



TO: All Humboldt County Workforce Innovation and Opportunity Act (WIOA) Staff, Subrecipients and Service Providers

FROM: Humboldt County Workforce Development Board

EFFECTIVE: August 14, 2020

SUBJECT: WIOA Youth Program Requirements

REFERENCES: California Education Code (EC) Sections 47612.1, 56026, 58500, and 66010 California Unemployment Insurance Code Section 14209
CUIC Section 14209
Title 2 Code of Federal Regulations (CFR) Part 200, 2900
Title 20 CFR Part 681, Sections 681.100 - 681.120, 684.130, 681-230, 681.400, 681.460, 681.480, 681.520, 681.540, 681.560, 681.570, 681.620, 681.640,
Training and Employment Guidance Letter (TEGL) 8-15, 12-14, 13-09, 19-14, 21-16, 23-14
Title 20 U.S.C. Section 1401, 1401[27]
WIOA Public Law 113-128
WIOA Section 3(36), 3 [38], 3[44], 3[54], 129 (a)(1)(B)(ii), 129(a)(4), 129[c][1]), 129(c)(3)(C)(4), 129[c][4]), 188, 194(1)], 194[12]129(c)
Workforce Service Directive (WSD)16-1
2 CFR part 200 of Uniform Guidance
Regs, 681.420(e), 681.590

PURPOSE

This policy provides the guidance and establishes the procedures regarding the Workforce Innovation and Opportunity Act (WIOA) youth programs provided by WIOA One-Stop Partners within the America's Job Centers of California (AJCC) in Humboldt County.

DEFINITIONS

Adult Education – academic instruction and education services below the postsecondary level that increases an individual's ability to: read, write, and speak in English, and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; transition to postsecondary education and training; and obtain employment (WIOA Section 203).

Alternative school – an alternative school is a type of school designed to achieve grade-level

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(K-12) standards and meet student needs. Examples of alternative schools include, but are not limited to, continuation, magnet, and charter schools. If the youth participant is attending an alternative school at the time of enrollment, the participant is considered to be In-School.

Attending School – an individual is considered to be attending school if the individual is enrolled in secondary or postsecondary school. If a youth is between high school graduation and postsecondary education, the youth is considered an In-School (IS) youth if they are registered for postsecondary education, even if they have not yet begun postsecondary classes. However, if the youth registers for postsecondary education, but does not follow through with attending classes, the youth is considered Out-of-School (OS) youth if the eligibility determination is made after youth decided not to attend postsecondary education. Youth on summer break are considered IS youth if they are enrolled to continue school in the fall.

Non-Federal Entity - a state, local government, Native American tribe, institution of higher education (IHE), or nonprofit organization that carries out a Federal award as a recipient or subrecipient.

Not Attending School – an individual who is not attending a secondary or postsecondary school. In addition, individuals enrolled in the following programs would be considered an OS youth for eligibility purposes:

- WIOA Title II Adult Education, Youth Build, Job Corps, high school equivalency program, or dropout re-engagement programs.
- A youth attending a high school equivalency program funded by the public K12 school system who is classified by the school system as still enrolled in school are the exception; the youth would be considered an IS youth.
- Non-credit bearing postsecondary classes only.
- A charter school program that provides instruction exclusively in partnership with WIOA, federally funded YouthBuild programs, federal Job Corps training or instruction, California Conservation Corps, or a state certified local conservation corps (in alignment with EC Section 47612.1).

Offender – An adult or juvenile subject to any stage of the criminal justice process or an adult or juvenile who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or convictions or for whom services under WIOA may be beneficial. Postsecondary School – California community colleges, and accredited public and private universities.

School – any secondary or postsecondary school. These include, but are not limited to, traditional K-12 public schools and private schools (e.g., continuation, magnet, charter, and home).

School Dropout – an individual who is no longer attending any school and has not received a secondary school diploma or its recognized equivalent. This term does not include individuals who dropped out of postsecondary school.

Secondary School – a nonprofit institutional day or resident 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.

Subrecipient - a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

POLICY

Eligibility for Youth Services

Individuals enrolled in the WIOA Youth program must meet the general eligibility criteria outlined under item A, and meet the additional criteria outlined for Out-of-School Youth (item B) or In-School Youth (item C).

Eligibility is determined based on information collected during registration and these criteria follow the participant through the entire course of WIOA programs and services attached to that application. If the participant's circumstances change during the WIOA registration cycle (such as a change in age, education status, employment status, etc.), the participant remains eligible. Eligibility for services should not be construed as a guarantee of services. The WIOA is not an entitlement program.

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 OS youth at time of enrollment and is subsequently placed in school is still considered an OS youth. Additionally, an individual who is an OS 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 OS youth until exited.

A. General Eligibility Criteria

All youth must meet the following general eligibility criteria:

1. Citizen Status
2. Compliance with Selective Service Registration
3. Age 14-24 on the *Date of Participation*

All of these general eligibility criteria must be documented in the participant file prior to the provision of WIOA services.

