



July 15, 2015

Workforce Innovation and Opportunity Act Policy Letter No. 15-10

To: Workforce Innovation and Opportunity Act (WIOA) Local Workforce Development Boards (WDBs), Fiscal Agents, and OhioMeansJobs Center Operators

From: Cynthia C. Dungey, Director

Subject: Youth Program Services

I. Purpose

The purpose of this policy is to communicate guidance and information regarding the provision of services for the Workforce Innovation and Opportunity Act (WIOA) youth program.

II. Effective Date

July 1, 2015

III. Background

The goal of the WIOA youth program is to assist youth in making a successful transition to employment and further education. However, the WIOA recognizes that simply providing training is not enough to enter a specific occupation. A wide range of activities and services must be available to assist youth, especially those who are disconnected and out-of-school, in making a successful transition to adulthood. The WIOA youth program is designed to provide services, employment, and training opportunities to those who can benefit from, and who are in need of such services. Funds allocated to the local workforce development areas must be used to carry out a series of services to eligible youth.

IV. Definitions

Adult mentoring: one-to-one supportive relationship between an adult and a youth that is based on trust.

Alternative school: schools which offer specialized, structured curriculum inside or outside of the public school system which may provide work/study and/or academic intervention for students with behavior problems,

physical/mental disabilities, who are at-risk of dropping out, who are institutionalized or adjudicated youth and/or youth who are in the legal custody of the Ohio Department of Youth Services and are residing in an institution. An alternative school must be approved by the local education agency.

Career pathway: a combination of rigorous and high-quality education, training, and other services that:

- Aligns with the skill needs of industries in the economy of the State or regional economy involved;
- Prepares an individual to be successful in any of the full range of secondary and postsecondary education options, including apprenticeships;
- Includes counseling to support an individual in achieving the individual's education and career goals;
- Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the education and career advancement of the individual to the extent practicable;
- Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
- Helps an individual enter or advance within a specific occupation or occupational cluster.

Comprehensive guidance and counseling: a process of helping youth make and implement informed education, occupation, and life choices.

Enrollment: the collection of information to support eligibility determination and participation in any one of the 14 program elements.

Entrepreneurial skills training: training which provides the basics of starting and operating a small business.

Follow-up services: activities after completion of participation to monitor youths' success during their transition to employment and further education and to provide assistance as needed for a successful transition.

In-demand occupation: an occupation that currently has or is projected to have a number of positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector so as to have a significant impact on the State, regional, or local economy as determined by the State and local boards.

In-demand industry sector: an industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the State, regional, and local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors as determined by the State and local boards.

Leadership development opportunities: opportunities that encourage responsibility, confidence, employability, self-determination and other positive social behaviors.

Occupational skill training: an organized program of study that provides specific vocational skills that lead to proficiency in performing actual task and technical functions required by certain occupational fields at entry, intermediate, or advance levels and results in attainment of a certificate.

On-the-job training (OJT): training by an employer that is provided to a paid participant while engaged in productive work in a job that:

- Provides knowledge or skills essential to the full and adequate performance of the job;
- Is made available through a program that provides reimbursement to the employer of a percentage of the wage rate of the participant; and
- Is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, prior work experience of the participant, and the service strategy for the participant.

Participation: the point at which the individual has been determined eligible for youth program services, has received an assessment, and has received or is receiving at least one program element and is the point at which the individual is to be included in calculations for performance measures.

Pay-for-performance contracts: a procurement strategy that uses pay-for performance contracts which specifies a fixed amount that will be paid to an eligible service provider based on achievement of specified levels of performance on the primary indicators of performance for target populations as identified by the local board within a defined timetable, and which may provide for bonus incentives to such service provider to expand capacity.

Postsecondary school: any schooling that follows graduation from high school or completion of high school equivalency, including community colleges, four-year colleges and universities, and technical and trade schools.

Pre-apprenticeship programs: programs or set of strategies designed to prepare individuals to enter and succeed in Registered Apprenticeship programs and have a documented partnership with at least one, if not more, Registered Apprenticeship programs.

