

# Commander's Manual: Establishing/Managing an Internship Program

Notes: The term Warrior Transition Unit (WTU) is used throughout this manual and includes Brigade, Battalion, Separate Company, and Community Based Warrior Transition Unit (CBWTU) elements. The term Transition Coordinator (TC) is used throughout this manual and includes personnel serving as a TC in the WTUs and CBWTUs.

**Purpose.** The Warrior Care and Transition Program (WCTP) is a standardized program. This manual provides requirements for implementing your internship program.

**Objective.** Commanders will use the requirements set forth by this manual to establish and manage the internship program. The internship program's overarching principle is to align opportunities with the Soldiers' Comprehensive Transition Plan (CTP) track and career goal(s).

The Commander's objectives are to:

- 1. Align the internship program with WCTP Policies and Guidance (Appendix B)
- 2. Properly resource the internship program
- 3. Provide internship opportunities that support civilian workforce reintegration and the Commander's Career and Education Readiness (CER) program

**Program Overview.** Internships develop or reinforce skill sets Soldiers need to prepare for civilian employment. The internship program is a Soldier-driven process, which supports the Soldier in both the <u>rehabilitation and reintegration</u> process of the CTP. Internship programs help the interdisciplinary team (IDT) identify opportunities to augment the Soldier's transition and provide a meaningful work day for the Soldier. The two approved internship programs for use at WTU/CBWTU are:

- Department of Defense (DoD) Operation Warfighter (OWF) Non-Paid Federal Internship program
- 2. Veterans Affairs (VA) Coming Home to Work (CHTW) Non-Paid Work Experience (NPWE) Federal Internship Program

Once a Soldier is determined CER eligible by the Commander and the Medical Management (M2) team, the Soldier may consider internship opportunities as one option to further their CTP track and career goal(s).

Outcomes of internship participation include:

- Meaningful activity that assists in wellness
- Exploring employment interests



- Developing job skills
- · Reintegrating with the civilian work force
- Gaining valuable federal government work experience
- Understanding military skills are transferable into civilian employment
- Building a résumé

### **Commander's Significant Information**. Commanders will ensure the following:

- Internship opportunities align with the Soldiers' CTP track and career goal(s).
- Internships are only performed at Federal Agencies.
- OWF forms are the only authorized documents for OWF internships.
- Unit TC and OWF Regional Coordinator (RC)/CHTW Coordinator have a working relationship which provides outcomes that support Soldiers participating in internships.
- Internship program objectives are communicated to Cadre and Soldiers.
- Soldiers and Cadre execute the internship program within the scope of WCTP policies and guidance.
- Assessments are conducted to ensure Federal Agencies provide a good, safe environment.
- Soldiers are afforded the opportunity to participate in an internship.

#### **Keys to Success.** Commanders will set internship program expectations using these methods:

- Command emphasis on placement <u>and</u> participation (directed at the Soldier and the Triad of Care) and ensure the internship meets the CTP track and career goal(s).
- Direct roles and responsibilities for each Cadre member executing the internship program.
- Communicate internship opportunities (fliers, internship events, announcements, etc.).
- Create an equal balance between internship participation and recreational activities (i.e. hunting/fishing trips, dinners, golf tournaments, etc.).
- Highlight internship program successes internally and externally.
- Acknowledge internship supporters.

**Responsibilities**. The Commander will define clear roles and responsibilities of Cadre members involved in the operation of the internship program. At a minimum, the internship program team is comprised of a Transition Coordinator (TC), Operation Warfighter Regional Coordinator (OWF RC), VA CHTW Coordinator, Occupational Therapist-Registered (OTR), Nurse Case Manager (NCM), Squad Leader (SL), and Soldier.



- a. WTU Commander: Holds overall responsibility for the internship program.
  Communicates the importance of the internship program and the participation rate of eligible Soldiers to Cadre. The WTU Commander will:
  - i. Establish an internship program and communicate objectives to Soldiers and Cadre (TC, NCM, SL, OTR, etc.).

ii. Direct roles and responsibilities of Cadre members involved in the internship program.

- iii. Ensure Cadre monitor Soldier internship participation.
- iv. Ensure Soldier meets participation requirements.
- v. Establish and develop the professional relationship between your TC and the OWF RC/CHTW Coordinator.
- vi. Ensure an internship fair is conducted twice a year.
- vii. Ensure Cadre conduct an assessment of available internship opportunities within 50 miles of the WTU footprint.