B. Additional Eligibility Criteria for Out-of-School Youth

In addition to the general eligibility criteria outlined in item A under this section, Out-of-School Youth (OSY) must also:

1. Not be attending any school
2. Not be attending any secondary or postsecondary school (not including Title II Adult Education, YouthBuild, Job Corps, high school equivalency programs [exceptions in definitions], non-credit bearing postsecondary classes, dropout reengagement programs or charter schools with federal and state workforce partnerships)
3. Be aged 16 -24 years
4. Have 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
 - 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 quarter. i. Note – If the school does not use school year quarters, Local Areas must use calendar quarters.
 - A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is –

- Basic skills deficient; or
- An English Language Learner
- A youth who is subject to the juvenile or adult justice system
- A homeless youth or runaway
- In foster care (or aged out of the foster care system)
- An individual in foster care or who has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption
- A youth eligible for assistance under section 477 of the Social Security Act
- A youth in out of home placement
- A youth who is pregnant or parenting
- A youth with a disability
- A low-income youth who requires additional assistance to enter or complete an education program or to secure or hold employment.

These additional eligibility criteria must be documented in the participant file prior to the provision of WIOA services.

C. Additional Eligibility Criteria for In-School Youth

In addition to the general eligibility criteria outlined in item A under this section, In School Youth must also:

1. Be attending school (secondary as well as postsecondary)
2. Be aged 14-21 years old (A youth with disabilities who is in an individualized education program at the age of 22 may be enrolled as an IS youth)
3. Be low income
4. Have one or more of the following barriers:
 - Basic Skills Deficient
 - English Language Learners
 - Justice-Involved
 - A homeless youth or runaway
 - In foster care
 - An individual who has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption
 - A youth eligible for assistance under section 477 of the Social Security Act
 - A youth in an out of home placement
 - A youth who is pregnant or parenting
 - A youth with a disability
 - Requires additional assistance to enter or complete an educational program or to secure or hold employment. *Note no more than 5% of ISY enrolled in a given program year may be found eligible based solely on meeting this criterion.

These additional eligibility criteria must be documented in the participant file prior to the provision of WIOA services.

Determining School Status

Different eligibility criteria apply to In-School (ISY) and Out-of-School youth (OSY), and the determination of school status is the first eligibility criterion that determines if a youth is to be designated ISY or OSY.

School status is determined at the time of program enrollment and remains the same throughout the youth's participation in the WIOA program.

1. ISY versus OSY – If a youth is enrolled in the WIOA youth program during the summer and is in between school years, he/she is considered as ISY if he/she is enrolled to continue school in the fall. A youth is also considered ISY if they are enrolled in the youth program between high school graduation and postsecondary education if they are registered for postsecondary education, even if they have not yet begun postsecondary education at the time of WIOA youth program enrollment.

A youth would be considered OSY if they graduated from high school and register for postsecondary education but do not ultimately follow through with attending postsecondary education, as long as the eligibility determination for youth is made after the point, they decide not to attend postsecondary education.

2. Non-Credit Bearing Postsecondary Classes – If a youth is enrolled in any credit-bearing postsecondary education classes, including credit-bearing community college classes and credit-bearing continuing education then they shall be considered to be attending postsecondary education and are therefore an ISY.
3. Exception for Youth with Disabilities – There is one exception to age eligibility for youth attending school. Youth with disabilities who have an Individualized Education Program (IEP) may be enrolled as ISY after the age of 21, if state law allows youth with disabilities to be served by the K-12 public school system beyond the age of 21. Such youth may only be enrolled as ISY up to the age allowed by their state law to receive postsecondary education services.
4. High School Equivalency Programs and Dropout Re-engagement Programs – For the purposes of WIOA, providers of Adult Education under Title II of WIOA, YouthBuild programs, the Job Corps program, high school equivalency programs, and dropout re-engagement programs are not to be considered to be schools for the purposes of determining school status.

There is one exception – youth attending high school equivalency (HSE) programs, including those considered to be dropout re-engagement programs, funded by the public K-12 system that are classified by the school system as still enrolled in school are considered ISY.

Any HSE program offers preparation for and the taking of tests which lead to an HSE degree. The “High School Equivalency: Resource Guide for the Workforce System” provides information about the options for high school equivalency.

A dropout re-engagement program conducts active outreach to encourage OSY to return to school and assists such youth in resuming their education and/or training to become career ready. A program of this type may provide case management and other services to support youth in overcoming barriers that prevent them from returning to school or work.

5. Homeschooling – State education agencies and/or local education agencies have policies regarding the classification of youth who are home-schooled. DOL has chosen not to provide guidance in this area except to state WIOA youth programs must classify homeschooled youth as ISY or OSY based on their state education agency (or local agency, if relevant) policy.