Recognized postsecondary credential: a credential consisting of an industry-recognized certificate or certification, certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree.

Secondary school: a nonprofit institutional day or residential school, including a public secondary charter school, that provides secondary education as determined under State law, except that the term does not include any education beyond grade 12.

Supportive services: services such as transportation, child care, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under the WIOA.

Work experience: a planned, structured learning experience that takes place in a workplace for a limited period of time. Work experiences may be paid or unpaid.

V. Requirements

The youth program is designed to provide the following:

- Activities leading to the attainment of a secondary diploma or its recognized equivalent, or a recognized post-secondary credential;
- Preparation for postsecondary educational and training opportunities;
- Strong linkages between academic instructions and occupation education that lead to the attainment of recognized postsecondary credentials;
- Preparation for unsubsidized employment opportunities, as appropriate; and
- Effective connections to employers, including small employers, in in-demand industry sectors and occupations of the local and regional labor markets.

The local workforce development board (WDB) shall ensure that parents, participants, and other members of the community with experience relating to programs for youth are involved in the design and implementation of the youth program, which includes the provision of the following to each participant:

- Information on the full array of applicable or appropriate services which are available through the local board or other eligible providers or OhioMeansJobs center partners.
- Referrals to appropriate training and educational programs that have the capacity to serve the participant either on a sequential or concurrent basis.

Local WDBs must provide eligible youth with information about the full array of applicable or appropriate services available through the local board or other eligible providers, or OhioMeansJobs partners. It also provides that local boards must refer eligible youth to appropriate services that have the capacity to serve them on a concurrent or sequential basis. Additionally, eligible providers must refer youth who either do not meet the enrollment requirements of a particular program or who cannot be served by that program for further assessment, as necessary, or to appropriate programs to meet the skills and training needs of the participant.

Per section 129 (c)(8) of the WIOA, the local WDB shall make opportunities available for individuals who have successfully participated in programs carried out under this section to volunteer assistance to participants in the form of mentoring, tutoring, and other activities.

A. Procurement of Providers of Youth Program Activities

Per section 123 of the WIOA, the local WDB shall award grants or contracts on a competitive basis to providers of youth workforce investment activities. If an insufficient number of eligible providers of youth workforce investment activities in the local area are available, the WDB may award grants or contracts on a sole-source basis.

Youth providers should be selected based upon their ability to provide youth program activities, especially those that may be identified in the State Plan, as well as the ability to meet performance accountability measures. The WDB shall conduct oversight of the selected youth providers.

The requirement that eligible providers of youth services be selected by awarding a grant or contract on a competitive basis does not apply to the design framework services when these services are more appropriately provided by WIOA staff.

The local WDB may implement a pay-for-performance contract strategy for program elements for which the local board may reserve and not use more than 10% of the total funds.

B. Pre-enrollment Activities

Clearly, there are an array of activities that must occur before enrollment into the WIOA youth program. These "pre-enrollment" activities include recruitment, intake, initial assessment including an initial determination of barriers and appropriateness for the program, referrals, and the determination of WIOA youth eligibility. None of these activities require enrollment in the local youth program. Pre-enrollment activities are considered to be those activities leading up to the decision to register a participant for services in the local WIOA youth program.

In addition to the "pre-enrollment" activities listed above, informational and self-help activities provided through the OhioMeansJobs centers or through OhioMeansJobs.com are not considered registered services in the WIOA youth program.

C. Design Framework Services

Framework services include the objective assessment, individual service strategy (ISS), general case management, and follow-up services that lead toward successful outcomes for WIOA youth participants.

Framework services are completed prior to participation in the WIOA youth program. As a result, these services may be completed by local WIOA staff. WIOA staff providing framework services may be in the best position to provide such services and can ensure the continuity of WIOA youth programming as youth service providers change.

Both the objective assessment and the ISS are integral to the youth program, and are intended to be on-going throughout program participation. These two activities serve as the basis for which decisions are made that lead to the receipt of the array of the 14 program elements.

