

SOUTHEAST ARKANSAS WORKFORCE DEVELOPMENT BOARD
P. O. BOX 6806
PINE BLUFF, AR 71611

Phone (870) 536-1971

Fax (870) 536-7718

southeastarkansas.org/services/workforce/

Services for Youth

PURPOSE:

The purpose of this policy is to describe and define the required and permitted services for Youth in the Southeast Arkansas Workforce Development Board (SEAWDB) area in accordance with the Workforce Innovation and Opportunity Act of 2014 (WIOA), the WIOA Final Rule, Training and Employment Guidance Letters (TEGLs) published by the Employment and Training Administration of the U.S. Department of Labor (ETA), and policies of the Arkansas Workforce Development Board (AWDB) and to detail eligibility requirements for receiving these services in accordance with the same law, regulations, and policies.

REFERENCE:

WIOA §§ 3(59), 116(b)(2)(A)(ii), 123, 129, & 681
2 CFR part 200
20 CFR 681
DOL comments in Final Rule concerning §§681.210 & 681.640
TEGLs 23-14, 8-15, & 21-16
A.C.A. §§ 6-1-201 & 6-15-501
ADWS Policy No. WIOA I-B – 2.3 (Eligibility for Adult Program)
ADWS Policy No. WIOA I-B – 2.5 (Eligibility for In-School Youth Program)
ADWS Policy No. WIOA I-B – 2.6 (Eligibility for Out-of-School Youth Program)
ADWS Policy No. WIOA I-B – 2.7 (Co-enrollment)
ADWS Policy No. WIOA I-B – 3.3 (Occupational Skills Training)
ADWS Policy No. WIOA I-B – 3.4 (On-the-Job Training)
ADWS Policy No. WIOA I-B – 3.8 (Work Experience)
ADWS Policy No. WIOA I-B – 3.9 (Supportive Services)

POLICY:

Both in-school youth (ISY) and out-of-school youth (OSY) are eligible for Youth services [20 CFR 681.200]. Local WIOA Title I-B Youth program providers must work with other one-stop partners and providers of services to assist youth in obtaining the full array of needed services [WIOA §129(c)(3)(A); 20 CFR 681.420(c & d)]. Youth service providers should also work with other appropriate entities in assessing the needs of participants and creating strategies to meet those needs. Assessments and service strategies developed for the participant by other entities should be used as appropriate [WIOA § 129(c)(1)(A & B); 20 CFR 681.420(h)].

Youth must register and be declared eligible for services before receiving any services other than self-service or information-only [681.320(a)]. In addition, all of the following activities must occur for a youth to be a participant for reporting purposes [20 CFR 681.320(b)]:

1. The collection of documentation to support an eligibility determination (ADWS Title I-B Form 2.4 *In-School Youth Eligibility Determination* or 2.5 *Out-of-School Youth Eligibility Determination*).
2. The provision of an objective assessment (may be a recent assessment by another entity [WIOA § 129(c)(1)(A); 20 CFR 681.420(h)]). Arkansas defines “recent assessment” as within the last six months.
3. The development of an individual service strategy (may be a recent individual service strategy developed by another entity [WIOA § 129(c)(1)(B); 20 CFR 681.420(h)] (See ADWS Title I-B Form 3.2 *Individual Service Strategy*). Arkansas defines “recent Individual Service Strategy” as within the last six months.
4. Participation in any of the 14 WIOA Youth program elements.

Not less than 75% of all local WIOA Title I-B Youth funds beyond administrative costs must be spent on OSY activities [WIOA §129(a)(4)(A); 20 CFR 681.410(d)], unless an exception is granted under WIOA § 129(a)(4)(B).