Determining Low Income Status

Income is determined by collecting information from the family for the complete six-month period and prior to application. This figure is then doubled (annualized) and compared to a table provided via Directive by the State of California to determine whether the youth is considered low income based upon family size and total reported “annualized” income.

A. Low Income Individuals

All In-School Youth (ISY) and some Out-of-School Youth must be “low income” to qualify for WIOA services (unless they qualify under the 5% window/low income exception as outlined in subsequent section of this policy).

A low-income individual is defined as one who:

1. Receives, or is a member of a family receiving, or in the past 6 months has received, assistance through the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008.
2. Is in a family with total family income that does not exceed higher of:
 - a. the poverty line
 - b. 70 percent of the lower living standard income level
3. Is a homeless individual or homeless child or youth
4. Receives or is eligible to receive a free or reduced priced lunch under the Richard B. Russell National School Lunch Act

Under WIOA, a youth who receives or is eligible to receive a free or reduced lunch under the Richard B. Russell National School Lunch Act, is considered to be low-income. While the free/reduced lunch low-income category primarily applies to IS Youth, OS youth may also qualify as low income if the youth is a parent living in the same household as a child who receives or is eligible to receive free or reduced price lunch based on their income level.

However, not all youth who receive a free or reduced priced lunch automatically qualify as low income for the WIOA youth program eligibility. In areas where a school district subsidizes all student meals under the Hunger-Free Kids Act of 2010, the Local Area must base low-income status on an individual student’s eligibility to receive free or reduced price lunch or on the youth’s ability to meet one of the other low-income categories under WIOA.

5. Is a foster child on behalf of whom state or local government are made; or
6. Is an individual with a disability whose own income meets the requirements of item 2 above but whose family income is above the limits (item 2)

High Poverty Area

A youth living in a high-poverty area is automatically considered to be a low-income individual. A high-poverty area is a Census tract or county that has a poverty rate of at least 25 percent as set every 5 years using American Community Survey (ACS) 5-Year data. The regulations allow Indian and Native American grantees to use either the poverty rate of the total population or the poverty rate of Indian and Native Americans in determining whether the poverty rate of an area meets the 25 percent threshold. Refer to the following for more information:

https://wdr.doleta.gov/directives/attach/TEGL/TEGL_21-16_Attachment_2.pdf.

Family

Family is defined as two or more persons related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories:

- A married couple and dependent children
- A parent/guardian and dependent children
- A married couple

The phrase “living in a single residence” with other family members includes temporary, voluntary residence elsewhere (e.g. attending school or college or visiting relatives). It does not include involuntary temporary residence elsewhere (e.g. incarceration or placement as a result of a court order).

In determining whether an individual without a disability can be considered to be a family unit of one, eligibility specialists are to consider the following:

- An individual 14 years of age or older, not living with his/her family, and receiving less than 50 percent maintenance from the family in the 6-month period prior to program application
- An individual 18 years of age, living with his/her family, receiving less than 50 percent maintenance from the family in the 6-month period prior to program application, and is not the principal earner nor the spouse of the principal earner.

Family income is the income received from included sources of income of all members of the family, as defined above. Eligibility specialists are to determine self-employment income based on the most recently submitted federal income tax return or based on annualized proceeds posted in more up-to-date acceptable accounting records. Specialists are to annualize other income based on receipts incurred during the past 6 months.

Family size is the maximum number of family members during the income determination period. For a separated or divorced applicant, specialists are to prorate the income depending on the length of time during the last 6 months the applicant lived with the other wage earner.

B. Sources of Income

The following income sources should be included in an individual's income calculation:

- Monetary compensation for services, including wages, tips, salary, commissions, or fees before any deductions;
- Unemployment insurance payments;
- Child support payments;
- Net receipts from non-farm self-employment (receipts from a person's own unincorporated business, professional enterprise, or partnership, after deductions for business expenses);
- Net receipts from farm self-employment (receipts from a farm which one operates as an owner, renter, or sharecropper, after deductions for farm operating expenses);
- Interest, dividends, and other net income from real or personal property
- Regular payments from railroad retirement, strike benefits from union funds, worker's compensation, and training stipends (e.g. wages from the California Conservation Corps);
- Alimony, military family allotments, or other regular support from an absent family member or someone not living in the household;
- Private pensions, government employee pensions (including military retirement pay);
- Regular insurance or annuity payments (including state disability insurance);
- College or university scholarships (not needs-based), grants, fellowships, and assistantships;
- Net gambling or lottery winnings;
- Net royalties;
- Periodic receipts from estates or trusts;
- Severance payments;
- Terminal leave pay;
- Social Security Disability Insurance (SSDI) payments (Title II of the Social Security Act, Federal Old Age, Survivors and Disability Insurance); and
- Social Security Old Age, Survivors Disability Insurance (OASI) benefits received under Section 202 of the Social Security Act.

