

Clean Energy Technical Trades Work and Learning Program Host Employer FAQs Session: September 1, 2023 – August 30, 2024

TECHNICAL TRADES WORK AND LEARNING PROGRAM FAQS

1. What is the Massachusetts Clean Energy Technical Trades Work and Learning Program?

The Massachusetts Clean Energy Technical Trades Work and Learning Program (the "<u>Program</u>") is a workforce development initiative offered through MassCEC which focuses on enhancing the talent pipeline for Massachusetts employers engaged in the clean energy industry. The Program facilitates the placement of vocational and technical high school students, high school After Dark students, and students of Career Technical Initiative (CTI) evening programs, who are considering careers in clean energy through paid training opportunities across the state. Consistent with MassCEC's role as a catalyst in growing the talent needed by the clean energy industry, the Program is designed to provide students and employers with the tools to connect, and MassCEC will reimburse eligible employers for intern stipends.

2. What are the objectives of the Massachusetts Clean Energy Technical Trades Work and Learning Program?

The objectives of the Program are to:

- Provide the clean energy community with a talented pool of young professionals with technical backgrounds;
- Enable students to gain significant career opportunities in a challenging economic environment;
- Enable clean energy employers to mentor students and provide internship opportunities; across a broad spectrum of student backgrounds;
- Support the need for greater diversity in our clean energy workforce; and
- Provide a peer network of students interested in working in clean energy.

3. How does the program work?

Students looking for an internship in the clean energy industry will be required to work with their co-op coordinator and complete an online application that includes a resume, transcript, and supporting eligibility documents (as discussed in the response to **Question #10**). **CTI students and anyone over 18 can register themselves in the portal.** Co-op coordinators will be responsible for completing the application, but students should assist in ensuring the information posted is accurate. Students will identify their academic background and the industry subsector in which they would prefer to intern. Representatives from employers looking to host interns review these applications and select candidates with the qualifications that are most suited to their needs. Internships are part-time during the session,

over a 32-week period. Employers will provide a meaningful internship opportunity and mentorship opportunities for each intern. Upon completion of the internship, eligible employers will request a reimbursement from MassCEC for the stipend paid to the intern. <u>Funding is reserved for clean energy employers to host interns on a first-come first-served basis until funding has been exhausted or the submission deadline is met.</u>

4. How does an employer register to participate?

Potential host employers interested in hosting interns through the Program should send a signed W-9 to <u>finance@masscec.com</u> and fill out the electronic Participating Host Employer Application posted at: https://www.masscec.com/program/technical-trades-employers.

5. What are the eligibility requirements for organizations to participate in the program?

<u>Completing the Participating Host Employer Application Form does not guarantee or entitle your</u> <u>organization to receive internship funds.</u> In order for your organization to gain approval to participate, your organization must:

- Be an eligible "clean energy employer". For the purposes of this program, MassCEC defines a "clean energy employer" as "an employer engaged in whole or in part in goods and services, or advanced and applied technologies that significantly reduce or eliminate the use of energy from non-renewable sources, including, but not limited to: energy efficiency; demand response; energy conservation and those technologies powered in whole or in part by the sun, wind, water, geothermal energy, including networked geothermal and deep geothermal energy, hydrogen produced by non-fossil fuel sources and methods, alcohol, fuel cells, fusion energy or any other renewable, non-depletable or recyclable fuel." MassCEC in its sole discretion makes the determination of whether an employer is a clean energy employer.
- Be registered to do business in Massachusetts. If you are unsure if your business is registered to do business in Massachusetts, please consult the Secretary of the Commonwealth's Corporate Database at the Commonwealth's <u>Corporations Division</u>.
- Provide a meaningful internship (as defined in the General Terms and Conditions).
- Provide adequate proof that your organization is able to pay your intern(s) and all associated costs associated with employment.
- Successfully demonstrate that your organization has a formal office in Massachusetts by the session start date.
- Be in good standing with MassCEC, including, without limitation, that the Host Employer must have submitted all paperwork relating to any prior internship including the mandatory final survey, which has been received and approved by MassCEC.

6. Can Government or Academic Institutions Apply to the Program?

Government and academic institutions seeking interns for work that fits the above definition may use the applicant database and hire interns; however MassCEC will not subsidize these interns.

7. How many interns may an organization employ?

Host Employers are allowed to select up to three (3) interns. Please note, because funding for the Program is limited, awards will be made on a first-come, first-served basis, and you may receive fewer

than three (3) interns if funding is fully committed by the time we receive your offer letters for additional interns.

There is also a restriction on Related Party Organizations as defined below. If your organization owns other eligible organizations, or if your organization is owned by another, you are only allowed a maximum of three (3) subsidized interns for ALL Related Party Organizations.