If a student is required to attend school under state compulsory school attendance laws, the priority in providing assistance is for the individual to attend school regularly [WIOA §129(a)(5)]. Arkansas law requires attendance at a private, public, parochial or home school each day the school is open for individuals age 5 through 17 unless one of the following applies [A.C.A. § 6-1-201; A.C.A. § 6-15-501]:

- The child has received a high school diploma or its equivalent as determined by the State Board of Education
- The child is 16 years or older and enrolled in a postsecondary vocational-technical institution, a community college, or two-year or four-year institution of higher education
- The child is 16 years or older and enrolled in either an adult education program or the Arkansas National Guard Youth Challenge Program

More information concerning eligibility for ISY and OSY programs may be found in ADWS Policy No. WIOA I-B – 2.5 (*Eligibility for In-School Youth Program*) and ADWS Policy No. WIOA I-B – 2.6 (*Eligibility for Out-of-School Youth Program*).

Design of Youth Programs

SEAWDB has designed WIOA Youth programs that meet the following guidelines [WIOA § 129(c)(1); 20 CFR 681.420; TEGL 21-16]:

1. Program Expenditures Prior to Participation: In limited instances, WIOA Youth funds may be expended on costs related to individuals who are not yet participants in the WIOA Youth program. Youth funds may be expended on outreach and recruitment or assessment for eligibility determination (such as assessing basic skills level) prior to determination, but they cannot be spent on Youth program services, such as the 14 elements, described below [TEGL 21-16]
2. The design framework of service must:

- a. Provide for an objective assessment of the academic levels, skill levels, and service needs of each participant that includes a review of basic skills, occupational skills, prior work experience, employability, interests and aptitudes (including interests and aptitudes for nontraditional jobs), supportive service needs, and developmental needs of each participant for the purpose of identifying appropriate services and career pathways for participants. Assessments must consider a youth's strengths in addition to areas of needed improvements. In assessing basic skills, programs must use assessment instruments that are valid and appropriate for the target population, and must provide reasonable accommodation in the assessment process, if necessary, for individuals with disabilities [20 CFR 681.290]. New assessments may not be required if appropriate assessments conducted by another educational or training entity within the past six months are available. More information concerning assessment requirements can be found in TEGl 21-16, Section 5.
- b. Develop and update as needed an individual service strategy (ISS) based on the needs, interests, and aptitudes indicated in the assessments and also based on one or more of the youth performance measures [WIOA §116(b)(2)(A)(ii)]:
 - i. Obtaining employment through education or training activities
 - ii. Retaining employment through education or training activities
 - iii. Increasing earnings in unsubsidized employment
 - iv. Obtaining a recognized postsecondary credential
 - v. Obtaining a high school diploma or its recognized equivalent and either obtaining and retaining employment or continuing education or training in a postsecondary school
 - vi. Obtaining measurable skills gains toward a postsecondary credential program or employment

The ISS must also identify career pathways that include education and employment goals, that considers career planning and the results of the objective assessment, and that prescribes achievement objectives and services for the participant [20 CFR 681.420].

- c. Provide case management of youth participants, including follow-up services
3. SEAWDB follows the design framework described in the local plan concerning how the 14 program elements will be made available within that framework.
 4. SEAWDB ensures appropriate links to entities that will foster participation of eligible local area youth. Such links may include, but are not limited to:
 - a. Local area justice and law enforcement officials
 - b. Local public housing authorities
 - c. Local education agencies
 - d. Local human service agencies
 - e. WIOA title II adult education providers
 - f. Local disability-serving agencies and providers and health and mental health providers

