



REGIONAL WORKFORCE DEVELOPMENT BOARD
POLICY AND OVERSIGHT
AMENDED MEETING AGENDA

Tuesday, October 8, 2019
3:00 PM

Locations:

Marin County: 734 A Street, Ste 6, San Rafael, CA 94901

Mendocino County: 31801 O'Bayley Dr., Fort Bragg, CA

Napa County: 1546 First Street, Second Floor, Napa, CA

CALL TO ORDER	
I.	<ul style="list-style-type: none"> A. Introductions B. Public Comment
CONSENT CALENDAR	
<p>These matters typically include routine financial or administrative action items requiring a vote. Any item will be discussed separately at the request of any person. Items are approved with one single motion</p>	
II.	<ul style="list-style-type: none"> A. June 4, 2019 Meeting Minutes (Attachment A)
REGULAR CALENDAR	
III.	<ul style="list-style-type: none"> A. Review and approve Workforce Alliance of the North Bay's policies. (Action) Staff requests the committee review, make recommendations if needed, approve and forward policies on to the regional workforce board/executive committee. <ul style="list-style-type: none"> 1. Youth Program Eligibility (Attachment B) 2. Youth Program (Attachment C)
INFORMATION / DISCUSSION ITEMS	
IV.	<ul style="list-style-type: none"> A. None
MEMBER / DIRECTOR REPORTS	
V.	<ul style="list-style-type: none"> A. Member B. Director
ADJOURN	
VI.	<ul style="list-style-type: none"> A. Next meeting Tuesday, December 3, 2019



WORKFORCEALLIANCE
OF THE NORTH BAY
DRIVING WORKFORCE TALENT

**REGIONAL WORKFORCE DEVELOPMENT BOARD
POLICY AND OVERSIGHT COMMITTEE MEETING
MEETING MINUTES**

**Tuesday, June 4, 2019
3:00 PM**

Locations:

Napa County: Workforce Alliance of the North Bay,
1546 First Street, Second Floor, Napa, CA

Mendocino County: 208 B. South Oak St. Ukiah, CA

Marin County: 734 A Street Suite 6, San Rafael, CA

CALL TO ORDER	
I.	<p>A. Introductions Chair Amar Inalsingh called the meeting to order at 3:14. Heather Gurewitz, Paul Castro, Celia Zamora, Bruce Wilson, Laura Davis, Tamara Ochoa, in attendance.</p> <p>B. Public Comment – None.</p>
CONSENT CALENDAR	
<p>These matters typically include routine financial or administrative action items requiring a vote. Any item will be discussed separately at the request of any person. Items are approved with one single motion</p>	
II.	<p>A. April 4, 2019 Meeting Minutes Chair Inalsingh confirmed that members reviewed the minutes. Motion to approve the Minutes: Heather Gurewitz Second: Paul Castro Motion carried: 3-0 Yea: 3 Nay: 0 Abstentions: Celia Zamora</p>
REGULAR CALENDAR	
III.	<p>A. Review 2018-19 April Performance Reports. – (Possible Action) Presentation by:</p> <ul style="list-style-type: none"> • CareerPoint Lake - (Mendocino Private Industry Council) • CareerPoint Mendocino - (Mendocino Private Industry Council) • CareerPoint PPSC – (Petaluma People Services Inc.) • CareerPoint Marin – (Marin County Health and Human Services) • CareerPoint Napa – (Napa County Health and Human Services Agency) <p>Executive Director, Bruce Wilson explained that WANB staff requested each service provider present to this committee a review of the current status of enrollments and program services and provide explanation for performance goals that may not be met by the end of the program year. Operations Manager, Laura Davis, reported the Marin County Health and Human Services (HHS) staff are attending training and will not be able to present. Petaluma People Services Center (PPSC) will present first via conference call at 3:30, Napa County Health and Human Services Agency will present second in person, and third, Mendocino Private Industry Council (MPIC) will call in after 4pm.</p> <p>Laura Davis reviewed the attached program reports. She provided the background on how the numbers are formulated. Enrollment numbers are calculated based on cost per calculations identified in the providers</p>

proposals. Exits can be more difficult to plan but are most predictable for training participants. On the Lake and Mendocino Adult and Dislocated Worker Plans an additional table is included with an overview of the Dislocated Worker Fire Grant status. Lake and Mendocino Youth Program plans include participant information from both Redwood Community Services (RCS) who had the contract through September and MPIC who had the youth contract starting in October.

Laura provided the committee with a handout of suggested questions for each area. It also provided each services training requirement and how much providers have reported spending to date. The committee reviewed the questions for Marin County adult and dislocated worker programs. The committee discussed concerns regarding the low number of certificates received by participants that received training as well as a low number of those exiting to training related jobs. In addition, Marin County HHS has only achieved 32% of enrolled dislocated worker participants. Laura reported Marin County HHS has requested a transfer of funds from dislocated worker to adult; this will lower the dislocated worker planned numbers and increase the adult planned numbers.

Elece Hempel, Executive Director from PPSC joined the committee via conference call. PPSC has enrolled 10 of 19 planned youth. Currently they have 13 participants, 1 pre-apprenticeship and no exited participants. It is a requirement that at least 80% of the youth are out of school and no more than 20% are in school. Currently, they have 77% out of school and 23% in school. Elece explained the youth being served have multiple barriers and finding a job is not the first priority for many of them. Those that are working are not looking for a career path, but a paycheck to meet their immediate needs, like food.

Paul Castro inquired if PPSC and its staff not being located in Marin County is a part of the issue. Elece responded PPSC has been conducting a lot of outreach to the youth in Marin county and creating relationships with the schools, probation, and social service agencies. Building their reputation with the youth and creating these relationships has taken longer than anticipated.

Committee members inquired if the youth being targeted are the right population since they are not ready for employment. Bruce explained PPSC is a social service program first and the WIOA funding was to allow them to build a work program element into their existing program. However, PPSC has not been able to transition the youth from social service to employment as predicted and has struggled to enroll new participants. Bruce recommends continuing the contract with PPSC next year; the committee asked what would be done differently. Elece stated more collaboration with the other youth agencies in the region to share what is working would be helpful. Cecilia Zamora recommended a supported youth counsel be developed, however, Bruce clarified this could not be funded with the WIOA program dollars.

Teresa Brown, Program Manager for Napa County HHSA, presented to the committee. She distributed a PowerPoint handout titled WIOA Program Update May 2019. Teresa explained Napa County HHSA had requested to move money from dislocated worker to adult but were denied due to the timeframe/contract completion status. Teresa stated she has reviewed applicants eligibility, and most qualify for adult not dislocated worker services. However, recently a local yogurt company closed which increased enrollments in the last few months. They have formally requested to change next year's numbers and funding to support more adults than dislocated workers. Laura clarified the allocations are established by the state. We may transfer up to 50% of the dislocated worker funds; paperwork must be completed, submitted and approved by the board and sent to the state.