"<u>Related Party Organizations</u>" are defined as organizations having common ownership and/or management personnel (including but not limited to the Chief Executive Officer, Chief Financial Officer, or Chief Operating Officer). Related Party Organizations are also considered to be related if at any time one organization has the ability to Control (as defined below) the other organization or exercise influence over the other organization in making financial and/or operating decisions. "<u>Control</u>" is defined as:

- 1. ownership, directly or indirectly, of more than one (1) half of the voting power of an organization; or
- 2. control of the composition of the board of directors, or other governing body of accompany organization; or
- 3. a substantial interest in voting power and the power to direct the financial and/or operating policies of the organization.

<u>Please be aware that MassCEC will not accept any documents submitted by any entity that is</u> <u>not the primary participating Host Employer.</u>

8. How long can an intern stay at my organization?

An intern will be subsidized for <u>one (1) session</u> of work which includes the academic year and the following summer. An intern may stay on after the conclusion of a session but will not continue to be subsidized by MassCEC.

9. Can we hire an intern from a previous session and be eligible for MassCEC reimbursement?

No, an intern will not be able to participate with you through the Program if they have already done so. The Program is designed to enable high school seniors, CTI and After Dark students the opportunity to gain hands-on experience in the clean energy sector. Once they complete the program, they are no longer eligible to participate.

NOTE: Current or very recent employees are not eligible to participate with you as an intern under the Program unless they have been working for the Host Employer less than six (6) weeks leading up to successful completion of their eligibility check. The Program is designed to enable many different individuals to participate in gaining clean energy work experience at Host Employers and is not designed to provide continuous support to full or part-time employees at a host company across multiple sessions. Please see **Question #8** for details.

10. What are the eligibility requirements for prospective interns?

Students are required to meet the following eligibility requirements:

- 1. Must be actively attending or graduated within the past 12 months:
 - (a) A vocational or technical high school located in Massachusetts; or
 - (b) An After Dark program offered through a Massachusetts-based vocational or technical high school; or
 - (c) A Career Technical Initiative (CTI) program offered through a Massachusetts-based vocational or technical high school; or
 - (d) A training/ career pathway program approved for participation in this program by MassCEC.
- 2. Vocational High School students must meet the following:
 - (a) Be a rising senior and in good standing; and
 - (b) Be approved to participate in a co-op by their school's administration.
- 3. Students participating in an After Dark program are eligible to participate, but should utilize a co-op coordinator or other career services support staff to apply to this program. If the student does not have access to this, please contact MassCEC at <u>internships@masscec.com</u>
- 4. If a student has graduated, is over 18, and no longer has access to their co-op coordinator, they may register themselves in the portal. If they are under 18, they should contact <u>internships@masscec.com</u> to discuss a parent/guardian approval.
- 5. If a student needs to withdraw for any reason and an employer is seeking a replacement, any replacement intern must be approved by MassCEC (see **Question #16**).

Certain individuals are not eligible to participate in the program:

- 1. Students who are not in good standing or with their school or program.
- 2. Current full or part-time employees of the potential host employer at the time of the eligibility check.
- 3. Any full-time employee or existing intern that has been on payroll for greater than twelve (12) weeks at a Host Employer. Please see **Question #9** for exceptions to this provision.
- 4. Family members of employers or owners of the Host Employer.

11. I've selected my student intern(s). Why do you need to conduct an eligibility check? I thought since they are in the database you had already been in touch with them.

MassCEC does not provide an eligibility check on interns before the check is specifically requested by a potential employer due to the large number of student applications we receive every session. This step allows us to check in with the student's school to ensure that they are in fact eligible and able to participate.

12. Is there a deadline for submitting signed offer letters to MassCEC?

MassCEC is currently accepting offer letters on a rolling basis until funds are depleted.

13. What is the process for reviewing student candidates?

Each Host Employer approved to participate will create a password that allows access to the <u>database of</u> <u>student applications</u>. The review of candidates for internships is done exclusively by the Host Employer. For high school students, they will proceed to reach out directly to co-op coordinators at the student's school to inquire about candidates that possess qualifications that are most suited to their needs. For CTI students, the Host Employer will reach out directly to the individual. It is highly recommended that Host Employers request an eligibility check from MassCEC prior to conducting interviews and is a requirement if the employer is interested in hiring an intern through this program. MassCEC will provide final approval to extend an offer to the intern, contingent upon verification of the applicant's eligibility and the availability of funds. Please note that all onboarding functions, including eligibility checks and offer letter submissions, must be performed by a permanent staff member at the Host Employer. Recent, current, or prospective interns are prohibited from serving in this capacity with the Host Employer.

14. What are a Host Employer's contractual obligations?

Host Employers will be required to accept the Technical Trades Work and Learning Program Host Employer General Terms and Conditions when applying to become a participating Host Employer and must also acknowledge the Award Letter that sets forth additional funding requirements. Host Employer are not required to hire interns at the end of the session, though are encouraged to do so.