  For CBWTUs, within 50 miles of the Soldier's residence.

viii. Designate a Composite Risk Management (CRM) qualified individual to conduct a job hazard analysis at each internship worksite and mitigate the specific hazard(s) identified.

- ix. Ensure OTR conducts a functional analysis of each worksite.
- x. Validate participation rate by incorporating the CER report into the weekly Commander's update. (Appendix E)
- xi. Provide monthly participation data to the Regional Medical Command (RMC). (Appendices F and G)

xii. Highlight internship program success (i.e. running articles in the installation newspaper, host Soldier and Veteran alumni to speak at formations, etc.) and ensure Internship Success Story Information Sheet is submitted to WCT Strategic Communications (STRATCOM) Division, and OWF RC.

Worksite Location

If a worksite is greater than 50 miles from the Soldier's place of residence an exception to policy must be submitted to the Commanding General, Warrior Care and Transition (WCT).



One Soldier's success may inspire another to try something new. Sharing success stories will help motivate Soldiers to become involved in an internship.



- b. *Transition Coordinator (TC):* Coordinates and manages the CER activities for Soldiers and collaborates with the OTR to ensure activities are aligned with the Soldier's CTP track and career goal(s). The TC will:
  - i. Set expectations with Cadre and Soldiers regarding the purpose of internships
    - Internships are part of a wellness program and do not guarantee employment with the federal agency once complete, but provide valuable work integration experience.
    - Internships should not be considered Borrowed Military Manpower (BMM) or a Remain in the Army Work Assignment (RIAWA).
    - Soldiers who receive Social Security Disability Insurance (SSDI) are
      authorized to participate in internships, but must file an Operation Warfighter
      (OWF) Approval for Participation Form and OWF Placement Form with their
      Social Security Administration (SSA) Case Manager. Failure to comply with
      this procedure will initiate a Trial Work Period as defined by the SSA, and
      may jeopardize the consideration for, receipt of, or recoupment of SSDI in the
      near or longer term.

Myth Buster: SSDI

Internship myth: If the Soldier is collecting SSDI they often think they cannot participate in an internship because they will stop receiving benefits. FALSE! If the Soldier is in an approved OWF internship and the appropriate paperwork is submitted to their Social Security Administration Case Manager their SSDI benefits will be protected and they will progress in their career readiness.

- ii. Provide an internship information briefing to the Soldiers during the inprocessing phase.
- iii. Provide weekly and monthly reports to the Commander on Soldier CER participation status, to include internship participation rate. (Appendices E, F, and G)
- iv. Work directly with the Soldier to understand career goals, identify internship interests, and initiate and complete required paperwork.
- v. Coordinate résumé completion with ACAP or other certified résumé writing workshop.
- vi. Collaborate with the OTR to understand Soldier's CER eligibility, worksite limitations, work development/progress.



- vii. Communicate worksite concerns, address and resolve performance issues, and share monthly evaluations with the SL.
- viii. Work directly with the OWF RC/CHTW Coordinator to identify internships, process paperwork, refer Soldiers for participation, track placement, and coordinate internship fairs twice a year.
- ix. Coordinate internship hand-off with new unit TC when a Soldier transfers.
- c. Occupational Therapist-Registered (OTR): Works as a member of the Career and Education Readiness (CER) team to assist in the vocational planning through goalsetting. The OTR will also assess the Soldier's physical and psycho-social limitations and work with the Soldier on life skills (time management, organization, interview preparation, communication skills, agency research, etc.) before and during the internship. The OTR will:
  - i. Collaborate with NCM on M2 CER eligibility.
  - ii. Meet with Soldier to define/refine career goal, determine eligibility, and refer to TC.
  - iii. Collaborate with TC to communicate CER eligibility, worksite limitations, work development/progress, and any change in Soldier status.
  - iv. Work closely with the SL to track placement and any changes in Soldier status.
  - v. Conduct worksite functional assessment before internship begins and recommend ergonomic modifications to accommodate the Soldier, as needed.
  - vi. Serve as the Computer/Electronic Accommodations Program (CAP) representative and provide assistance with reasonable accommodations.
  - vii. Coordinate internship hand-off with new unit OTR when a Soldier transfers.
- d. *Nurse Case Manager (NCM):* An integral member to communicate to the CER team any changes in a Soldier's medical status and update the physical profile. The NCM will:
  - i. Coordinate the M2 evaluation of CER eligibility with all members of M2 and document results.
  - ii. Ensure the Soldier is informed of their medical appointments and anticipated final medical disposition.
  - iii. Ensure all Cadre understand the Soldier's medical condition for internship planning purposes.
  - iv. Notify the TC, SL, and OTR regarding any clinical issues that affect CER readiness and execution.
  - v. Validate and document M2 CER eligibility. (Annex A)
- e. Squad Leader (SL): The SL will coach, teach, mentor, and counsel the Soldier on their roles and responsibilities while participating in an internship. The SL will maintain accountability of the Soldier, daily. The SL is responsible for coordinating with the Commander to determine and document when a Soldier has been determined to be CER eligible from a Command perspective. The SL will:



