

<b>WORKFORCE INVESTMENT BOARD OF TULARE COUNTY</b>  <b>WORKFORCE INNOVATION AND OPPORTUNITY ACT TITLE I</b>	<b>DATE:</b> <b>April 8, 2020</b>
	<b>SUBJECT:</b> <b>WIOA Youth Program Requirements</b>

**WIB DIRECTIVE**

**TUL 20-03**

APPROVED BY  
WORKFORCE INVESTMENT BOARD  
MINUTES OF 04-08-2020

**TO:           WIB Subrecipients**  
**WIB Staff**

**SUBJECT:   WIOA YOUTH PROGRAM REQUIREMENTS**

**EXECUTIVE SUMMARY**

This policy provides guidance and establishes the procedures regarding the activities associated with *Workforce Innovation and Opportunity Act* (WIOA) Title I youth program.

**Scope**

This directive applies to the, Tulare County Workforce Development Area (local area), and all WIB subrecipients of Workforce Innovation and Opportunity Act (WIOA) Title I funded youth funds.

**REFERENCES:**

- *Workforce Innovation and Opportunity Act* (WIOA) (Public Law 113-128)
- Title 2 *Code of Federal Regulations* (CFR) Part 200 “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (Uniform Guidance)
- Title 2 CFR Part 2900: “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (Department of Labor (DOL) Exceptions)
- Title 20 CFR Part 681: “Youth Activities under Title I of the WIOA”
- Title 20 *United States Code* (U.S.C.) Section 1401: “Definitions”
- Training and Employment Guidance Letter (TEGL) [21-16](#), *Third WIOA Title I Youth Formula Program Guidance* (March 2, 2017)
- TEGL [8-15](#), Subject: *Second Title I WIOA Youth Program Transition Guidance* (November 17, 2015)
- TEGL [23-14](#), Subject: *WIOA Youth Program Transition* (March 26, 2015)
- TEGL [19-14](#), Subject: *Vision for the Workforce System and Initial Implementation of the WIOA* (February 19, 2015)
- TEGL [12-14](#), Subject: *Allowable Uses and Funding Limits of Workforce Investment Act (WIA) Program Year (PY) 2014 funds for WIOA Transitional Activities* (October 28, 2014)
- TEGL [13-09](#), Subject: *Contracting Strategies That Facilitate Serving the Youth Most in Need* (February 16, 2010)

- California Education Code (EC) Sections 47612.1, 58500, and 66010
- California Unemployment Insurance Code Section 14209
- Workforce Services Directive [WSD16-1](#), Subject: *WIOA Youth Program Requirements* (September 16, 2016)
- Workforce Services Directive [WSD 17-07](#), Subject: *WIOA Youth Program Requirements* (January 16, 2018)
- Workforce Services Information Notice WSIN 17-22, January 10, 2018

## **WIB-IMPOSED REQUIREMENTS**

This policy contains WIB-imposed requirements. All WIB-imposed requirements are indicated by **bold, italic** type.

## **FILING INSTRUCTIONS**

*This policy supersedes Revised WIOA Youth Program Requirements (TUL 18-02), dated June 13, 2018. Retain this directive until further notice.*

## **BACKGROUND:**

The WIOA Section 129 introduces key investments in Out-of-School Youth (OSY) and work experience. Specifically, it increases the minimum OSY expenditure rate from 30 percent under WIA to 75 percent under WIOA, and introduces a 20 percent work experience expenditure requirement. In addition to, increasing the number of required youth program elements from 10 under WIA to 14 under WIOA.

On August 19, 2016, the DOL issued the WIOA Final Rules. Among other things, the WIOA Final Rules establish a poverty rate of 25 percent for a youth living in a high poverty area, allow Local Boards to directly provide youth services, allow for youth work experiences education and work components to be provided sequentially, and clarify youth program eligibility. The DOL has also published three additional TEGs since 2015 providing further guidance and clarification for the WIOA Title I youth program. Therefore, the state is issuing its third iteration of the WIOA Youth Program Requirements directive to ensure state guidance is in full alignment with the WIOA Statute, the WIOA Final Rules, TEG 23-14, TEG 8-15, and TEG 21- 16.