The following income sources should not be included in an individual's income calculation:

- Foster care child payments;
- Needs-based public assistance payments;
- Social Security old age and survivors' insurance benefit payments;
- Financial assistance under Title IV of the Higher Education Act (i.e. Pell Grants);
- Supplemental Educational Opportunity Grants and Federal Work Study;
- Needs-based scholarship assistance;
- Loans
- Veteran's Benefits
- Income earned while the veteran was on active military duty and certain other veterans' benefits, i.e., compensation for service-connected disability, compensation for service-connected death, vocational rehabilitation, and education assistance;
- Capital gains;
- Any assets drawn down as withdrawals from a bank, the sale of property, a house or a car;
- Tax refunds, gifts, loans, lump-sum inheritances, one-time insurance payments, or compensation for injury;

- Non-cash benefits such as employer paid or union-paid portion of health insurance of other fringe benefits, food or housing received in lieu of wages;
- The value of food produced and consumed on farms;
- The imputed value of rent for from owner occupied nonfarm or farm housing;
- Medicare, Medicaid, food stamps, school meals, and housing assistance; and
- Allowances, earnings and payments to individuals participating in programs under WIOA (except on-the-job-training wages).

C. Low Income Exception (5% Window)

Under WIOA, no more than five percent of IS youth enrolled in a given program year may be found eligible based solely on meeting the criterion, “requires additional assistance.” This limitation applies to IS youth enrolled on or after July 1, 2015. Therefore, participants that were enrolled under WIA and carried into WIOA would not be factored in.

WIOA allows a low-income exception where five percent of WIOA youth may be participants who ordinarily would be required to be low-income for eligibility purposes and meet all other eligibility criteria for WIOA youth, except the low-income criterion. The five percent must be calculated based on the percent of newly enrolled youth during a program year who would ordinarily be required to meet low-income criterion. It cannot be based upon all youth, since several of the OSY categories do not require low-income status.

The 5% window exception shall be calculated for each service provider in Humboldt County, based upon newly enrolled participants during a program year. Service providers that choose to enroll under this category without the total number of enrollments required for compliance with this exception run the risk of disallowed costs as the youth would not technically be eligible for WIOA youth program.

In some instances, the HC-WDB may grant a Service Provider permission to enroll a youth under this exception, based upon the total number of enrollments throughout the consortium. This permission must be obtained in writing/email prior to the enrollment of the youth and placed in the participant file with other eligibility documentation.

Requires Additional Assistance- Qualifications

Youth that qualify under “requires additional assistance” include both OS and IS youth include youth who have:

- Have repeated at least one secondary grade level or are one year over age for grade.
- Have a core grade point average of less than 1.5.
- For each year of secondary education, are at least two semester credits behind the rate required to graduate from high school.
- Are emancipated youth.
- Have aged out of foster care.
- Are previous dropouts or have been suspended five or more times or have been expelled.
- Have received court/agency referrals mandating school attendance.
- Are deemed at risk of dropping out of school by a school official.
- Have been referred to or are being treated by an agency for a substance abuse related problem.

- Have experienced recent traumatic events, are victims of abuse, or reside in an abusive environment as documented by a school official or other qualified professional.
- Have serious emotional, medical or psychological problems as documented by a qualified professional.
- Have never held a job (applies to OS youth).
- Have been fired from a job within the 12 months prior to application (applies to OS youth).
- Have never held a full-time job for more than 13 consecutive weeks (applies to OS youth).

OS Youth Expenditure Requirement

In compliance with WIOA Section 129[a] [4], Humboldt County will spend at least 75 percent of their WIOA youth formula allocation on youth workforce investment activities for OS youth. The OS youth expenditure rate is calculated after subtracting funds spent on administrative costs.

Recruiting OS Youth

Youth outreach and recruitment are among the limited instances in which WIOA youth funds may be expended on costs related to individuals who are not yet participants. However, youth program services may not be provided until a formal eligibility determination being made.

Work Experience

The WIOA places a priority on providing youth with occupational learning opportunities through work experience.

Work Experience Expenditure Requirement

The HC-WDB will spend at least 20 percent of their WIOA youth formula allocation on work experience]). Leveraged resources will not be used to fulfill any part of the 20 percent minimum work experience expenditure requirement. The work experience expenditure rate is calculated after subtracting funds spent on administrative costs. Additionally, the expenditure rate is not applied separately for IS youth and OS youth.

Work Experience Criteria

Work experience provides IS and OS youth an invaluable opportunity to develop workplace skills. Paid and unpaid work experiences will include academic and occupational education (provided either concurrently or sequentially) and may include the following:

- Summer employment opportunities and other employment opportunities available throughout the school year.
- Pre-apprenticeship programs—Designed to prepare individuals to enter and succeed in an apprenticeship program. Pre-apprenticeship programs include the following elements:
 - Training and curriculum that aligns with the skill needs of employers in the economy of the state or region involved.
 - Access to educational and career counseling and other supportive services, directly or indirectly.