- i. Validate and document Command CER eligibility.
- ii. Ensure the Soldier has met with the OTR and TC.
- iii. Collaborate with the NCM to assist the Soldier in developing a weekly clinical and non-clinical calendar to de-conflict appointments and internship hours.
- iv. Ensure the clinical and non-clinical appointments are entered in AWCTS.
- v. Annotate résumé completion on the reintegration checklist.
- vi. Ensure the Soldier is at their place of duty, daily.
- vii. Call the worksite supervisor once a week, and visit the worksite once a month, at a minimum.
- viii. Use the internship monthly evaluations when counseling the Soldier and considering for award.
- ix. Ensure the Soldier completes the internship exit interview provided by the OWF RC.
- x. Maintain worksite paperwork in the Soldier's file. This includes *OWF Approval for Participation* form, worksite agreement, worksite hours, supervisor information, etc.
- xi. Coordinate internship hand-off with new unit Squad Leader or Platoon Sergeant when a Soldier transfers.
- f. Soldier: Establishing specific, measurable, actionable, realistic, and time-bound (SMART) career goals and maintaining motivation will lead to a productive internship. Soldiers will be active, aggressive, and accountable in meeting goals outlined in their individual CTP. The Soldier's medical care is always the first priority and will be considered when developing a work schedule. While participating in an internship, the Soldier's place of duty is at the internship worksite, if not at a medical appointment. The Soldier will:
  - i. Select a CTP track (Transition from the Army or Remain in the Army).
  - ii. Establish SMART career goal(s).
  - iii. Attend an internship fair and/or research and select a preferred agency.
  - iv. Complete a résumé.
  - v. Meet with the OTR to define/refine career goal, determine eligibility, and communicate any reasonable accommodation requirements.
  - vi. Meet with TC to discuss career goals, identify internship interests, and initiate and complete required paperwork.
  - vii. Meet with the SL to develop a weekly clinical and non-clinical calendar to deconflict medical appointments and internship hours.
  - viii. Maintain medical appointments and internship work schedule.
  - ix. Communicate change in status to SL, TC, OTR, NCM, and worksite supervisor.



- x. Report to the worksite during designated hours, dress in accordance with worksite standards, and perform work within the scope of the profile and the parameters of the position description.
- g. Department of Defense (DoD) OWF Regional Coordinator (OWF RC): Not a member of your WTU staff, but a part of the process working directly with the TC and the Federal Agency. The OWF RC is responsible for matching capabilities and opportunities for Soldiers to place them in internships. OWF RC will support CBWTUs and Separate Companies by targeting internships with Federal Agencies in remote areas. As part of their job description, the OWF RC will:
  - i. Develop professional relationship with Federal Agency POCs and provide onboarding brief.
  - ii. Coordinate internship fairs at WTUs.
  - iii. Distribute *OWF Intern Request Forms* from Federal Agency to promote internship opportunities.
  - iv. Document and track Soldier placement and provide status to the TC.
  - v. Share the OWF Placement Form and monthly evaluation results with the TC.
  - vi. Communicate any worksite positive/negative concerns, unexplained absences, or change in Soldier status with the TC.
  - vii. Coordinate internship hand-off with gaining region OWF RC when a Soldier transfers.
- h. Veterans Affairs (VA) Coming Home to Work (CHTW) Non-Paid Work Experience (NPWE) Coordinator: Not a member of your WTU staff, but a part of the process working directly with the TC and the Federal Agency. As part of their job description, CHTW Coordinators determine VA Vocational Rehabilitation and Employment (VR&E) eligibility and entitlement and work with the Soldier to decide which employment track is most suitable. The goal is to assist eligible Soldiers to obtain and maintain suitable employment that will not aggravate their disabilities. The CHTW Coordinator will assist with internship placement as part of the VR&E program.

