm that all parties—the employer, the students, and the parent(s) or guardian(s)—understand that students in the WBL program must not displace regular employees. A written training agreement documenting this understanding should be signed by all involved. Secondly, those who supervise the student at the worksite may observe when employee displacement and other violations occur and take steps to correct the situation.

34. If the activity is ordinarily not performed by employees and yet is beneficial to the business, can the student perform the activity?

The student should neither perform the activity nor be paid appropriate wages. Although regular employees have not been displaced or relieved of assigned duties, the student is still providing services which benefit the business. Therefore, an employment relationship exists between the student and the employer. This would not be the case if the activity were of no benefit to the employer and consisted of “busywork” designed to develop or improve a student’s skills. For example, reorganizing materials awaiting shipment into sets of five would not constitute an employment relationship if the business did not ship the materials in this manner.

35. Can students accept an offer of paid employment at a worksite where they were placed for work-related training?

Yes. Students can accept an offer of paid employment at a worksite where they received instruction and training. The student would then become an employee of the business, and an employment relationship would ensue. This means that the employer is responsible for full compliance with the FLSA, including minimum wage and overtime pay provisions.

36. Could the student be paid less than the minimum wage?

Yes. Paid employment below the minimum wage rate is permitted when a worker’s disability impairs their ability to perform the job. This special minimum wage rate is based on the productivity of the worker with disabilities as compared to the productivity of a worker without disabilities. Employers must obtain a certificate from the Wage and Hour Division of the U.S. Department of Labor authorizing the payment of a special minimum wage to youth with disabilities participating in cooperative work experience or state-approved career and technical education programs. Application must be made to the U.S. Department of Labor for authority to employ workers with disabilities at these special minimum wage rates.


The Goal of Productive Employment for All Youth

In 1990, the U.S. President and state governors adopted six ambitious national education goals. These goals apply to all youth. They require that all students leave school literate and with the knowledge and skills necessary to compete in a global economy and be able to exercise the rights and responsibilities of citizenship. Foremost among these goals is access
to productive employment in our modern economy, whether immediately following secondary school or after further postsecondary study.

To support these goals, preparation for employment must become a focal point of every student’s educational program. This is especially true for youth with disabilities. Congress underscored this need by including transition services requirements in the IDEA Amendments of 1990, and most recently in the 1997 IDEA Amendments (P.L. 105-17), and the IDEA 1998 final regulations. These actions serve as an impetus for schools to intensify their efforts to prepare youth with disabilities for productive employment and other post school, adult-living objectives. Required transition services are described in IDEA 1997 as:

A coordinated set of activities for a student with a disability that is designed within an outcome-oriented process, that promotes movement from school to post school activities, including postsecondary education, vocational training, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation; is based on the individual student’s needs, taking into account the student’s preferences and interests; and includes instruction, related services, community experiences, the development of employment and other post school adult-living objectives, and if appropriate, acquisition of daily-living skills and functional vocational evaluation.

Recent studies reinforce the need to strengthen the connection between education and employment. For example, a national longitudinal transition study of special education students found that enrollment in occupationally oriented career and technical education programs was significantly related to a lower likelihood of youth with disabilities dropping out of school, and that youth who took career and technical education during school or had work experience as part of their educational program were more likely to be employed after high school. Research supports the value of a functional skills approach to curriculum and training for youth with disabilities. This involves teaching the skills needed to enhance independent adult living in community settings.

Career and technical education has long been an option for preparing youth with disabilities for productive employment. However, most of these programs in the past relied heavily on simulated work experience in classroom settings. This approach has not led to productive employment in integrated work environments for many students. In fact, the outcome often has been sheltered employment in segregated work settings. The skills acquired through classroom or simulated work experiences do not generalize to typical work settings, and therefore do not meet the goal of post school productive employment for youth with disabilities. When career and technical education and training occur primarily through classroom or simulated settings, youth with disabilities do not acquire social skills normally built through interactions with colleagues and coworkers. These skills are critical to long-term employment success.

**The WBL Approach to Productive Employment for Youth with Disabilities**

Work-Based Learning (WBL) is an effective approach to employment preparation for youth with disabilities. WBL delivers career and technical education and training to youth with disabilities in workplace settings rather than in typical school settings. Students aged 14 years or older engage in nonpaid career exploration, career assessment, and work-related training experiences to identify their career interests, assess their employment skills and training needs, and develop the skills and attitudes necessary for paid employment. After such instruction, students engage in paid cooperative work experience.

