VIRGINIA CAREER WORKS

CENTRAL REGION

Workforce Innovation and Opportunity Act Policy #YC 17-02

Subject: **Workforce Investment Act Youth Services Framework**

Effective Date: **January 10, 2018**

Policy Statement: The purpose of this policy is to establish and convey to service providers the foundation of Workforce Innovation and Opportunity Act (WIOA) youth services in Central Region.

Local youth programs must be designed and built around the following framework:

A. Provide an Objective assessment of academic levels, skill levels, and service 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 consider a youth's strengths rather than just focusing on areas that need improvement. Upon request, Central Region will provide reasonable accommodation in the assessment process for Individuals with disabilities.

Recent Assessment means any assessment conducted **within the last 6 months** by an educational or training program; and includes a review of the academic as well as the needs of each youth.

Assessments should be used to develop the necessary service strategies appropriate for each youth that identifies an employment goal (including participation in nontraditional employment opportunities), achievement objectives, and services for the participant utilizing the results of an objective assessment process, except that a new service strategy for a youth is not required if the provider carrying out such a program determines it is appropriate to use a recent service strategy developed for the youth under another education or training program; **and**

B. **Recent service strategy** means any service strategy developed **within the last 6 months** by an educational or training program; and includes a review of the academic as well as the service needs, of each youth. In Central Region, the TABE test will be the primary tool for assessing youth basic skill levels and will include the locator test. And the Career Scope assessment will be the primary tool for assessing youth interest and aptitude levels.

C. Availability of 14 program elements
Local youth programs should incorporate the fourteen required program elements into the youth service delivery framework. The fourteen required program elements are:

1. Tutoring, study skills training, and instruction, leading to completion of secondary school, including dropout prevention strategies;
2. Alternative secondary school services;
3. Paid and unpaid work experiences (WIOA identifies four categories of work experience: (1) summer employment opportunities and other employment opportunities available throughout the school year; (2) pre-apprenticeship

programs; (3) internships and job shadowing; and (4) on-the-job training (OJT) opportunities as defined in WIOA Section 3(44) and in 20 CFR § 680.700.)

4. Occupational skills training
5. Education offered concurrently with workforce preparation and training for a specific occupation
6. Leadership development opportunities
7. Supportive services;
8. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;
9. Follow-up services for not less than 12 months after the completion of participation, as appropriate
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate.
11. Financial literacy education
12. Entrepreneurial skills training
13. Services that provide labor market information
14. Postsecondary preparation and transition activities

While the fourteen program elements shall be available to youth, the services provided to each youth must meet the individuals' needs and be based on the results of an objective assessment and individual service strategy.

Additional Requirements: Information and Referrals - Participants or applicants who meet the minimum criteria to be considered an eligible youth should be provided with:

• Information on the full array of applicable or appropriate services that are available through the local workforce area, including eligible providers or one-stop partners, and including those receiving funds under this subtitle; and

• Referral to appropriate training and educational programs that have the capacity to serve the participant or applicant either on a sequential or concurrent basis.

For applicants not meeting the enrollment requirements - Each eligible provider of a program of youth activities shall ensure that an eligible applicant who does not meet the enrollment requirements of the particular program or who cannot be served shall be referred for further assessment, as necessary, and referred to appropriate programs to meet the basic skills and training needs of the applicant.

D. Involvement in Design and Implementation
Parents, participants, and other members of the community with experience relating to programs for youth should be involved in the design, implementation and evaluation of youth programs.

E. Priority
At a minimum, 75 percent of the youth served shall be out-of-school youth.

F. Concurrent Enrollment for Youth
For purposes of WIOA, eligible youth are 14 through 24 years of age. Adults are defined as individuals 18 and older. Individuals 18 through 24 may be eligible for both adult and youth programs.

Eligible individuals who are 18 through 24 years old may concurrently participate in adult and youth programs. These individuals must meet the eligibility requirements of both the youth and adult programs applicable to the services they are receiving and be documented by the case manager to benefit from enrollment in both programs.

G. Supportive Services for Youth:

Supportive services must be necessary to the success of the Individual Service Strategy, beyond the ability of the participant to pay, **and documented as unavailable from other sources**. Supportive services will only be provided after a participant is determined in need of such services through an Objective Assessment and such need is documented as part of the Individual Service Strategy. Justification for the provision of Supportive Services shall be documented in case notes.

A maximum supportive service allowance of $2,500 per participant per program year is permitted. Such services may be provided from the list below. Exceptions to the cost limit and type of service provided may be granted by the WDB director under a written waiver request submitted by the service provider justifying the basis for such request.

1. Child Care: The following additional stipulations apply:

   • Priority will be given to single heads of household. Reimbursement will not be made for child care if the participant has an unemployed family member at home. Special cases, such as a handicapped spouse who is unable to work, shall receive individual consideration and be documented by the program operator.

   • Child care services shall be paid to a licensed vendor unless the vendor is providing services in the participant's home. Exceptions can be made if it is clearly demonstrated (documentation must be maintained) that child care as described above is not readily available due to the child's age, the child requiring special care, or a lack of licensed child care in the area. These exceptions are intended as temporary measures, to enable the client to participate in an activity, until acceptable child care can be found.

   • Child care costs shall not exceed $85 per week ($17 per day assuming 5 day program week). Rates for additional children are $10 per week per child.

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2. Transportation: Assistance may include public transportation vouchers, licensed transport services, mileage allowance, or other travel assistance that is determined reasonable and necessary. Mileage allowance shall not exceed the rate approved by the WDB for the adult and dislocated worker program, which is currently set at 75% of the federal mileage reimbursement rate and may be adjusted annually.