**Point of Contact:** If there are questions, concerns, or suggestions they may be directed to the Warrior Care and Transition (WCT) Career and Education Readiness Branch (CERB) at <a href="mailto:usarmy.pentagon.medcom-wct.mbx.career-education-readiness-br@mail.mil">usarmy.pentagon.medcom-wct.mbx.career-education-readiness-br@mail.mil</a>.



### Appendix A. Definitions.

Borrowed Military Manpower (BMM): BMM is the use of Soldiers borrowed from Modified Table of Organization and Equipment (MTOE) units to perform duties within a Tables of Distribution and Allowances (TDA) activity for which a Major Command (MACOM) approved manpower requirement exists, but for which no manpower space has been authorized; or where the manpower space has been authorized but the position is unfilled.

CER Eligible: Eligibility for Career and Education Readiness (CER) activity is based on two distinct evaluations made by the Command and the Medical Management (M2) team. The M2 evaluation must conclude that the Soldier is medically, emotionally and physically ready to participate in a CER activity while continuing medical treatment. The Nurse Case Manager (NCM), in collaboration with the interdisciplinary team (IDT), is responsible for coordinating the M2 evaluation of CER eligibility with all members of M2; the NCM is also responsible for documentation. The Command evaluation must conclude that the Soldier demonstrates the initiative and self-discipline required to participate in a CER activity. The Commander is responsible for the Command evaluation of CER eligibility and the Squad Leader (SL) is responsible for documentation.

CER Data Collection: Soldiers who are "participating in a CER activity". This number is not merely the sum of Soldiers who are engaged in Remain in the Army Work Activity (RIAWA), Operation Warfighter (OWF)/Coming Home to Work (CHTW), and Education/Training, since this would result in double counting individuals engaged in more than one activity. Ensure this number reflects an accurate count of Soldiers reported in any of the three basic activities: RIAWA, OWF/CHTW, or Education/Training. This number should NOT include a Soldier who has a completed résumé on file but who has not participated in any of the three basic activities.

Composite Risk Management (CRM): CRM is a decision-making process used to identify hazards and mitigate risks associated with all hazards that have the potential to injure or kill personnel, damage or destroy equipment, or otherwise impact mission effectiveness.

Department of Defense (DoD) Operation Warfighter (OWF) Internship: OWF internships are permitted at federal agencies, to include the Department of the Army, and may or may not be on the installation. These internships include positions that would normally be filled by federal civilian employees. OWF is typically aligned with the *Transition from the Army* track. Until explicit policy is issued by WCT, OWF internships are limited to federal agencies. Soldiers must not be permitted to participate in an internship, a non-paid work experience, a work-study program, or any other-named program, where they spend duty hours at <u>any</u> organization other than a federal agency.



Job Safety Analysis (JSA): A Job Safety Analysis (JSA) is a method that can be used to identify, analyze and record: 1) the steps involved in performing a specific job; 2) the existing or potential safety and health hazards associated with each step; and 3) the recommended action(s)/procedure(s) that will eliminate or reduce these hazards and the risk of a workplace injury or illness.

Medical Management (M2) Clearance: Must conclude the Soldier is medically, emotionally, and physically ready to participate in a CER activity or activities while continuing medical treatment. The Nurse Case Manager (NCM), in collaboration with the Interdisciplinary Team (IDT), is responsible for coordinating the medical management evaluation of CER eligibility with all members of medical management. The NCM is also responsible for documentation.

Command Clearance: Must conclude the Soldier demonstrates the initiative and self-discipline required to participate in a CER activity or activities. The Commander is responsible for the mission command evaluation of CER eligibility and the Squad Leader is responsible for documentation.

Reasonable Accommodation: A reasonable accommodation is any change in the work environment (or in the way things are usually done) that helps a person with a disability apply for a job, perform the duties of a job, or enjoy the benefits of employment.