- Hands-on, meaningful learning activities that are connected to education and training activities.
- Opportunities to attain at least one industry-recognized credential.
- 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).
- Internships and job shadowing. Job shadowing is a temporary, unpaid exposure to the workplace an occupational area of interest to the participant and may last anywhere from a few hours to a week or more.
- On-the-job training (OJT) opportunities. OJT means training by an employer that is provided to a paid participant while engaged in in a job that meets the following criteria:
 - 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 up to 50 percent of the wage rate of the participant or up to 75 percent in circumstance of extraordinary costs of providing the training and additional supervision related to the training.
 - Is limited in duration to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant as appropriate.

The academic and occupational education component refers to contextual learning that accompanies a work experience. It includes the information necessary to understand and work in specific industries or occupations. For example, if a youth is in a work experience in a hospital, the occupational education could be learning about the duties of different types of hospital occupations such as a phlebotomist, radiology tech, or physical therapist. Whereas, the academic education could be learning some of the information individuals in those occupations need to know such as why blood type matters, the name of a specific bone in the body, or the function of a specific ligament.

WIOA One-Stop Partners within the America's Job Centers of California (AJCC) in Humboldt County will determine the appropriate type of academic and occupational education necessary for a specific work experience. The academic component may take place inside or outside the worksite, and the work experience employer may provide the academic and occupational education component or such components may be provided separately in the classroom or through other means.

Youth formula funds may be used to pay a participant's 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 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.
- Classroom training or the required academic education component directly related to the work experience.

- Orientation sessions for participants and employers.
- Incentive payment to youth for an achievement directly tied to the work experience.
- Employability skills/job readiness training to prepare youth for a work experience.

Allowable Transitional Job Experience and On-the-Job Training (OJT) activities and hours

- With the exception of Pre-Apprenticeship activities, all other work experience activities must be of a duration of 320 hours or less for Transitional Jobs or 640 hours for On-the-Job Training, unless prior HC-WDB approval is obtained. All work experience activities must also be paid experiences, with the exception of Pre-Apprenticeship and Job Shadowing activities.
- WIOA funds can subsidize Transitional Job Experience and OJT placements and employers can be reimbursed a percentage of the wage. Based on the placement and funds available, wage reimbursement percentages will need to be negotiated with employers.
- OJT wages can be reimbursed up to 50% while Transitional Job Experience has the flexibility to reimburse up to 100% based on the negotiation with employer.
- For the youth program - WIOA wage subsidies cannot exceed the \$6,000 amount allocated per client annually. A portion of the funds cover staff time, overhead and supportive services. It is recommended that Transitional Job Experience and OJT wages for each client should not exceed \$4,800 annually.
- Example of reimbursement and allowable hours – If OJT wages were to be reimbursed at 50%, approximately 640 hours could be covered for the youth program. If Transitional Job Experience wages were to be reimbursed at 100%, approximately 320 hours could be covered for the youth program.
- The length of the Transitional Job Experience and OJT and the percentage of subsidy needs to be determined at onset of Transitional Job Experience and OJT. In some instances, additional hours can be allowed.
- To request an amount higher than \$4,800 per client annually, a written request stating the amount and justification must be submitted and approved by the HC-WDB Executive Director.
- Labor standards apply in any internship where an employee/employer relationship as defined by the Fair Labor Standards Act, exists.
- There is no expectation that the Transitional Job Experience/OJT trainee will be retained in employment after the training period.

Stipends and incentives

Stipends and incentives are achievement awards for milestones directly tied to education, work readiness and work experience accomplishments. Neither are to be used in place of wages and both are provided to youth clients.

Stipend Competency Program:

Up to five competency-based learning activities are allowed per client annually. These activities will support StepUP youth attaining work readiness competencies that may include but are not limited to arriving on time; dressing professionally; customer service; working on trainee activities assigned; and acting in a leadership capacity. The need for work readiness needs to be detailed in case notes, including achievements or challenges. The Stipend Competency Program does not pay wages, therefore minimum wage is not applicable. In all settings where youth are gaining work readiness competencies, supervision and mentoring is required. Program participants may not take the place of an employee. A stipend award may

be granted at the completion of each set of activities and should be reasonable and justified. The intent of the program is better prepare clients for Transitional Job Experience and OJTs.

Note: If a client is in need of additional opportunities to gain work readiness skills, approval from the HC-WDB Executive Director is required.

Incentives

The County of Humboldt may provide incentive payments to youth participants for recognition and achievement directly tied to training activities and work experiences. When offering incentive payments, the County will:

- Tie the incentive to the goals of the specific program;
- Outline in CalJOBS' case notes the incentive before the commencement of the activity and providing the payment;
- Align the incentive with local organizational policy; and
- Meet the requirements in 2 CFR part 200.

IS Youth

Under WIOA, fewer resources are available to serve IS youth. As a result, the Board proactively works to identify resources and/or establish partnerships with youth providers that can provide services to IS youth that are cost effective and reach more students.

The following additional uses of Youth Funds may be used, as appropriate, to serve area youth.