Teresa predicts they will be meeting and may be exceeding both the dollar amount and number of participants in training services. She has been working with the county to make the process for On-The-Job Trainings (OJTs) more efficient and modifying the contract language to be more friendly for employers. She is confident they will have more OJTs as the process continues to improve.

	<p>The committee reviewed the youth enrollments. Teresa does not believe Napa County HHS will be meeting the planned enrollments this year. The youth eligibility requirement is difficult to meet; youth have difficulty providing the documents required and sharing the issues that would make them eligible. Many times, older youth enroll as adults. Teresa reported they have made changes that are making it a faster process and see improvement for next year. Bruce suggested the board could assist with increasing connections with other youth organizations. Laura stated the counties current process doesn't support Work Experiences (WEX) which is an important tool for serving youth. Bruce suggested WEX could be run through a non-profit. Teresa responded she believes Napa County HHSA will be able to spend the money next year and would like to have the opportunity to continue to improve the WEX process similar to her improvements to the OJT process for adults.</p> <p>Amar Inalsingh asked if Napa County HHSA is conducting business outreach. Teresa responded the program does include this and she is currently the person conducting the employer outreach.</p> <p>@ 4:42 PM Heather Gurewitz had to leave the meeting.</p> <p>Christy Guard, Programs Operations Director for MPIC joined the meeting via conference call. Laura Davis distributed a handout Christy prepared for the presentation. She reviewed the current enrollment numbers, explaining that they have recently completed 9 more applications and 17 are being evaluated for eligibility. They continue to conduct outreach in both areas. In Mendocino, dislocated worker numbers are higher than planned due to the Mendocino Complex Fire and TAA. Adult enrollments have been unusually low this year. Christy is investigating the reason for this and is speaking with CalWORKs to increase co-enrollments. She's found many adults are looking for temporary jobs.</p> <p>Bruce stated MPIC staff organization shows only two people carrying a caseload for each area and a number of administrative and front desk staff. He stated it would make sense to have more staff touching clients and carrying cases, doing outreach, job listing, events, and other core services. Christy reported this is the first year MPIC has struggled with their WIOA numbers. The program has a good reputation and outcomes are good. She can report the struggles that have led to lower numbers, such as relocating a center and changing its name. The recent disasters have been a huge impact; as a result, adults are more interested in transitional work. Another big impact has been the loss of training programs in the area and significant changes in staffing at training and partner agencies. Typically, MPIC would have been meeting 50% of their planned numbers by first quarter.</p> <p>MPIC has been focusing on rebuilding connections with those agencies and partners that have had dramatic change. They have been working with local businesses. Christy is currently on the chamber of commerce. She feels confident that next year these issues will be resolved.</p>
INFORMATION / DISCUSSION ITEMS	
IV.	<p>A. New member appointment. Workforce Alliance of the North Bay Regional Board Chair Hansen has appointed Cecilia Zamora, Executive Director of the Hispanic Chamber of Commerce to represent Marin County on the Policy and Oversight Subcommittee.</p> <p>Paul Castro asked if this item needs to have the subcommittees vote. Bruce explained it is informational only; the Regional Board has the authority to appoint to subcommittees.</p>
MEMBER / DIRECTOR REPORTS	
V.	<p>A. Member</p> <p>Cecilia Zamora stated that it looks like all areas are struggling with youth eligibility. She suggested the WANB do some kind of resource funding with non-profits or foundations to help.</p>

	<p>Bruce reported he has been talking with the city of Marin about their youth program. They are local to that area and have the clients. It would be important for them to work with PPSC.</p> <p>Paul Castro expressed concern about the low number of participants served. He suggested pay for performance contracts be considered in the future.</p> <p>Bruce explained there are some restrictions but pay for progress or incremental funding is possible.</p> <p>B. Director</p> <p>Bruce stated the WANB staff has been reviewing dashboard reports from Solano and Sonoma counties. It looks like we are within range in many areas with our region. Staff is working to provide comparison information like this in the future.</p> <p>Laura stated we are expecting performance numbers from the state.</p>
A D J O U R N	
VI.	<p>A. Next meeting Tuesday, August 6, 2019</p> <p>Chair Inalsingh adjourned the meeting at 5:29 PM.</p>



Workforce Alliance of the North Bay Policy #: 1015

Effective Date: Date Board Approves

YOUTH PROGRAM ELIGIBILITY

PURPOSE

The purpose of this policy is to provide guidance to Workforce Alliance of the North Bay (Alliance) service providers in determining participant eligibility for Workforce Innovation and Opportunity Act (WIOA) youth programs.

SCOPE

Workforce Innovation and Opportunity Act Title I contracted Service Providers

RESPONSIBLE PARTY

Workforce Alliance of the North Bay
Regional Workforce Development Board

REFERENCES

- WIOA (Public Law 113-128) Sections 126 (a) (3) (B,) Section 129 (3) (A) (i) and Section 129 (3) (A) (ii)
- Title 20 CFR "WIOA Final Rule" Sections 681.210 - 681.280, 681.300, 681-310
- Training and Employment Guidance Letter (TEGL) 21-16 "Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance" (March 2, 2017)
- TEGL 8-15 "WIOA Youth Program Transition" (March 26, 2015)
- Workforce Services Directive WSD17-07 "WIOA Youth Program Requirements" (January 16, 2018)

DOCUMENTS

- WANB Youth Eligibility Determination Form 109

DEFINITIONS

Adult Education – academic instruction and education services below the post-secondary 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 (IS) youth if they are registered for postsecondary education, even if they have not yet begun postsecondary classes. However, if the youth registers for

postsecondary education, but does not follow through with attending classes, the youth is considered an Out-of-School (OS) youth if the eligibility determination is made after the 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 system who is classified by the school system as still enrolled in school are the exception; the youth would be considered an IS youth (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 of for who 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 post-secondary 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 who has not received a secondary school diploma or its recognized equivalent. (WIOA 3[54]) Per TEGL 8-15, this term does not include individuals who dropped out of post-secondary 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 included any education beyond grade 12. (Title 20 U.S.C. Section 1401[27]).

Individual with a Disability –An individual with 1) A physical or mental impairment that substantially limits one or more major life activities of such individual; 2) A record of such an impairment; or 3) Being regarded as having such an impairment (Americans with Disabilities Act Section 12012 1,3 and WIOA Section 3[25]).