Remain-in-the-Army Work Assignment (RIAWA): Previously called On-Post Work Assignment. RIAWA is a place of duty (in addition to the Soldier's medical routine) that is rank-appropriate and that provides a productive work therapy environment aligned with the Soldier's career track and long-term goals. To qualify as a RIAWA, the position must ordinarily be filled by a Soldier and not a civilian employee. If the position is normally filled by a civilian employee, it may be suitable for an OWF or CHTW internship. The name RIAWA was chosen to indicate alignment with the Remain in the Army track. Some examples of RIAWA include, but are not limited to:

- Dining Facility
- Human Resources
- Finance
- Clinics
- Army Warrior Training
- WTB/WTU/CBWTU Offices (S-3, S-1, etc.)
- National Guard Armories or US Army Reserve Centers
- MOS-specific training and MOS-reclassification training

*SMART Goals:* Specific, measurable, actionable, realistic, and time-bound goals provide the Soldier a roadmap that supports healing and transition.



Social Security Disability Insurance (SSDI): SSDI is a payroll tax-funded, federal insurance program of the United States government. It is managed by the Social Security Administration and is designed to provide income supplements to people who are physically restricted in their ability to be employed because of a notable disability, usually a physical disability. SSDI can be supplied on a temporary or permanent basis, usually directly correlated to whether the person's disability is temporary or permanent.

Social Security Administration (SSA) Case Manager: The SSA Case Manager efficiently and effectively manages the follow-up process of the SSDI application to ensure corresponding information/documentation to receive disability compensation approval.

Trial Work Period (TWP): The TWP allows an individual to test their ability to work for at least 9 months while receiving full SSDI benefits regardless of how high earnings might be as long as work activity is reported. The TWP starts when the individual begins working and performing "services".

Veterans Affairs (VA) Coming Home to Work (CHTW) Internship: A CHTW internship is similar to an OWF internship but is coordinated through the VA CHTW program rather than via DoD OWF. CHTW is typically aligned with the *Transition from the Army* track. The CHTW Internship is one element of the CHTW Program. But there are other elements in the CTHW program such as counseling. It is easy to misunderstand and mis-report a Soldier's participation in other elements of CHTW. The only activity that should be reported is active participation in a CHTW Non-Paid Work Experience (NPWE) which we call a CHTW Internship. Until explicit policy is issued by WCT, CHTW internships are limited to federal agencies. Soldiers must not be permitted to participate in an internship, a non-paid work experience, a work-study program, or any other-named program, where they spend duty hours at <u>any</u> organization other than a federal agency.



### Appendix B. References.

- 1. Army Regulation 570-4, "Manpower Management," 8 February 2006
- 2. Under Secretary of Defense Memorandum, subject: "Support of the DoD Operation Warfighter Program," 18 March 2010
- 3. WCT Comprehensive Transition Plan Policy and CTP-Guidance (CTP-G), 1 December 2011
- 4. WCT Internship SOP for TCs, SL/PSGs, OTs, and NCMs, 4 May 2012
- 5. DoDI 1300.25, "Guidance for the Education and Employment Initiative (E2I) and Operation WARFIGHTER (OWF)," 25 March 2013
- Under Secretary of Defense Directive Type Memorandum (DTM) 12-007, "Implementation of Mandatory Transition Assistance Program Participation for Eligible Service Members," 21 November 2012
- 7. WCTP Policy Memo 13-001, "Work Site Selection," 18 March 2013
- 8. WCT Transition/CER Program SOP, 29 May 2013



### **Appendix C. Best Practices.**

- Include CER participation rate as a Cadre NCOER/OER bullet
- TC provides professional development training sessions with Cadre
- Soldier and Veteran alumni speaking about their internship experiences at formations, or participating in small peer groups
- Treat internship as a real job if the Soldier does not have a medical appointment then the internship is the Soldier's place of duty
- Arrange site visits to agencies to pique Soldier interest
- Host internship fairs
- Request that Federal Agencies provide mentorship programs to Soldiers in internships