- g. Job Corps representatives
 - h. Representatives of other area youth initiatives, such as YouthBuild, entities that serve homeless youth, and other public and private youth initiatives
5. SEAWDB ensures that WIOA Youth program providers refer all youth participants to appropriate other entities where they can receive needed services [WIOA § 129(c)(3)(A)], including:
 - a. Providing these participants with information about the full array of applicable or appropriate services through the one-stop system and other appropriate providers
 - b. Referring these participants to appropriate training and educational programs that have the capacity to serve them either on a sequential or concurrent basis.
 6. If a youth applies for enrollment in a WIOA Youth program and either does not meet the enrollment requirements for that program or cannot be served by that program, the Youth program provider must ensure that the youth is referred for further assessment, if necessary, or referred to appropriate programs to meet the skills and training needs of the youth.
 7. In order to meet the basic skills and training needs of applicants who do not meet the eligibility requirements of a particular program or who cannot be served by the program, each Youth provider must ensure that these youth are referred for further assessment, as necessary, and to appropriate programs who might be able to meet the needs of the youth.
 8. SEAWDB ensures that parents, Youth participants, and other members of the community with experience relating to youth programs are involved in both the design and implementation of its youth programs.
 9. The required objective assessment or the required individual service strategy is not required if the program provider determines that it is appropriate to use a recent objective assessment or individual service strategy (within the last six months) that was developed under another education or training program.
 10. SEAWDB may implement a WIOA Pay-for-Performance contract strategy for the 14 program elements. Not more than 10% of the total youth funds may be used for this strategy. Additional regulations for the WIOA Pay-for-Performance contract strategies are contained in 20 CFR 683.500.

14 Program Elements

Fourteen program elements must be available to all Youth participants. WIOA Youth funds are not required to be spent on these services. Local programs are encouraged to partner with existing local, state, and national entities that can provide program elements at no cost to the local Youth program [20 CFR 681.460(c); 20 CFR 681.470]. The local area, however, must ensure that if a program element is not funded with WIOA title I Youth funds, the local program has an agreement in place with a partner organization to ensure that the program element will be offered. SEAWDB ensures that program elements provided by other entities are closely connected and coordinated with the WIOA Youth program [20 CFR 681.470].

SEAWDB has the discretion to determine what specific program services a youth participant receives based on each participant's objective assessment and individual service strategy. Local programs are not required to provide all program services to each participant [20 CFR 681.460(b)].

SEAWDB will make each of the following 14 program elements available to Youth participants who need such services [WIOA § 129(c)(2); 20 CFR 681.460(a); TEGL 23-14; TEGL 21-16]. Local area Youth programs should ensure that services received are reported in AJL. Documenting receipt of program elements is critical to ensure that youth who are actively participating in programs do not get unintentionally exited due to 90 days of no services. Note that case management (the act of connecting youth to appropriate services) is not a program element and should not be reported as one of the 14 Youth program elements [TEGL 21-16].

Program Element 1: Tutoring, study skills training, instruction, and dropout prevention services

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 postsecondary credential [20 CFR 681.460(a)(1); TEGL 21-16].

The following services and activities are reported under Program Element 1 [TEGL 21-16]:

- a. Tutoring, study skills training, and instruction that lead to a high school diploma. Such services focus on providing academic support, helping a youth identify areas of academic concern, assisting with overcoming learning obstacles, and providing tools and resources to develop learning strategies. Tutoring, study skills training, and instruction can be provided one-on-one, in a group setting, through resources and workshops.
- b. Secondary school dropout prevention intended to lead to a high school diploma. Such services include services and activities that keep a young person in school and engaged in a formal learning and/or training setting. Strategies include, but are not limited to, tutoring, literacy development, active learning experiences, after-school opportunities, and individualized instruction.

The following strategies are listed in 20 CFR 681.460(a)(1), (Program Element 1), but they overlap with other program elements and are reported under other program elements [TEGL 21-16]:

- a. Dropout recovery strategies that are aimed at getting a youth who has dropped out of secondary education back into a secondary school or alternative secondary/high school equivalency program and preparing them for high school equivalency attainment are reported in Program Element 2.
- b. Services, including training services, leading to recognized postsecondary credentials are reported in Program Element 4.