Although some of the deadlines for implementation of the WIOA requirements have passed, the Employment Development Department (EDD) chose to retain past deadlines in this directive for compliance monitoring purposes.

## **POLICY AND PROCEDURES:**

### **Definitions**

For the purposes of this directive, the following definitions apply:

**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 (K-12) standards and meet student needs (EC Section 58500). 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 Youth (ISY) 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 Youth (OSY) 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 (TEGL 21-16).

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, YouthBuild, Job Corps, high school equivalency program, or dropout re-engagement programs.
- A youth attending a high school equivalency program funded by the public K-12 school who is classified by the school system as still enrolled in school are the exception; the youth would be considered an ISY (Title 20 CFR Section 681.230)
- Non-credit bearing postsecondary classes only (TEGL 21-16).
- 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 (WIOA Section 3[38]).

Postsecondary School – California community colleges, and accredited public and private universities (EC Section 66010).

School – any secondary or postsecondary school (Title 20 CFR Section 681.230). **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 (WIOA Section 3[54]). Per TEGL 8-15, 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 (Title 20 U.S.C. Section 1401[27]).

### **Youth Eligibility Criteria**

The WIOA Section 129(a)(1) provides new eligibility criteria for the WIOA youth program. To be eligible to participate in the WIOA youth program, an individual must be an OSY or an ISY.

Youth enrolled after July 1, 2015, must meet the WIOA eligibility criteria. After July 1, 2015, all Workforce Investment Act (WIA) youth participants who are enrolled in the WIA youth program must be grandfathered into the WIOA youth program, even if the participant would not otherwise be eligible for the WIOA.

#### *Out-School Youth (OSY) Eligibility (Title 20 CFR Section 681.210)*

In order to receive services as an OSY, an individual must meet the following eligibility criteria:

1. Not 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).
2. Age 16-24 years old
3. One or more of the following barriers:
  - a. A school dropout.
  - b. 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.
  - c. A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English language learner.
  - d. An offender.
  - e. A homeless individual or a runaway.
  - f. 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 child eligible for assistance under Section 477 of the Social Security Act, or in an out-of-home placement.
  - g. An individual who is pregnant or parenting (custodial and non-custodial parent including non-custodial fathers).
  - h. An individual with a disability.
  - i. Transgender and gender non-conforming individuals. (WSIN 17-22, WSIN 19-14, and Bill 396)
  - j. A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

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 OSY at time of enrollment and is subsequently placed in school is still considered an OSY. Additionally, an individual who is an OSY and between the ages of 16-24 at the time of enrollment, and is now beyond the age of 24, is still considered an OSY until exited.

#### *In-School Youth (ISY) Eligibility*

In order to receive services as an ISY, an individual must meet the following eligibility criteria: (Title 20 CFR Section 681.220)

1. Attending school, including secondary and postsecondary school.
2. Age 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 [TEGL 21-16 and EC 56026]).
3. Low income individual.
4. Meets one or more of the following barriers:
  - a. Basic skills deficient.
  - b. An English language learner.
  - c. An offender.
  - d. A homeless individual or runaway.
  - e. An individual in foster care or who has aged out of the foster care system or who has attained 6 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under Section 477 of the Social Security Act, or in an out-of-home placement.
  - f. Pregnant or parenting (custodial and non-custodial parent including noncustodial fathers).
  - g. An individual with a disability.
  - h. An individual who requires additional assistance to complete an educational program or secure and hold employment.

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 ISY and between the ages of 14-21 at the time of enrollment, and is now beyond the age of 21, is still considered an ISY until exited.

#### *Low-Income*

***All ISY and two categories of OSY must meet low-income guidelines to qualify for WIOA services OSY Categories:***

1. A recipient of a secondary school diploma or its recognized equivalent and either basic skills deficient or an English language learner; or
2. An individual who requires additional assistance to enter or complete an educational program or secure or hold employment.

