

WIOA YOUTH PROGRAM REQUIREMENTS POLICY AND GUIDANCE

EXECUTIVE SUMMARY

This policy provides guidance and establishes the procedures regarding the Workforce Innovation and Opportunity Act (WIOA) youth program, including out-of-school youth and 20 percent work experience minimum expenditure requirements.

REFERENCES

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- WIOA (Public Law 113-128).
 - Title 2 Code of Federal Regulations (CFR) Part 200: "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" (Uniform Guidance).
 - Title 2 CFR Part 2900: "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" (Department of Labor [DOL] Exceptions).
 - Title 20 CFR Part 681: "Youth Activities under Title I of the WIOA."
 - Title 20 United States Code (U.S.C.) Section 1401: "Definitions."

BACKGROUND

The Monterey County Workforce Development Board (MCWDB) is charged with overseeing the allocation of WIOA funds and the WIOA funded program operations of the America's Job Center of California (AJCC) / One-Stop delivery system in Monterey County to provide services for youth needing eligibility, assessment, employment training resources, supportive services, case management, and follow-up services and to maintain appropriate documentation of the eligible populations served with WIOA funds

PROCEDURAL GUIDANCE

Out-of-School Youth Eligibility Criteria:

To receive services as an out-of-school youth, an individual must meet the following eligibility criteria:

- Not attending any secondary or post-secondary school (not including Title II Adult Education, Youth Build, Job Corps, or charter schools with federal and state workforce partnerships);

The Monterey County Workforce Development Board is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.

- Age 16-24 years old; and
- Meets one or more of the following barriers:
 - A school dropout;
 - A youth who is within the age of compulsory school attendance but has not attended school for at least the most recent complete school year calendar quarter. (Note that, “school year quarter” is defined by the local school district calendar);
 - A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English language learner;
 - An individual who is subject to the juvenile or adult justice system;
 - A homeless individual, a runaway, an individual who is in foster care or has aged out of the foster care system, a child eligible for assistance under Section 477 of the Social Security Act, or an individual who is in an out-of-home placement;
 - An individual who is pregnant or parenting;
 - An individual with a disability; or
 - A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

Serious Barriers to Employment:

For purposes of program eligibility, MCWDB’s definition of “youth who face serious barriers to employment” is defined as an individual who requires additional assistance or has serious barriers to employment to complete an educational program or secure and hold employment or is one who in addition to meeting the income and age eligibility criteria, also meets one or more of the following barriers listed below:

- Has repeated at least one secondary grade level or are one year over age for grade;
- Are emancipated youth;
- Has aged out of foster care;
- Resides in a non-traditional family setting (i.e., single parent, lives with guardian, latchkey, domestic partners, etc.);
- Has been referred to or are being treated by an agency for a substance abuse related problem;
- Has experienced recent traumatic events, are victims of abuse, or reside in an abusive environment as documented by a school official or other qualified professional;
- Has serious emotional, medical or psychological problems as documented by a qualified professional;
- Parents have a history of chronic unemployment, including living in a family on long-term public assistance;
- Member of a seasonal farm worker family;
- Resides in a High Intensity Gang Activity Area (HIGAA), according to the Department of Justice (DOJ) and as designated by the State of California;
- Child of incarcerated parents;
- Court involved youth or at-risk of involvement;

- Has never held a job;
- Has been fired from a job within the 12 months prior to program application; or
- Has never held a full-time job (30+ hours per week) for more than 3 consecutive months.

NOTE: A youth participant's eligibility is determined at intake; therefore, the youth remains eligible for youth services until exited. For example, an individual who is an out-of-school youth at time of enrollment and is subsequently placed in a GED program at an adult school, or any school, is still considered an out-of-school youth. Additionally, an individual who is an out-of-school youth and between the ages of 16-24 at the time of enrollment, and is now beyond the age of 24, is still considered an out-of-school youth until exited.

Fourteen (14) Youth Program Elements:

The service provider staff will determine which of the following services a youth participant receives based on the participant's objective assessment and Individual Service Strategy (ISS) described below.

1. Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized post-secondary credential.
2. Alternative secondary school services, or dropout recovery services, as appropriate.
3. Paid work experiences that have academic and occupational education as a component of the work experience, which may include the following types of work experiences:
 - a. Summer employment opportunities and other employment opportunities available throughout the school year;
 - b. Pre-apprenticeship programs;
 - c. Internships and job shadowing;
 - d. On-the-job training opportunities; and
 - e. Placement in MCWDB Sectors.
4. Occupational skill training, which includes priority consideration for training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors as identified by the Monterey County Workforce Development Board (MCWDB).
5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.
6. Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors.
7. Supportive services.
8. Adult mentoring for duration of at least 12 months that may occur both during and after program participation.
9. Follow-up services for not less than 12 months after the completion of participation.
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth.
11. Financial literacy education such as budgeting.
12. Entrepreneurial skills training to expose students to the skills and knowledge necessary to support self-employment, small business ownership, and entrepreneurship.

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 post-secondary education and training.

WIOA Youth Program Design:

Outreach, Recruitment, Orientation, Intake and Enrollment:

- Sufficient outreach will be conducted to target and recruit youth within the service delivery area(s) that meet the eligibility requirements for WIOA out-of-school youth.
- Service provider staff shall conduct an intake process with youth that will involve prescreening for eligibility determination and providing an orientation of youth program services.
- If service provider staff is contacted by in-school youth who cannot be served under this agreement, the staff will be expected to make appropriate referrals to other community partners who provide services to in-school youth or refer youth to self-help basic career services at the AJCC.
- Staff shall comply with the out-of-school youth Eligibility Criteria to enroll participants in the program.

Initial Assessment:

- Service provider staff assess each applicant's initial skill level using the Comprehensive Adult Student Assessment System (CASAS) appraisal test to determine "basic skills deficiency" or grade-equivalent skill levels in language and mathematics to place youth at appropriate levels of instruction.
- Service provider staff will ensure all testing is proctored to avoid cheating and all testing instruments are used. All tests will be discussed with the youth by service provider staff qualified to interpret the results. The discussion will include the scores and the impact of test results.
- Following initial assessment, service provider staff will select and certify participants for WIOA eligibility and enrollment to receive services at the AJCC or other designated service delivery area.
- Service provider staff shall collect all documentation and enter all enrolled participants into the State CalJOBS system and place a hard copy of the CalJOBS system documentation in the participant file or upload the documentation into the youth's virtual case file in the State CalJOBS system.

Basic Skills Remediation:

- Staff shall provide literacy and numeracy remediation to basic skills deficient participants, based on the initial CASAS test, assessment results, and a participant's Individual Service Strategy, with the objective for the youth to gain at least one education functioning level (equivalent to Adult Basic Education "ABE" level) as measured by the CASAS.

WorkKeys Assessment:

- Participants interested in pursuing occupational skills training are required to complete the following WorkKeys® assessments: Locating Information, Reading for Information and Applied Mathematics.
- If participant scores less than a level 3 on any of the WorkKeys tests, staff will give the participant access to the ACT Career Ready 101 online remediation training tool to upgrade their skills to qualify for a referral to training.
- Those who master these assessments by scoring a level 3 or higher on all three tests will be eligible to receive a National Career Readiness Certificate (NCRC) provided through the Monterey County Business Council (MCBC).

Individual Service Strategy (ISS):

- Staff shall provide a comprehensive assessment for all participants interested in pursuing education, training and employment.
- Using the information gathered during the comprehensive assessment phase, staff will develop a mutually agreeable Individual Service Strategy (ISS) with youth participants.
- Staff will ensure that youth participants are screened for basic skills, complete a pre-application and/or equivalent, and ensure that adequate information about the need for training, as specified in the ISS, is on record.
- The ISS will be discussed with the youth by service provider staff qualified to interpret the ISS strategy and goals. The service provider will enter the youth participant's ISS into the State CalJOBS system.

The ISS and assessment documents on record may include the following information:

- The needs identified in the assessments;
- Clear, measurable, achievable goals based upon the educational and job/career attainment goals of the youth;
- The services that will be provided to the youth;
- A plan for intervention services that is mutually supported and agreed upon in writing, bearing the signature of both the youth and the Service provider case manager; and
- The obligations of the youth in terms of program participation, behavior, etc.