Program Element 2: Alternative secondary school services or dropout recovery services [20 CFR 681.460(a)(2); TEGL 21-16]. Alternative secondary school services, such as basic education skills training, individualized academic instruction, and English as a Second Language training, are those that assist youth who have struggled in traditional secondary education. Dropout recovery services, such as credit recovery, counseling, and educational plan development, are those that assist youth who have dropped out of school [TEGL 21-16]

Program Element 3: Paid and unpaid work experiences that have academic and occupational education as a component of the work experience. Work experience as a planned, structured learning experience that takes place in a workplace for a limited period of time. The types of work experiences may include the categories of [20 CFR 681.460(a)(3) & 681.600(c)]:

- a. Summer employment opportunities and other employment opportunities available throughout the school year;
- b. Pre-apprenticeship programs;
- c. Internships and job shadowing; and
- d. On-the-job training opportunities.

A pre-apprenticeship is a program designed to prepare individuals to enter and succeed in a registered apprenticeship program. It includes all of the following elements [20 CFR 681.480; TEGL 21-16]:

- a. Training and curriculum that aligns with the skill needs of employers in the economy of the state or region involved
- b. Access to educational and career counseling and other supportive services, directly or indirectly
- c. Hands-on, meaningful learning activities that are connected to education and training activities, such as exploring career options and understanding how the skills acquired through coursework can be applied toward a future career
- d. Opportunities to attain at least one industry-recognized credential
- e. A partnership with one or more registered apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship program in a registered apprenticeship program

Job shadowing is a work experience option where youth learn about a job by walking through the work day as a shadow to a competent worker. It is a temporary, unpaid exposure to the workplace in an occupational area of interest to the participant, where the youth experiences firsthand the work environment, occupational skills in practice, the value of professional training, and potential career options. It is designed to increase career awareness, help model youth behavior through examples, and reinforce in the youth the link between academic classroom learning and occupational work requirements [TEGL 21-16].

Although OJT is a training service for Adults/Dislocated Workers and a work experience for Youth, the guidelines and policies for both are the same [20 CFR 681.600(c)(4)]. Each youth who has been determined eligible either as an In-school Youth or an Out-of-school Youth may receive OJT if appropriate, as determined by the local area. The appropriateness of this program element for an eligible youth is established through the participant's objective assessment and individual service strategy [20 CFR 681.460(b)]. Out-of-school Youth may participate in Registered Apprenticeship Programs (RA) [TEGL 13-16]. RAs provide the required occupational and academic component required for Program Element 3 [TEGL 21-16].

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 employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists [20 CFR 681.600(a)]. Additional information on the employer/employee relationship may be found on DOL's Wage and Hour Division website [TEGL 21-16]. For additional guidance concerning work experience regulations in general, see ADWS Policy No. WIOA I-B – 3.8 (*Work Experience*). For additional guidance concerning on-the-job training, see ADWS Policy No. WIOA I-B – 3.4 (*On-the-Job Training*).

Not less than 20% of the youth funds allocated to a local area (minus area administrative costs) must be spent to provide ISY and OSY with paid and unpaid work experiences. SEAWDB programs

track program funds spent on paid and unpaid work experiences, including wages and staff costs for the development and management of work expenses, and report such expenditures as part of the local youth financial reporting. The percentage of funds spent on work experience is calculated as the total amount spent on ISY and OSY work experience divided by the total allocated youth funds (minus administrative costs) [WIOA § 129(c)(4); 20 CFR 681.590; TEGL 23-14; TEGL 21-16]. Leveraged resources cannot be used to fulfill any part of the 20% minimum [TEGL 21-16].

Allowable work experience expenditures that may be included in the 20% minimum are [TEGLs 23-14, 8-15, & 21-16]:

- a. Wages/stipends paid for participation in a work experience (including employment costs such as FICA match and workers' compensation insurance)
- b. Staff time working to identify and develop a work experience opportunity, including staff time spent working with employers to identify and develop the work experience
- c. Staff time spent working with employers to ensure a successful work experience, including staff time spent managing the work experience
- d. Staff time spent evaluating the work experience
- e. Participant work experience orientation sessions
- f. Employer work experience orientation sessions
- g. Classroom training or the required academic education component directly related to the work experience
- h. Incentive payments directly tied to the completion of work experience
- i. Employability skills/job readiness training to prepare youth for a work experience

Supportive services are a separate program element, and funds spent for supportive services cannot be counted toward the 20% work experience work expenditure requirement, even if supportive services assist the youth in participating in the work experience [TEGL 21-16].