3. Tools/Equipment: to include boots, helmets, gloves, and tools required for participation in training or to succeed in their education or employment.

4. Clothing: Only for articles determined appropriate by the case manager and directly related to employment, interviewing and participation in approved training programs.

5. Automobile Repairs/Maintenance: Assistance may be provided for vehicles used as the primary source of transportation to program activities, training or work. The program operator must document who owns the vehicle. If the participant is not the registered owner, a signed statement from the registered owner documenting that the participant uses the vehicle for transportation to training or work, must be obtained. An invoice from an automobile maintenance and/or repair facility must be presented.

6. Medical services: Assistance for medical, vision or dental services not covered by non-WIOA resources, other insurance policies, may be provided, and only if such assistance is determined by the case manager to be directly

related to success program participation and completion. The service provider must exhaust all other resources for medical assistance before using WIOA funds.

7. Temporary Housing: Assistance with temporary housing may be provided for eligible participants participating in WIOA approved occupational skills training outside of the service area.

8.Testing & Licensing: Testing fees required for licensure or certification exams – GED test, driver's permit, and licensing test fees for professional certification after training (e.g. CNA, LPN, MCSE, CDL, etc.)

H. Use of training vouchers for older and out of school youth

As discussed in 20 CFR § 681.550 "in order to enhance individual participant choice in education and training plans and provide flexibility to service providers, the Department allows WIOA Individual Training Accounts (ITAs) for OSY, ages 16 to 24, using WIOA youth funds, when appropriate." ITAs allow participants the opportunity to choose the training provider that best meets their needs. To receive funds from an ITA, the training provider must be on the Eligible Training Provider List as outlined in§ 680.400 and 680.410.

ISY cannot use youth program-funded ITAs. However, ISY between the ages of 18 and 21 may co-enroll in the WIOA Adult program if the young adult's individual needs, knowledge, skills, and interests align with the WIOA adult program and may receive training services through an ITA funded by the adult program.

I. Follow-up

As discussed in 20CFR § 681.580, 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.

The types of services provided and the duration of services must be determined based on the needs of the individual and therefore, the type and intensity of follow-up services may differ for each participant.   Follow-up services must include more   than only a contact attempted or made for securing documentation in order to report a performance outcome.

For example:
A participant who has multiple employment barriers and a limited work history may need significant follow-up services to ensure long-term success in the labor market. However, a participant that has few barriers to employment may need less follow-up services.

Follow-up services may include, but are not limited to:
1) Regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise.
2) Supportive services
3) Adult Mentoring
4) Financial literacy education
5) 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 education and training.
6) Activities that help youth prepare for and transition to postsecondary education and training

The policy of the WDB is to follow the spirit of the law and make follow-up services available to each youth participant after they have exited the program. The extent of the specific follow-up services offered to each participant, is at the discretion of the program operator.

All follow-up contacts and attempts should be documented in case notes on the Virginia Workforce Connection. Follow up activities must be entered quarterly in the Virginia Workforce Connection.

J. Performance & Data Collection

The Virginia Workforce Connection (or VOS) will be used to assess the effectiveness of local areas in achieving continuous improvement of workforce investment activities. To assist the Central Virginia Workforce Development Board in achieving continuous improvement, it is the responsibility of the program operators to track and gather data on youth performance. It is critical that all performance data is entered in the Virginia Workforce Connection. Data entry of performance information should occur at the time performance verifications are obtained, and in no instance will data entry occur later than required by the state through its written guidance.

Approved Documentation for Performance Data

1. Employment /Military Placement

In order to ensure the accuracy of customer employment status at the time of closure and during the applicable performance time periods, the WDB is requiring that one of the following supplemental sources be used to verify employment:

- An employer/military written affidavit or signed verification.
- Documentation of telephone conversation with employer indicating that customer was employed during the period(s) required by the applicable measure. Telephone contact must document the name and title of the employer representative who verified the information. (Note: If documentation of telephone conversation with employer is used for any reason other than case closure, reasonable efforts must be made to obtain the employer written affidavit/signed employment verification. Follow-up log should clearly document the efforts made to obtain the aforementioned form of verification.
- Copy of paycheck stub covering the period required by the applicable measure. (Note: Paycheck stubs should only be used after reasonable efforts have been made to obtain the written affidavit/signed employment verification and documentation of telephone conversation. Follow-up log should clearly document the efforts made to obtain the aforementioned forms of verifications.
- Self-attestation covering the period required by the applicable measure. (Note: Self-attestations should only be used as a last resort and only after reasonable efforts have been made to obtain the employer written affidavit/signed employment verification, documentation of telephone conversation, and a copy of paycheck stub. Follow-up log should clearly document the efforts made to obtain the aforementioned forms of verification.
- For those self-employed: self-attestation covering the period required by the applicable measure. Tax returns will be the preferred supporting document for those self-employed.

2. Education Placement

All data and methods must be documented and are subject to audit. A telephone response from the program participant regarding the outcome is accompanied by *written* documentation such as a degree, certificate or other written documentation. Telephone verification with the institution responsible for the activity (i.e. schools, military, and apprenticeship program) is acceptable but must be documented in the participant's file and reflected in VOS.

3. **Degree or Certificate**
   The WDB is requiring that one of the following sources be used by program operators to verify Degrees and certificates:

   • Diplomas
   • Certificates
   • Licenses
   • Training provider records
   • A copy of a participant's examinee form or certificate may be used to verify a GED

Performance Reports: It will be the responsibility of the program operator to provide the WDB with reports on youth programs in the manner and timing as may be communicated by the WDB or Youth Standing Committee. In addition, each program operator is required to maintain a file on each participant in which all performance verifications and follow-up attempts/contacts must be kept.