By participating in the Program, the Host Employer and MassCEC do not form a partnership, employment relationship, joint venture, or principal and agent relationship. At no time is any Intern deemed or otherwise considered to be an employee, intern, contractor, subcontractor or agent of MassCEC for any purpose. The terms and conditions of the Internship shall be set by an intern and the Host Employer and MassCEC shall have no responsibility, liability or oversight authority whatsoever with respect to Intern or the Internship. The Host Employer and its agents, employees and Interns may not hold themselves out as MassCEC employees and shall not be deemed an employee of MassCEC for any purpose.

15. The Cleantech Industry is really competitive. I'd like to have my intern sign a noncompete agreement. Is there a policy for non-compete agreements?

The goal of the Program is to increase opportunities for students entering the clean energy workforce and improve their prospects for future employment in the industry. A non-compete agreement goes against the spirit of the program and therefore <u>at no point shall an intern sign a non-compete</u> <u>agreement</u>. Any Host Employer found executing a non-compete agreement with a subsidized intern will result in the inability to receive reimbursement through the Program. It is instead suggested that an employer have an intern sign a non-disclosure or confidentiality agreement to protect any sensitive information.

16. My intern left mid internship. Can I still hire someone?

If a hired intern terminates employment during the internship, MassCEC may at its discretion allow a Host Employer to hire an additional intern to take their place and use up the remaining funding allocated to their previous intern. Please be aware that any new student selected must first be approved as eligible by MassCEC and the Host Employer would then need to submit a signed offer letter for that individual before MassCEC could issue a final approval. In order to hire a new student, the Host Employer must contact and work through a Coop Coordinator, if the intern is a high school student.

17. How much can I pay my intern?

Host Employers may pay their intern(s) more than the subsidy rate (\$15/hr), however, MassCEC will only reimburse up to the full award amount. Host Employers may not pay an intern less than \$15 per hour. Failure to pay the minimum amount may result in MassCEC denying a Host Employer's reimbursement request. MassCEC will only reimburse a Host Employer up to its cap of \$8,640/intern.

18. How does an employer request reimbursement?

The Host Employer may either submit a Reimbursement Certification package:

- 1) Twice by January 30, 2024 and again by September 30, 2024; or
- 2) Once by September 30, 2024.

The reimbursement request must be supported with adequate proof that each intern was paid during the internship along with all applicable taxes. Proof of payment must include at least a year-to-date earnings report at the internship's conclusion. In order to help MassCEC process your invoice quickly, MassCEC strongly encourages you to submit the following documentation when seeking reimbursement:

- Provide backup documentation of payment of wages to the intern and payment of any necessary taxes in the form of paycheck stubs and/or a payroll summary relating to an intern's worked hours over the approved session. MassCEC reserves the right to request additional documentation from Host Employer to ensure compliance.
- Show all hours the intern(s) worked throughout the session. MassCEC will provide you with the necessary forms to help you provide this information. If MassCEC is unable to match hours with year to date earnings, a delay in payment will occur while we procure this additional information from you.
- <u>1099 employees are not eligible for reimbursement under the Program</u>. If an intern was paid as a 1099 employee, the employer must retroactively pay all taxes associated with being a W-2 employee. We must be able to verify proof of taxes paid on your backup documentation.
- Please clearly outline how your backup documentation relates to your timesheet summary (include this in reimbursement forms) for a timely reimbursement.
- The Reimbursement Certification package will be provided to the Host Employer in an email from MassCEC with their award letter. Completed Reimbursement Certification packages must be submitted to internships@masscec.com no later than September 30, 2024.
 MassCEC reserves the right to deny reimbursement funding for a Host Employer's session if a complete reimbursement package is not received by the session's reimbursement package submission deadline.

Please Note: MassCEC will mail a reimbursement check to the Host Employer within forty-five (45) business days of receipt of the Reimbursement Certification form and all completed supporting

documentation. If the Host Employer's address changes, they must: 1) Send a notification letter of address change to <u>internships@masscec.com</u>; <u>AND</u> 2) Send an updated W-9 to <u>finance@masscec.com</u>. Failure to properly notify MassCEC in the aforementioned manner may result in a delay in payment of reimbursement or inability to provide a reimbursement payment.

19. I'm a small organization and I don't have a payroll system. What should I do?

If you are a smaller-sized organization and need assistance with your payroll services, please review the resource list below. Please note, without adequate proof of payment of the internship's wages and taxes in the form of paycheck stubs and/or a payroll summary, reimbursement will not be issued to your organization. MassCEC will not reimburse a Host Employer for the costs of using a payroll service. Below are some examples of payroll services that may be useful to a Host Employer:

- <u>ADP</u>
- <u>Ceridian</u>
- <u>Paychex</u>
- <u>MassPay</u>

Please do not hesitate to email the Workforce Development team at <u>internships@masscec.com</u> with any questions not covered in this FAQ. Someone will respond to you as quickly as possible.