

## Chapter 3: WIOA Youth

### Overview

The purpose of the Workforce Innovation and Opportunity Act (WIOA) youth services is to assist young people, ages 14-24, who face significant barriers to success in the labor market, by providing resources and support to overcome those barriers and successfully transition to self-sufficient adulthood.

The WIOA outlines a broader youth vision that supports an integrated service delivery system and provides a framework through which states and local areas can leverage other federal, state, local, and philanthropic resources to support in-school youth (ISY) and out-of-school youth (OSY). WIOA affirms the U.S. Department of Labor's (USDOL's) commitment to provide high-quality services for all youth and young adults, beginning with career exploration and guidance, continued support for educational attainment, opportunities for skills training in in-demand industries and occupations, such as pre-apprenticeships or internships, and culminating with a good job along a career pathway, enrollment in post-secondary education, or a Registered Apprenticeship. All of the Department's youth-serving programs continue to promote evidence-based strategies to assist in achieving high levels of performance, accountability, and quality in preparing young people for the workforce.

The transition from the Workforce Investment Act (WIA) to WIOA includes notable changes to youth programming, such as, but not limited to:

WIA

- Youth were primarily classified by age
- Maximum age of 21
- A minimum of 30% of youth funds were to be expended on OSY
- No minimum percentage of youth funds to be expended on work experiences
- 10 youth elements
- Youth Council required

WIOA

- Youth are primarily classified by school status
- Maximum age of 24
- A minimum of 75% of youth funds must be expended on OSY
- A minimum of 20% of youth funds must be expended on work experiences
- 14 youth elements
- Youth Standing



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The WIOA funding enables the delivery of a comprehensive array of youth services that prepare youth for post-secondary educational and employment opportunities, attainment of educational and/or skills training credentials, and obtainment of employment with career opportunities. This is accomplished by assessing the participant's skills, interests, needs and personal goals; creating customized service plans in collaboration with the participant; and expanding the participant's connection to and understanding of the local economy, educational opportunities, and available community services. This process is organized and coordinated around 14 WIOA Youth program elements, which **must be made available** to every participant.

**Make available** means that each Workforce Development Board (WDB) must ensure that all 14 program elements are available in all areas served. While this does not mean that an individual service provider must deliver all 14 elements, they must identify partnerships to ensure availability by referral. Local areas have the discretion to determine which specific services a youth will receive based upon the youth's informal interview, objective assessment, and individual service strategy (ISS).

## WIOA Youth Program Elements

The 14 program elements include the original 10 program elements under WIA, which have been consolidated to nine elements as the summer employment opportunities program element is now a sub-element under paid and unpaid work experiences, and five new program elements. The five new program elements are: financial literacy education; entrepreneurial skills training; services that provide labor market and employment information about in-demand industry sectors or occupations available in the local areas; activities that help youth prepare for, and transition to, post-secondary education and training; and education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster. These elements are starred in the comprehensive list below.

The 14 youth program elements under WIOA section 129(c)(2) are:

- (1) Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized post-secondary credential;
- (2) Alternative secondary school services, or dropout recovery services, as appropriate;
- (3) Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, which may include the following types of work experiences:
  - (i) summer employment opportunities and other employment opportunities available throughout the school year;
  - (ii) pre-apprenticeship programs;
  - (iii) internships and job shadowing; and
  - (iv) on-the-job training opportunities;

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- (4) Occupational skill training, which includes priority consideration for training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the local area involved, if the local board determines that the programs meet the quality criteria described in WIOA Section 123;
- (5) \*Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- (6) Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors;
- (7) Supportive services;
- (8) Adult mentoring for a duration of at least 12 months that may occur both during and after program participation;
- (9) Follow-up services for not less than 12 months after the completion of participation;
- (10) Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth;
- (11) \*Financial literacy education;
- (12) \*Entrepreneurial skills training;
- (13) \*Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
- (14) \*Activities that help youth prepare for, and transition to, post-secondary education and training.

### Education Offered Concurrently with and in the Same Context as Workforce Preparation

The three components of an integrated education and training program include: adult education and literacy activities, workforce preparation activities, and workforce training. Adult education and literacy activities are programs, activities, and services, such as English language services, to achieve competence in reading, writing, speaking, and comprehension. Workforce preparation activities help individuals acquire a combination of basic academic, critical thinking, and digital literacy skills. They improve employability by improving self-management abilities, increasing ability to work with others, and develop other skills necessary for successful transition into post-secondary education, training, and employment.

### Activities to Help Youth Transition to Postsecondary Education and Training

Such activities could include: skill development and practice, such as time management, mock interviews, independent living, or legal responsibilities after the age of 18, and how to prepare for post-secondary education, such as applications, financial aid, scholarship application, etc.

### **Procurement and Providers**

The local board must identify eligible providers of youth workforce investment activities in the local area by awarding grants or contracts on a competitive basis, based on the recommendation of the youth standing committee, if they choose to establish a standing youth committee and assign it that function. If such a committee is not established for the local area, this responsibility falls to the local board.

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Where the local board determines there is an insufficient number of eligible providers of youth workforce investment activities in the local area, such as a rural area, the local board may award grants or contracts on a sole source basis.

The requirement that eligible providers of youth services be selected by awarding a grant or contract on a competitive basis does not apply to the design framework services when these services are more appropriately provided by the grant recipient/fiscal agent. Design framework services include intake, objective assessments and the development of individual service strategy, case management, and follow-up services.

The Workforce Development Agency (WDA) has determined that three of the 14 required services, per WIOA Section 129(c)(2) and NPRM Section 681.460, may be directly provided by the grant recipient/fiscal agent. These services include:

- Follow-up services for not less than 12 months after the completion of participation, as provided in § 681.580; and
- 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; and
- Supportive services, including the services listed in § 681.570.

### Program Design

Local communities provide youth activities and services in partnership with the WIOA One-Stop system and under the direction of the local Workforce Investment Boards.

Funds shall be used to carry out, for eligible youth, programs that –

- Provide an objective assessment of the academic levels, skill levels, and service needs of each participant, which shall include a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs of the participant;
- Develop service strategies for each participant that shall identify an employment goal (including, in appropriate circumstances, nontraditional employment), appropriate achievement objectives, and appropriate services for the participant;
- Provide:
  - activities leading to the attainment of a secondary school diploma or its recognized equivalent, or a recognized post-secondary credential;
  - preparation for post-secondary educational and training opportunities;
  - strong linkages between academic instruction and occupational education that lead to the attainment of recognized post-secondary credentials;
  - preparation for unsubsidized employment opportunities, in appropriate cases; and
  - effective connections to employers, including small employers, in in-demand industry sectors and occupations of the local and regional labor markets.



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## References:

WIOA Sections 123 and 129(c)(2)

Training and Employment Guidance letter (TEGL) 9 -00 23-

14 NPRM Sections 681.310, 681.400 681.420, 681.460

## *Section 3-1: Developing Partnerships, Outreach, and Recruitment*

### **Partnerships**

Strong partnerships help to leverage resources and increase opportunities for youth. They can enhance the ability of workforce investment areas to access information and data, improve services, and increase efficiencies with regard to recruitment processes, referrals, and case management. Creating strong partnerships is critical to providing the most effective, targeted, and appropriate services for youth to maintain progress along a successful career pathway.

The intent of the WIOA is not necessarily to use WIOA Youth funds for every youth element; rather, the WIOA Youth program is intended to act as an intermediary, partnering with various publicly and privately funded organizations to ensure that all 14 youth program elements are available to all youth participants. Local grant recipients can rely on partner programs to provide some of the elements if such services are available for all eligible youth in the local area. If an activity is not funded with the WIOA Title I funds, the local area must ensure that those activities are closely connected and coordinated with the WIOA system. Ongoing relationships should be established with providers of non-WIOA funded activities either through coordinated case management strategies, memorandums of understanding, or an alternate, similar method.

### **Outreach and Recruitment**

Outreach and recruitment are vital components of a successful WIOA Youth program. The objective is to connect youth most in need to the array of services that the WIOA has to offer.

Recruitment factors to consider include:

- Where do you find youth in your local community? Where do they “hang out?”
- How do youth workers, counselors, and others identify potential youth participants?
- Where and to whom do referrals go?
- What marketing materials do you use to recruit youth? Are they current?

Partners who may assist with recruitment efforts include:

- Faith-based organizations
- Schools
- Social service agencies
- Non-profit organizations
- Juvenile institutions
- Homeless shelters
- Food pantries
- Public housing authorities
- Education agencies
- Job Corps representatives
- Mentoring organizations
- Other community-based organizations



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Outreach and recruitment ideas include:

- Use radio, TV, and print media to promote the value and positive outcomes of the WIOA services;
- Involve previous youth participants who can positively speak about programs as peer advocates and recruiters;
- Offer incentives for recruiting youth;
- Hold youth-specific orientation events that promote the benefits of participation, such as
  - Summer and year-round employment opportunities
  - Free tutoring
  - Supportive services
  - Fun activities and other unique opportunities;
- Involve local community leaders;
- Emphasize appeal, value, and uniqueness of the WIOA services;
- Use social media tools, such as Facebook and Twitter, to reach out to youth.

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## Orientation

The WIOA orientation should provide a complete overview of the WIOA program, opportunities provided, overview of training programs, eligibility requirements, and application methods. Following orientation, interested youth are to be scheduled for an intake appointment to determine if they are eligible and suitable for services.