## Appendix D. Commander's Program Checklist.

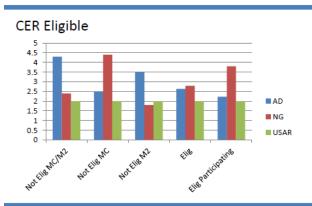
	Read and understand CTP-Guidance and WCT Policies
	Provide the TC with the internship program goals and objectives
	Separate Company WTUs and CBWTUs – designate a Transition Coordinator
	Implement internship program policies and procedures
	Ensure the CER eligibility process is implemented and followed
	Set expectations for Cadre based on roles and responsibilities
	Direct the TC to assess available internship opportunities
	Designate a Composite Risk Management (CRM) qualified individual to conduct job hazard analyses
	Direct and ensure the OTR to conduct worksite functional assessments
	Direct and ensure the SL call worksites once a week and visit worksites once a month, at a minimum
	Direct and ensure the SL de-conflicts each Soldier's weekly calendar
	Ensure Soldiers maintain medical appointments and internship work schedules
	Periodically visit each Soldiers' internship site
	Highlight internship successes
	Track internship participation as part of the Commander's weekly update
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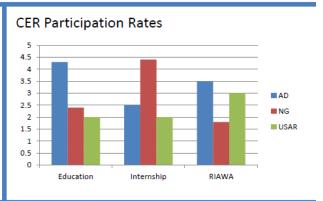


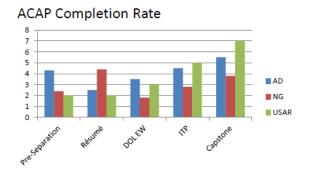
**Appendix E. Commander's Report Template.** The template below will provide the Commander a weekly status of Soldier CER eligibility, CER participation, and ACAP completion. This will allow the Commander to validate the participation rate of eligible Soldiers and remain informed of successes and challenges the TC may experience.

# TC Weekly Update

This is a template and should be tailored to Commander's priorities and metrics







## Successes and Challenges

- Bullet points
- To highlight successes/challenges
- Completed by TC



### Appendix F. CER Data Reporting to Regional Medical Command (RMC).

- A. CER data will be collected by RMCs on a monthly basis IAW WCTP yearly CER Data Collection tasker.
- B. CER data reports are due by 2300 (EST) of the 10th calendar day each month; if the 10th falls on a weekend/holiday, the report is due the next duty day.
- C. The reporting period is the calendar month.
- D. Report name. The naming convention is "XRMC MONTH CER Data Report\_Date Submitted"; for example:
  - ERMC OCT'12 CER Data Report\_2012-11-12
  - NRMC NOV'12 CER Data Report\_2012-12-10
- E. Email CER Data Collection Report to <u>usarmy.pentagon.medcom-wct.mbx.career-education-readiness-br@mail.mil.</u>
- F. A spreadsheet is provided for use by each RMC. The spreadsheet is locked to prevent changes other than data entry. Please use the spreadsheet without making any changes. For example, do not move the tabs, and do not create a new spreadsheet that would permit re-organizing or re-sequencing.
- G. Enter a single number in each cell. Do not leave a cell blank, as a blank cell is considered an error and indicates that no entry was made. If the correct number is zero, please enter 0. Please do not enter explanations or questions. Explanations and questions should be handled outside of this data collection spreadsheet, via email or phone call to the CER data collection POC at WCT G1 CERB.
- H. If errors in previously reported data are discovered, correct errors in subsequent monthly reports. Indicate corrections by using red text for corrected data entries.
- CER Data Collection training is provided periodically for transition coordinators and RMC CER POCs during monthly virtual training (via DCO and conference call) by WCT G1 CERB. Training is also available upon request from the WCT G1 CERB Data Collection POC; customized training can be created for individual units, or specific groups/types of units.



## Appendix G. CER Data Report Template to Regional Medical Command (RMC).

The template below is provided to the unit from the RMC. The report will provide the RMC and WCTP a monthly status of Soldier CER eligibility, CER participation, CER activity.

Eligible for CER Activity									
Region	WTU/CBWTU	Oct'12	Nov'12	Dec'12	Jan'13	Feb'13	Mar'13		
ERMC	Raw Data								
	Landstuhl								
PRMC	Raw Data								
	Schofield Barracks								
NRMC	Raw Data								
	Fort Belvoir								
	Fort Bragg								
	Fort Dix								
	Fort Drum								
	Fort Eustis								
	Fort Knox								
	Fort Meade								
	Walter Reed								
	West Point								
	CBWTU-IL								
	CBWTU-MA								
	CBWTU-VA								
	Raw Data Sub-								
NRMC	Total	0	0	0	0	0	0		
SRMC	Raw Data								
	Fort Gordon								
	Fort Hood								
	Fort Jackson								
	Fort Campbell								
	Fort Benning								
	Fort Sam Houston								
	Fort Polk								
	Fort Stewart								
	Fort Sill								
	CBWTU-AL								
	CBWTU-AR								
	CBWTU-FL								
	CBWTU-PR								