There are four distinct components to the WBL approach: career exploration, career assessment, work-related training, and cooperative work experience. Students often progress sequentially through all four components. However, some students participate in only one or two components before moving to cooperative work experience, depending on their instructional needs.

**Career Exploration**
The career exploration component exposes students briefly to a variety of work settings to help them make decisions about future career directions or occupations. The exploration process involves examining interests, values, beliefs, and strengths in relation to the demands and other characteristics of work environments. This occurs most often through worksite field trips, job shadowing, guest speakers, and career mentorship. Through career exploration, students gain information by watching work being performed, talking with employees, and actually trying out work under direct supervision of school personnel. Exploration enables students to make choices regarding career or occupational areas they wish to pursue. The student, parents, worksite employees, and school personnel use this information to develop transition planning in the student’s Individualized Education Program (IEP).

**Career Assessment**

The career assessment component leads to individual training objectives for a youth with a disability. Career assessment activities may include but are not limited to computerized assessments, career and technical education classes, career mentorship, service learning projects, volunteering, and extended observation. In this WBL component, the student undertakes work assignments in various business settings under the direct supervision of school personnel and employees. Assessment data are systematically collected detailing the student’s interests, aptitudes, special needs, learning styles, work habits, behavior, personal and social skills, values and attitudes toward work, and work tolerance. The student rotates among various occupational settings corresponding to the student’s range of employment preferences as situational assessments are completed by school personnel and worksite employees. As a result, students select work settings in which they can best pursue career or occupational areas matching their interests and aptitudes. Future training objectives are matched with these selections. These training objectives become a part of the student’s subsequent IEP.

**Work-Related Training**

The work-related training component of WBL places the student in various employment settings for nonpaid work experiences. The student, parents, and school personnel develop a detailed, written training plan, which includes competencies to be acquired, method(s) of instruction, and procedures for evaluating the training experience. Training is closely supervised by a representative of the school or a designated employee/supervisor. The purpose of this component is to enable students to develop the competencies and behaviors needed to secure paid employment. As the student achieves the training objectives in a particular employment setting, the student moves to other employment environments where additional or related learning and reinforcement of current competencies and behaviors can occur. (A business providing work-related training may derive no benefit from the student. If a business does derive benefit, the nonemployment relationship becomes a paid employer-employee relationship, or the student must move to another environment.)

**Cooperative Work Experience**

A cooperative work experience consists of an arrangement between the school and an employer that uses the workplace and its environment to create links between the learning occurring in school and the skills required in the workplace. The experience is closely supervised by a representative of the school or a designated employee/supervisor. Typically during the cooperative work experience the student attends a class or seminar at the school to reinforce and supplement the experience. Paid for work performed in the employment setting, the student may receive payment from the employer, from the school’s cooperative career and technical program, from another employment program operating in the community such as those supported by the Workforce Investment Act, or a combination of these. The student is paid the same wage as nondisabled employees performing the same work. In some instances, arrangements are made by the school and employer through the U.S. Department of Labor Wage and Hour Division to pay a special minimum wage called “commensurate wage rate” (see [The FLSA and the WBL Cooperative Work Experience Component](#) for a brief description of these FLSA provisions).

The school and employer reach a written agreement before the student enters the cooperative work experience. This agreement includes a clear stipulation of the student’s wages, benefits, and specific individual training plan. This agreement may also include follow-along services to ensure the student adjusts to the work assignments and improves performance and productivity over time. It is likely that students may engage in several cooperative work experience
placements as part of their special education experience during school.

**Requirements of the FLSA Related to WBL**

Because WBL activities take place in employment settings, these activities must comply with the provisions of the Fair Labor Standards Act (FLSA). The FLSA is the federal legislation establishing minimum wage, overtime pay, record-keeping requirements (i.e., personal employee information, wages, hours), and child labor. Employees are entitled to a regular wage of at least $5.15 (current minimum wage) per hour and overtime pay of at least one and one-half times their regular wage for all hours more than 40 in a work week. In states with a minimum wage rate higher than the federal, the higher rate applies.