While not required, it is a best practice to offer **youth -specific** orientations. This allows for in-depth coverage of youth specific programs, but also allows for the content to be modified to better meet the physical, educational, and emotional developmental state of young adults.

Orientation is the ideal time to inform youth of required documentation for eligibility determination.

### References

TEGL 33-12 and 05-14

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## *Section 3-2: WIOA Youth Eligibility and Suitability*

### **Eligibility**

The WIOA Registration Form is used to collect information required by federal regulations and to make a determination of eligibility and suitability for the WIOA Youth program. The registration and eligibility determination process must be completed for any youth who is to receive any WIOA services.

A sample eligibility checklist may be found in Attachment 2.

Following verification of school status, age, and citizenship, as identified in the WIOA Section 188(a)(5), eligibility determination includes the following steps:

1. Determining income eligibility, where applicable;
2. Determining barriers;
3. Ensuring selective service registration, if applicable; and
4. Identifying basic skill deficiencies.

Unlike under WIA or under the definition of an in-school youth, low income is not a requirement to meet eligibility for most categories of OSY under the WIOA.

### **Nondiscrimination**

To determine program eligibility and/or meet federal reporting requirements, the WDB, in compliance with applicable federal and state laws, does not discriminate in employment or in the provision of services based on race, color, religion, sex, national origin, age, disability, height, weight, genetic information, marital status, arrest without conviction, political affiliation or belief, and for beneficiaries only, citizenship or participation in any federally assisted program or activity.

Non-discrimination provisions that apply to the public Workforce System prohibit discrimination under the basis of sex, among other basis. Although gender identity is not an explicitly protected basis under the applicable federal laws, discrimination based upon gender identity, gender expression, and sex stereotyping has been interpreted to be a form of prohibited sex discrimination, including under laws that apply to federally-assisted employment, training, and education programs and activities. One-Stop Career Centers should ensure that they are providing equal access to services.

### **Determination of Out-of-School and In-School Youth**

Once the determination of out-of-school or in-school is made, the classification stays with the participant during the period of participation. For example, if an individual enrolls as a high school student, they are an ISY during their period of participation, even after graduating high school.

### **Out-of-School Expenditure Requirement**

The WIOA increases the minimum OSY expenditure rate for the youth formula-funded program from 30 percent under the WIA to 75 percent under the WIOA. State and local areas must work toward spending 75 percent of Program Year (PY) 2020 funds on OSY. The OSY expenditure rate is calculated for local area funds after subtracting the funds spent on administrative costs. If the 75 percent requirement for their 2020 funds is not met, there must be demonstrated progress toward meeting the 75 percent OSY minimum expenditure rate through increased expenditures on OSY compared to the previous year.

For the PY 2014 WIA youth allotment, including unobligated PY 2014 funds carried over to PY 2020, the 30 percent OSY expenditure minimum will still apply. Consistent with that 30 percent requirement, state and local areas may choose to use most of the remaining PY 2014 funds for services to ISY, in order to assist them in successfully completing the program, while focusing PY 2020 funds on OSY, consistent with the minimum 75 percent expenditure requirement on OSY.

The increased expenditures must be a minimum increase of 10 percentage points compared to the previous year and no lower than a 50 percent OSY expenditure rate.

### **Step 1: Income Eligibility**

A youth is income eligible, as applicable, for youth services if he/she is:

- i. Receiving, or is a member of a family that receives, or was determined eligible to receive income-based public support within the prior six months;
- ii. A member of a family that lives at 100 percent or less of the poverty threshold or at 70 percent or less of the lower living standard income level;
- iii. Receiving, or is a member of a family that receives, or was determined eligible to receive, food stamps within the prior six months;
- iv. Homeless;
- v. Receiving, or is eligible to receive a free or reduced price lunch;

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- vi. A foster child;
- vii. An individual with a disability whose own income meets the income requirement of clause ii, but who is a member of a family whose income does not meet this requirement; and/or
- viii. Living in a high-poverty area.

### Five Percent Income Exception

Up to five percent of covered individuals served by WIOA Youth programs may be individuals who do not meet the income criteria for eligible youth, as long as all other eligibility criteria are met. The five percent is calculated based on all youth served in the WIOA local youth program in a given PY.

Local policy is to dictate whether case managers may seek approval for use of the five percent allowance.

The term  
“covered  
individual”  
means:

- an in-school youth; or
- an out-of-school youth who is low income -AND-
- is a recipient of a secondary school diploma or its recognized equivalent –AND-
- basic skills deficient, or
- an English language learner; -OR-
- requires additional assistance to enter or complete an

### Free or Reduced Lunch

If the youth qualifies as receiving free or reduced lunch, documentation from the school must be obtained.

### High Poverty Area

In order to maintain consistency across the country, the USDOL has proposed that a high-poverty area be defined as a Census tract; a set of contiguous Census tracts; Indian Reservation, tribal land, or Native Alaskan Village; or a county that has a poverty rate of at least 30 percent as set every five years using American Community Survey five-year data.

[http://www.census.gov/acs/www/data\\_documentation/data\\_main/](http://www.census.gov/acs/www/data_documentation/data_main/)

See Chapter 5 for additional information on income eligibility and the revised definition of family.



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### Step 2: Barrier Determination

Barriers differ slightly for OSY and ISY. Youth who are income eligible must have at least one of the following barriers:

OSY must be facing one or more of the following barriers:

- (I) A school dropout.
- (II) 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 calendar quarter.
- (III) A recipient of a secondary school diploma, or its recognized equivalent, who is a low income individual and is—
  - (aa) basic skills deficient; or
  - (bb) an English language learner.
- (IV) An individual who is subject to the juvenile or adult justice system.
- (V) A homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), a homeless child or youth (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement.
- (VI) An individual who is pregnant or parenting.
- (VII) A youth who is an individual with a disability.
- (VIII) A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

ISY must be facing one or more of the following barriers:

- (I) Basic skills deficient.
- (II) An English language learner.
- (III) An offender.
- (IV) A homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), a homeless child or youth (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement.
- (V) Pregnant or parenting.
- (VI) A youth who is an individual with a disability.
- (VII) An individual who requires additional assistance to complete an educational program or to secure or hold employment.

**Please Note: Youth who are homeschooled or virtual learners are ISY.**





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### Individual who Requires Additional Assistance

Examples of individuals who require additional assistance may include individuals who:

- Youth in a situation of domestic violence
- Youth with a history of substance abuse
- Youth that lacks occupational goals/skills
- Youth that has a poor work/no work history
- Youth that has been actively seeking employment for at least 12 months, but remains unemployed
- Youth that is gang involved or at-risk of gang involvement
- Youth that has limited English proficiency
- Migrant youth
- Youth residing in a household where at least one family member living at the same residence has received public assistance in the last six months.

For additional details and information, please refer to the Region VII WDB WIOA Youth Additional Assistance Policy (<http://www.wvregion7wib.org>).

### **Step 3: Selective Service Registration Verification**

Males age 18 or older must be registered with the Selective Service in order to be eligible for WIOA Youth services. In order to maintain eligibility for the WIOA services, a male participant who turns age 18 while participating in the program must be registered for Selective Service by the 30th day after their 18th birthday. Please refer to the Adult/Dislocated Worker (DW) Eligibility Section in Chapter 2, which provides additional information regarding Selective Service requirements and verification.

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### **Step 4: Determining Basic Skills Deficiency**

Low educational functioning levels can be a significant barrier to educational and/or employment success, thus all participants must be assessed to determine any basic skills deficiencies. WIOA aligns the prior definitions of "Deficient in Basic Literacy Skills" and "Basic Skills Deficient" by now defining the singular term "Basic Skills Deficient" as an individual—

- (A) who is a youth, that has English reading, writing, or computing skills at or below the 8<sup>th</sup> grade level on a generally accepted standardized test; or
- (B) who is a youth or adult, that is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

Part A of the basic skills deficiency definition is identified by an assessment score at or below grade level 8.9. Part B of the definition, which reads "a youth who is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society," must to be locally defined.

WDBs must use valid and reliable assessment instruments, as found in Section 3-5, and provide reasonable accommodations to youth with disabilities in the assessment process in making this determination.

If appropriate, steps to improve educational functioning should be included in the participant's ISS.

### **Alternative Forms of Documentation**

#### Telephone Verification:

Some eligibility criteria may be verified by telephone contacts with appropriate governmental agencies or verified by document inspection. The information obtained must be documented by recording the information on a standardized form. The information recorded must be adequate to enable a monitor or auditor to trace back to the cognizant agency or document used. Telephone verification must include the name and title of the agency representative providing the verification information, along with the date and contact information.