Individual Training Accounts

In order to enhance individual participant choice in their education and training plans and provide flexibility the HC-WDB may choose to use youth funds for Individual Training Accounts (ITA) for OS youth between the ages of 16 to 24. When using youth funds for ITAs, only training providers on the Eligible Training Provider List can be used.

Braiding Funds

Braiding funds is the process of using different funding streams to support different needs for the same participant while maintaining documentation to support the charging and allocations of cost to the separate funds. The HC-WDB and WIOA One-Stop Partners providing youth services in Humboldt County may use braided funds to provide more comprehensive services to participants and maximize partner resources available to assist youth. Braiding funds must meet the following criteria:

- The cost to each funding stream is tracked, documented, and allocated based on the proportional benefit.
- The cost benefits two or more programs in proportions that can be determined without undue effort or cost.
- The youth meets the eligibility requirements for each program from which they are receiving funds.

Youth Standing Committees

Youth councils are not required under WIOA. However, the HC-WDB may, at its discretion, determine to establish and operate a youth council as a standing committee. If established, the Youth Standing Committee may provide information and assist with planning, operations, oversight, and other issues related to the provision of services to youth. The committee may be

asked to recommend youth policy direction, ensure quality services, and leverage financial and programmatic resources and may oversee eligible youth providers.

An existing youth council may be designated as the Youth Standing Committee or a design a Youth Standing Committee to meet the needs of Humboldt County's youth program. When no Youth Standing Committee exists, the HC-WDB remains responsible for conducting the oversight of youth activities.

The membership of any established Youth Standing Committee will include:

- (1) a member of the HC-WDB Board, who must chair the committee, (2) members of community-based organizations with a demonstrated record of success in serving eligible youth, and (3) other individuals with appropriate expertise and experience who are not members of the HC-WDB. The committee may include parents, participants, and youth.

When appointing members to a Youth Standing Committee the HC-WDB will endeavor to appoint:

- Representatives of youth who are enrolled IS and OS youth
- Representatives from the private sector
- Representatives of local education agencies serving with youth
- Representatives of private nonprofit agencies serving youth
- Representatives of apprenticeship training programs serving youth

Procurement of WIOA Youth Service Providers

The HC-WDB will award grants or contracts to youth service providers through a competitive process

that does the following:

- Takes into consideration the ability of the youth service provider to meet performance accountability measures.
- Meets the procurement standards specified in Uniform Guidance and the DOL Exceptions.
- Follows state and local procurement laws.

Youth service providers will also meet criteria in the State Plan and perform the following:

- Employ proven recruitment strategies of effective outreach, engagement, enrollment, and retention of OS youth.
- Demonstrate meaningful partnerships with eligible training providers, institutions of higher education, and employers from in-demand industries.
- Offer a continuum of services that allow participants to obtain a GED/High School diploma, enroll into postsecondary education, and obtain employment within their chosen career path.
- Utilize career pathways and sector strategy models with a structured sequence of activities, as well as multiple entry and exit points that provide adequate supportive services.
- Use structured work-based learning, such as paid and unpaid work experiences and career exploration that leads to gainful employment.
- Provide intensive case management and support services to help youth overcome complex barriers, successfully complete the program, and retain employment.

The HC-WDB may choose to:

- Award youth service provider contracts on a sole source basis where the HC-WDB determines there is an insufficient number of eligible youth providers in the County.
- Assign the function of selecting service provider contracts to the standing youth committee (if established).

When the HC-WDB awards a grant or contract to a youth service provider who also fulfills another role in the Area, a written agreement will be established that provides clarity on the expectation for those roles and clear methods of tracking execution and accountability for the distinct roles.

Youth Program Elements

In order to support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for participants, youth programs will be designed to offer the following fourteen elements to youth participants

Program Element 1 – Tutoring, Study Skills Training, Instruction, and Dropout Prevention Services

Tutoring, study skills training and instruction that lead to a high school diploma or its equivalent, including a recognized certificate of attendance or similar document for individuals with disabilities. These 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. Services may include tutoring, study skills training, and instruction in a one-on-one or group setting, through resources and workshops.

Program element 1 also includes secondary school dropout prevention strategies that keep a youth in school and engaged in formal learning or training. These activities include, but are not limited to, tutoring, literacy development, active learning experiences, after-school opportunities, and individualized instruction.

Program Element 2 – Alternative Secondary School Services or Dropout Recovery Services

Alternative secondary school services assist youth who have struggled in traditional secondary school education. These services include, but are not limited to, basic education skills training, individualized academic instruction, and English as a Second Language training.

Program element 2 also includes dropout recovery services aimed at getting youth who have dropped out of secondary education back into a secondary school or alternative secondary school/high school equivalency program. Examples of these services include credit recovery, counseling, and educational plan development. While there is some overlap with dropout prevention strategies (program element 1), the activities within both program elements are provided with the goal of helping youth re-engage and persist in education that leads to the completion of a recognized high school equivalent.

