

**SOUTHERN WORKFORCE BOARD
BIG FIVE COMMUNITY SERVICES
DURANT, OKLAHOMA**



**WORKFORCE DEVELOPMENT
YOUTH PROGRAM OPERATIONS
& ADMINISTRATION POLICY
#SWB - 004**

**July 2005
Revised November 30, 2005**

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I. Introduction and Overview

The Workforce Investment Act of 1998, enacted on August 16, 1998, introduces seven guiding principles to assist states and local partners to implement reforms to the Workforce Investment System. One of these guiding principles is *Improved Youth Programs*. WIA envisions these improvements will occur by:

- Tying activities and services more closely to labor market needs,
- Creating a strong connection between academic and occupational learning,
- Providing activities geared specifically toward youth development, and
- Providing the follow up services that are central to the development of effective youth programs.

An emphasis will be placed on the coordination of youth activities and the creation of a comprehensive network of youth program services.

The WIA Vision for youth is that:

“All youth, particularly those out-of-school, acquire the necessary skills and work experience to successfully transition into adulthood, careers, and further education and training.”

This vision moves the workforce development system away from short-term interventions by emphasizing the long-term development of young people. Program design should reflect an age continuum of services that generally plans for the needs of youth aging through the program.

The overall purpose of the WIA Youth program is to:

- Provide, to eligible youth seeking assistance in achieving academic and employment success, effective and comprehensive activities, which include a variety of options for improving educational and skill competencies and provide effective connections to employers;
- Ensure on-going mentoring opportunities, in the workplace and the community; for eligible youth with adults committed to providing such opportunities;
- Provide opportunities for training to eligible youth;
- Provide continued supportive services for eligible youth;
- Provide incentives for recognition and achievement to eligible youth; and
- Provide opportunities for eligible youth in activities related to leadership, development, decision making, citizenship and community service.

Year Round Focus

The majority of youth participants are to be involved in year round activities. The intensity of those services may fluctuate during the year depending on other activities, such as school. However, the general program design and individual service strategies are to be based on comprehensive, year round services.

Participation Rates

The WIA Title 1 B Youth Program is designed to assist those youth that meet the eligibility requirements as described in the Act, Regulations and Policy and Guidance provided by the Oklahoma Employment Security Commission and the United States Department of Labor. The United States Department of Labor provides the State of Oklahoma and the Southern Workforce Board with a specific allocation of youth funding each year. In order to maximize resources the Service Provider case manager must ensure that each Youth Program participant can complete his/her activities, services and educational or training assistance within 5 years of his/her date of registration. An exception may occur in extreme circumstances due to a hardship, illness or other unforeseen circumstance. To this affect, an extension can only be granted through written request to the Service Provider Executive Director. This "participation Rate" limit does NOT apply to any youth registered with WIA prior to July 27, 2005.

II. Definitions

- A. Application** – The process to gather information to determine eligibility and register youth as a participant.
- B. Basic Skills Deficient** – Computes or solves problems, reads, writes or speaks English at or below the 8th grade level on a generally accepted standardized test or comparable score on a criterion referenced test; or is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual's family or in society. NOTE: Grade level scores below 9.0 (e.g., 8.9) should be considered at or below the 8th grade level.
- C. Basic Skills Goal** – measurable increase in basic education skills including reading comprehension, math computation, writing, speaking, listening, problem solving, reasoning, and the capacity to use these skills.
- D. Disabled Youth** – A youth who meets the following American with Disability Act of 1990 definition:
Disability: The term "disability" means, with respect to an individual
- a physical or mental impairment that substantially limits one or more of the major life activities of such individual;
 - a record of such an impairment; or
 - being regarded as having such an impairment.
- E. Drop Out** – A youth who is no longer attending any school, this may include, but is not limited to youth who have been expelled and transient youth who are not enrolled. A youth's dropout status is determined at registration. Document in the case file the reason the youth has been determined to be a drop out.
- F. Employed** – An employed individual is one who, during the 7 consecutive days prior to registration, did any work at all as a paid employee, in his or her own business, profession or farm, worked 15 hours or more as an unpaid worker in an enterprise operated by a member of the family, or is one who was not working,

but has a job or business from which he or she was temporarily absent because of illness, bad weather, vacation, labor-management dispute, or personal reasons, whether or not paid by the employer for time-off, and whether or not seeking another job.

- G. Exit** – A participant who does not receive any WIA Title I funded or non-WIA funded partner services for 90 days and is not scheduled for future services except follow-up 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.
- H. Family** – means 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:
- A husband, wife, and dependent children
 - A parent or guardian and dependent children.
 - A husband and wife.
- I. Homeless/Runaway Youth** – An individual who:
1. lacks a fixed, regular, or adequate nighttime residence; or
 2. has a primary nighttime residence that is:
 - a. a public or private operated shelter for temporary accommodation;
 - b. an institution providing temporary residence for individuals intended to be institutionalized; or
 - c. a public or private place not designated for or ordinarily used as a regular sleeping accommodation for human beings.
- J. Low Income** – An individual who:
1. Receives, or is a member of a family that receives cash payments under a Federal, State, or local income-based public assistance program;
 2. Received an income, or is a member of a family that received a total family income, for the 6-month period prior to application for the program, that in relation to family size does not exceed the higher of:
 - a. the poverty line, for an equivalent period, or
 - b. 70% of the lower living standard income level, for an equivalent period.
 3. Is a member of a household that receives or has been determined within the 6-month period prior to application to be eligible to receive food stamps;
 4. Qualifies as a homeless individual as defined above;
 5. Is a foster child on behalf of whom state or local government payments are made, or
 6. Is an individual with a disability whose own income meets the income requirements above but who is a member of a family whose income does not meet those requirements.
- K. Not employed** – An individual who does not meet the definition of employed.
- L. Occupational skills goal** – primary occupational skills encompass the proficiency to perform actual tasks and technical functions required by certain occupational fields at entry, intermediate or advanced levels. Secondary occupational skills entail familiarity with and use