The academic and occupational education component that must be included with work experiences refers to contextual learning that accompanies a work experience. It includes the information necessary to understand and work in specific industries and/or occupations. The component may include learning the general duties of workers in the occupation, specific knowledge related to the occupation, specific skills needed to work in the occupation, or such. The component is not general education, such as GED® classes. The component may occur concurrently or sequentially with the work experience, inside or outside the work site. The work experience employer may provide the academic and occupational component, or such components may be provided separately in the classroom or through other means [20 CFR 681.600(b); TEGL 21-16].

Program Element 4: Occupational skill training, which includes priority consideration for training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the local area involved, if the LWDB determines that the programs meet the quality criteria for eligible providers of Youth workforce investment activities described in WIOA § 123 [20 CFR 681.460(a)(4) & 681.540(b); TEGL 21-16]. Occupational skills training is defined as an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels. Local areas must give priority consideration to training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the local area [20 CFR 681.540].

Occupational skills training for youth must meet all of the following requirements [20 CFR 681.540(a); TEGL 21-16]:

- a. Be outcome-oriented and focused on an occupational goal specified in the individual service strategy
- b. Be of sufficient duration to impart the skills needed to meet the occupational goal
- c. Lead to the attainment of a recognized postsecondary credential
- d. Youth (OSY only) has the skills and qualifications to participate successfully in training services

Participants enrolled in a two-year community college or college/university degree program must hold and maintain a cumulative grade point average of a 2.0 GPA or higher on a 4.0 scale to meet this requirement. The student must have also attended a learning institution as described above within the last six months.

Participants interested in or enrolled in an apprenticeship, *short-term training program (*can be completed within six months), or any other related program, not meeting the criteria of a two-year community college or college/university must adhere to the following guidelines:

Where appropriate, a recent interview, evaluation, or assessment may be used for the assessment purpose [WIOA § 134(c)(2)(B); 20 CFR 680.220(a); TEGL 19-16]. Recent interview, evaluation, assessment, career planning or observations must be conducted within a time frame not to exceed three months prior to the start of occupational skills training.

The case file must contain a determination of need for occupational training services as determined through the interview, evaluation, or assessment, and career planning or any other method through which the one-stop center or partner can obtain enough information to make an eligibility determination. Staff of the SEAWDB will utilize the "Occupational Skills Justification Form" to document and justify the need for training services.

Examples of supporting justification may include:

Recent Interview/Observation- Career Advisor is able to engage the applicant in a thorough interview, in which the applicant can articulate clear goals, understand and comprehend written and verbal questions, and think critically by responding appropriately to prompts that assess training readiness.

Evaluation/Assessment- Evidence of a prior training completed, exam passed*, standardized tests passed*, or similar assessment that supports the applicant's capability of completing a training program, certificate, entrance exam, exit exam or other required exam that measures educational competencies or functioning levels. *(i.e. High School Diploma, National Career Readiness Certificate, A.C.T., Accuplacer Test, Compass Test, Driver's License Exam, TABE Test, etc.) **This is not an exhaustive list. *Passed is defined by industry standards and requirements, as well as benchmarks set by training providers, state and federal agencies, and partnering organizations.

Career Planning- The use of an Individual Service Strategy or Individualized Employment Plan, as required of all WIOA participants, to determine that occupational skills training is necessary in order for a participant to reach employment goals.

Career Advisors should use a mixed approach to determine if occupational training skills are appropriate and justifiable for participants. Staff-assisted individualized services and career services may be used in this process. However, there is no requirement that career service be provided as a condition to receive occupational skills training. If the recommended services are not provided before occupational training, however, case files must document the circumstances that justified the determination to provide training without any of these recommended career services [20 CFR 680.220)].