Program Element 3 – Paid and Unpaid Work Experience

Work experience is covered in detail on a previous section of this policy.

Program Element 4 – Occupational Skills Training

Occupational skills training is an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupation fields at entry, intermediate, or advanced levels. Priority consideration is given to training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the region.

Occupational skills training will meet the following criteria:

- Be outcome-oriented and focused on an occupational goal specified in the individual service strategy.
- Be of sufficient duration to impart the skills needed to meet the occupational goal.
- Lead to the attainment of a recognized postsecondary credential.
- Meet the quality standards in WIOA Section 123.

Program Element 5 – Education Offered Concurrently with Workforce Preparation and Training for a Specific Occupation

This program element reflects an integrated education and training model. Workforce preparation activities, basic academic skills, and hands-on occupational skills training will be taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway. While programs developing basic academic skills, which are included as part of alternative secondary school services and dropout recovery services, workforce preparation activities that occur as part of a work experience, and occupational skills training can all occur separately and at different times (and are counted under separate program elements), this program element refers to the concurrent delivery of these services which make up an integrated education and training model

Program Element 6 – Leadership Development Opportunities

This program element encourages responsibility, confidence, employability, self-determination, and other positive social behaviors and includes:

- Exposure to postsecondary educational possibilities.
- Community and service learning projects.
- Peer-centered activities, including peer mentoring and tutoring.
- Organizational and teamwork training
- Training in decision-making such as determining priorities and problem solving.
- Citizenship training, including life skills training such as parenting and work behavior training.
- Civic engagement activities which promote quality of life in a community
- Other leadership activities that place youth in a leadership role such as serving on the Standing Youth Committee.

Program Element 7 – Supportive Services

Supportive services are services that enable an individual to participate in WIOA activities. Supportive services include, but are not limited to, the following:

- Linkages to community services.
- Assistance with transportation.
- Assistance with childcare and dependent care.
- Assistance with housing.
- Needs-related payments.

- Assistance with educational testing.
- Reasonable accommodations for youth with disabilities.
- Legal aid services.
- Referrals to health care.
- Assistance with work attire and work-related tools including eyeglasses and protective eye gear.
- Assistance with books, fees, school supplies, and other necessary items for student enrolled in postsecondary education classes.
- Payments and fees for employment and training-related application, tests, and certifications.

Program Element 8 – Adult Mentoring

Adult mentoring will last at least 12 months and may take place both during the program and following the youth's exit from the program. The HC-WDB may use group and electronic mentoring, but at a minimum, the youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis. Case managers may serve as adult mentors in areas where adult mentors are sparse.

Program Element 9 – Follow-up Services

Follow-up services for youth may include supportive services, adult mentoring, financial literacy education, services that provide labor market and employment information about in-demand industry sectors, and activities that help youth prepare for and transition to postsecondary education and training. When these elements are provided as follow-up services, they will occur after the exit date, and should be documented as such in case files

Program Element 10 – Comprehensive Guidance and Counseling

This program element provides individualized counseling to participants and may include drug and alcohol abuse counseling, mental health counseling, and referral to partner programs. And referrals to outside providers must include coordination with the referred counseling organization to ensure continuity of service

Program Element 11 – Financial Literacy Education

Financial literacy education includes information and activities such as creating budgets, setting up checking and saving accounts, managing spending, understanding credit reports, and protecting against identity theft. Service providers may partner with local financial institutions to provide this element.

Program Element 12 – Entrepreneurial Skills Training

This program element helps youth develop the skills associated with starting and operating a small business. Such skills may include 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 may include the following:

- Entrepreneurship education that introduces the values and basics of starting and running a business, such as developing a business plan and simulations of business start-up

and operation.

- Enterprise development which provides supports and services that incubate and help youth develop their own businesses, such as helping youth access small loans or grants and providing more individualized attention to the development of viable business ideas.
- Experiential programs that provide youth with experience in the day-to-day operation of a business.

Program Element 13 – Services that Provide Labor Market and Employment Information

These services provide labor market and employment information about in-demand industry sectors or occupations available in the region. Services may include career awareness, career counseling, and career exploration. Career counseling provides advice and support in making decisions about what career path to take and may include providing information about resume preparation, interview skills, potential opportunities for job shadowing, and the long-term benefits of postsecondary education and training. In addition to connecting youth to self-service labor market information (LMI) tools, youth providers will share and discuss state and local LMI with youth participants.

Program Element 14 – Postsecondary Preparation and Transition Activities

This program element prepares IS youth and OS youth for postsecondary education after attaining a high school diploma or its recognized equivalent. Activities include exploring postsecondary education options such as registered apprenticeships, technical training schools, community colleges and four-year colleges and universities. Additional services may include, but are not limited to, the following:

- Preparing youth for the SAT/ACT
- Assisting with college admission applications
- Searching and applying for scholarships and grants
- Filling out financial aid applications
- Connecting youth to postsecondary programs

All of these elements will be available to youth enrolled in the WIOA program, but there is no requirement that all elements must be funded with WIOA title I youth funds or that every youth receives all fourteen program elements. The HC-WDB will leverage partner resources, when practical, to provide some of the elements. Local agreements will be established between the WIOA youth service provider and partners to ensure the program element are closely connected and coordinated with the WIOA youth program.