Homeless Individual – as defined in Section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))

1. An individual who lacks a fixed, regular, and adequate nighttime residence; and
2. Includes an individual who:
 - a. Is sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; is living in a motel, hotel, trailer park, or campground due to the lack of alternative adequate accommodations; is living in an emergency or transitional shelter; is abandoned in a hospital; or is awaiting foster care placement;
 - b. Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings; or

- c. Migratory children who qualify as homeless because the children are living in circumstances defined in Section 1309 of the Elementary and Secondary Education Act of 1965; 20 U.S.C. 6399.

Homeless Child or Youth – as defined in Section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))

- 1. An individual who lacks a fixed, regular, and adequate nighttime residence; and
- 2. Includes children and youth who:
 - a. Are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in a motel, hotel, trailer park, or campground due to the lack of alternative adequate accommodations; are living in an emergency or transitional shelter; are abandoned in a hospital; or are awaiting foster care placement;
 - b. Have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
 - c. Are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; or
 - d. Migratory children who qualify as homeless because the children are living in circumstances defined in Section 1309 of the Elementary and Secondary Education Act of 1965; 20 U.S.C. 6399.

Foster Youth – an individual in foster care or 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 (42 U.S.C. 677); or an individual who is an out of home placement.

Basic Skills Deficient/Low Levels of Literacy — who is a youth, that the individual who has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or who is a youth or adult, that the individual 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 (WIOA Section 3[5]).

English Language Learner (ELL) – an individual who has limited ability in reading, writing, speaking, or comprehending the English language, and - (A) whose native language is a language other than English; or (B) who lives in a family or community environment where a language other than English is the dominant language (WIOA Section.3{21} and WIOA Section 203[6]).

POLICY

- I. Youth Eligibility Criteria
 - A. To be eligible to participate in the WIOA youth program, an individual must meet the generally eligibility criteria outlined below and meet the additional criteria outlined for an Out-of-School (OS) youth or In-School (IS) youth.
 - B. Eligibility is determined at intake. The participant information is collected during registration and these criteria follow the participant through the entire course of WIOA programs and services attached to that application. If the participant's circumstances change during the WIOA registration cycle (such as a change in age, education status, employment status, etc.) the participant remains eligible for those services until exited. Examples are provided below:

1. An individual who is an OS youth at time of enrollment and is subsequently placed in school is still considered an OS youth. Additionally, an individual who is an OS youth and between the ages of 16-24 at the time of enrollment, and is now beyond the age of 24, is still considered an OS youth until exited.
 2. An individual who is an IS youth and between the ages of 14-21 at the time of enrollment, and is now beyond the age of 21, is still considered an IS youth until exited.
- C. Eligibility for services should not be construed as a guarantee of services. The WIOA is not an entitlement program.
 - D. Employment and training opportunities must be provided to youth who can benefit from, and are most in need of, such opportunities.
 - E. Eligibility criteria must be documented in the participant file prior to the provision of WIOA services. Service Providers will complete the WANB Youth Eligibility Determination Form (form 109) to identify youth eligibility.

This form includes disability as an eligibility criterion and therefore must be maintained in accordance with the Nondiscrimination and Equal Opportunity Procedures. Any medical or disability-related information, including information that could lead to the disclosure of a disability, must be collected separately and maintained apart from any other information about the individual, and treated as confidential. Program staff who are responsible for documenting eligibility, where disability is an eligibility criterion for a program or activity may be informed and have access to the information in the related files.

II. General Eligibility Criteria

All youth must meet the following general eligibility criteria:

- A. Authorization to Work
- B. Compliance with Selective Service Registration Requirements
- C. Age 14-24 on the "Date of Participation"

III. Out-of-school (OS) Eligibility Criteria– In order to receive services as an OS youth, an individual must meet the following eligibility criteria:

- A. Not be attending any secondary or postsecondary school (not including Title II Adult Education, YouthBuild, Job Corps, high school equivalency programs [except if program is funded by the public K-12 school system and youth attending are classified by the school system as still enrolled in school], non-credit bearing postsecondary classes, dropout reengagement programs or charter schools with federal and state workforce partnerships).
- B. Not younger than age 16 or older than age 24 years.
- C. Have one or more of the following barriers:
 1. A school dropout.
 2. 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.
 - a) If the school does not use school year quarters, use calendar quarters.
 3. 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.
 4. An offender.

5. A homeless individual or a runaway.
6. 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.
7. An individual who is pregnant or parenting (custodial and non-custodial parent including non-custodial fathers).
8. An individual with a disability.
9. A low-income individual who requires additional assistance to enter or complete an educational program to secure or hold employment.

IV. In-school (IS) Eligibility Criteria – In order to receive services as an IS youth, an individual must meet the following eligibility criteria:

- A. Be attending school, including secondary and postsecondary school.
- B. 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).
- C. Low income individual.
- D. Have one or more of the following barriers:
 1. Basic skills deficient.
 2. An English language learner.
 3. An offender.
 4. A homeless individual or runaway.
 5. 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.
 6. Pregnant or parenting (custodial and non-custodial parent including non-custodial fathers).
 7. An individual with a disability.
 8. An individual who requires additional assistance to complete an educational program or secure and hold employment.

V. Additional Assistance –

No more than five percent of IS youth enrolled in a given program year may be found eligible solely on meeting the criterion, “requires additional assistance.” The five percent shall be calculated for each service provider within the Alliance, based upon the percent of newly enrolled participants during a program year. Service providers that choose to enroll under this category without the total number of enrollments required for compliance risk disallowed costs as the youth would not technically be eligible for the WIOA youth program.

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

The Alliance defines additional assistance to include the following:

- A. Has repeated at least one secondary grade level or is one year over age for grade;
- B. Has a core GPA of less than 1.5;
- C. For each year of secondary school, are at least 2 semester credits behind the rate required to graduate from high school;
- D. Emancipated youth;
- E. Previous dropout; or has been suspended 5 or more times; or has been expelled;
- F. Has court/agency referral mandating school attendance;
- G. Deemed at risk of dropping out of school by school official;
- H. Referred to/being treated by an agency for a substance abuse related problem;
- I. Has experienced recent traumatic events, victim of abuse, or resides in abusive environment documented by a school official or other qualified professional;
- J. Has serious emotional, medical or psychological problems documented by a qualified professional.

And, for OS youth,

- K. Has never held a job;
- L. Has been fired within the 12 months prior to application;
- M. Has never held a full-time job for more than 13 consecutive weeks.