#### **Determining Low Income Status**

##### **Living in a 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. Service Providers may access ACS 5- Year data on the U.S. Census Fact Finder website to determine the poverty rate. TEGL 21-16.

***To determine the high poverty rate of Tulare County, Staff must view the [data.census.gov](http://data.census.gov) website.***

***If using the high poverty rate to determine low income; a printout of Tulare County's poverty rate, must be uploaded into the participant's file and case noted.***

### **Free or Reduced Lunch**

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. Service Providers must base low-income status on an individual student's eligibility to receive free or reduced price lunch or on meeting one of the other low-income categories under WIOA.

### **Low-Income/Family Size Determination**

The individual receives an income, or is a member of a family that received a total family income, for the six-month period prior to WIOA registration that does not exceed the higher of the poverty line of 70 percent of the lower living standard income level provided in the most current poverty guidelines directive.

*The 70 percent LLSIL and Poverty Guidelines can be found at [tularewib.org](http://tularewib.org) (Resources, active directive,)*

### *Low-Income Exception*

#### **Five percent (5%) Exception Request-Low Income**

WIOA provides a five percent (5%) eligibility to allow for the participation of youth who would benefit from services but do not meet the income eligibility requirements, provided they have at least two barriers. No more than 5 percent of the total youth enrolled per program year.

*Subrecipients must submit a written request for approval to the WIB prior to enrollment. The request must provide documentation of at least two barriers. The approval must be maintained with the eligibility/enrollment documentation in the participant's file.*

### *Requires Additional Assistance*

Under WIOA, no more than five percent of ISY enrolled in a 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.

*An individual who requires additional assistance to complete an educational program or to secure or hold employment is defined by the Workforce Investment Board of Tulare County as a youth who meets one or more of the following criteria:*

- 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
- 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 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 never held a job (applies to OS youth).
- Has a personal or family history of seasonal or chronic unemployment (i.e., seasonal farmworker).
- A youth that is not attending school or employed, defined as disconnect.

***Subrecipients must submit a written request for approval to the WIB prior to enrollment. The approval must be maintained with the eligibility/enrollment documentation in the participant's file.***

## **Work Experience**

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

### **Work Experience Criteria**

Work experience provides ISY and OSY an invaluable opportunity to develop work place skills. Paid and unpaid work experiences must 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. Pre-apprenticeship is a program designed to prepare individuals to enter and succeed in an apprenticeship program. Pre-apprenticeship programs include the following elements:
  - o Training and curriculum that aligns with the skill needs of employers in the economy of the state or region involved.
  - o Access to educational and career counseling and other supportive services, directly or indirectly.
  - o Hands-on, meaningful learning activities that are connected to education and training activities.
  - o Opportunities to attain at least one industry-recognized credential.
  - o 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 (Title 20 CFR Section 681.480).
- Internship and job shadowing. Job shadowing is a temporary, unpaid exposure to the work place in an occupational area of interest to the participant and may last anywhere from a few hours to a week or more (TEGL 21-16)
- On-the-Job Training opportunities require co-enrollment into WIOA Adult Programs.

### ***Co-enrollment process:***

***WIB Youth subrecipient and WIB Adult subrecipient staff will coordinate to provide 18-24 year old participants with full access to training programs such as Occupational Skills Training (OST) and On-the-Job Training (OJT).***

***Youth Service Providers will:***

- ***Certify eligibility for youth the youth program***
- ***Upload supporting documentation***
- ***Update Objective Assessment with current career goals and ensures training is aligned with local labor market demand occupations***
- ***Complete Individual Service Strategy***
- ***Ensure participants have received the following services;***
  - ***Resume Workshop***
  - ***Career Planning***
  - ***Career Exploration***
  - ***Mock Interview***
- ***Upload professional resume into CalJOBS***
- ***Make every effort to collect required adult eligibility requirements***
- ***Email designated adult intake staff to review file for certification***
- ***Upon receipt of approval- email a referral form to designated staff***
- ***Add local status tracking-referral to education/training code, and enter 436 Post-Secondary Transition activity code***