Program Design

Youth programs will emphasize individual participant needs by adding new components as needed and incorporating career pathways to the objective assessment and individual service strategy. Additionally, individual service strategies will be directly linked to one or more of the performance indicators. The program design framework will consist of an objective assessment, an individual service strategy, case management, and follow-up services that will support successful outcomes for youth participants.

Assessment

Youth service providers will implement an objective assessment of academic levels, skill

levels, and services needs of each participant, which includes a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs. Assessments will also consider a youth's strengths rather than just focusing on areas that need improvement. Assessments will be valid and appropriate for the target population and provide reasonable accommodation in the assessment process. Any formalized testing must also be cost effective, well-matched to the test administrator's qualifications, and easy to administer and interpret results. Assessments approved by the Department of Education's National Reporting System (NRS) are not required and service providers are not required to determine an individual's grade equivalent or educational functioning level, although it is permitted. Service providers may also use previous basic skills assessment results if such previous assessments have been conducted with the past six months.

If service providers do measure Educational Functioning Level (EFL) gains after program enrollment under the measurable skills gain indicator, the provider must use an NRS-approved assessment for both the EFL pre and post-test to determine a youth's educational functioning level.

Career assessments may also be used to help youth understand how a variety of their personal attributes affect their potential success and satisfaction with different career options and work environments. These career assessments may be provided through youth program staff and/or through referrals to national and community-based partners and resources.

Registration

Registration is an information collection process that documents a determination of eligibility (registration is also referred to as the "intake process"). For an individual to be registered into a WIOA program, the following must occur:

1. The individual must complete the application/eligibility.
2. The individual must provide documentation to substantiate his/her eligibility.

After eligibility has been confirmed, potential participants should undergo a "suitability screening" or "structured interview" to determine the youth's need for, and ability to benefit from, services. If the youth is deemed "suitable," service provider staff will then enroll the individual in the WIOA program. Enrollment into the WIOA program must then occur within 90 days of the date of application,

Employment and training opportunities must be provided to youth who can benefit from, and are most in need of, such opportunities.

Enrollment

WIOA requires all eligible individuals enrolled in the Youth program must receive an objective assessment and have an individual service strategy (ISS) developed based on the needs of each youth that is directly linked to one or more of the performance indicators outlined in section 116(b)(2)(A)(ii) of the WIOA15 .

In CalJOBS (the State of California's participant tracking system), an individual is considered enrolled in WIOA as of the "Participation Date" that is recorded under the Create Participation section. After information is entered in to the Create Participation section, the "412-Objective

Assessment” activity must be entered under the Create Activity section.

Note: The “begin date” of the “412-Objective Assessment” activity must be the same date as the “Participation Date.” Additional activities shall be added to CalJOBS as they are provided.

The second activity that must be entered is “413 – Develop Service Strategies IEP/ISS/EDP”. (The “actual begin date” for this activity can be the same date as the “actual begin date” for the objective assessment activity, but it is usually a few days after.)

Occasionally, a youth may participate only in “412” and “413” activities. DOL has determined that each Youth must receive at least one of the 14 program elements outlined under WIOA in order to be considered a “participant.” In instances where a Youth does not receive services beyond “412” and “413,” the system will soft exit the participant 90 days after the completion date of the last activity, and this individual will NOT be included in performance standard calculations. These Youth will also be excluded from enrollment number calculations when HC-WDB calculates average cost per enrollment figures for the Youth program.

Exited Participants

After a participant has completed his/her last service under the WIOA program, a case closure shall be entered into the participant tracking system (CalJOBS). Ninety days after the closure date, CalJOBS will soft exit the participant from the WIOA program. The soft-exit process will record the exit date to match the end date of the last reported service in CalJOBS.

If additional services are required after the case closure has been entered but the 90 days have not yet lapsed, the case closure shall be deleted, and a new activity will be entered with a start date reflecting the date the service began. The 90 day “exit” clock will be reset, and will begin again, upon the entry of the next case closure

If additional services are required after the 90-day period lapses, the individual must begin the application/registration process again. The eligibility documentation must be updated to reflect the circumstances of the individual on the date of the new application.

Additional Assessment and Referral

If a youth applies for enrollment in a program of workforce investment activities and does not meet the enrollment requirements for the program or cannot be served by the program, Service Provider staff shall 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, to the extent practicable.

INQUIRIES:

Any questions regarding this policy may be directed to the Workforce Development Board Director at 707-445-7745.

Humboldt County Workforce Development Board Approval Required? Yes No