

Transitional Jobs Policy #P-38-9.25

Re: Guidance on the implementation of Work-based learning activities that involve building worker skills and establishing pathways to higher wages and career opportunities.

Reviewed for Updates February 26, 2026
Revision Approved: No changes were made.

Originated: October 9, 2025
Approved: October 30, 2025

References: WIOA Section 134(c) (3)(H)
WIOA Section 134(d) (1-5)
20 CFR 680.150
20 CFR 680.530
20 CFR 680.830
20 CFR 680.840
20 CFR 680.850
20 CFR 680.900

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I. Definitions

- A. Transitional Jobs Requirements: A transitional job is one that provides a time-limited work experience, that is wage-paid and subsidized, and is in the public, private, or non-profit sectors for those individuals with barriers to employment who are chronically unemployed or have an inconsistent work history.
- B. Chronic Unemployment: Individuals experiencing chronic unemployment or an inconsistent work history are those who:
 - i. Have been unemployed for 13 weeks or longer;
 - ii. Were unemployed at least 26 of the past 52 weeks; or
 - iii. Have held three or more jobs in the past 52 weeks and are currently unemployed or underemployed.
- C. Individualized Career Services: Specific to individuals enrolled in WIOA Adult and Dislocated Worker programming, are provided when PA CareerLink® staff determine that such services are required to retain or obtain employment. Individualized career services include:
 - i. Specialized assessments;
 - ii. The development of an individual employment plan (IEP);
 - iii. Career counseling; and
 - iv. Work experiences, including transitional jobs.

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II. Policy

- A. SCPa Works allots up to 10 percent of combined total adult and dislocated worker allocations for transitional jobs as described in the Code of Federal Regulations (CFR) 20 CFR [§ 680.190](#).
- B. Vendors and case managers are required to combine Transitional Job programming with comprehensive career services (CFR [§ 680.150](#)) and supportive services (CFR [§ 680.900](#)).
- C. Transitional jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment.
- D. Vendors are required to ensure that Transitional Jobs are:
 - i. Time-limited up to 12 weeks in duration, wage-paid work experiences that can be subsidized up to 100 percent;
 - ii. Employment positions with employers that are in the public, private, or nonprofit sectors;
 - iii. Only available for individuals with barriers to employment who are considered reentry individuals, who are chronically unemployed, or who have an inconsistent work history;
 - iv. Combined with comprehensive employment and supportive services; and
 - v. An employment opportunity to provide individuals with work experience and an opportunity to develop important workplace skills through an employee-employer relationship with an opportunity for the individual to develop important workplace skills.
- E. Transitional Jobs may be full-time or part-time employment positions.

III. Transitional Job Wage and WIOA Reimbursement

- A. Transitional Jobs should offer a wage in alignment with the [self-sufficiency standard](#) and at a minimum pay the TJ participant [minimum wage as dictated by the Commonwealth of Pennsylvania](#).
- B. TJ placements must pay participants at least the Pennsylvania minimum wage of \$7.25/hr.
 - i. TJ funds may be used to pay up to \$10.00/hr. of wages earned by a participant.
- C. WIOA Title I vendors are required to develop TJ placements that pay a self-sustaining wage, as defined by the [SCPa Works Self-Sufficiency Policy](#).
- D. The total cost per participant for the duration of a TJ will be set contractually in the Transitional Jobs Agreement, per placement.
- E. Participant cost levels will take into consideration both participant wages and supportive services as determined by the:
 - i. Degree of participant barriers to employment;
 - ii. Type of employers to be served as TJ sites, the employers' needs, and the time needed to establish an applicable work history;
 - iii. Level of current job skills upon entry and the level needed to generate a positive outcome; and
 - iv. Need and type of program support or access to career and supportive services for the duration of the TJ employer-participant relationship.

IV. Transitional Job Duration

- A. WIOA TJ length is limited for up to six (6) months.

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- B. TJs require that participants be provided with at least 15 hours of work per week and not more than 40 hours of work per week.
- C. Vendors should be aware that TJ participants may need a time-consuming pre-requisite level of training to attain a required skill level prior to beginning the TJ, or that an ITA may need to be administered alongside the TJ to ensure skill attainment while working.
 - i. Additional training and a prolonged timeline are documented in the Transitional Job Agreement when necessary.

V. Transitional Jobs Supportive Services

- A. TJ participants are eligible to receive Supportive Services for the duration of the training or employment period.
- B. Vendors should reference the [SCPa Works Supportive Services Policy](#) for additional requirements and content relating to eligible benefits.

VI. Transitional Jobs Participant Eligibility

- A. WIOA Title I Adult and Dislocated Worker participants must meet WIOA eligibility in adherence to the [SCPa Works Eligibility and Enrollment Policy](#) for financial assistance, training services, and priority of service before engaging in a TJ.
- B. WIOA Title I Out-of-School Youth participants are eligible for a TJ if it is identified as an appropriate service in the employment plan.
- C. Per [20 CFR 683.200\(g\)](#), no individual may be placed in an employment activity if a member of that person’s immediate family is supervised by or supervises that individual.
 - i. The term “immediate family” includes a spouse, child, son-in-law, daughter-in-law, parent, mother-in-law, father-in-law, sibling, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, step-parent, step-child, grandparent, and grandchild.
- D. SCPa Works honors target populations for candidates who are a good fit for TJ, including but not limited to individuals who are:
 - i. Long-term unemployed;
 - ii. Reentry individuals;
 - iii. Individuals who are currently receiving or have exhausted TANF benefits; and
 - iv. Individuals with disabilities.
- E. A career aptitude assessment must be performed by the vendor to gauge career interest and aptitudes.
 - i. The recommended career assessments are Career Scope or O*NET.
 - ii. The recommended academic aptitude assessment is CASAS.