***Adult Service Provider will:***

- ***Upon receipt of email will review file for certification- if additional information is required, will inform youth staff to gather the addition information***
- ***Certify file for adult program training services, and add certification case note***
- ***Email youth staff the file has been reviewed and certified***
- ***Accept the referral and add a case note indicating receipt of referral***
- ***Update Individual Service Strategy (ISS)/ Individual Employment Plan (IEP) to include the training information and create the 205 activity***
- ***Case manage participant while in training-create a 300 activity or 301 activity***
- ***Comply with all WIB policies and procedures associated with OJT/ITA***
- ***Upon completion will close training activity and upload certificate or applicable training documents***
- ***Create MSG/Credential attainment***
- ***Refer participant to Youth Service Provider***

***Participant will be case managed by Youth Service Provider until participant begins training. Thereafter, Adult service provider will be responsible for monthly contacts.***

***While participants are in training, it is highly recommended Youth Service Provider reviews participants case notes to follow-up on participants progress.***

***Academic and Occupational Education***

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.



### *Youth formula funds*

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.

***The youth work experience policy may be found at on [tularewib.org](http://tularewib.org) (Resource, active directive), Youth Work Experience Policy TUL 14-02.***

### *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. Braiding of funds will 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.

An example is when the WIOA Title I youth program and the WIOA Title II adult education program are used to serve eligible youth. The WIOA Title I resources can provide career guidance, work experiences, and leadership development, while the WIOA Title II resources can provide adult education and literacy activities. (TEGL 21-16)

### *Incentives (Title 20 CFR Section 681.640)*

Incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experience. ***The most current Youth Incentive Policy can be found at [tularewib.org](http://tularewib.org) (Resource, active directive).***

### *Youth Standing Committees*

The Youth Committee shall be designated as a standing committee of the WIB who, acting in an advisory capacity, provides information and assist with planning, operational, and other issues relating to the provision of services to youth. Committee members are appointed for their expertise

to help address the employment, training, education, human and supportive service needs of eligible youth. The committee reflects the needs of the local area and includes:

- A member of the Local a Workforce Development Board (WBD), who chairs the committee;
- Members of community-based organizations with a demonstrated record of success in serving eligible youth;
- Other individuals who appropriate expertise and experience who are not members of the Tulare County Workforce Investment Board

*Procurement of WIOA Youth Service Providers*

*The WIB awards contracts agreements with subrecipients through a competitive procurement process taking into consideration the service providers ability to meet performance accountability measures.*

**Program Elements**

<b>WIOA Youth Program Element</b>	<b>Relates to or Overlaps with Other Program Element(s)</b>	<b>Applicable DOL-only PIRL Data Element Number(s)</b>	<b>Program Description Citation</b>
<b>1. Tutoring, study skills training, instruction, and dropout prevention</b>	Program elements 2 and 4	1402	TEGL 21-16
<b>2. Alternative secondary school services or dropout recovery services</b>	Program element 1	1403	TEGL 21-16
<b>3. Paid and unpaid work experience</b>		1205-1405	Title 20 CFR Sections 681.600, 681.590, 681.480 and TEGL 21-16
<b>4. Occupational skills training</b>	Program Element 1	1300, 1302, 1303, 1306, 1307, 1308	Title 20 CFR Sections 681.540, 681.550 and TEGL 21-16
<b>5. Education offered concurrently with workforce preparation and training for a specific occupation</b>	Program elements 2, 3, and 4	1407	Title 20 CFR Section 681.630 and TEGL 21-16
<b>6. Leadership development opportunities</b>		1408	Title 20 CFR Sections 681.520, 681530 and TEGL 21-16
<b>7. Supportive services</b>		1409	Title 20 CFR Section 681.570 and TEGL 21-16
<b>8. Adult mentoring</b>		1410	Title 20 CFR Sections 681.490 and TEGL 21-16
<b>9. Follow-up services</b>	Program Elements 7, 8, 11, 13, and 14	1412	Title 20 CFR Sections 681.580 and TEGL 21-16