When completing either the objective assessment or the ISS, a new assessment of the youth is not required if the youth provider determines it is appropriate to use a recent assessment (within 6 months) of the participant conducted pursuant to another education or training program. This may include evaluations completed by a secondary school, Vocational Rehabilitation, Adult Basic and Literacy Education (ABLE), or other education or training providers.

Objective Assessment

Per section 129 (c)(1)(A) of the WIOA, local areas are required to provide an objective assessment of the academic levels, skill levels, and service needs of each youth participant. The purpose of the objective assessment is to identify the appropriate services, including the identification of career pathways, for each youth participant. The objective assessment shall include a review of all the following information:

- Basic skills;
- Occupational skills;
- Prior work experience;
- Employability;
- Interests;
- Aptitudes (including interests and aptitudes for nontraditional jobs);
- Supportive service needs; and
- Developmental needs.

All the information captured as part of the objective assessment must be contained within the participant's case file.

Individual Service Strategies (ISS)

Per section 129 (c)(1)(B) of the WIOA, local areas are required to develop service strategies for each participant that are directly linked to one or more performance measure and include the identification of a career pathway that includes education and employment goals, appropriate achievement objectives, and appropriate services for the participant. It is a personalized plan for each WIOA youth participant. As such, the ISS should be completed with the youth participant and periodically reviewed with the participant.

D. Program Elements

Per section 129 (c)(2) of the WIOA, in order to support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for participants, the local area youth program shall make each of the following services available to youth participants:

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies.

These strategies must lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate or attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.

2. Alternative secondary school services or dropout recovery services.
3. Paid and unpaid work experiences.

Work experience helps youth understand proper workplace behavior and what is necessary in order to attain and retain employment. They are designed to enable youth to gain exposure to the working world and its requirements. Work experiences can serve as a stepping stone to unsubsidized employment and is an important step in the process of developing a career pathway for youth. This is particularly important for youth with disabilities.

A work experience may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employer/employee relationship, as defined by the Fair Labor Standards Act or applicable State law, exists. Work experiences provide the youth participant with opportunities for career exploration and skill development.

Work experiences must include academic and occupational education. The types of work experiences include the following categories:

- Summer employment opportunities and other employment opportunities available throughout the year;
- Pre-apprenticeship programs;
- Internships and job shadowing; and
- On-the-job training (OJT) opportunities.

Not less than 20% of the youth program funds shall be used to provide in-school and out-of-school youth with work experience activities. WIOA youth programs must track program funds spent on paid and unpaid work experiences, including wages and staff costs for the development and management of work experiences, and report such expenditures as part of the local WIOA youth financial reporting. The percentage of funds spent of work experience is calculated based on the total local area youth funds expended for work experience rather than calculated separately for in-school and out-of-school. Local administrative costs are not subject to the 20% minimum work experience expenditure requirement.

Guidance and requirements pertaining to paid and unpaid work experiences for youth participants are outlined in Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) No. 15-13, Work Experience for Youth.

4. Occupational skills training.

Occupational skills training shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with state and local in-demand industry sectors or occupations. Such training must:

- Be outcome-oriented and focused on occupational goals specified in the ISS;
- Be of sufficient duration to impart the skills need to meet the occupational goal; and
- Result in the attainment of a recognized post-secondary credential.

An individual training account (ITA) is one of the primary methods through which training is financed and provided. ITAs are established on behalf of a WIOA participant to purchase a program of training services from eligible training providers. The use of an ITA is allowed for out-of-school youth, ages 18 to 24, using WIOA youth funds when appropriate.

As part of the determination of the appropriateness for occupational skills training, a review of "family self-sufficiency" must be completed

for those youth participants whose eligibility was not based upon being a low income individual. In these cases, WIOA youth-funded ITAs may only be approved for those who have been determined to be below a locally defined standard of "family self-sufficiency." This requirement is intended to ensure that participants whose eligibility was not based upon being a low income individual and who are seeking youth-funded ITAs are those whose families lack or have limited ability to pay for training and supportive services needed in order to obtain or retain employment.