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

- A. IS youth - If a youth is enrolled in the WIOA youth program during the summer and is in between school years, they are considered an IS youth if they are enrolled to continue school in the fall. A youth is also considered IS if they are enrolled into the youth program between high school graduation and postsecondary education if they are registered for postsecondary education, even if they have not yet begun postsecondary education at the time of WIOA youth program enrollment.
- B. OS youth – If the youth graduated from high school and registers for postsecondary education, but does not ultimately follow through with attending postsecondary education, they are considered an OS youth as long as the eligibility determination is made after the point they decide not to attend postsecondary education.

VII. Non-Credit Bearing Postsecondary Classes –

- A. IS youth – If a youth is enrolled in any credit-bearing postsecondary education classes, including credit-bearing community college classes and credit-bearing continuing education, then they are considered to be attending postsecondary education and are an IS youth.
- B. OS youth – If the youth is only enrolled in non-credit bearing postsecondary classes, they are not considered to be attending postsecondary education and are an OS youth.

VIII. Low Income Exception – The WIOA maintains a five percent low-income eligibility exception where five percent of WIOA youth may be participants who ordinarily would need to be low-income. This includes:

- A. IS youth who is not low-income but would otherwise qualify as an IS youth; or

B. OS youth who is not low-income but:

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

The 5% exception shall be calculated for each service provider within the Alliance, based upon the percent of newly enrolled participants during a program year that would ordinarily be required to meet the low-income criteria. Service providers that choose to enroll under this category without the total number of enrollments required for compliance with this exception risk disallowed costs as the youth would not technically be eligible for the WIOA youth program.

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

IX. Low-Income Determination – All IS youth and some categories of OS youth must meet low income guidelines to qualify for WIOA services (unless they qualify for the 5% low income exception). Low-income is defined as:

A. Public Assistance –

An applicant who receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008, the program of block grants to States for temporary assistance for needy families program under part A of title IV of the Social Security income program established under title XVI of the Social Security Act, or State or local income-based public assistance.

B. Free or Reduced Lunch –

Eligible to receive a free or reduced lunch under the Richard B. Russell National School Lunch Act, In schools where the whole school automatically receives free or reduced price lunch, WIOA programs must base low-income status on an individual student's eligibility to receive free or reduced price lunch or the youth's ability to meet one of the other low-income categories under WIOA.

If an OS youth is a parent living in the same household as a child who receives or is eligible to receive free or reduced priced lunch based on their income level, then such an OS youth would meet the low-income criteria based on his/her child's qualification.

C. Living in a High Poverty Area -

WIOA contains a provision that allows for youth living in a high-poverty area to automatically meet the low-income criterion. A high-poverty area is defined as a Census tract or a county that has a poverty rate of at least 25 percent as set every 5 years using American Community Survey (ACS) 5-Year data. The youth's physical address must be used to determine the high poverty area. The ACS 5-Year data can be accessed on the U.S. Census Fact Finder website to determine the poverty rate.

D. Homeless Individual –

A homeless individual who meets the criteria as defined in:

1. Violence Against Women Act of 1994, Section 41403(6)

2. McKinney-Vento Homeless Assistance Act, Section 725(2)

E. Foster Child –

A foster child on behalf of whom State or local government payments are made.

F. Individual with a Disability (ISY Only) –

Are an individual with a disability whose own income meets the income requirement but who is a member of a family whose income exceeds the income requirement.

G. Low-Income/Family Size Determination –

The individual receives 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 or 70 percent of the lower living standard income level.

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

Sources of Income –

1. The following sources of income should be included in an individual’s income calculations:

- a) Monetary compensation for services, including wages, tips, salary, commissions, or fees before any deductions
- b) Unemployment Insurance Payments
- c) Child Support payments
- d) Net receipts from non-farm self-employment (receipts from a person’s own unincorporated business, professional enterprise, or partnership, after deductions for business expenses)
- e) Net receipts from farm self-employment (receipts from a farm which one operates as an owner, renter, or sharecropper, after deductions for farm operating expenses)
- f) Regular payments from railroad retirement, strike benefits from union funds, worker’s compensation, and training stipends (e.g., wages from the California Conservation Corp)
- g) Alimony, military family allotments, or other regular support from an absent family member or someone not living in the household
- h) Private pensions, government employee pensions (including military retirement pay)
- i) Regular insurance or annuity payments (including state disability insurance)
- j) College or university scholarships (not needs-based), grants, fellowships, and assistantships
- k) Net gambling or lottery winnings
- l) Severance payments
- m) Terminal leave pay

- n) Social Security Disability Insurance (SSDI) payments (Title II of the Social Security Act, Federal Old Age, Survivors and Disability Insurance)
 - o) Social Security Old Age, Survivors and Disability Insurance (OASI) benefits received under Section 202 of the Social Security Act.
2. The following income sources should not be included in an individual's income calculation:
- a) Foster care child payments
 - b) Need-based public assistance payments (including Temporary Assistance for Needy Families, supplemental security income (SSI), emergency assistance money payments, and non-federally funded general assistance or general relief money payments)
 - c) Social Security old age and survivors' insurance benefit payments
 - d) Financial assistance under Title IV of the Higher Education Act (i.e., Pell Grants)
 - e) Supplemental Educational Opportunity Grants and Federal Work Study
 - f) Needs-based scholarship assistance
 - g) Loans
 - h) Veterans benefits
 - i) Income earned while the veteran was on active military duty and certain other veterans' benefits, i.e., compensation for service-connected disability, compensation for service-connected death, vocational rehabilitation, and education assistance
 - j) Capital gains
 - k) Any assets drawn down as withdrawals from a bank, the sale of property, a house or a car
 - l) Tax refunds, gifts, loans, lump-sum inheritances, one-time insurance payments, or compensation for injury
 - m) Non-cash benefits such as employer paid or union-paid portion of health insurance or other fringe benefits, food or housing received in lieu of wages
 - n) The value of food and fuel produced and consumed on farms
 - o) The imputed value of rent from owner occupied nonfarm or farm housing
 - p) Medicare, Medicaid, food stamps, school meals and housing assistance
 - q) Allowances, earnings and payments to individuals participating in programs under WIOA (except on-the-job training wages).

POLICY UPDATE HISTORY

Date Board Approves – New Policy

INQUIRIES

Questions regarding this policy can be sent to Operations Unit.