Individual Training Accounts (ITAs) may be provided to Out-of-School Youth (OSY) ages 16 to 24 with Youth funds [20 CFR 681.550; TEGL 21-16]. Youth funds may not be used to provide ITAs to In-School Youth (ISY), but ISY between the ages of 18 and 21 may co-enroll in the WIOA Adult program if the youth's needs, knowledge, skills, and interests align with the WIOA adult program, the youth meets priority requirements, and the ITA is funded by the Adult program [TEGL 21-16]. More information may be found in ADWS Policy No. WIOA I-B – 2.3 (*Eligibility for Adult Program*), ADWS Policy No. WIOA I-B – 2.7 (*Co-enrollment*), and ADWS Policy No. WIOA I-B – 3.3 (*Occupational Skills Training*).

Program Element 5: Education offered concurrently with workforce preparation and training for a specific occupation or occupational cluster [20 CFR 681.460(a)(50); TEGL 21-16]. This program element reflects an integrated education and training model that 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 pathway [20 CFR 681.630].

Program Element 5 is the concurrent delivery of Program Element 2, Program Element 3, and Program Element 4 to create an integrated education and training model. When the program elements occur concurrently to train for a particular occupation, occupational cluster, or career pathways, the services are reported in Program Element 5. When the activities occur separately and at different times, they are reported in the Program Element 2, 3, or 4, as appropriate [TEGL 21-16].

Program Element 6: Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors [20 CFR 681.460(a)(6)]. Leadership development opportunities are opportunities that encourage responsibility, confidence, employability, self-determination, and other positive social behaviors, such as [20 CFR 681.520; TEGL 21-16]:

- a. Exposure to postsecondary educational possibilities
- b. Community and service learning projects
- c. Peer-centered activities, including peer mentoring and tutoring
- d. Organizational and team work training, including team leadership training
- e. Training in decision-making, including determining priorities and problem solving
- f. Citizenship training, including life skills training, such as parenting and work behavior training

- g. Civic engagement activities that promote the quality of life in a community**
- h. Other leadership activities that place youth in leadership roles, such as serving on youth leadership committees, such as a Standing Youth Committee**

Program Element 7: Supportive services that are necessary to enable an individual to participate in Youth activities [WIOA 3(59); 20 CFR 681.460], including, but not limited to [20 CFR 681.460(a)(7) & 681.570; TEGL 21-16]:

- a. Linkages to community services
- b. Assistance with transportation
- c. Assistance with child care and dependent care
- d. Assistance with housing
- e. Assistance with educational testing
- f. Reasonable accommodations for youth with disabilities
- g. Legal aid services
- h. Referrals to health care
- i. Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear
- j. Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes
- k. Payments and fees for employment and training-related applications, tests, and certifications

For more information concerning supportive services, see ADWS Policy No. WIOA I-B – 3.9 (*Supportive Services*).

Program Element 8: Adult mentoring for a duration of at least 12 months, which may occur both during and following exit from the program. It must be a formal relationship between a youth participant and an adult mentor. There must be structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee. Group mentoring and mentoring through electronic means are allowed as part of the mentoring activities, the local youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis. Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company [20 CFR 681.460(a)(8) & 681.490; TEGL 21-16]. Local programs should ensure appropriate policies and processes are in place to adequately screen and select mentors [TEGL 21-16]. DOL strongly prefers that case managers not serve as mentors, but case managers may serve as mentors in areas where adult mentors are sparse [TEGL 21-16].