#### Participant Statement:

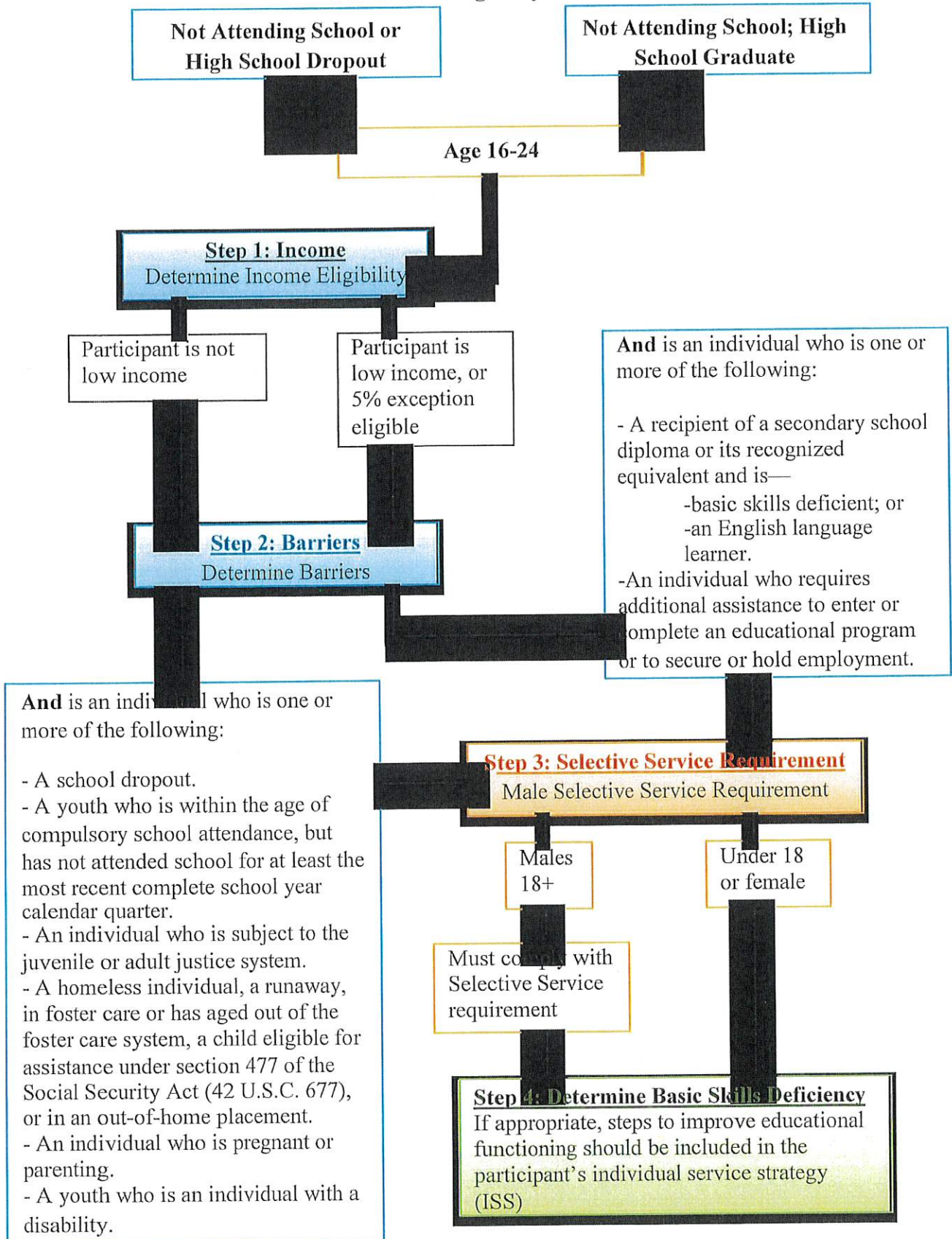
For certain documents, a participant statement, also referred to as an applicant statement, may be used only after all practicable attempts to secure other documentation have failed. It is recommended that a written log be maintained of attempts made and the results. Documented corroborative contact, or a reliable witness attesting to the accuracy of the statement, must support participant statements. A corroborative contact or witness must be indicated on the statement. The corroboration may be via witness signature or a supporting telephone verification. In those rare instances when a participant cannot obtain a satisfactory witness or provide a telephone contact, the participant must explain why such corroboration is not possible. Submitting regular case notes into the MACC is an imperative part of effective case management. Case notes also play a vital role in the documentation required by local, state, and federal regulatory bodies governing WIOA programs.

Copies of documents used to verify eligibility must be maintained in permanent participant file.



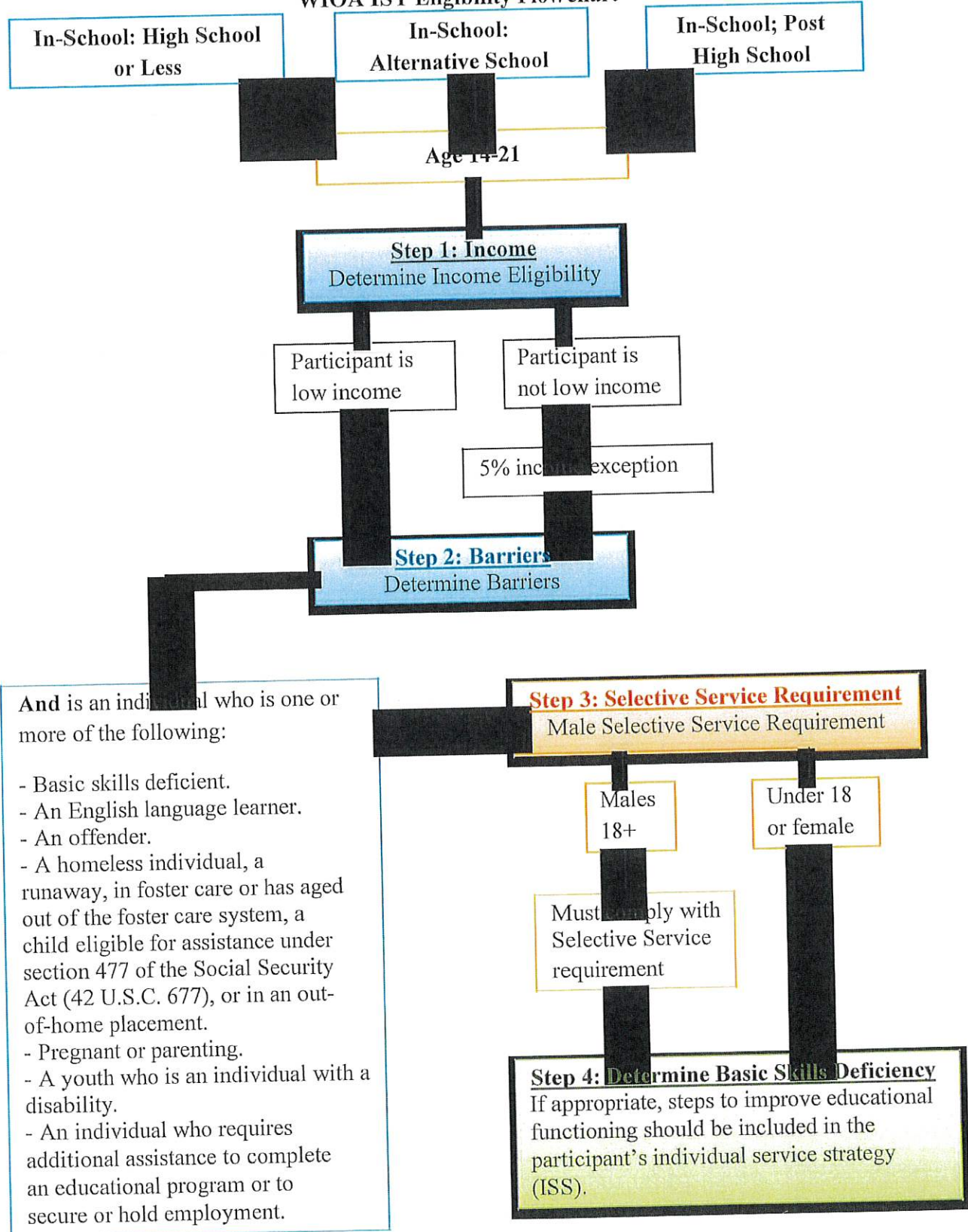
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## WIOA OSY Eligibility Flowchart



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WIOA ISY Eligibility Flowchart



And is an individual who is one or more of the following:

- Basic skills deficient.
- An English language learner.
- An offender.
- A homeless individual, a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement.
- Pregnant or parenting.
- A youth who is an individual with a disability.
- An individual who requires additional assistance to complete an educational program or to secure or hold employment.

**Step 3: Selective Service Requirement**  
Male Selective Service Requirement

Males  
18+

Under 18  
or female

Must comply with  
Selective Service  
requirement

**Step 4: Determine Basic Skills Deficiency**  
If appropriate, steps to improve educational functioning should be included in the participant's individual service strategy (ISS).

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Suitability determination is one of the most important factors in ensuring the overall success of the participant and program as a whole. The goal is to select youth who need assistance in overcoming employment and educational barriers, yet who are motivated and committed to putting forth the effort to improve their situation.

Best Practice:

WIOA Youth Suitability Rubric, provided by Macomb/St. Clair Michigan Works!



## References

The WIOA Sections 129(a)(1)(B)(iii) and (a)(3)(B), 129(c)(5); 188(a)(5)  
NPRM 681.290 681.250 681.260 681.300 681.410  
TEGLs; 11-11; 33-12; 02-14, 05-14, 23-14 and 37-14  
MCL 380.1561



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## ***Section 3-3: Intake***

The WIOA participant registration process is used to collect information required by federal regulations and to make a determination of eligibility, as outlined in Section 3-2, for the WIOA Youth program. A WIOA registration and eligibility and suitability determination must be completed for any youth who is to receive any WIOA service.

### **Pre-Registration**

The WIOA registration process begins with pre-registration. The pre-registration process collects all information to meet Equal Opportunity (EO) requirements as stated in the WIOA, Section 188, and 29 Code of Federal Regulations (CFR) Part 37; and includes collection and data entry of other essential information, such as address and telephone numbers.