YOUTH ELIGIBILITY DETERMINATION

Name: _____

Age: _____

Date of Birth: _____

I-9 verification: _____

Household Income

Household Member Name	Relationship	Income	Verification
1. _____	_____	\$ _____	_____
2. _____	_____	\$ _____	_____
3. _____	_____	\$ _____	_____

Total Household Income: \$ _____ Income Guidelines for Household Size: \$ _____

Out-of-School Youth

- ☐ 16-24 years old
- ☐ Not attending any secondary or post-secondary school (doesn't include Adult Ed. Job Corps, YouthBuild, school equivalency, or dropout reengagement programs unless funded by Public K12)

Criteria Met:

- ☐ 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 calendar quarter.
(If the school does not use the quarter system 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 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. A **low-income** individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.
*Additional assistance criteria on page #2

In-School Youth

- ☐ 14-21 years old
- ☐ Attending school (includes secondary/post-secondary)
- ☐ Low income individual

Criteria Met:

- ☐ a. Basic skills deficient; (At or below 8.9)
- ☐ b. An English language learner;
- ☐ c. An offender;
- ☐ d. A homeless individual, or a runaway;
- ☐ e. An individual in foster care or 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.
- ☐ f. Pregnant or parenting (custodial and non-custodial parent including non-custodial fathers);
- ☐ g. An individual with a disability;
- ☐ j. An individual who requires additional assistance to complete an education program or secure and hold employment.
*Additional assistance criteria on page #2

Verification:

Additional Assistance Criteria Met:

- ☐ Has repeated at least one secondary grade level or is one year over age for grade;
- ☐ Has a core GPA of less than 1.5;
- ☐ For each year of secondary school, are at least 2 semester credits behind the rate required to graduate from high school;
- ☐ Emancipated youth;
- ☐ Previous dropout; or has been suspended 5 or more times; or has been expelled;
- ☐ Has court/agency referral mandating school attendance;
- ☐ Deemed at risk of dropping out of school by school official;
- ☐ Referred to/being treated by an agency for a substance abuse related problem;
- ☐ Has experienced recent traumatic events, victim of abuse, or resides in abusive environment documented by a school official or other qualified professional;
- ☐ Has serious emotional, medical or psychological problems documented by a qualified professional.

(Below applies to Out of School Youth only)

- ☐ Has never held a job;
- ☐ Has been fired within the 12 months prior to application
- ☐ Has never held a full-time job for more than 13 consecutive weeks.

Verification:



Workforce Alliance of the North Bay Policy #: 1022

Effective Date: Date Board Approves

YOUTH PROGRAM

PURPOSE

The purpose of this policy is to provide guidance to Workforce Alliance of the North Bay (Alliance) service providers on the requirements of the Workforce Innovation and Opportunities Act (WIOA) Youth Program.

SCOPE

Workforce Innovation and Opportunity Act Title, I contracted Service Providers

RESPONSIBLE PARTY

Workforce Alliance of the North Bay
Regional Workforce Development Board

REFERENCES

- Workforce Innovation Opportunities Act
- Workforce Services Directive (WSD) 17-07, WIOA Youth Program Requirements
- Workforce Services Directive (WSD) 16-19, Youth Service Eligible Provider List
- Training and Employment Guidance Letter - TEGL 21-16 Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance
- Training and Employment Guidance Letter - TEGL 31-10 Increasing Enrollment and Improving Services to Youth with Disabilities

DOCUMENTS

- WANB Form #108 WIOA 14 Youth Program Elements

DEFINITIONS

Comprehensive Guidance and Counseling – as defined in the DOL Final Rule, Section 681.510, provides individualized counseling to participants. This includes drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate.

Entrepreneurial Skills Training – as defined in the DOL Final Rule, Section 681.560, provides the basics of starting and operating a small business.

Job Shadowing – as defined in TEGL 21-16, is a work experience option where youth learn about a job by walking through the workday as a shadow to a competent worker. The job shadowing experience is a temporary, unpaid exposure to the workplace in an occupational area of interest to the participant. A job shadowing experience can be anywhere from a few hours, to a day, to a week or more.

Leadership Development Opportunities – as defined in the DOL Final Rule, Section 681.520, are opportunities that encourage responsibility, confidence, employability, self-determination, and other positive social behaviors.

Mentoring – as defined in the DOL Final Rule, Section 681.490, must:

- a. Last at least 12 months and may take place both during the program and following exit from the program;
- b. Be a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee; and
- c. Match the youth with an individual mentor with whom the youth interacts on a face to face basis (group mentoring activities and mentoring through electronic means are allowable as long as face-to-face interaction also occurs).

Occupational Skills Training – as defined in the DOL Final Rule, Section 681.540, 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 occupational fields at entry, intermediate, or advanced levels, with priority consideration to training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the local area.

Positive Social and Civic Behaviors – as defined in the DOL Final Rule, Section 681.530, are outcomes of leadership opportunities, which are incorporated by local programs as part of their menu of services. Positive social and civic behaviors focus on areas that may include the following:

- a. Positive attitudinal development;
- b. Self-esteem building;
- c. Openness to work with individuals from diverse backgrounds;
- d. Maintaining healthy lifestyles, including being alcohol and drug-free;
- e. Maintaining positive social relationships with responsible adults and peers, and contributing to the well-being of one's community, including voting;
- f. Maintaining a commitment to learning and academic success;
- g. Avoiding delinquency; and
- h. Positive job attitudes and work skills.

Pre-apprenticeship – as defined in the DOL Final Rule, Section 681.480, is a program designed to prepare individuals to enter and succeed in an apprenticeship program registered under the National Apprenticeship Act of 1937 (referred to as a “registered apprenticeship” program) and includes the following elements:

- a. Training and curriculum that aligns with the skill needs of employers in the economy of the State or region involved;
- b. Access to educational and career counseling and other supportive services, directly or indirectly;
- c. Hands-on, meaningful learning activities that are connected to education and training activities, such as exploring career options, and understanding how the skills acquired through coursework can be applied toward a future career;
- d. Opportunities to attain at least one industry-recognized credential; and
- e. 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.

Supportive Services – as defined in WIOA Law Section 3(59), means services such as transportation, childcare, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under this Act.

Work Experiences – as defined in the DOL Final Rule, Section 681.600, are a planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience may be

paid or unpaid, as appropriate. A work experience may take place in the private for-profit sector, the non-profit sector, or the public sector.

POLICY

I. Intake Process

- A. The Intake process is conducted by service provider program staff with the applicant to determine interest and eligibility for the WIOA youth program. Program staff will complete the data entry into the CalJOBS (the State of California's participant tracking system) application. All required data and information collection and maintenance are to be conducted per Alliance policies. This process is to include, but not be limited to:
 - 1. Completion of the program application with applicants signature, applicants parent signature if required, and program staffs signature.
 - 2. Collection of documentation to substantiate applicants eligibility. This may include a signed release of information to allow the program staff to assist the applicant in collection of documentation to substantiate eligibility.
 - a) Testing to determine Basic Skills Deficiency may be conducted during the Intake Process to help determine eligibility, and if the applicant's enrolled, must be completed within 60 days of the participant's first youth program service.
 - 3. Explanation and collection of signed acknowledgements for WIOA provisions for Nondiscrimination and Equal Opportunity and Grievance and Complaint procedures.
- B. After the program staff determines the youth's need for, ability to benefit from, and eligibility for services, the service provider will have senior staff review the information and documentation and approve the applicant for program enrollment. The reviewer is to sign the application to authenticate they have completed this review.

