
Policy Number: Section 2 Policy 24

Effective Date: 12-06-22

Services for Youth Policy

Purpose:

The purpose of this policy is to describe and define the required and permitted services for Youth.

Policy:

WIOA §§ 3(59), 116(b)(2)(A)(ii), 123; 129, & 681
20 CFR 200
20 CFR 681
DOL comments in Final Rule concerning §§681.210 & 681.640
TEGLs 23-14, 8-15, & 21-16
TEN 22-19
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)
ADWS Policy No. WIOA I-B – 3.2 (Services for Youth)

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)].

This policy lays the framework for the administrative entity to develop procedures that provide a compliant and effective service delivery system.

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

1. Collection of documentation to support an eligibility determination
2. Provision of an objective assessment. A recent assessment from another entity may qualify. "Recent" is defined as within the last six months.
3. Development of an individual service strategy. A recent assessment from another entity may qualify. "Recent" is defined 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).

Arkansas law §6-18-222 (2019) 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:

- Child has received a high school diploma or its State-recognized equivalent
- Child is 16 years or older and enrolled in a post-secondary vocational institution, community college, or two or four-year higher education institution
- Child is 16 years or older and enrolled in an Adult Education program or the Arkansas National Guard Youth Challenge Program.

Youth Program

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 later in this policy.

CAWDB shall engage the community, youth, parents, and other organizations in order to better develop and administer its youth services.

Assessment & Individual Service Strategy:

1. Provide an objective assessment of academic levels, skill levels, and service needs of each participant. Including, but not limited to, a review of:
 - a. Basic skills, occupational skills, prior work experience, employability, interests & aptitudes, supportive service needs, and developmental needs. Must consider a youth's strengths in addition to areas of needed improvements. Must develop or adopt an appropriate assessment tool to be used. If another education or training entity has completed an assessment on the potential participant within the past six months, a new assessment is not required.
2. Develop & 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 following:
 - a. Obtaining employment through education or training
 - b. Retaining employment through education or training
 - c. Increasing earnings in unsubsidized employment
 - d. Obtaining a recognized postsecondary credential
 - e. Obtaining a high school diploma or its recognized equivalent and either obtaining an retaining employment or continuing education or training in a postsecondary school

- f. Obtaining measurable skill gains (MSGs) toward a postsecondary credential program or employment.

The ISS must also identify career pathways that include education and employment goals, that consider career planning and the results of the assessment, and prescribes achievement objectives and services for the youth.

- 3. The administrative entity should reach out to establish relationships with area entities to foster youth participation. The entities may include local :
 - a. Justice and law enforcement officials
 - b. Public housing authorities
 - c. Education agencies
 - d. Human service agencies
 - e. WIOA Title II providers
 - f. Disability servicing agencies
 - g. Health and mental health providers
 - h. Job Corp representatives
 - i. Representatives of other area youth indicatives
- 4. All WIOA Youth program providers must refer all youth participants to appropriate entities where they can receive needed services.
- 5. If a youth applies and does not meet enrollment requirements or cannot be served by the program, the youth must be referred for further assessment if deemed necessary, or referred to appropriate partners who may be able to assist the youth. This should be done for the purpose of meeting basic skills and training needs if a youth is deemed ineligible.
- 6. An assessment from another or the ISS is not required if a recent (within six months) was developed under another education or training program.
- 7. If CAWDB ever chooses to enact a 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

The elements must be available to all Youth participants, but not all elements are required to be provided to each participant. In addition, WIOA funds are not required to be spent on these services. CAWDB will provide these services or enter into an agreement with a partner organization to make sure these services are offered.

These services must be reported in AJL.