With the exception of the WIOA registration, the Region VII WDB must collect EO data for every individual who is interested in being considered for the WIOA Title I financially-assisted aid, benefits, services, or training by the WDB, and who has signified that interest by submitting personal information in response to a request by the WDB.

### **Registration**

An informal interview with the participant should be conducted by the intake worker to collect information on income, living situation, education level, and reason for visiting the WDB. Intake worker assistance to guarantee accurate reporting is strongly encouraged while the participant fills out the registration form, since the participant will not be familiar with the definitions used for many of the reporting items. The case manager will assist the participant to complete all applicable items on the form prior to the transfer of information to the web-based form.

#### Other Responsible Adult

For purposes of authorizing a minor to participate in the WIOA programs, the signature of a parent, guardian, or other responsible adult is required. Local areas **may define in policy** "other responsible adult" in order to enroll minors with the authorization of individuals other than a parent or legal guardian.

The definition of "other responsible adult" may include:

- A relative with whom the individual resides;



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- An adult who has been delegated custodial or administrative responsibilities in writing, either temporarily or permanently, by parents or by an appropriate agency;
- An agency or organization representative who is in a position to know the individual's circumstances (i.e., that they could not get a parent's or guardian's signature authorizing participation), for example, a clergy person, a school teacher or other school official, a probation or other officer of the court, a foster parent;
- A representative of an agency which provided support services to the individual and who is aware of the individual's circumstances (i.e., that they cannot get a parent's or guardian's signature authorizing participation), for example, a social worker, a homeless shelter official, a child protective worker, a health clinic official; or
- Other responsible adults determined by the local board as appropriate to authorize the individual's participation.

Corrections or clarification to information completed by the registrant, when using the “hard copy” form, should show clearly that the case manager made the notations by the addition of the intake worker’s signature and date on which the change was made. The intake worker may wish to use a different color pen, etc.

In no instance should the intake worker cross out or erase information provided by the registrant. The case manager is to note which additional/correct information is appropriate in the **Comments Section** of the registration form. For instances when self-attestation is applicable, the participant must make, sign, and date the correction.

The Electronic Participant Management Information Guide is designed to assist One-Stop staff in filling out the web-based registration form, and may be found at <https://staff.workforcewv.org>.

### Co-Enrollment

A determination should be made as to whether or not the participant’s needs would be best met by simultaneous enrollment in both the WIOA Youth and WIOA Adult programs. To qualify for co-enrollment, the participant must be between the ages of 18-24 and meet all eligibility requirements of both programs. The Region VII WDB may create additional directives and policies regarding co-enrollment.

Additionally, many disconnected youth age 16 to 24 meet eligibility requirements for both the WIOA Title I youth activities and the WIOA Title II Adult Education. Co-enrollment between these two programs can be very beneficial to disconnected youth as they can receive work experience and occupational skills through Title I funding and literacy skills through Title II funding. Because the eligibility for Title II is similar to that for an OSY under Title I, an individual who is not enrolled or required to be enrolled in secondary school under State law, can be considered to be already enrolled in Title II as an OSY for purposes of Title I WIOA Youth eligibility.

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### **Non-eligible Youth**

Non-eligible youth should be referred to other services offered by other community-based organizations in accordance with the individual's needs.

### **Referrals**

In addition to existing partnerships, this link provides an interactive mapping tool to locate federally supported youth programs in your community:

<http://www.findyouthinfo.gov/maps/map-my-community>.

Search by key word and full address or zip code and click Find Programs. If programs are found, the location is marked on the map. Click on the marker to see the program title, CFDA number, department, funding agency, recipient name and full address. Results can be filtered by topic and sponsoring federal department.

Topics include:

- Afterschool
- Bullying
- Community Development
- Disabilities
- Education, Training and Employment
- Health and Nutrition
- Homelessness and Housing
- Mental Health
- Mentoring
- Parenting
- Positive Youth Development
- Substance Abuse
- Transition-Age Youth
- Violence and Victimization

Sponsoring departments include:

- Department of Agriculture
- Department of Defense
- Department of Education
- Department of Health and Human Services
- Department of Homeland Security
- Department of Housing and Urban Dev.
- Department of Justice
- Department of Labor
- Department of Interior
- Department of Transportation
- Social Security Administration



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## Map My Community

Key word:


Address or ZIP Code:

Radius:

**Search Filters**

**Topics** [Select All | Deselect All]

- Afterschool
- Bullying
- Community Development
- Disabilities
- Education, Training and Employment
- Health and Nutrition
- Homelessness and housing
- Mental Health
- Mentoring
- Parenting
- Positive Youth Development
- Substance Abuse
- Transition-Age Youth
- Violence and Victimization



## References

WIOA Section 188

NPRM Sections 681.420, 681.440

## *Section 3-4: Case Management*

Case management is the foundation of service delivery in the workforce development system. Effective case management practices include the development of ISSs (See Section 3-6), follow-up services (See Section 3-9), and case note and file maintenance. A successful case management approach includes assessing and interpreting needs; developing strategies to help reach educational, training, and employment goals; providing tools and resources to help overcome personal barriers; documenting youth participation, referral outcomes, service decisions, summaries of one-on-one meetings, and achievements; and providing follow-up services. Case management provides an opportunity for staff to build a working relationship with the participant and with key organizations in order to assist youth in meeting their objectives.

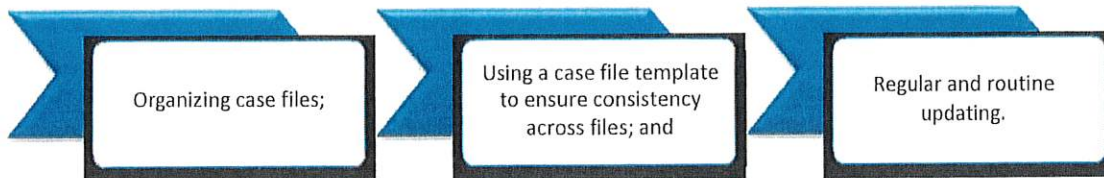
### **Case File Management**

Each WIOA Youth participant shall have a case file with detailed information on basic and occupational skills, work experience, interests, supportive service needs, assessment results, eligibility documentation, case notes documenting active case management and follow-up, including how service decisions are made, and other information that will help create a strategy for success. Thorough case file maintenance and documentation by case notes are essential to the effective provision of case management, as they assist with managing and supporting participants' progress.

Following the USDOL Employment and Training Administration's (ETA) monitoring reviews, conducted in 2011, 2012, and 2013, reviews reported several types of issues with case file documentation and practices. These issues included incomplete case notes, poor case file maintenance where required documentation was missing, case files not updated and/or not matching information entered into MACC, and extended gaps in time for documenting updates, including updating the ISS. WDB monitoring has confirmed these concerns.

In accordance with TEGL 3-03, Change 1, grantees must collect and store specific source documentation to enable the validation of data elements related to eligibility, services received, and outcome information that is used to calculate and support the validity of performance outcomes reported to the ETA. Required documentation must be kept in case files, particularly for eligibility documentation, such as verification of date of birth, assessment of basic skills, scores for pre- and post-tests, income verification, signatures from the youth and/or parent, guardian, or other responsible adult of minor participants, and contact information.

Proper case file maintenance includes:



The Region VII WDB and WorkForce West Virginia has developed procedures regarding case file maintenance (see WorkForce West Virginia Data Validation handbook for more details). Regular in-house monitoring and regular random selection file reviews are tools utilized by the WDB to ensure high quality case files. The WDB has a common file format. ***The case notes being generated in the MACC must also be printed and stored in the permanent file.***

## Case Notes

Comprehensive case notes help plan, implement, and evaluate services. More importantly, case notes should tell the detailed story of the participant from intake through follow-up.

Case notes refer statements by the case manager that identify, at a minimum, the following:

- 1) A participant's status;
- 2) The date on which the information was obtained; and
- 3) The case manager who obtained the information.

***Again, the case notes being generated in the MACC must also be printed and stored in the permanent file.***

All participants are required to meet with a case manager. The case manager should use case notes to document the outcome of the informal interview and objective assessment. The case manager and the participant should collaboratively develop the ISS and determine both short and long-term goals as well as action steps the participant will take.

## Case Managers

The case manager is expected to:

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- Develop ongoing relationships with their participants and act as a resource;
- As appropriate, be in communication with a staff member trained in career counseling services;
- Develop a relationship with adult education instructors where appropriate and possible;
- Guide the participant in understanding and acting on their ISS; and
- Document case management, as it is vital to quality service.

Participants should see the same case manager for check-ins and return visits until the participant exits the system.

The participant should be notified in the event that the case manager changes and offered an opportunity for an introductory meeting with the new case manager as soon as mutually convenient.