VII. Employer Eligibility

- A. SCPa Works monitors and evaluates employers for compliance with equal opportunity laws, guidelines, and policies to ensure that employment practices and contracting arrangements provide equal opportunity without regard to race, religion, color, national origin, sex, age, or disability. ([SCPa Works EO and Discrimination Policy #P-13-2.22.](#))
- B. Employers must comply with local, Commonwealth, and federal rules for lawful business operation.
- C. Employers must ensure that the training provided is in accordance with federal wage and labor standards, no less than the higher of the rate specified in section 6(a)(1) of the Fair Labor Standards Act of 1938 (29 U.S.C. 206(a)(1) or the applicable Federal, State, or local minimum wage as such:

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- D. Employers are not permitted to use WIOA-funded TJ payments to directly or indirectly assist, promote, or deter union organizing.
- E. Employers are required to present proof of the following:
 - i. Current Federal Tax ID Number; and
 - ii. Proof of current workman's compensation insurance coverage.
- F. Employers must agree to cooperate with monitoring efforts as required by WIOA legislation, adhere to local, state, and federal rules and regulations, and respond to SCPa Works staff requests for wage and retention information of participants in adherence to the [SCPa Works Oversight and Monitoring Policy](#).
- G. Employers who have financial responsibilities related to the receipt and disbursement of funding under the TJ Agreement shall be covered by fidelity bonding. (It is the vendor's responsibility to collect all validating documentation.)
- H. Employers shall adhere to the worker protection requirements set forth in WIOA Sections 181(a) (1) (A) and (B), (b) (2), (3), (4), and (5) and 188.

VIII. Transitional Jobs Agreement with an Employer

- A. Transitional Jobs are provided under an agreement between the WIOA Title I vendor and the employer.
- B. The vendor is responsible for ensuring that the Transitional Jobs Agreement with the employer, per participant engagement, is completed and uploaded into CWDS.
 - i. The Transitional Jobs Agreement is to be completed and signed by the vendor, the employer, and the participant.
- C. Prior to entering into a TJ agreement, the vendor is required to assess the employer to ensure that the employer meets the minimum standards and can provide both training and employment to a TJ participant.
- D. TJ agreements are entered into with employers before a WIOA-eligible participant begins work with or engages in a working relationship with the TJ employer.
- E. Transitional Job Agreements should specify:
 - i. If additional training is needed for the TJ participant to excel at the TJ or to attain skills necessary to work in the TJ position, the WIOA Title I vendor is required to ensure that a third-party training provider via a WIOA ITA or an alternate skills training is included in the agreement, and is detailed in the training description section of the TJ Agreement.
 - 1. Additional skills training should be specified in the TJ Agreement as a prerequisite to the TJ or as an activity that runs adjacent to and simultaneous with the TJ, as described in the training description section of the TJ Agreement.
 - ii. The exact duration of the TJ, up to six (6) months.
 - iii. The funding stream used to reimburse the employer:
 - 1. WIOA Adult; or
 - 2. WIOA Dislocated Worker
 - iv. The arrangement of the WIOA Title I vendor as the employer of record.
 - 1. The WIOA Title I vendor is required to serve as the employer of record for Transitional Jobs engagements due to the nature of TJ opportunities being time-limited within a six (6) month period, wage-paid work experiences that are subsidized up to 100% by SCPa Works using WIOA funds, and are without the obligation of the employer to retain the participant following the completion of the TJ period.

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- v. The number of hours per week that the TJ participant is expected to work.
- vi. The exact dollar amount per hour wage paid to the TJ participant by the WIOA Title I vendor.
- vii. The total anticipated cost of the TJ engagement, including:
 - 1. TJ participant wages
 - 2. Supportive services
 - 3. Additional or supplemental training such as an ITA for skill attainment
- viii. The employer is not required to retain the individual upon completion of the transitional job; however, job retention is an ideal outcome.
- ix. Notation that employers must agree to respond to SCPa Works and all other WIOA Title I vendor staff requests for documentation, reporting, and monitoring purposes.
- x. Notation that employers are not permitted to use WIOA funds to directly or indirectly assist, promote, or deter union organizing.

IX. Ineligible Employers

- A. An employer will NOT be eligible to participate as a WIOA Transitional Job placement site if one or more of the following characteristics are true:
 - i. The employer has laid off an existing employee from the same or substantially equivalent position.
 - ii. The TJ would infringe upon the promotion or displacement of any currently employed worker or would result in a reduction in existing employee hours.
 - iii. The same or a substantially equivalent position is open due to a hiring freeze.
 - iv. If the participating employer(s) has recently relocated, resulting in the loss of employment of any employee of such business at the original location in the U.S., TJ placements may not be granted to the employer(s) until after 120 days have passed since the relocation.

Summary of Changes: This policy is reviewed annually by the SCPa Works Policy Department for necessary changes, edits, updates, and revisions.

Date of Change:	Changed by:	Summary of Change(s):	Effective Date