- 1. **Program Element 1: Tutoring, study skills training, instruction, and dropout prevention services** that lead to completion of secondary school diploma or its recognized equivalent, or for a recognized postsecondary credential.
 - a. Tutoring, study skills training, and instructions that lead to a high school diploma.
 - b. Secondary school dropout prevention intended to lead to a high school diploma.Strategies that overlap with other program elements:

- c. Dropout recovery strategies aimed at youth who have dropped out of secondary education
- 2. **Program Element 2: Alternative secondary school services or dropout recovery services.** They are:
 - a. Basic education skills training, individualized academic instruction, and English as a Second Language training.
 - b. Dropout recovery services include credit recovery, counseling, and education plan development, focuses to assist youth who have dropped out.
- 3. **Program Element 3: Paid and unpaid work experiences** that have academic and occupational education as a component. Work experience is a planned, structured learning experience that takes place in a workplace for a limited period. Types:
 - a. Summer Employment
 - b. Employment throughout the year
 - c. Pre-Apprenticeships
 - d. Internships & job shadowing
 - e. On-the-job training

Work experience should be “appropriate,” based on the participant’s objective assessment and ISS.

No less than 20% of the youth funds (minus admin costs) must be spent to provide ISY and OSY with paid and unpaid work experiences. Administrative staff must track the funds to ensure this requirement is met. **Supportive Services cannot be counted towards the 20% minimum.** Examples of work experience expenditures that may be counted for the 20% minimum are:

- 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
- 4. **Program Element 4: Occupational skill training**
 - a) Training must be for in-demand industry or occupation in the Central Area, and lead to a recognized postsecondary credential.
 - b) Training must provide 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
 - c) Training must also meet **all** of the following criteria:
 - 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

Individual Training Accounts (ITAs) may be provided to Out-of-School Youth (OSY) ages 16 to 24 with Youth funds. 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.

5. Program Element 5: Education offered concurrently with workforce preparation and training for a specific occupation or occupational cluster.

- a. 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].
- b. 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].

6. Program Element 6: Leadership development opportunities:

- 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.

7. Program Element 7: Supportive services that are necessary to enable an individual to participate in Youth activities, including, but not limited to:

- 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.

8. Program Element 8: Adult mentoring

- a. Shall be for a duration of 12 months, which may occur both during and following exit from the program.
- b. Must be structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee.
- c. May include, but not limited to:
 - i) Group mentoring
 - ii) Mentoring through electronic means
 - iii) Workplace mentoring
 Workforce staff must develop procedures to properly screen and select mentors.

9. **Program Element 9: Follow-up services** WIOA Section 129 (c)(2)(I) and WIOA regulations at 20 CFR § 681.580(c) require that all youth participants must be offered an opportunity to receive follow-up services that align with their individual service strategies. Follow-up services must be provided to all participants for a minimum of 12 months unless the participant declines to receive follow-up services or the participant cannot be located or contacted.

If a participant declines/opts out of follow-up services, or cannot be located/contacted, staff must document one of the following in the AJL case notes: (1) At least three attempted contacts made during the quarter, or (2) Participant has declined/opted out of follow-up services.

Participant files must indicate follow-up activity as opposed to contact attempts after exit. Follow-up activities may include, as appropriate:

- 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

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. 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 complete upon one year from the date of exit.

10. **Program Element 10: Comprehensive guidance and counseling**
- a. May include drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate to the needs of the individual youth.
11. **Program Element 11: Financial literacy education**
- 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
12. **Program Element 12: Entrepreneurial skills training.** Skills that teach youth to:
- 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
- Training may include teaching youth how to start and run a business and enterprise development.
13. **Program Element 13: Services that provide labor market and employment information** about in-demand industry sectors or occupations available in the local area.
- a. Career awareness
 - b. Career counseling
 - c. Career exploration
- Workforce staff should also familiarize themselves with Labor Market Information in order to better assist youth with in-demand sectors and occupations.
14. **Program Element 14: Postsecondary preparation and transition activities**
- a. Services given to assist youth in postsecondary advancement once they have obtained a high school diploma, GED, or recognized equivalent.
 - i. Services may be provided prior to the youth obtaining a high school diploma or GED.
 - ii. 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.

- b. Incentive Payments- Any incentive payments must be in compliance with the Cost Principles in Uniform Guidance at 2 CFR part 200, and may **not** include entertainment.
- i. If incentive payments are used, **they must be:**
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.
- c. Program Exit- 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.
- i. There is no minimum or maximum time an individual can participate in the program.
 - ii. Must link participation time to the individual service strategy and not to the timing of youth service provider contracts or program years
 - iii. 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

Approved by: Michelle Allgood

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Title: CAWDB Chairperson

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