Guidance and requirements pertaining to the use of ITAs are outlined in WIOAPL No. 15-11, Use of Individual Training Accounts (ITA).

5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.

This element requires integrated education and training to occur concurrently and contextually with workforce preparation activities and training for a specific occupation or occupational cluster for the purpose of educational and career advancement. This program element describes how workforce preparation activities, basic academic skills, and hands-on occupational skills training are to be taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway. Youth participants will not be required to master basic skills before moving on to learning career-specific technical skills.

6. Leadership development opportunities.

Leadership development opportunities include:

- Exposure to post-secondary education opportunities;
- Community and services learning projects;
- Peer-centered activities, including peer mentoring and tutoring;
- Organizational and team work training, including team leadership training;
- Training in decision-making, including determining priorities and problem solving;
- Citizenship training, including life skills training such as parenting and work behavior training;
- Civic engagement activities which promote the quality of life in a community; and
- Other leadership activities that place youth in a leadership role such as serving on youth leadership committees.

Positive social behaviors are outcomes of leadership opportunities. Benefits of leadership development may include:

- Positive attitudinal development;
- Self-esteem building;
- Openness to work with individuals from diverse backgrounds;
- Maintaining healthy lifestyles;
- Maintaining positive social relationships with responsible adults and peers, and contributing to the well-being of one's community;
- Maintaining a commitment to learning and academic success;
- Avoiding delinquency;
- Postponing parenting and responsible parenting;
- Positive job attitudes and work skills; or
- Keeping informed in community affairs.

The purpose of leadership development activities is to develop skills and attitudes that are important in all areas of life. It provides encouragement and support to youth, developing skills, and instilling confidence as they transition to adulthood.

7. Supportive services.

Supportive services for youth may include, but are not limited to:

- Linkages to community services;
- Assistance with transportation;
- Assistance with child care and dependent care;
- Assistance with housing;
- Needs-related payments;
- Assistance with educational testing;
- Reasonable accommodations for youth with disabilities;
- Referrals to health care; and
- Assistance with uniforms or other appropriate work attire and work-related tool costs

Supportive services may be provided to youth both during participation and after program exit.

8. Adult mentoring for the period of participation and subsequent period, for a total of not less than 12 months.

Adult mentoring for youth must:

- Last at least 12 months and may take place both during the program and following exit from the program;
- Be a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee;

- Include a mentor who is an adult other than the assigned youth case manager; and
- While group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the local youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis.

The purpose of adult mentoring is to build positive, supportive relationships between youth and adults and to provide positive adult role models for youth. High-quality adult mentoring programs include an adult role model who builds a working relationship with a youth and who fosters the development of positive life skills in youth.

Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company.

9. Follow-up services.

Follow-up services are critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or post-secondary education and training.

Follow-up services may include:

- Leadership development and supportive service activities;
- Regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise;
- Assistance in securing better paying jobs, career pathway development , and further education or training;
- Work-related peer support groups;
- Adult mentoring; and/or
- Services necessary to ensure the success of youth participants in employment and/or post-secondary education

All youth participants must receive some form of follow-up services for a minimum duration of 12 months. Follow-up services may be provided beyond the 12 months at the local board's discretion. The types of services provided and the duration of services must be determined based on the needs of the youth and therefore, the type and intensity of follow-up services may differ for each participant. However, follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome.

10. Comprehensive guidance and counseling.

Comprehensive guidance and counseling provides individualized counseling to participants. This includes career and academic counseling, drug and alcohol counseling, mental health counseling, and referral to partner programs.

The purpose of comprehensive guidance and counseling is to promote growth in each youth's educational, personal, social, and employability skills. Comprehensive guidance and counseling programs impart through counselor-directed learning opportunities that help youth achieve the success through academic, career, personal, and social development.

When referring participants to necessary counseling that cannot be provided by the youth program or its service providers, the local youth program must coordinate, including obtaining releases of information to obtain information regarding appropriateness of WIOA services, with the organization it refers to in order to ensure continuity of service.