### References

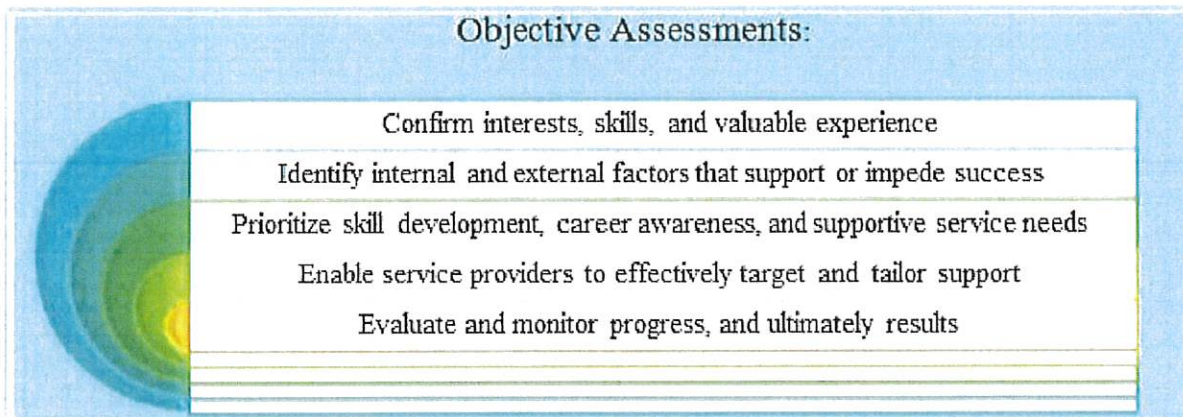
TEGLs 03-03, Change 1; 5-12; 33-12, and 05-14

## *Section 3-5: Objective Assessment*

All youth participants are to be provided an objective assessment that assesses educational functioning levels, as well as identifies individual strengths and barriers, goals, interests, hard and soft skills, and need for supportive services. The objective assessment process includes a review of basic and occupational skills, prior work experience, educational attainment level, employability potential and developmental needs.

The objective assessment:

- Is an ongoing process and should not be viewed as a one-time event.
- Should include interviews, career guidance instruments, basic skills assessments, and observations.
- Can provide insight and guidance to both the case manager and the participant during development of the ISS.



### **Determining Educational Functioning Level (EFL)**

The WIOA requires all eligible youth to be provided with an objective assessment which includes a review of academic skill levels.

If a youth has been assessed for basic skills deficiency in the previous six months, staff may use those results in lieu of re-testing; however, the results of the alternate test must be verifiable and documented. In addition, the same test format must be available and administered for post-testing at a later date.

Reasonable accommodations must be provided, as applicable, when assessing youth with disabilities.

As a reminder, frontline staff must keep a copy of the test scoring sheet in the participant file. In addition to the participant's name, per TEGl 46-11, the test score sheet must show the date of the test, total scores, and grade levels. Case notes should also detail the participant's progress.



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## Pre-Testing

The Region VII WDB must administer one of the following assessments:

1. Test for Adult Basic Education (TABE);
2. Comprehensive Adult Student Assessment System (CASAS);
3. Wonderlic General Assessment of Instructional Needs (GAIN); or
4. ACT WorkKeys.

If the participant computes or solves problems, reads, writes, or speaks English at or below the 8<sup>th</sup> grade level, the participant is determined to be basic skills deficient and will require post-testing. Participants who are determined not to be basic skills deficient, based on pre-test results, are excluded from post-testing requirements. Participants determined to be basic skills deficient will be referred to ABE for remedial education and tutoring.

**Scale Score Conversions to Educational Functioning Levels**

EDUCATIONAL FUNCTIONING LEVEL	Basic Skills Deficient	Grade Level	Test Benchmarks						
			TABE			CASAS		GAIN	
			Reading	Math	Language	Reading/ Math	Writing	English	Math
Beginning ABE Literacy	Basic Skills Deficient	0-1.9	<368	<314	<390	<201	<201	200-406	200-314
Beginning Basic Education		2.0-3.9	368-460	314-441	390-490	201-210	201-210	407-525	315-522
Low Intermediate Basic Education		4.0 – 5.9	461-517	442-505	491-523	211-220	211-220	526-661	523-669
High Intermediate Basic Education		6.0-8.9	518-566	506-565	524-559	221-235	221-235	662-746	670-775
Low Adult Secondary Education	Not Basic Skills Deficient	9.0-10.9	567-595	566-594	560-585	236-245	236-245	747-870	776-854
High Adult Secondary Education		11 - 12.	>595	>594	>585	>245	>245	871-1000	855-1000

National Reporting System Guidelines may be found at:

[http://www.nrsweb.org/foundations/implementation\\_guidelines.aspx](http://www.nrsweb.org/foundations/implementation_guidelines.aspx)

## Post-Testing

Basic skills deficient participants who receive services for more than one year must be post-tested prior to the participant's anniversary date (the date of the first youth program service) of each year, through year three of participation.

The ETA and WDB monitoring review reports included findings demonstrating that many ISSs lacked documentation of objective assessment results and failed to incorporate assessment results into the ISS.

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## References

The WIOA Section 129(c)(1)(A)

NPRM 681.290

TEGLs 17-05; 17-05, Change 2; 18-11; 20-11; and 33-12, 46-11



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## *Section 3-6: Individual Service Strategy (ISS)*

The WIOA calls for the youth population to be intimately involved in the design and implementation of services so the youth voice is represented and their needs are being met. Having a well-developed ISS and related documentation is a vital part of case management and is required by DOL regulations. As outlined in the WIOA Section 129 (e)(1)(B), the ISS represents an individual plan for each young person and includes: 1) an employment goal; 2) appropriate achievement objectives, including educational goals; and 3) appropriate services that take into account information learned from the objective assessment. The ISS is a detailed, unique, individual strategy for each participant that is the basis for the overall case management strategy.

**The ISS shall be a living document**, to be reviewed and updated on an ongoing basis. The case manager should use the ISS to update strategies and activities as they occur and/or as life changes require, and to document referral and contact information for services obtained from partner organizations.

When reviewing the ISS, case managers shall document a participant's progress, activities completed, benchmarks reached, and any other accomplishments. Additionally, the ISS shall be developed, and modified in partnership with the participant, and shall document achievements in measurable and attainable short-term and long-term goals that both reflect the young person's interests and incorporate career pathway planning.

The ETA and the WDB monitoring reviews have found that the Youth providers often lack a fully-developed ISS for participants. Furthermore, in many cases, ISSs were found to be inadequately developed and incomplete. In addition to not incorporating comprehensive assessment results, many did not reflect a career goal, were not developed for each participant, did not document remediated barriers, and/or did not match service provisions.

ISSs are subject to review during the One-Stop Reviews. Lack of the abovementioned components and/or lack of proper revision will result in a finding.

The participant must receive a copy of the plan signed and dated by both the participant and case manager. When the plan is significantly modified, such as the addition or modification of information that may be used as data validation source documentation, a new copy should be signed and dated by both parties and provided to the participant.

WIOA calls for customer-focused services based on the needs of the individual participant. This includes the creation of career pathways for youth in all Title I youth programs, including a connection to career pathways as part of a youth's ISS in the Youth formula-funded program.

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## Credentials

Appropriate credentials to be obtained shall be included in the participant's ISS. As stated above, the participant's progress and achievements must be updated in the ISS and case notes, as appropriate.

Additional information regarding credentials may be found in Chapter 8.

## Supportive Services

Supportive services may be provided to address identified needs that may interfere with the participant's ability to successfully participate in the WIOA program or interrupt their attachment to the workforce. These services may be addressed whenever the need is identified, whether at initial assessment or at any time during participation in the WIOA program. The participant's ISS and case notes should always reflect a clear picture of circumstances and services provided. Supportive services may be delivered while a participant is enrolled in one or more of the 14 required program elements, including while an exited participant is eligible for follow-up services. Supportive services may be provided only after it has been determined that the services are *necessary* for participation in program activities.

When considering the necessity of providing a supportive service, providers shall make a determination of which services are reasonably required for each individual participant based on his/her unique needs, as identified through the participant assessment process. Supportive services may be provided to participants as follow-up services only, as documented in his or her ISS.

Supportive services for youth may include the following:

- a. Linkages to community services;
- b. Assistance with transportation;
- c. Assistance with child care and dependent care;
- d. Assistance with housing;
- e. Needs-related payments;
- f. Assistance with educational testing;
- g. Reasonable accommodations for youth with disabilities;
- h. Referrals to health care; and
- i. Assistance with uniforms or other appropriate work attire and work-related tools,

WIOA lists two supportive services that were not included in WIA

- Needs-related payments
- Assistance with educational testing and accommodations

The need for and provision of, or referral to these services should be documented in the ISS.

The decision to provide supportive services, as well as the method to determine the level and duration of assistance, rests with the Region VII WDB and current Youth Provider.

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## References

The WIOA Sections 129(c)(1)(B) and (c)(2)(G)

NPRM 681.570

TEGLs 33-12 and 05-14

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## *Section 3-7: WIA Goals and WIOA Activities*

### **WIA Youth Goals**

Setting goals was an essential part of developing an ISS in the WIA Youth program. Learning how to set goals enabled youth to make effective use of the WIA program and services and, ultimately, to set goals for themselves as they pursue adult responsibilities, such as completing their education, finding employment, and becoming good citizens.

WIOA performance will not be implemented until **July 1, 2016**. The Region VII WDB must continue to track skill attainment goals and the literacy/numeracy measure until ETA issues further guidance on performance and reporting. There are no changes related to performance tracking on July 1, 2020.

For a carry-in youth participant aged 14-18, and any appropriately assessed out-of-school youth who needs to attain basic skills, work readiness skills, or occupational skills, a minimum number of one and a maximum number of three goals must be set per registration year, until new performance requirements take effect on July 1, 2016. Goals must be attainable within one year or less. Subsequent goals are to be entered on or before the anniversary date of the enrollment each year of participation. Goals must be attained on or before the participant's anniversary date (i.e., the set date plus 365 days) in order to be considered "achieved." A maximum of three goals can be recorded by the system. Any additional goals set during the registration year will not count towards the WIA performance measures. Any goal not achieved at time of exit from the WIA is reported as a goal not attained.