## Appendix H. Frequently Asked Questions (FAQs)

### Q1. Why are internships authorized only at Federal Agencies?

- A1. There is no single authoritative source of prohibition for a Soldier participating in internships at other than a federal agency. Army Command Judge Advocates cite two documents: (a) DoD 5500.07-R, Joint Ethics Regulation (Change 7) 17 Nov 11 and (b) DoDI 1000.17, Detail of DoD Personnel to Duty Outside DoD (Change 1) 5 Jan 12. The JER prohibits (1) DoD endorsement of non-federal entities and (2) interference with the employment of local civilians. DoDI 1000.17 prohibits (3) details outside of DoD when it would be the Soldier's final tour before retirement or separation and (4) provides detailed procedures to request DoD approval, and the time required for processing routinely exceeds the duration of most OWF internships. Thus, the JER and DoDI 1000.17 create insurmountable policy obstacles to approval of OWF internships outside of DoD. The OWF Charter which was approved by DUSD (MC&FP) in July 2009 creatively worked around these restrictions for the special circumstances of WII Soldiers pursuing an internship (detail outside of DoD) within a federal agency, but there was never any creative policy solution to permit an internship/detail outside of a federal agency.
- Q2. I'm a unit Commander and want to "do the right thing" for my WII Soldiers. I know that authorizing Soldiers to participate in a non-federal internship is best for their long-term success. I'm paid to make decisions, cut through red tape and do the right thing. I'm considering just doing that on my own authority. What are the risks for my Soldiers and me?
- A2. A Commander who authorizes a Soldier to participate in an internship outside of a Federal Agency places the Soldier at considerable legal/medical risk including possibility of an adverse Line of Duty (LOD) determination in event of serious injury. The Commander also puts the Army at risk should the Soldier intentionally/unintentionally injure another co-worker at a non-Federal Agency. This also puts the Commander at considerable legal and career risk.
- Q3. I remember hearing at the 2011 Annual Conference that NDAA'12 was supposed to include authorization for non-federal internships. When will we be able to permit non-federal internships?
- A3. NDAA'12 authorized the service secretaries to "...carry out one or more programs to provide eligible members of the armed forces under the jurisdiction of the Secretary with job training and employment skills training, including apprenticeship programs, to help prepare such members for employment in the civilian sector." This language is very vague and is subject to wide ranging interpretations. Before WCT is able to implement the authority provided in NDAA'12, DoD and SECARMY must first create implementing guidance. DoD published Directive-type Memorandum (DTM) 12-007 "Implementation of Mandatory Transition Assistance Program Participation for Eligible Service Members", 21 Nov 2012, which (as the



title suggests) was intended to make TAP mandatory for service members and was never intended to address the issue of non-federal internships. However, in its 2011-2012 Annual Report published on 31 Aug 2012, the Congressionally Chartered Recovering Warrior Task Force (RWTF) criticized DoD for its failure to publish guidance on administrative and clinical care of recovering warriors. Specifically, the RWTF said "DoD should publish timely guidance to standardize care to RWs without delay, including the DoDI 1300.jj, Guidance for the Education & Employment Initiative (E2I) and Operation WARFIGHTER (OWF)." This instruction was published as DoDI 1300.25 on 25 Mar 2013. However, there is no reference to non-federal internships. Thus, DoD and Army implementing regulations still need to be written before WCT is able to authorize the use of non-federal internships.

## Q4. How long should a Soldier be available for internship participation?

A4. There is no standard length of internship participation. A Soldier should plan to dedicate a minimum of four weeks to the position as a courtesy to the Federal Agency host. Internships range in duration and hours per week, however they typically last a few months with an average of 15-20 hours per week. Ultimately, the length of time and frequency depends upon the Soldier's medical appointments and the Federal Agencies requested participation timeline.

# Q5. Does the Soldier have to participate in an internship if it is not aligned with their CTP track and career goal(s)?