In order to promote WBL programs to prepare youth with disabilities for productive, paid employment, the U.S. Departments of Labor and Education entered into an agreement in September 1992 and adopted the following Statement of Principle:

*The U.S. Departments of Labor and Education are committed to the continued development and implementation of individual education programs, in accordance with the Individuals with Disabilities Education Act (IDEA), that will facilitate the transition of students with disabilities from school to employment within their communities. This transition must take place under conditions that will not jeopardize the protections afforded by the Fair Labor Standards Act to program participants, employees, employers, or programs providing rehabilitation services to individuals with disabilities.*

**The FLSA and WBL Career Exploration, Career Assessment, and Work-Related Training Components**

The Departments of Labor and Education joined this statement of principle with Policy Guidelines governing the participation of youth with disabilities in employment settings for career exploration, career assessment, and work-related training. Youth with disabilities who engage in nonpaid career exploration, career assessment, and work-related training activities are not considered employees of the businesses in which they receive these services only if they can demonstrate compliance with all of the guidelines below. When schools and employers engaging in these WBL activities with youth with disabilities adhere to all of the following guidelines, they do not violate the provisions of the FLSA. The guidelines are:

- Participants will be youth with physical and/or mental disabilities for whom competitive employment at or above the minimum wage level is not immediately obtainable and who, because of their disability, will need intensive ongoing support to perform in a work setting.
- Participation will be for career exploration, career assessment, or work-related training at a worksite placement under the general supervision of public school personnel.
- Worksite placements will be clearly defined components of Individualized Education Programs (IEPs) developed and designed for the benefit of each student. The statement of needed transition services established for the exploration, assessment, training, or cooperative work experience components will be included in the student’s IEP.
- Information contained in a student’s IEP will not have to be made available; however, documentation as to the student’s enrollment in the work-based learning program will be made available to the Departments of Labor and Education. The student and his or her parent(s) or guardian(s) must be fully informed of the IEP and the career exploration, career assessment, or work-related training components and have indicated voluntary participation with the understanding that participation in these components does not entitle the student-participant to wages or other compensation for duties performed at the worksite placement.
The activities of the student at the worksite do not result in an immediate advantage to the business. The Department of Labor looks at the following factors to determine if this guideline is being met:

- There has been no displacement of employees, vacant positions have not been filled, employees have not been relieved of assigned duties, and the students are not performing services that, although not ordinarily performed by employees, clearly are of benefit to the business.
- The students are under continued and direct supervision by either representatives of the school or by employees of the business. The student receives ongoing instruction and close supervision at the worksite during the entire experience, resulting in any tasks the student performs being offset by the burden to the employer of providing ongoing training and supervision.
- Such placements are made according to the requirements of the student’s IEP and not to meet the labor needs of the business.
- The periods of time spent by the students at any one site or in any clearly distinguishable job classification are specifically limited by the IEP.

While the existence of an employment relationship will not be determined exclusively on the basis of number of hours, as a general rule, each component will not exceed the following limitation during any one school year:

- Career exploration – 5 hours per job experienced
- Career assessment – 90 hours per job experienced
- Work-Related training – 120 hours per job experienced

Students are not automatically entitled to employment at the business at the conclusion of their IEP. However, once a student has become an employee, the student cannot be considered a trainee at that particular worksite placement unless in a clearly different occupation.

Schools and participating businesses are responsible for ensuring that all seven of these guidelines are met. If any of these guidelines are not met, an employment relationship exists, and participating businesses can be held responsible for full compliance with the FLSA.

**The FLSA and WBL Cooperative Work Experience Component**

In this WBL component, the youth with a disability is paid for work performed in the employment setting. Therefore, an employment relationship exists; the student is an employee and is entitled to the same wages as nondisabled employees performing the same tasks; schools and businesses are subject to all of the provisions of the FLSA, (i.e., minimum wage, overtime pay, record-keeping, and child labor). This is true whether the student is paid by the business, school, or a third party.

The FLSA contains several provisions addressing employees who are age 14 and 15, age 16 and older, or workers with disabilities. These provisions are described as follows.