As a reminder, basic skills deficient youth must have a basic skills goal set as their first goal in the

#### Basic Skill Goals

Basic skill goals reflect a measurable increase in basic education skills including reading, math computation, writing, speaking, listening, problem-solving, reasoning, and capacity to use these skills.

#### Occupational Skill Goals

Occupational skill goals include performing actual tasks and technical functions required by certain occupations at entry, immediate, or advanced levels.

For example:

- Safety procedures;
- Clean-up routines;
- Work-related terminology; or
- Use of tools and equipment.

#### Work Readiness Skill Goals

Work readiness skill goals include:

- World of work awareness;
- Labor market information;
- Occupational information;
- Values clarification;
- Personal understanding;
- Decision making;
- Job search awareness; and
- Daily living skills.





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## WIOA Activities

The WIOA youth can be enrolled in several different activities, as appropriate, following the determination of their needs as identified during intake and the development of the ISS. Each activity involves the collection of information unique to that activity. There are five categories of youth activities found in the MACC, including:

1. Education Services;
2. Work Experiences;
3. Additional Support for Youth;
4. Leadership Development Opportunities;  
and
5. Follow-up Services.

The previous summer youth employment activity has been combined with employment service activity. Both are now found under the title of work experiences.

## Work Experience Requirement

**Under WIOA, work experience becomes the most important of the program elements.** Local Youth programs must use not less than 20 percent of the funds allocated to the local area to provide youth participants, both ISY and OSY, with paid and unpaid work experiences. In order to ensure that the local WIOA Youth programs meet this requirement, the USDOL has proposed that the local WIOA Youth programs track program funds spent on paid and unpaid work experiences, and report such expenditures as part of the local WIOA Youth financial reporting. Program expenditures on the work experience program element include wages as well as staffing costs for the development and management of work experiences.

Similar to the 75 percent OSY expenditure requirement, local area administrative costs are not subject to the 20 percent minimum work experience expenditure requirement. The work experience expenditure rate is calculated for local area funds after subtracting out funds spent on administrative costs, and is calculated based on remaining total local area youth funds rather than calculated separately for ISY and OSY.

Unlike WIA, the WIOA does not discourage the use of on-the-job training as a work experience for youth.

## Self-Service Activities

Unlike the WIA, there is no self-service concept for the WIOA Youth program. Every individual receiving services under the WIOA Youth program must meet ISY or OSY eligibility criteria and formally enroll in the program.

## Open Activities

The Region VII WDB should develop a schedule of review of participant activities to ensure that open activities are appropriate for the current needs of each participant. The WDB may benefit from available queries, provided by the MACC and Evaluation Section of the WDA, to identify activities that have been open for excessive periods of time.

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### References

WIOA 129(c)(4)

NPRM 681.310 681.590 681.600



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## *Section 3-8: Case Closures and Exits*

### **Case Closures**

When a participant no longer requires services and case management because he/she has entered employment or education, become disabled or otherwise incapable of working, or the participant voluntarily opts out of service, the participant's case should be formally closed. Case closure is a case management process and is not terminology used in the WIOA law. Case closure should not be confused with Exit, which is federally defined and structured. The decision to close the case should be documented accordingly in the case notes.

While a participant's case may be closed because the participant entered employment or education, the participant may not be ready for exit and follow-up services. Ideally, each youth should remain a program participant long enough to be stable in a job or post-secondary education.

### **Exits**

**When to formally close a case** - A good rule of thumb is that youth can be considered stable if they continue to be successful after 6-8 weeks on the job or the second quarter or semester in post-secondary education or advanced training.

Participants should be notified that their cases are being transitioned and for what reason, along with information on the type and frequency of follow-up contact to expect. The term 'exit' is not mandatory and may be found abrasive. Instead, you may wish to explain to the youth that they are transitioning to another phase of service where they will become more and more independent, but that you are still there to help them if they need it and will be in contact.

A case note should be made indicating the formal closure of the case and the reason, i.e., no longer in need of, or able to benefit from services, lack of participation, or customer requested exit.

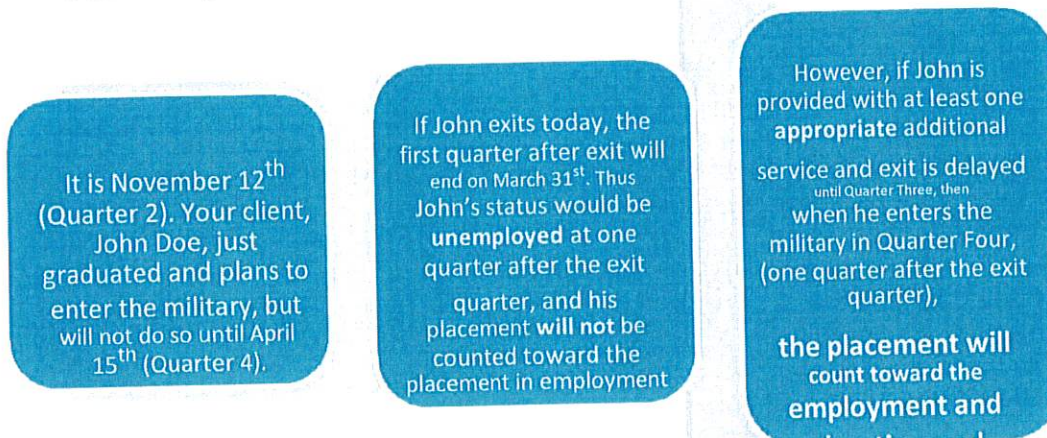
A participant will automatically exit the program when they have not received the WIOA services for 90 consecutive days. The exit date is the last date of service with no other services planned. The only way to prevent a system exit is to provide a service before the 90th day after the last service. This service **must** be appropriate for the participant.

### **Managing Exits for Performance**

To ensure that performance will be credited, the case manager should consider a participant's status at the time of exit, as well as the anticipated future status in related performance quarters.



For example:



**Please Note:** The above scenario applies to current performance reporting requirements, which will change to the second quarter after the quarter of exit as of July 1, 2016.

## Mismanagement of Exits

Once a participant has not received any services funded by the program, or a partner program, for 90 consecutive calendar days, has no gap in service, and is not scheduled for future services, the date of exit is applied retroactively to the last day on which the individual received a service funded by the program or a partner program.

Examples of activities that do not extend the period of participation, or delay program exit, include follow-up services and any other required administrative case load management activities that involve regular contact with the participant or employer to obtain information regarding the participant's employment status, educational progress, or need for additional services. Prolonging exit due to the inability to contact a participant is inappropriate.

**Proper management of exits will be determined by the Region VII WDB Youth Coordinator.**

## Prematurely Exiting Youth

The USDOL's monitoring of local areas commonly found that youth were exited before successfully completing the program due to artificial time constraints, or the ending of youth service provider contracts. In order to ensure that youth are not prematurely exited from the WIOA Youth program, the USDOL has proposed that Youth programs serve participants for the amount of time necessary to ensure they are successfully prepared to enter post-secondary

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education and/or unsubsidized employment. While there is no minimum or maximum time a youth can participate in the WIOA youth program, programs must link program participation to a participant's ISS and not the timing of youth service provider contracts or PYs.

The USDOL recognizes that states and local areas may still be serving large numbers of ISY as they transition into WIOA on July 1, 2020. It is critical that local areas not prematurely exit ISY from the program due to the shift in emphasis under WIOA to OSY. At the same time, new enrollments must reflect the shift in emphasis to OSY programs. As previously stated, ISY and OSY expenditure rates are tracked and reported based on a specific program year's allotment.

States and local areas must carefully plan the services and referrals necessary to successfully serve the remaining ISY while beginning to shift the WIOA funds to serving more OSY. As fewer resources under WIOA will be devoted to ISY, local boards and youth committees need to identify existing resources throughout their communities that can provide services to ISY. In addition, local boards and youth committees may consider strategies for serving ISY that cost less and reach more students, such as providing labor market and employment information as well as exposure to the world of work through career awareness, employer presentations, and employer visits.

State and local WDB leadership is important to ensure this shift in target population is both complete and also balances the needs of youth currently in the program, particularly ISY, as they complete their participation. Outreach, contracting, and service strategies are examples of the approaches that should be carefully considered and planned as part of the transition.

### References

TEGL 17-05 and 23-14

NPRM 681.450





## *Section 3-9: Follow-Up*

All youth must receive some form of follow-up services for not less than 12 months after the completion of participation. Follow-up services may be provided beyond 12 months at the State or local board's discretion. 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. However, follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome.

As described in TEGL 05-12, a follow-up service provides support and guidance after placement to facilitate: 1) sustained employment and educational achievement; 2) advancement along a job and/or educational ladder; and 3) personal development.

### Examples of follow-up services for youth include:

- (1) The leadership development and supportive service activities listed in §§ 681.520 and 681.570;
- (2) Regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise;
- (3) Assistance in securing better paying jobs, career pathway development, and further education or training;
- (4) Work-related peer support groups;
- (5) Adult mentoring; and/or
- (6) Services necessary to ensure the success of youth participants in employment and/or post-secondary education.

While a follow-up service should include more than just a contact attempted or made for securing documentation for the case file in order to report a performance outcome, regular contact with the participant to ensure youth successfully continue in their placement of employment, or post-secondary education, may be a sufficient follow-up service as long as the case manager has assessed whether the participant needs anything beyond the regular contact and determined they do not need additional services.