II. Enrollment

Enrollment into the WIOA youth program must occur within 45 days of the date of application. In CalJOBS, an individual is considered enrolled in WIOA as of the "Participation Date" that is recorded under the Create Participation section. After information is entered in to the Create Participation section, to fully enroll the youth, the program staff must create an Objective Assessment (Activity 412), Individual Service Strategy (Activity 413) and one other service activity.

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

- III. Program Design – Service providers will be responsible for administering a youth program model that meets the requirements as described in the Alliance's Request for Proposal (RFP) and Alliance contracts. The youth program must include the required youth program elements as described under WIOA Law, Department of Labor (DOL), and EDD guidance. The program design framework consists of an objective assessment, an individual service strategy, case management, and follow-up services that lead toward successful outcomes for youth participants.

- IV. Objective Assessment - WIOA requires all eligible individuals enrolled in the Youth program must receive an objective assessment that will assess the academic levels, skill levels, and service needs of each participant, which includes a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs reviewed for the purpose of identifying appropriate services and career pathways for participants.
1. The “begin date” of the “412-Objective Assessment” activity must be the same date as the “Participation Date.”
 2. A new Objective Assessment of a participant is not required if the service provider determines it is appropriate to use a recent assessment of the participant conducted pursuant to another education training program. However, this must be documented in CalJOBS.
- B. Individual Service Strategy - The second activity WIOA requires is an individual service strategy (ISS) developed based on the needs of each youth that is directly linked to one or more performance indicators and that shall identify career pathways that include education and employment goals, appropriate achievement objectives, and appropriate services for the participant, taking in to account the Objective Assessment results. This must be entered as the “413-Develop Service Strategies IEP/ISS/EDP.” (The “actual begin date” for this activity can be the same date as the “actual begin date” for the objective assessment activity or a later date.)
1. The ISS is the overall case strategy and plan for the youth. It is to be developed in partnership with the youth and changes over time. It is a living document that must be updated as activities change, achievements are made, and supportive services are issued or addressed.
- C. Case Management – The case management component of the WIOA youth program is conducted throughout the entirety of the youth’s participation. Case management is essential to the success of WIOA service delivery. Case management activities consist of the following, but are not limited to:
1. Direct customer service –objective assessment, ISS development, career planning, coordination of supportive services, referrals, job and work experience placement, outreach, and follow-up.
 2. Monitoring and documenting eligibility, services, and outcomes – Accurate and timely data entry in to CalJOBS, ensuring eligibility and documentation requirements are met according to the latest EDD Technical Assistance Guide (TAG) or DOL standards, determining the appropriate time to exit a youth from program participation and monitoring program exits and performance outcomes.
 3. Provide at a minimum a monthly contact documented in case notes.
 4. Utilize the Alliance technical assistance, policies, and forms for WIOA Youth program service delivery.
 5. Provide the specific services to support youth, based on the youth’s assessment and service strategy, from within the fourteen program elements under WIOA.
- D. Follow up – Follow up is one of the fourteen program elements under WIOA. All youth participants must receive follow up services for a minimum duration of 12 months after exit. The types of services provided must be determined based on the needs of the individual and therefore, the intensity of follow up services may differ for each participant. Follow up services must include more than only a contact attempted or made for securing

documentation in order to report a performance outcome. Follow up services must follow the guidelines outlined in the Alliance's Follow Up policy.

A participant exit date is determined as follows:

1. After a participant has completed their last service under the WIOA program, a case closure must be entered into CalJOBS. Ninety days after the closure date, CalJOBS will soft exit the participant from the WIOA program. The soft-exit process will record the exit date to match the end date of the last reported service in CalJOBS.
2. If additional services are required, the case closure has been entered, but the 90 days have not yet lapsed, the case closure shall be deleted, and a new activity will be entered with a start date reflecting the date the service began. The 90 day "exit" clock will be reset and will begin again upon the entry of the next case closure.
3. If additional services are required after the 90-day period lapses, the individual must begin the application/registration process again. The eligibility documentation must be updated to reflect the circumstances of the individual on the date of the new application.

V. Program Elements

The service provider must have available all of the fourteen program elements identified in WIOA Section 129(c)(2) to provide to youth participants. Although, all 14 program elements must be available in the local area, it is not required all are provided to each participant. The service provider has the flexibility to determine what specific services a youth will receive based upon the youth's Objective Assessment and ISS.

Program elements may be available by leveraging resources from other partner programs or other community resources. Referrals to these resources should be made, as appropriate.

The provided 14 elements shall be recorded on the WANB form 108, WIOA 14 Youth Program Elements. This form is used to record the elements what were provided and who provided them.

A. **Program Element 1:** Tutoring, study skills training, and evidence-based dropout prevention and recovery strategies that lead to completion of secondary school diploma or its recognized equivalent or for a recognized postsecondary credential.

1. Strategies under this element must 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 postsecondary credential.
2. Tutoring, study skills training, and instruction 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. This element may be provided one-on-one or in a group setting, through resources or workshops. This element does not include training services that lead to recognized postsecondary credentials.
3. Secondary school dropout prevention strategies intended to lead to a high school diploma include services and activities that keep a youth participant in school and engaged in a formal learning and/or training setting. Strategies include, but are not limited to, tutoring, literacy development, active learning experiences, after-school opportunities, and individualized instruction.

B. **Program Element 2:** Alternative secondary school services, or dropout recovery services, as appropriate.

1. Alternative secondary school services, such as basic education skills training, individualized academic instruction, and English as a Second Language training, are those that assist youth who have struggled in traditional secondary education. Dropout recovery services, such as credit recovery, counseling, and educational plan development, are those that assist youth who have dropped out of school. These services are to be provided with the goal of helping participants to re-engage and persist in education that leads to the completion of a recognized high school equivalent.

C. **Program Element 3:** Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, including the following:

1. Summer employment opportunities and other employment opportunities available throughout the school year
2. Pre-apprenticeship programs
3. Internships and job shadowing
4. On-the-job training opportunities

Labor standards apply in a work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists. Work experiences must include academic and occupational education. The educational component may occur concurrently or sequentially with the work experience. Further academic and occupational education may occur inside or outside the work site. The work experience employer can provide the academic and occupational component, or it may be provided separately in the classroom or through other means. 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 and/or occupations.