<b>10. Comprehensive guidance and counseling</b>		1411	Title 20 CFR Sections 681.510 and TEGL 21-16
<b>11. Financial literacy</b>		1206	Title 20 CFR Sections 681.500 and TEGL 21-16
<b>12. Entrepreneurial skills training</b>		1413	Title 20 CFR Sections 681.560 and TEGL 21-16
<b>13. Services that provide labor market information</b>		1414	Title 20 CFR Sections 651.10 and TEGL 21-16
<b>14. Postsecondary preparation and transition activities</b>		1415	TEGL 21-16

*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, are reported under program element 1. 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. Local Areas may provide 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 (TEGL 21-16).

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

Alternative secondary school services that assist youth who have struggled in traditional secondary school education, are reported under program element 2. 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 (TEGL 21-16). 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 page 7 of this directive, and can be found on [tularewib.org](http://tularewib.org) (Resource, active directive), *Youth Work Experience Policy TUL 14-02*

*Program Element 4- Occupational Skills Training (Title 20 CFR Section 681.540)*

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. Training may only be provided for occupations with a local labor market demand in accordance with the employment/career goal indicated in the objective assessment and Individual Service Strategy.

***Subrecipient may choose, at the benefit of the participant, to enroll a participant in more than one program to access a wide-range of services. Co-enrollment is highly encouraged for further guidance refer to co-enrollment process on pages 7 and 8.***

*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 and 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 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 (element 2), workforce preparation activities that occur as part of a work experience (element 3), and occupational skills training (element 4) can all occur separately and at different times (and thus 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 (Title 20 CFR Section 681.520)*

This program element encourages responsibility, confidence, employability, self-determination, and other positive social behaviors. Positive social behaviors include the following:

- Exposure to postsecondary educational possibilities
- Community and service learning projects
- Peer-centered activities, including peer mentoring and tutoring
- Organizational and team work 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 (Title 20 CFR Section 681.570)*

Supportive services are services that enable an individual to participate in WIOA activities.

***Reference WIB directive TUL 17-02, WIOA Title I Adult, Dislocated Worker and Youth Supportive Services Policy. This directive sets the local policy and procedures to follow when providing supportive services to eligible WIOA participants. This includes documentation requirements to demonstrate that supportive services are allowable, reasonable, and necessary, and otherwise available to the participant.***

### *Program Element 8 – Adult Mentoring*

Adult mentoring must last at least 12 months and may take place both during the program and following the youth's exit from the program. (TEGL 21-16)

### *Program Element 9 – Follow-up Services*

Follow-up services are to enable youth to continue life-long learning and achieve a level of self-sufficiency to ensure job retention, wage gains, and post-secondary education and training progress. 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.

***All youth participants must receive follow-up services that align with their individual service strategies. Furthermore, follow-up services must be provided to all participants for a minimum of 12 months.***

***Follow-up services may include, but are not limited to:***

- ***Contacting individual or employer to verify employment;***
- ***Providing individuals with information about additional educational or employment opportunities;***
- ***Providing individuals with referrals to other community resources;***
- ***Contracting individuals to help secure better paying jobs, additional career planning, and counseling for individual;***
- ***Supportive services;***
- ***Adult mentoring;***
- ***Financial literacy education; or***
- ***Activities that help youth prepare for and transition to postsecondary education and/or training.***

***Follow-up begins after the end of the applicable post-exit quarter and must be completed in CalJOBS within 30-days after the follow-up due date. During the follow-up reporting month, a minimum of three different attempts is required prior to recording "Cannot locate". If participant declines follow-up services or cannot be located or contacted, a detailed case note must be entered and Service Providers will still be accountable for the performance measures.***

***Follow-up services must be documented in a case note and entered in CalJOBS using the most appropriate Follow-up Activity code(s) to show that follow-up has been completed. Refer to the most current CalJOBS Activity Code Dictionary to select the most appropriate F-Code***

### *Program Element 10 – Comprehensive Guidance and Counseling*

This program element provides individualized counseling to participants include career counseling and coaching, and may include drug and alcohol abuse counseling, mental health counseling, and referral to partner programs.