A5. No. The goal of the internship program is to positively impact the recuperation process and provides an opportunity to augment their employment readiness and prepare them for the future. To the extent possible, internships should align with the Soldier's CTP track and career goal(s). If the internship is not aligned with the Soldier's CTP track and career goal(s) the duties would simply be for accountability only and should not be included as data in the CER report.

### Q6. How does the Soldier learn what job options are available?

A6. If the Soldier is interested in permanent employment with the agency they are interning with the Soldier should discuss the option with their worksite supervisor. He or she will have the most up to date information regarding the position and will be able to guide the Soldier through the process or receive assistance from the agency's Human Resources Division. If the Soldier is interested in federal employment with a different agency they should search USAJobs and apply through the website.

#### Q7. How may a Soldier benefit from participating in an internship?

A7. An unexpected injury or illness may change the Soldier's life plans and leave them feeling lost. The Soldier is used to the Army telling them, "this is your job and this is what you are going to do," and suddenly they are faced with, "what do you want to do? What can you do?" An

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internship may help the Soldier see past their injuries to new possibilities within a new military or civilian career.

# Q8. What if the Federal Agency the Soldier is interested in interning with is not on the list of agencies provided by the Transition Coordinator?

A8. If the Soldier wants to intern with a specific Federal Agency that is not included on the list provided by the Transition Coordinator (TC), the Soldiers should inform the TC of their interest. The TC will then discuss the request with the Operation Warfighter (OWF) Regional Coordinator (RC) who in-turn will approach the agency about the program.

### Q9. What is required of the Soldier prior to internship participation?

A9. The Soldier must be determined medically ready to participate, which depends on two factors:

- A medical management (M2) clearance that concludes the Soldier is medically, physically, and emotionally ready to participate in an internship while continuing medical treatment.
- 2) A Command clearance that concludes the Soldier demonstrates the initiative and selfdiscipline required to participate in an internship.

The Soldier must also have a federal résumé and a completed and signed Operation Warfighter Approval for Participation form.

### Q10. Will WCT fund TDY for internship training?

A10. No. The individual WTU may fund the internship training if funds are available and approved by the local Command. The internship agency may also fund the training through Invitational Travel Orders (ITO). However, any funded TDY trip outside of the 50 mile radius must request an exception to policy through the WCT. Any TDY trip must also not interfere with the Soldier's medical care, board process, or other commitments they must complete while in the WTU.

# Q11. Are Soldiers required to wear Army Combat Uniform (ACUs), Army Service Uniform (ASUs), or PTs to the internship site?

A11. No. The Soldier should be dressed in attire that all other employees of the agency wear on a daily basis. The worksite supervisor will communicate the proper work attire to the Command and the Soldier.



### Q12. May a Commander remove a Soldier from an internship site for non-compliance?

A12. Yes. The Soldier is required to maintain discipline and professional bearing while in the WTU. If the Soldier is removed for non-compliance, the SL will counsel the Soldier on improving performance and implement corrective actions. The Command must communicate openly with the internship worksite supervisor in order to maintain a collaborative relationship that will allow continued Soldier placement at the agency.

## Q13. May the Soldier receive compensation for his internship duties?

A13. No. The Soldier may not receive compensation or benefits from the agency as they will continue to be paid by the Army until discharge or return to duty.

## Q14. Who do I notify if there are performance issues with our OWF RC or VA CHTW Coordinator?

A14. Notify your Regional Warrior Transition Office (WTO). They will compile trends and share issues with the WCT.

# Q15. Does the WCTP provide transportation or reimburse transportation costs for internship participation?

A15. No. You can coordinate with the installation and utilize available installation transportation assets. The Army Mass Transportation Benefit Program (AMTBP) is also available at any Army installation. For more information, email the Department of the Army Program Manager at: <a href="mailto:usarmy.pentagon.hqda-asa-fm.list.mtbp-program-manager2">usarmy.pentagon.hqda-asa-fm.list.mtbp-program-manager2</a> @mail.mil

## Q16. What should the unit do if the Agency is using the Soldier for menial labor (i.e. answering phones) and not in accordance with the position description?

A16. The unit should notify the OWF RC or VA CHTW Coordinator and communicate the issue. The OWF RC or VA CHTW Coordinator should address the issue with the Federal Agency. If the Agency does not correct the issue, then it is permissible to remove the Soldier from the internship location and attempt to find a more productive internship opportunity.