D. **Program Element 4:** Occupational skill training, which includes priority consideration for training program that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations.

1. Staff and/or youth service providers must give priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area. Individual Training Agreements (ITAs) may be utilized for OS youth. Although IS youth may not use youth program funded ITAs, IS youth between the ages of 18 and 21 may co-enroll in the WIOA Adult program and may receive training services through an ITA funded by the adult program.

E. **Program Element 5:** Education offered concurrently with and in the same context as workforce preparation activities and training for specific occupation or occupational cluster.

1. This program element reflects an integrated education and training model and allows workforce preparation activities and/or basic academic skills to be taught within the same time frame and connected to hands-on occupational skills training in a specific occupation, occupational cluster, or career pathway.

F. **Program Element 6:** Leadership development opportunities, including community service and peer-centered activities encouraging responsibility, and other positive social and civic behaviors.

1. Leadership development opportunities may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors. Activities may include:
 - a) Exposure to postsecondary educational possibilities;
 - b) Community and service-learning projects;
 - c) Peer-centered activities, including peer mentoring and tutoring;
 - d) Organizational and teamwork training, including team leadership training;
 - e) Training in decision-making, including determining priorities and problem solving;
 - f) Citizenship training, including life skills training such as parenting and work behavior training;
 - g) Civic engagement activities which promote the quality of life in a community; and
 - h) Other leadership activities that place youth in a leadership role such as serving on youth leadership committees.
- G. **Program Element 7:** Supportive services. For further detail on supportive services, see WANB Policy #1001 "Supportive Services."
- H. **Program Element 8:** Adult mentoring for a duration of at least 12 months that may occur both during and after program participation.
 1. Adult mentoring must last at least 12 months and may take place during the period of participation or following program exit. Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of the company. Youth providers should ensure appropriate processes are in place to adequately screen and select mentors. If mentors are sparse, case managers may serve as mentors.
- I. **Program Element 9:** Follow up services for not less than 12 months after the completion of participation.
 1. Follow-up services are critical services provided for a minimum of 12 months after a youth exits from the program to help ensure the youth is successful in employment and/or postsecondary education. All youth participants must be offered an opportunity to receive follow-up services that align with their ISS and must be provided follow-up services for a minimum of 12 months unless the participant declines to receive follow-up services, or the participant cannot be located or contacted.
 2. Follow-up services must include more than only a contact attempted or contact made for securing documentation in order to report a performance outcome.
 3. Follow-up services may begin immediately following the last expected date of service in the youth program when no future services are scheduled. Follow-up services do not cause the exit date to change and do not trigger re-enrollment in the program.
 4. Follow-up services may include (but must begin after exit to count as follow-up services):
 - a. Regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise;
 - b. Supportive services;

- c. Adult mentoring;
 - d. Financial literacy education;
 - e. 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
 - f. Activities that help youth prepare for and transition to postsecondary education and training.
- J. **Program Element 10:** Comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth.
- 1. Comprehensive guidance and counseling provides individualized counseling to participants. This may include drug and alcohol abuse counseling and referral to partner programs, as appropriate. When referring participants to necessary counseling that cannot be provided by the local youth program or its service providers, the local youth program must coordinate with the organization it refers to in order to ensure continuity of service.
- K. **Program Element 11:** Financial literacy education.
- 1. Financial literacy education may include activities which:
 - a. Support the ability of participants to create budgets, initiate checking and savings accounts at banks, and make informed financial decisions;
 - b. Support participants in learning how to effectively manage spending, credit, and debt; including student loans, consumer credit, and credit cards;
 - c. Teach participants about the significance of credit reports and credit scores, what their rights are regarding their credit and financial information, how to determine the accuracy of a credit report and how to correct inaccuracies, and how to improve or maintain good credit;
 - d. Support a participant's ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions;
 - e. Educate participants about identity theft, ways to protect themselves from identity theft, and how to resolve cases of identity theft and in other ways understand their rights and protections related to personal identity and financial data;
 - f. Support activities that address the particular financial literacy needs of non-English speakers, including providing the support through the development and distribution of multilingual financial literacy and education materials;
 - g. Support activities that address the particular financial literacy needs of youth with disabilities, including connecting them to benefits planning and work incentives counseling;
 - h. Provide financial education that is age appropriate, timely, and provides opportunities to put lessons into practice, such as by access to safe and affordable financial products that enable money management and savings; and
 - i. Implement other approaches to help participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high quality, age-appropriate, and

relevant strategies and channels; including, where possible, timely and customized information, guidance, tools, and instruction.

L. Program Element 12: Entrepreneurial skills training.

1. Entrepreneurial training must develop the skills associated with entrepreneurship. Such skills may include, but are not limited to, the ability to:
 - a. Take initiative;
 - b. Creatively seek out and identify business opportunities;
 - c. Develop budgets and forecast resource needs;
 - d. Understand various options for acquiring capital and the trade-offs associated with each option; and
 - e. Communicate effectively and market oneself and one's ideas.
2. Approaches to teaching youth entrepreneurial skills include, but are not limited to, the following:
 - a. Entrepreneurship education that provides an introduction to the values and basics of starting and running a business. Entrepreneurship education programs often guide youth through the development of a business plan and also may include simulations of business start-up and operation;
 - b. Entrepreneurship development which provides supports and services that incubate and help youth develop their own businesses. Enterprise development programs go beyond entrepreneurship education by helping youth access small loans or grants that are needed to begin business operation and by providing more individualized attention to the development of viable business ideas; and
 - c. Experiential programs that provide youth with experience in the day-to-day operation of a business. These programs may involve the development of a youth-run business that young people participating in the program work in and manage. Or, they may facilitate placement in apprentice or internship positions with adult entrepreneurs in the community.

M. Program Element 13: Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career counseling, and career exploration services.

1. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area may include career awareness, career counseling, and career exploration services. Labor market information tools may be utilized to help participants make effective decisions about education and careers, as well as facilitate awareness of career fields that are likely to provide long-term employment and earnings in the local labor market.
2. Career awareness begins the process of developing knowledge of the variety of careers and occupations available. Career exploration is the process in which youth choose an educational path and training or a job that fits their interests, skills and abilities. Career counseling or guidance provides advice and support in making decisions about what career paths to take. Career counseling services may include providing information about resume preparation, interview skills, potential opportunities for job shadowing, and the long-term benefits of postsecondary education and training.

N. **Program Element 14:** Activities that help youth prepare for and transition to postsecondary education and training.