Program Element 9: Follow-up services for not less than 12 months after completion of participation [20 CFR 681.460(a)(9)], to ensure the youth is successful in employment and/or postsecondary education and training. Follow-up services may include, as appropriate [20 CFR 681.580]:

- a. Regular contact with a youth participant's employer

- b. Assistance in addressing work-related problems that arise
- c. Supportive services, as described in Program Element 7
- d. Adult mentoring, as described in Program Element 8
- e. Financial literacy education, as described in Program Element 11
- f. 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
- g. Activities that help youth prepare for and transition to postsecondary education and training

When these services are given as follow-up services (after the expected exit date), they should be coded in AJL as follow-up services, as opposed to program services provided prior to exit. In addition, follow-up services should be documented in case files that they were provided as follow-up services post exit [TEGL 21-16].

Follow-up services may begin immediately following the last expected date of service in the programs included in the Common Exit date, when no future services are scheduled [TEGL 21-16]. Once 90 days of no services, other than follow-up services, self-service, and information-only services and activities, has elapsed and the participant has an official exit date applied retroactively to the last date of service, the program continues to provide follow-up services for the remaining 275 days of the 12-month follow-up requirement. The 12-month follow-up requirement is completed upon one year from the date of exit [TEGL 21-16].

All youth participants must be offered an opportunity to receive follow-up services that align with their individual service strategies. Follow-up services do not have to be provided if the participant declines to receive services or if the participant cannot be located or contacted. Follow-up services may be provided beyond 12 months at the discretion of the SEAWDB and the program provider. The types of services provided, and the duration of the services must be determined based on the needs of the individual. Follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome [20 CFR 681.580(c)].

Youth should be informed at the time of enrollment that follow-up services will be provided for 12 months following exit. SEAWDB has policies in place to establish how to document and record when a participant cannot be located or contacted. Documentation must be placed in the case file if a youth requests not to receive or continue follow-up services [TEGL 21-16]

Program Element 10: Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate to the needs of the individual youth. When referring participants to necessary counseling that cannot be provided by the local youth program or its program providers, the local youth program must coordinate with the organization it refers to in order to ensure continuity of service [20 CFR 681.510]. When resources exist within the local program or its service providers, it is allowable to provide counseling services directly to participants rather than refer youth to partner programs [TEGL 21-16].

Program Element 11: Financial literacy education, which may include the following activities [20 CFR 681.460(a)(11) & 681.500; TEGL 21-16]:

- a. Support the ability of participants to create budgets, initiate checking and savings accounts at banks, and make informed financial decisions
- b. Support participants in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards
- c. 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
- d. Support a participant's ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions
- e. Educate participants about identity theft, ways to protect themselves from identity theft, and how to resolve cases of identity theft and in other ways understand their rights and protection related to personal identity and financial data
- f. 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
- g. Support activities that address the particular financial literacy needs of youth with disabilities, including connecting them to benefits planning and work incentives counseling
- h. 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
- i. 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 instruction

Program Element 12: Entrepreneurial skills training [20 CFR 681.460(a)(12)], which is training that develops the skills associated of starting and operating a small business. Such skills may include, but are not limited to, the ability to [20 CFR 681.560(a)]:

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

Approaches to teaching youth entrepreneurial skills include, but are not limited to [20 CFR 681.560(b); TEGL 21-16]:

- a. Entrepreneurship education that provides an introduction to the values and basics of starting and running a business. Entrepreneurship education programs often guide youth through the development of a business plan and may also include simulations of business start-up and operation.
- b. Enterprise development, which provides support and services that incubate and help youth develop their own businesses. Enterprise development programs go beyond entrepreneurship education by helping youth access small loans or grants needed to begin business operation and by providing individualized attention to the development of viable business ideas.
- c. Experiential programs that provide youth with experience in the day-to-day operation of a business. Some of these programs may involve the development of a youth-run business that young people participating in the program work in and manage. Other experiential programs may facilitate placement in apprentice or internship positions with adult entrepreneurs in the community.

Program Element 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 [20 CFR 681.460(a)(13)]. Workforce and labor market information is the body of knowledge that describes the relationship between labor demand and supply [20 CFR 651.10]. Youth program providers should be familiar with state Labor market information (LMI) tools. LMI tools identify in-demand industries and occupations and employment opportunities and provide knowledge of job market expectations. LMI also provides information about education, skill requirements, and potential earnings. Such information can help youth make appropriate decisions about education and careers [TEGL 21-16].