WorkKeys Work Readiness Training:

- Staff shall provide or coordinate with other agencies to conduct short-term work readiness training to youth participants, if deemed appropriate for the participant.
- Short-term workshops may include, but are not limited to: soft skills, such as resume writing and interview techniques; computer literacy; financial literacy; and National Retail Federation and ServSafe Certifications.

Work Experience (WEX):

The WIOA places a priority on providing youth with occupational learning opportunities through work experience. Work experience provides in-school and out-of-school youth an invaluable opportunity to develop workplace skills. Work experience activities will be provided as a priority service, including but not limited to summer jobs, year-round employment, pre-apprenticeships, on-the-job training, internships, and job shadowing, in order to help youth participants obtain gainful work experience.

- **Work Experience 20 Percent Expenditure Requirement:**
Local area youth service providers must spend at least 20 percent of their WIOA youth formula funds on work experience. The work experience expenditure rate is calculated after subtracting funds spent on administrative costs. Additionally, the expenditure rate is not applied separately for in-school youth and out-of-school youth.
- **Work Experience Activities:**
Paid and unpaid work experiences must include academic and occupational education and may include the following types of work experiences:
 - Summer employment opportunities and other employment opportunities available throughout the school year.
 - Pre-apprenticeship programs.
 - Internships and job shadowing.

- On-the-job training opportunities.
- The required academic and occupational education (e.g., workforce preparation activities, basic academic skills, and hands-on occupational skills training) must be taught within the same timeframe and connected to training in a specific occupation, occupational cluster, or career pathway.

Youth formula funds may be used to pay wages and related benefits for work experience in the public, private, for-profit or non-profit sectors when the participant's objective assessment and individual service strategy indicate that a work experience is appropriate. Additionally, youth formula funds may be used to pay wages and staffing costs for the development and management of work experience.

- **Allowable WEX expenditures beyond wages may include the following:**

- Staff time spent identifying potential work experience opportunities.
- Staff time working with employers to develop the work experience.
- Staff time spent working with employers to ensure a successful work experience.
- Staff time spent evaluating the work experience.
- Staff time spent providing Orientation sessions for participants and employers.
- Classroom training or the required academic education component directly related to the work experience.

- **Work Experience Local Policy:**

- The maximum duration of a work experience assignment per participant will be 12 weeks; however, an extension may be provided based on need and must be approved by the MCWDB.
- The maximum number of work experience hours per participant will be 320.

Documentation of Service Delivery and Case Management:

- Staff will ensure timely entry in the State CalJOBS system to document case management services provided while participants remain active in a WIOA-funded program and during the post placement follow-up period.
- Staff will ensure that 100% of all participant enrollments are entered in the State CalJOBS system within three (3) days of enrollment, showing, at a minimum, the results of all assessments, and all goals and activities planned and agreed upon at the time of intake.
- Staff will ensure that case notes include details of services delivered during interaction with participant.
- MCWDB Management Information Systems (MIS) staff will provide user IDs and log-in access and training, as needed, to service provider staff that require access to the State CalJOBS system to conduct case management.

Referrals to WIOA Partners:

Youth service providers are mandated partners in the America's Job Center of California (AJCC)/One-Stop delivery system. As such, the service provider is providing part of a continuum of services and must work in collaboration with WIOA required partners, as required under the Memorandum of Understanding (MOU) between the MCWDB and the partners of the AJCC/One-Stop delivery system. The service provider will be expected to develop or maintain appropriate mechanisms of referrals to ensure that participants can access the services that they require to support their success and identify areas of participant need apart from WIOA services to refer participant to appropriate agencies to mitigate these needs.

Follow-up Services:

Follow-up must be made available, as appropriate – including counseling regarding the workplace – for participants in youth program activities who are placed in unsubsidized employment for a minimum of 12 months after the first day of employment.

Follow-up services include the following:

- Referral to community services.
- Referral to medical services.
- Tracking progress on the job.
- Work related peer support group.
- Assistance to secure a better paying job.
- Career development and further education planning.
- Assistance with job/work-related problems.
- Adult mentoring.
- Tutoring.
- Leadership development.
- Supportive services, as approved by MCWDB's Supportive Services policy, located online at: www.montereycountywdb.org.
- Other follow-up services as approved by the MCWDB.

INQUIRIES

If you have questions, please contact staff at (831) 796-3505. This policy is posted on the MCWDB website located at: www.montereycountywdb.org.

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