In order for the Region VII WDB to maintain a high performing youth program, coordination between the Youth Provider, case managers, and WDB staff is imperative. While the Youth Provider and staff provide the case management and effectively operate the day-to-day activities the WDB staff will serve to provide guidance through registrations, exits, and fiscal oversight as well as compliance with all state and federal laws.

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In the event that for a period of no less than six months following exit a youth is unreachable, refuses to divulge information, or has relocated out of state with no intention of returning, follow-up contact attempts may cease. At the end of six months, a letter should be sent to the last known address of the participant. If there is still no contact, the Region VII WDB Youth Coordinator must be contacted. At this point, the participant may be exited or at the discretion of the Region VII WDB Youth Coordinator alternative means i.e., social media, may be used.

As discussed in NPRM 681.580, the type of follow-up services provided is based on the needs of the participant. Any WIOA Youth service is allowable as a follow-up service if it is determined an individual needs such a service.

Supportive services or incentives tied to a goal in the youth's ISS may be allowable expenses after exit.

As long as the participant is still in his/her follow-up services period, there is no need to re-enroll a participant in the WIOA Youth program following exit in order to receive further services. Such services are considered part of follow-up services.

For example:

A participant is placed in employment, and after 90 days of no service is exited from the program.

Four months later, during their 12 month follow-up period, the participant loses their job and is determined to be in need of additional services such as further education or work experience.

Under WIOA, such a service **may be** provided as part of follow-up services.

It is inappropriate to limit youth follow-up to activities such as:



- Monthly phone calls to check if the youth is still working or still in school;
- Mail/E-mail to check if the youth is still working or still in school; or
- Letters to inquire about status.

Monthly follow-up entries, as entered in the MACC, must be detailed.

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For example:

	<b>Entered Employment</b>	
<b>Employed in Qtr</b>		
<b>Source of Supplemental Data</b>	<b>1st Qtr Following Exit</b>	<b>2nd Qtr Following Exit</b>
<b>Employer</b>	<input type="text" value="Yes"/>	<input type="text" value="Yes"/>
<b>Address</b>	<input type="text"/>	<input type="text" value="Case Mgmt"/>
<b>City</b>	<input type="text"/>	<input type="text" value="ABC Company"/>
<b>State</b>	<input type="text"/>	<input type="text" value="123 Job Street"/>
<b>Zipcode</b>	<input type="text"/>	<input type="text" value="Lansing"/>
<b>Contact</b>	<input type="text"/>	<input type="text" value="MI"/>
<b>Phone</b>	<input type="text"/>	<input type="text" value="John Doe"/>
<b>Hours (per week)</b>	<input type="text"/>	<input type="text" value="25"/>
<b>Wage (per hour)</b>	<input type="text"/>	<input type="text" value="15.00"/>
<b>ONET Code</b>	<input type="text"/>	<input type="text" value="XYZ-321"/>

Follow-up services will be reviewed during WIOA One-Stop Reviews. Inadequate or insufficient follow-up services, providing follow-up services inconsistently, *i.e.*, “only upon request,” and providing follow-up services for less than a duration of 12 months will be noted as findings unless thoroughly deemed justifiable via documentation. **Please note that all MACC entries and paper documents/forms must be filled out accurately and completely.**

References

- The WIOA Section 129(c)(2)(I)
- NPRM 681.580
- TEGLs 09-00; 30-10; 05-12; and 33-12; 05-14

## *Section 3-10: Additional Youth Resources*

### **Bringing Students Back to the Center:**

The Department of Education released this guide in November 2014, to help school and community leaders address the challenges of dropout recovery and establish or strengthen their own re-engagement efforts. It was written to provide useful information to school and district level leaders, civic leaders, and state policy makers, as well as other potential drivers and partners in re-engagement initiatives. It includes information on: establishing the need for re-engagement support, understanding disconnected youth and their needs, defining a re-engagement center and its key functions and determining the range of existing models and their operation. Please visit: <http://www2.ed.gov/programs/dropout/re-engagement-guide121914.pdf>.

**Career Pathways:** The WIOA defines Career Pathways, in part, as a combination of rigorous and high-quality education, training, and other services that aligns with the skill needs of industries in the economy of the state or regional economy involved, and prepares an individual to be successful in any of a full range of secondary or post-secondary education options, including Registered Apprenticeship. To learn more about Career Pathways, please visit: <https://learnwork.workforce3one.org/>.

**Employment and Training Administration at the United States Department of Labor**  
For general information on the WIOA and other related resources regarding USDOL, visit <http://www.doleta.gov/>

### **Find Youth Info-USDOL:**

The USDOL's Find Youth Info website has information on various topics relating to youth, such as strategic plans for youth, mentoring, youth development, transition age youth, and service learning. Furthermore, you can also search various federal links on topics that relate to youth. For more information on Find Youth Info, visit <http://www.findyouthinfo.gov/>.

### **Improving Demand-Driven Services and Performance: Toolkit for Effective Front-Line Services to Youth:**

The toolkit was created to assist this program with improving case management, recruitment, intake, follow-up services, and developing individual service strategies. To view the toolkit, visit [http://www.doleta.gov/youth\\_services/Toolkit-improve.cfm](http://www.doleta.gov/youth_services/Toolkit-improve.cfm).

**Pre-Apprenticeship Programs:** The DOL defined a quality pre-apprenticeship program in the Training and Employment Notice (TEN) 13-12. Pre-apprenticeship is defined as a program, or set of strategies designed to prepare individuals to enter and succeed in a Registered Apprenticeship program and has a documented partnership with at least one, if not more, Registered Apprenticeship programs. YouthBuild and Job Corps often serve as pathways to Registered Apprenticeship programs and have a track record of successful apprenticeship placements because they have the elements of successful pre-apprenticeship programs. For more information, see: [http://wdr.doleta.gov/directives/attach/TEN/TEN\\_13-12.pdf](http://wdr.doleta.gov/directives/attach/TEN/TEN_13-12.pdf).

### **Soft Skills to Pay the Bills: Mastering Soft Skills for Workplace Success**

The USDOL Office of Disability Employment Policy published the curriculum in 2012. The curriculum focuses on teaching “soft” or workforce readiness skills in both in-school and out-of-school environments. For more information, visit <http://www.dol.gov/odep/topics/youth/softskills/>. Please note interview skill/resume writing workshops are conducted monthly at each One-Stop Career Center. Youth registrants are encouraged to participate.

### **The Casey Family Programs Foundation:**

A number of online tools are available to assess interests, abilities, career maturity, or work readiness skills. For more information, visit <http://casey.org/Resources/Tools/>.

### **The WIOA Youth Resources:**

To learn about Titles I and III of the WIOA, as well as access additional WIOA resources and updates go to: <http://www.doleta.gov/wioa/> and click on WIOA 101 webcast series, WIOA overview, and other resources displayed on this page.

## **Webinars**

**Enough Is Known for Action Briefing and Webinar Series:** On November 13, 2014, the Department of Labor and Brandeis Center for Youth and Communities hosted the “Enough is Known for Action: Ready to Employ, Educate, and Support Youth” **briefing**. Panelists from six communities addressed how results-oriented partnerships involving government, business, nonprofits, public schools, post-secondary institutions and intermediaries employ, educate, and support youth by leveraging resources – including those made available through the passage of WIOA. To learn more, please visit: <http://cyc.brandeis.edu/Employ-educate-support-youth/EnoughIsKnownforAction.html>. The **webinar series** informs and inspires the youth community so they are positioned for action now in anticipation of the WIOA implementation. The webinars on OSY are available for viewing at: <https://www.workforce3one.org/view/5001501350570154610/info>

### **The Key to Effective Case Management for Youth: Linking Assessment to Service Delivery**

This webinar shares the following tips: constructing an ISS based on assessed needs; planning and implementing services for a young person; and providing regular, updated case notes that accurately describe each youth’s progression. To view the webinar, visit <https://www.workforce3one.org/view/5001331641439184103/info>.



## Chapter 4: Career Preparation and Inspiration Initiatives

### *Section 4-1: Career Exploration*

#### **Introduction**

Career Exploration introduces young adults, parents, and teachers to available career paths in their region by offering a behind-the-scenes look into in-demand businesses and industries. Career Exploration provides real-time information regarding employer, education, and training requirements necessary to secure employment. Impacts include relationship building, establishing a talent pipeline, talent retention, and the opportunity to see real life application of coursework.

#### **Criteria**

1. Local in-demand industries are targeted. These industries will be identified by region;
2. Tours are to be conducted on-site at the employer's business, or at a simulated workplace where the employer provides hands-on experience;
3. An overview of the industry and key positions in demand are to be provided;
4. The educational requirements for key positions in demand (credential, apprenticeship, two or four year degree, etc.) are to be provided;
5. The experience is to highlight "an average day on the job;" and
6. Potential should exist for job shadowing, internships, and/or other work experiences with participating employers.
7. The Region VII WDB will use a combination of virtual career exploration activities ([http://www.O\\*NET.org](http://www.O*NET.org) and <http://www.mycareeronestop.org>) and whenever possible on-site visits.

#### **Partner Roles**

1. The Region VII WDB: Facilitate relationship building between educational partners and businesses;
2. Businesses: Define roles, skills, and training expectations via short presentations and hands-on experiences; and
3. Educational Partners: Arrange transportation, monitor student safety and behavior, and encourage engagement and open communication.