1. This element includes activities that help youth prepare for and transition to postsecondary education and training after attaining a high school diploma or its recognized equivalent. These services include exploring postsecondary education options, including technical training schools, community colleges, four-year colleges and universities, and registered apprenticeships. Additional services include, but are not limited to, assisting youth to prepare for SAT/ACT testing; assisting with college admission applications, searching and applying for scholarships and grants, filling out financial aid applications, and connecting youth to postsecondary education programs.

VI. Expenditure Requirements

- A. Out of School Youth – WIOA shifts the primary focus of youth formula funds to support the educational and career success of OSY. At least 75% of the WIOA youth formula allocation must be spent on workforce investment activities for OSY, after subtracting funds spent on administrative costs.
- B. Work Experience (WEX) – WIOA places a priority on providing youth with occupational learning opportunities through WEX. At least 20% of the WIOA youth formula allocation must be spent on WEX. The WEX expenditure rate is calculated after subtracting funds spent on administrative costs. Additionally, the expenditure rate is not applied separately for In-School Youth and Out of School Youth. WEX activities include the following:
 1. Summer employment opportunities and other employment opportunities throughout the year.
 2. Pre- apprenticeship programs
 3. Internships and Job shadowing
 4. On-the-job training (OJT)

VII. Work Experience (WEX)

WEX provides youth an invaluable opportunity to develop workplace skills. Paid and unpaid WEX must include **academic and occupational education** and may include the program elements.

The required academic and occupational education (e.g., workforce preparation activities, basic academic skills, and hands-on occupational skills training) must be taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway.

- A. Youth formula funds may be used to pay wages and related benefits for WEX in the public, private, for profit or non-profit sectors when the participant's Objective Assessment and ISS indicate that a WEX is appropriate. Additionally, youth formula funds may be used to pay wages and staffing costs for the development and management of WEX. Staff costs incurred for the functions and activities directly serving participants may count as program costs such as:
 1. Staff time spent identifying potential work experience opportunities.
 2. Staff time working with employers to develop the work experience.
 3. Staff time spent working with employers to ensure a successful work experience.
 4. Staff time spent evaluating the work experience.
 5. Classroom training or the required academic education component directly related to the work experience.
 6. Orientation sessions for participants and employers.
 7. Incentive payment to youth for an achievement directly tied to the work experience.

8. Employability skills/job readiness training to prepare youth for a work experience.

All work experience activities must be paid experiences, with the exception of Pre-Apprenticeship and Job Shadowing activities. Youth WEX participants may be assigned paid WEX positions, with an hourly pay rate to be determined at the time of WEX assignment, which will be the employer's entry level wage for the similar position, but no less than State minimum wage and not to exceed \$15 per hour.

B. Youth WEX placements will be time-limited using the following criteria:

1. Youth WEX participants in OJT shall have a contract established with the OJT provider. All OJT contracts shall be limited to a period of time required for a participant to become proficient in the occupation for which the training is being provided, not to exceed 6 months under normal circumstances. In determining the appropriate length of the contract, consideration will be given to the skill requirements of the occupation, the academic and occupation skill level of the participant, prior work experience, and the participant's individual employment plan. OJT contract time periods which exceed 6 months will need the Alliance's Workforce Development Board (WDB) Director review prior to approval, and any exceptions granted by the WDB Director will not exceed a total contract time period of 12 months. All OJTs must follow the guidelines outlined in the Alliance's OJT policy.

C. Youth WEX participants in any youth WEX program which is not OJT shall have placements time-limited not to exceed 6 months or 480 hours in duration under normal circumstances. Exceptions to this time limit can be proposed to the WDB Director on an individual basis, allowing for a 6-month extension when approval has been obtained by the WDB Director.

All minors under 18 years of age employed in the State of California must have a permit to work. [EC49160; LC 1299] The Federal Fair Labor Standards Act also requires a certificate of age for working minors. The State Permit to Employ and Work ("Permit") is accepted as the Federal certificate [EC 49110, 49112, 49113, 49116]. A youth participant, under 18 years of age and assigned to WEX, must have a copy of their permit to work in the case file.

Workers' compensation benefits must be available for injuries suffered by the participant while performing WEX activities.

VIII. Individual Training Accounts (ITA) – ITA's are only allowable for OSY, aged 16-24. ITAs may only be utilized for training vendors that appear on the State of California's Eligible Training Provider List (ETPL). WIOA Youth funds may not be utilized to fund an ITA for an OSY with a training provider that is headquartered outside of California and does not have an in-state training facility, even if the provider is listed on another State's ETPL.

IX. 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. Service providers may use braided funds to provide more comprehensive services to participants and maximize partner resources available to assist youth. Braiding funds must meet the following criteria:

- A. The cost of each funding stream is tracked, documented, and allocated based on the proportional benefit.
- B. The cost benefits two or more programs in proportions that can be determined without undue effort or cost.

- C. The youth meets the eligibility requirement 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.

- X. System Validation and Monitoring

The Alliance will be responsible for the review of all WIOA case records for eligibility. The review will be based on the information and eligibility documents contained in the participant's file.

Case record information, documentation, and verifications must be retained for a minimum of three years. Additional guidelines are outlined in the Alliance's Oversight and Monitoring policy.

POLICY UPDATE HISTORY

Date Board Approves – New Policy

INQUIRIES

Questions regarding this policy can be sent to Operations Unit.

WIOA 14 Youth Program Elements

Youth Name: _____

Please indicate which 14 elements the participant was provided and who provided the service.

WIOA Youth 14 Elements	
<input type="checkbox"/>	Tutoring, study skills training, and evidence-based dropout prevention and recovery strategies that lead to completion of secondary school diploma or its recognized equivalent or for a recognized post-secondary credential.
<input type="checkbox"/>	Alternative secondary school services, or dropout recovery services, as appropriate.
<input type="checkbox"/>	Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, including the following: <ul style="list-style-type: none"> <input type="checkbox"/> Pre-apprenticeship programs; <input type="checkbox"/> Internships and job shadowing; <input type="checkbox"/> On-the-job training opportunities;
<input type="checkbox"/>	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
<input type="checkbox"/>	Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster
<input type="checkbox"/>	Leadership development opportunities, including community service and peer-centered activities encouraging responsibility, and other positive social and civic behaviors
<input type="checkbox"/>	Supportive services
<input type="checkbox"/>	Adult mentoring for a duration of at least 12 months that may occur both during and after program participation
<input type="checkbox"/>	Follow-up services for not less than 12 months after the completion of participation
<input type="checkbox"/>	Comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth
<input type="checkbox"/>	Financial literacy education
<input type="checkbox"/>	Entrepreneurial skills training
<input type="checkbox"/>	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
<input type="checkbox"/>	Activities that help youth prepare for and transition to post-secondary education and training