### *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.

The Financial Literacy Guide provides links to financial literacy materials and maps how and why financial institutions engage in helping young adults achieve greater financial well-being and employment success. (TEGL 21 16)

### *Program Element 12 – Entrepreneurial Skills Training (Title 20 CRF Section 681.560)*

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 provides an introduction to 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 in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services. 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 should share and discuss state and local LMI with youth participants (TEGL 21-16).

### *Program Element 14 – Postsecondary Preparation and Transition Activities (Title 20 CFR Section 681.460)*

This program element prepares 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

**ACTION:**

*Please bring this directive to the attention of all WIB Subrecipients and WIB Staff.*

**INQUIRIES:**

*Please direct inquiries regarding this directive to the WIB at (559) 713-5200.*



Adam Peck  
Executive Director

AP:DL:llg

Attachment: [Summary of Comments](#)

# SUMMARY OF COMMENTS

Directive : *WIOA Youth Program Requirements TUL – 20-03*

There are 4 comments to the draft version of this directive:

**Comment #1** – Page 3 of Draft Directive: States: *A charter school program that provides instruction exclusively in partnership with WIOA...*

We are not aware what Charter Schools are in partnership with WIOA, Can the Charter Schools in partnership with WIOA be listed on the Directive?

**Response** – The Workforce Investment Board of Tulare County does not have an exclusive partnership with any Charter Schools.

**Comment #2** – Page 8 first section: *Ensure training is aligned with local labor market demand* the statement is listed twice.

**Response** –The duplicate statement on page 8 has been removed.

**Comment #3** – Page 12 bold section: *WIB policy requires youth ages 18 and older must be referred to the Employment Connection AJCC site for co enrollment into WIOA Adult or Dislocated Worker programs...*

Youth who qualify for Proteus’s Farm Worker program are referred to Farm Worker program for co-enrollment services. Take into consideration what is in the best interest of the customer. Is requesting to be flexible to refer the youth to the program that is best suited to their needs.

**Response** –The co-enrollment process on page 12 has been changed and now includes the following information:

*“Subrecipient may choose, at the benefit of the participant, to enroll a participant in more than one program to access a wide-range of services.”*

**Comment #4** –The process for co-enrollment would be more customer friendly if the youth staff were to ensure the participant is adult eligible prior to emailing a referral. This would eliminate youth returning to the office to provide additional information.

Suggested edits to co-enrollment process

Youth Staff will:

- Include- Collect applicant statement or PA report to establish low income-
- Delete- *Email and upload the referral form to designated staff-*
- Include-Email Adult intake reviewer to review file and certify the file for adult program training services



# SUMMARY OF COMMENTS

Directive : *WIOA Youth Program Requirements TUL – 20-03*

Adult staff will:

- Delete- *Accept the referral and add a case note indicating receipt of referral*
- Review and certify the file for adult program training services, and add certification case note. Delete- *If at this point additional information is required the adult eligibility staff will gather information from participant, and inform youth staff-*

**Response** – The co-enrollment process has been changed and now includes the following statements.

Youth Service Providers will:

- Make every effort to collect required adult eligibility requirements
- Email designated adult intake staff to review file for certification
- Upon receipt of approval, email a referral form to designated staff

Adult Service Provider will:

- Upon receipt of email, will review file for certification- if additional information is required, will inform youth staff to gather the additional information
- Certify file for adult program training services, and add certification case note
- Email youth staff the file has been reviewed and certified