11. Financial literacy education.

Financial literacy includes activities which:

- Support the ability of youth participants to create household budgets, initiate savings plans, and make informed financial decisions about education, retirement, home ownership, wealth building, or other savings goals;
- Support participants in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards;
- Teach participants about the significance of credit reports and credit scores; what their rights are regarding their credit and financial information; how to determine the accuracy of a credit report and how to correct inaccuracies; and how to improve or maintain good credit;
- Support a participant's ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed decisions;
- Educate participants about identity theft, ways to protect themselves from identity theft, and how to resolve cases of identity theft and in other ways under their rights and protection related to personal identity and financial data; and
- Support activities that address the particular financial literacy needs of non-English speakers, including providing the support through the development and distribution of multilingual financial literacy and education materials.

- Provide financial education that is age appropriate, timely, and provides opportunities to put lessons into practice, such as by access to safe and affordable financial products that enable money management and savings; and
- Implement other approaches to help participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high quality, age-appropriate, and relevant strategies and channels, including where possible, timely and customized information, guidance, tools, and instructions.

12. Entrepreneurial skills training.

Entrepreneurial skills training must develop skills associated with entrepreneurship. Such skills include, but are not limited to the ability to:

- Take initiative;
- Creatively seek out and identify business opportunities;
- Develop budgets and forecast resource needs;
- Understand various options for acquiring capital and the trade-offs associated with each option; and
- Communicate effectively and market oneself and one's ideas.

Approaches to teaching youth entrepreneurial skills include, but are not limited to, the following:

- Entrepreneurship education that provides an introduction to the values and basics of starting and running a business;
- Enterprise development which provides supports and services that incubate and help youth develop their own business; and
- Experiential programs that provide youth with experience in the day-to-day operation of a business.

13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services.

14. Activities that help youth prepare for and transition to postsecondary education and training.

Local areas must make all these program elements available to youth participants. This does not mean, however, that every youth participant must receive services from all program elements. Local areas have the discretion to determine what specific program elements will be provided to a youth participant, based on each participant's objective assessment and ISS.

Although the fourteen program elements must be provided and/or made available to WIOA eligible youth participants in each local area, they are not the sole array of services that made up the local youth programs.

Local areas are not required to use WIOA youth funds for each of the program elements. Local programs may leverage partner resources to provide some of the readily available program elements. However, the local area must ensure that if a program element is not funded by the WIOA, the local program has an agreement in place with the partner organization to ensure that the program element will be offered. The local board must ensure that the program element is closely connected and coordinated with the WIOA youth program.

VI. Reporting Requirements

There is no self-service concept for the WIOA youth program and every individual receiving services under the WIOA must meet eligibility criteria and formally enroll in the program.

Program participation begins when the youth is determined eligible and receives an assessment and a program element. Therefore, at the point of participation, a youth participant will be enrolled in the youth program and reported in the Ohio Workforce Case Management System (OWCMS). All youth participants will be counted in the WIOA youth program performance measure calculations.

VII. Monitoring

At the local level, the local area must conduct oversight of the implementation of the WIOA youth program to ensure that participants enrolled in the program have an objective assessment and ISS and that identified services have been provided.

Through the state's monitoring system, program monitors will review the local area's implementation of the WIOA youth program, including a participant file review, during the annual onsite monitoring review for compliance with federal and state laws and regulations. Any issues will be handled through the state's monitoring resolution process.

VIII. Technical Assistance

For additional information, you may send your questions to the Office of Workforce Development: OWDPOLICY@jfs.ohio.gov.

For technical assistance, you may send your request to the Office of Workforce Development: WIAQNA@jfs.ohio.gov.

IX. References

Workforce Innovation and Opportunity Act, Pub. L. 113-128.

20 C.F.R. 603 et seq.

29 U.S.C. 3101 et seq.

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-13, Work Experience for Youth, (July 1, 2015).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-11, Use of Individual Training Accounts (ITA), (July 1, 2015).

Rescission

ODJFS, Workforce Investment Act Transmittal Letter No. 33, Youth Services and Program Participation, (July 3, 2007).