- **Youth age 14 and 15:** Under the FLSA child labor provisions, these students may work in various jobs outside school hours no more than three hours on a school day with a limit of 18 hours in a school week; no more than eight hours on a non-school day with a limit of 40 hours in a non-school week; and not before 7:00 a.m. or after 7:00 p.m., except from June 1 through Labor Day, when the evening hour is extended to 9:00 p.m. These students may not work in jobs declared hazardous by the Secretary of Labor.

- **Youth age 16 and 17:** Under the FLSA child labor provisions, these students may work anytime for unlimited hours in all jobs not declared hazardous by the Secretary of Labor. (States often have limited hours for students age 16 and 17. The school and employer are responsible for knowing and enforcing the hours. When state rules are stricter than federal rules, state rules apply.)

- **18 is the minimum age for employment in occupations declared hazardous by the Secretary of Labor.** For the purposes of this manual, a hazardous occupation is defined as an occupation that may be detrimental to the health...
and well-being of children under 18 years of age or an occupation that may jeopardize their educational opportunities. The rules prohibiting working in hazardous occupations (HO) apply either on an industry or an occupational basis no matter what industry the job is in. Parents employing their own children are subject to these same rules. Some of these hazardous occupations have definitive exemptions. In addition, limited apprentice/student-learner exemptions apply to those occupations marked with an asterisk (*). Youth age 18 and older may be placed in any hazardous occupation if it is developmentally appropriate for the youth.

CEES Curriculum

We will be utilizing the following social skills curriculum during the 12 week program:

1. Components of the PEERS Curriculum for School- Based Professionals
2. Conover Education Curriculum- Workplace Readiness
3. James Stanfield- First Impressions and Transitions Curriculum

CEES STUDENT POSTER BOARD PRESENTATIONS

In addition to utilizing these curriculums, students will have the opportunity to develop a poster board presentation reflecting their experience during CEES. During the 12th week of CEES students will present their board at the University of Cincinnati. Families, school based teams, and friends are welcome to come and see the students’ presentations. Information will be dispensed close to the presentation date.

RESEARCH

CEES would like to use data gathered from the digital storytelling to assess and monitor the quality of the program. An Assent to participate in a Research Study form will be attached to the application. Guardians will need to sign the attached form if they agree to allow their child to participate. If guardians would NOT like their child to participate in the study, participants will still take part in the digital story telling, but their data will not be utilized. If you have any questions regarding this study, please contact Jazmine Bowman (614)-537-2429.
### Sample Schedule

<table>
<thead>
<tr>
<th>Time</th>
<th>Daily Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>9:00-9:15</td>
<td>Daily Arrival Routine Schedule of Day Rules</td>
</tr>
<tr>
<td>9:15-11:30</td>
<td>Employment Rotations</td>
</tr>
<tr>
<td>11:30-12:00</td>
<td>Lunch</td>
</tr>
<tr>
<td>12:00-12:30</td>
<td>Social Skills Instruction</td>
</tr>
<tr>
<td>12:50-1:00</td>
<td>Dismissal</td>
</tr>
</tbody>
</table>
Parents/legal guardians can access their children directly (by calling camper’s cell phones) or indirectly, by contacting (Employee(s) with Primary Responsibility, Director) at (Phone Number). Our staff will maintain the list of parent/legal guardian contact information.

**CEES Contacts**

<table>
<thead>
<tr>
<th>Name</th>
<th>Phone Number</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jazmine Bowman- Director</td>
<td>(614)537-2429</td>
<td><a href="mailto:bowmanjz@ucmail.uc.edu">bowmanjz@ucmail.uc.edu</a></td>
</tr>
<tr>
<td>Christi Carnahan- ATS Director</td>
<td></td>
<td><a href="mailto:carnahc@ucmail.uc.edu">carnahc@ucmail.uc.edu</a></td>
</tr>
</tbody>
</table>
**VOCATIONAL EXPLORATION SITES**

**Aramark Center Court:**
- Bakery
- Just 4 U
- World Series
- Greens
- Dining Room Assistant

**Aramark Market Point:**
- Dough
- Register
- Pizza/Pasta
- Grab & Go

**Aramark: DAAP Café**

**DAAP Library**
Collaboration for Education and Employment Synergy (CEES) Project
Collaboration for Education and Employment Synergy (CEES) Project

Aramark: Burger King

UC Grounds & Recycling

UC Landscaping

Currito