Post-secondary partners often participate to provide information about the availability of corresponding education and training programs.

The Region VII WDB will identify additional partners, such as regional career liaisons, as appropriate. The Region VII WDB recognizes career exploration as a pivotal component to comprehensive case management services. It is the expectation that career exploration activities will be offered to our clients whenever our career coaches deem appropriate.





## Chapter 5: Income and Family

### *Section 5-1: Income Levels for Low-Income Status*

Title I of the Workforce Innovation and Opportunity Act (WIOA) requires the U.S. Secretary of Labor to update and publish the Lower Living Standard Income Level (LLSIL) tables annually, for uses described in the law, including determining eligibility for youth. WIOA defines the term “low-income individual” as one who qualifies under various criteria, including an individual who received income for a six-month period that does not exceed the higher level of the poverty line or 125 percent of the LLSIL.

#### Low-Income

- Low-income has a statutory definition, as stated in the WIOA Section 3(36)(A) – based on poverty level or Lower Living Standard Income Level (LLSIL).
- Low-income status is irrelevant for Dislocated Worker eligibility. A minimum of ninety-five percent of the WIOA Youth must meet low-income standards.

There are six different categories of low-income:

1. Receives, or in the past six months has received, or is a member of a family that is receiving or in the past six months has received, cash payments under a federal, state, or local income-based public assistance program:
  - a. Temporary Assistance to Needy Families (TANF)
  - b. Social Security Income (SSI)
  - c. Refugee Assistance
  - d. Social Security Disability Insurance (SSDI)
  - e. Supplemental Nutrition Assistance Program (SNAP)
2. Received an income, or is a member of a family that received a total family income for the six-month period prior to application for the program which, in relation to family size, does not exceed the higher of the poverty level (for the equivalent period of time) or 125 percent of the LLSIL for the period. Documentation should be provided for each applicable inclusive income source received by the applicant and each family member for the six-months preceding the determination date. It is necessary to verify family size when utilizing family income eligibility. This may require establishing that the family is living in a single residence.
3. Receives, or is eligible to receive free, or reduced price, lunch under the National School Lunch Act.
4. Qualifies as a homeless individual.
5. Is a foster child on behalf of whom State or local government payments are made.

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6. Is an individual with a disability whose own income meets the income requirements described for a family size of one, but who is a member of a family whose income does not meet such requirements.

The Region VII WDB staff shall use the appropriate income and poverty levels, per the poverty guidelines updated periodically in the *Federal Register* by the U.S. Department of Health and Human Services under the authority of 42 U.S.C. 9902(2), to determine the reference guideline for income levels for low-income status.

*NOTE: For a particular family size, the level provided is either 125 percent of LLSIL or the poverty level, whichever is the greater of the two figures.*

### References

WIOA Section 3(36)(A);

NPRM 685.360

Federal Registry for LLSIL: <http://www.gpoaccess.gov/fr/index.html>

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## *Section 5-2: Family*

To determine low-income status and family size, per Training and Employment Guidance Letter (TEGL) 26-13, the definition of family is used. The definition of family is 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:

1. A husband, wife, and dependent children
2. A parent(s) or guardian(s) and dependent children
3. A husband and wife

The issue of guardianship concerning dependent children may be determined by a decree of court or may be determined by a State or Federal agency which has established or assumed guardianship.

Although the definition of "family" uses the terms "husband" and "wife," the Employment and Training Administration interprets these terms as gender neutral, based on the U.S. Supreme Court's recent decision in *United States v. Windsor*. Consistent with Employment Training Administration's policy to recognize same-sex marriage, same-sex spouses are included within the WIOA's definition of "family."

A person not meeting the definition of family is considered to be an individual (often known as a family of one). Additionally, a person with a disability shall be considered a family of one.

As a reminder, the revised definition of "husband" and "wife" as gender neutral in the definition of "family" could impact an individual's family income calculation.

### **Family Income**

Includes all income actually received by the members of the registrant's family during the income determination period six months prior to application. Only the income for individuals included in the registrant's family size is considered when determining family income. In addition, the income of these family members is only to be counted during the periods persons are actually members of the registrant's family unit.

When a registrant indicates an absence of income or other means of support for the income determination period, an explanation of how the person supported him/herself must be included in the comment section of the WIOA Registration Form.

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## Inclusions and Exclusions

### Inclusions

The following are examples of family income that are included:

1. Gross Wages and Salary - The total money received (amount paid before deductions) from work performed as an employee including:
  - a) Gross wages and salaries
  - b) Tips
  - c) Commissions
  - d) Piece rate payments
  - e) Cash bonuses
  - f) Vacation pay (this includes Armed Forces terminal leave pay)
  - g) Income earned through the senior community service employment program
  
2. Net Self-Employment Income - Net income (gross receipts, minus operating expenses) from a business firm, farm, or other enterprise (including odd jobs), in which a person is engaged on his/her own account. If net self-employment income reflects a deficit amount, income from the source is to be considered "-0-" when calculating family income. Self-employed includes a farmer, rancher, fisherman, professional person, independent trades person, and other business people.
  - a) Regular payments from railroad retirement, strike benefits from union funds, worker's compensation, veteran's payments, and training stipends
  - b) Alimony
  - c) Military family allotments, excluding allotments for active duty, or other regular support from an absent family member or someone not living in the household
  - d) Pensions whether private, including employer contributing 401(k), or government employee (including military retirement pay)
  - e) Regular insurance or annuity payments
  - f) College or university grants, fellowships, scholarships, and assistantships
  - g) Dividends, interest, net rental income, net royalties, and periodic receipts from estates or trusts
  - h) Net gambling or lottery winnings
  - i) WIOA On-the-Job Training payments

In programs that require income-based eligibility to receive services, amounts paid while on active duty or paid by the Department of Veterans Affairs (VA) or Vocational Rehabilitation disability, or other related VA programs are not considered as income when determining low-income status. Generally, this means many separating service members may qualify for the WIOA Adult program because it provides priority for low-income individuals, and military earnings are not to be considered income for this purpose.

### Exclusions

Exclusions From Family Income Include:

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- a) Unemployment compensation
- b) Severance pay
- c) Child support payments
- d) Welfare payments (including Temporary Assistance for Needy Families, Supplemental Security Income, Food Assistance Employment and Training Program, and Refugee Assistance)
- e) Capital gains
- f) Foster child care payments
- g) Any assets drawn down as withdrawals from a bank, an employee exclusive 401(k), the sale of property, a house, or a car
- h) Tax refunds, gifts, loans, lump-sum inheritances, one-time insurance payments, or compensation for injury
- i) Non-cash benefits such as employer paid fringe benefits, food or housing received in lieu of wages, Medicare, Medicaid, Food Stamps, school meals, and housing assistance
- j) Pay or allowances received while on Active Military Duty (38 U.S.C. 2013)
- k) Pell grants
- l) Education assistance and compensation payments to veterans and other eligible persons under Title 38, United States Code, Chapter 11, Compensation for Service Connected Disability or Death, Chapter 13, Dependence and Indemnity Compensation for Service Connected Death, Chapter 31, Vocational Rehabilitation, Chapter 34, Veterans' Education Assistance, Chapter 35, War Orphans' and Widows' Educational Assistance, and Chapter 36, Administration of Educational Benefits (38 U.S.C. 2013)
- m) Allowances, earnings, and payments to individuals participating in programs under the WIOA shall not be considered as income for the purposes of determining eligibility for the WIOA
- n) Earned Income Credit
- o) Educational financial assistance received under Title IV of the Higher Education Act (20 U.S.C. 1087)
- p) Needs-based scholarships
- q) Old Age, Survivors and Disability Insurance benefits received under Section 202 of the Social Security Act (42 U.S.C. 402)
- r) Adoption subsidies

For all other sources of income, please refer to <http://www.irs.gov/> to research income inclusions versus exclusions.

### References

NPRM 680.640  
JTPA 626.5  
TEIN 35-93  
TEGL 26-13

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Family Size	Non-Metropolitan (70% LLSI)	Metropolitan (70% LLSI)	Berkeley and Jefferson Counties (70% LLSI)	125% Poverty Guideline
1	\$11,770.00	\$11,770.00	\$11,770.00	\$14,713.00
2	\$15,930.00	\$15,930.00	\$18,782.00	\$19,913.00
3	\$20,149.00	\$21,821.00	\$25,780.00	\$25,113.00
4	\$24,873.00	\$26,939.00	\$31,822.00	\$30,313.00
5	\$29,353.00	\$31,795.00	\$37,557.00	\$35,513.00
6	\$34,327.00	\$37,186.00	\$43,923.00	\$40,713.00
7	\$39,301.00	\$42,577.00	\$50,289.00	\$45,913.00
8	\$44,275.00	\$47,968.00	\$56,655.00	\$51,113.00

For families larger than eight persons, add \$4,974.00 for each additional member of a non-traditional family and \$5,391.00 for each additional member of a metropolitan family. For families larger than eight persons in Berkeley and Jefferson Counties, add \$6,366.00 for each additional family member. For families larger than eight persons, add \$5,200.00 for each additional family member under the 125% Poverty Guideline. The more inclusive of the two, Lower Living Standard Income Levels and 125% Poverty Guidelines, will be used when determining low-income Adult and Youth eligibility.

### Effective Dates

- Poverty Income Guidelines are issued every year in January.
- 70 percent LLSIL is issued every year in June.