Career awareness begins the process of developing knowledge of the variety of careers and occupations available, their skill requirements, working conditions, training prerequisites, and job opportunities across a wide range of industry sectors. Career exploration is the process in which youth choose an educational path and training or a job that fits their interests, skills and abilities. Career counseling or guidance provides advice and support in making decisions about what career paths to take. Career counseling services may include providing information about resume preparation, interview skills, potential opportunities for job shadowing, and the long-term benefits of postsecondary education and training [TEGL 21-16].

Program Element 14: Postsecondary preparation and transition activities [20 CFR 681.460(a)(14)].

Postsecondary preparation and transition activities and services prepare youth for advancement to postsecondary education after attaining a high school diploma or its recognized equivalent, although the services may be given before a youth earns the diploma or GED®. These services include exploring postsecondary education options, such as technical schools, two-year colleges, four-year colleges and universities, and registered apprenticeships. Additional services include, but are not limited to, assisting youth to prepare for SAT/ACT tests, assisting with college admission applications, searching and applying for scholarships and grants (including the FAFSA), and connecting youth to postsecondary education programs [TEGL 21-16].

Incentive Payments

Incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences [20 CFR 681.640]. Any incentive payments must be in compliance with the Cost Principles in Uniform Guidance at 2 CFR part 200. Incentives may not include entertainment, such as movie or sporting tickets or any other venues whose sole purpose is entertainment. All requirements concerning the control of cash also refer to gift cards, which are essentially cash [TEGL 21-16].

Incentives paid for with WIOA funds must be connected to recognition of achievement of milestones in the program tied to work experience, education, or training, such as the acquisition of a credential or other successful outcome [TEGL 21-16]. WIOA funds may not be used for incentives for recruitment and eligibility documentation, although local areas may leverage private funds for such incentives [Comments in WIOA Final Rule concerning §681.640; TEGL 21-16].

If incentive payments are to be used, local youth program providers must have written policies and procedures in place governing the award of incentives and must ensure that incentive payments meet all of the following requirements [20 CFR 681.640; TEGL 21-16]:

1. Tied to the goals of the specific program
2. Outlined in writing before the commencement of the program that may provide incentive payments
3. Align with the local program's organizational policies
4. Are in accord with the requirements contained in 2 CFR part 200

The SEAWDB will award incentive payments to youth who meet all of the following criteria:

1. Actively participating in the WIOA Youth Program (*not in follow-up status or no contact within the past 89 days status, in which the incentive is to be awarded.*)
2. Received a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, as described in USDOL's TEGL 10-16; within six months in which the incentive is to be awarded.
3. Entered a post-secondary education or training program or entered into unsubsidized employment.

Participants will receive a one-time incentive payment of \$100.00. Awards will be granted based on the availability of youth funding.

Program Exit

SEAWDB Youth programs must provide service to a participant for the amount of time necessary to ensure successful preparation to enter postsecondary education and/or unsubsidized employment. There is no minimum or maximum time an individual can participate in the Youth program. Programs must link participation time to the individual service strategy and not to the timing of youth service provider contracts or program years [20 CFR 681.450]. A youth need not exit the program if he or she reaches the maximum age or if an OSY enrolls in school, as long as the youth still needs services provided in the Youth program [20 CFR 681.210(b); 20 CFR 681.220(b); 20 CFR 681.240; Comments in WIOA Final Rule concerning §681.210].

The exit date is determined when the participant has not received services in the Youth program (or any other program included in a common-exit program in which the participant is co-enrolled) for 90 days, and no additional services are scheduled. At that point, the date of exit is applied retroactively to the

last date of service [20 CFR 677.150(c)].

Approved:

SEAWDB Chairperson Date

Amended:

 6-17-20
SEAWDB Chairperson Date