of set-up procedures, safety measures, work-related terminology, record keeping and paperwork formats, tools, equipment and materials, and breakdown and clean-up routines.

- M. Offender** – An individual, adult or juvenile, who is or has been subject to any stage of the criminal justice process, for whom services under WIA may be beneficial; or who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.
- N. Older Youth** – An individual who is 19 through 21 years old, an eligible youth and receiving youth services.
- O. Out of School Youth (OSY)** – A eligible youth who is a school drop out, or who has received a secondary school diploma or its equivalent but is basic skills deficient, unemployed or underemployed. (WIA section 101(33)). For reporting purposes, this term includes all youth except those who are attending any school and have not received a secondary school diploma or its recognized equivalent, and **except** those who are attending post-secondary school and are **NOT** basic skills deficient.
- P. Participant** – A youth who has been registered into the youth program and who is receiving services, except follow up services. Participation commences on the first day, following determination of eligibility, in which the youth begins receiving WIA Title I-B youth services.
- Q. Pregnant or Parenting Youth** – An individual who is under 22 years of age and who is pregnant, or a youth, male or female, who is providing custodial care for one or more dependents under age 18.
- R. Self-Certification** – An individual’s signed attestation that the information he/she submits to demonstrate eligibility for a WIA Title I–B program is true and accurate.
- S. Sixth Eligibility Criterion** – WIA Sec. 101(13) defines an eligible youth. Included in the definition are barriers/eligibility criteria. Five of the barriers are specifically defined. The sixth barrier “an individual who requires additional assistance to complete an educational program, or to secure and hold employment” requires a local definition. The local definition is a youth who has one of the following characteristics or combination of characteristics:
- Substance-abuse
 - Lacking fundamental skills
 - Alternative school enrollees
 - Disability (learning or physical)
 - Poor work history
 - Lacking work readiness or occupational skills
- T. Underemployed** – an individual who is employed but does not meet the definition of self-sufficient as determined by the Southern WIB, see Adult/Dislocated Worker Delivery of Service.
- U. Work readiness skills goal** – work readiness skills include world of work awareness, labor market knowledge, occupational information, values clarification and personal understanding, career planning and decision making, and job search techniques (resumes, interviews, applications, and follow-up letters). They also encompass survival/daily living

skills such as using the phone, telling time, shopping, renting an apartment, opening a bank account, and using public transportation. They also include positive work habits, attitudes, and behaviors such as punctuality, regular attendance, presenting a neat appearance, getting along and working well with others, exhibiting good conduct, following instructions and completing tasks, accepting constructive criticism from supervisors and co-workers, showing initiative and reliability, and assuming the responsibilities involved in maintaining a job. This category also entails developing motivation and adaptability, obtaining effective coping and problem-solving skills, and acquiring an improved self image.

V. Younger Youth – Eligible youth who are 14 through 18 years old.

III. Application

The first step in determining a prospective participant’s eligibility for the WIA youth program is to take the application from the individual. The information gathered during the application process must include all of the information necessary to determine eligibility and complete registration. Equal Employment Opportunity Data must be collected on all youth applicants (eligible and ineligible) and retained for a period of time that is consistent with the requirements issued by the Directorate of Civil Rights. *(For further instructions, information, and definitions needed to complete the Application see the MIS and/or OSL Guide developed by the Oklahoma Employment Security Commission.)*

IV. Eligibility/Registration

After the Application form is completed, Service Provider case managers will review the application, check the eligibility items, and gather evidence to verify the applicant’s eligibility for the youth program. Case Managers should note if any questions were left unanswered, or if answers to any of the questions were contradictory.

The next step is to review the applicant’s eligibility for the WIA program by using the Eligibility Determination Form. The form is presented as a matrix that the interviewer will fill out based on the applicant’s circumstances and reflecting the program he/she is applying for. Each section of the matrix represents the required eligibility item that must be documented and maintained in the client’s file.

When using the matrix, the un-shaded squares are provided for indicating the attachment number of the various acceptable eligibility documents. The documents are to be attached in the same sequence as shown on the matrix in descending order. This will allow for consistent and sequential method of documentation.

For youth ages 14 through 17, a signature of a parent or legal guardian must be obtained. After youth are determined eligible for the program they are considered registered.

A. General Eligibility Requirements

Youth are eligible to receive WIA Title I-B services if they are:

1. A citizen of the United States or an eligible non-citizen whose status permits them to be employed in the United States.

Eligible non-citizens are required to show a current “Resident Alien Card” issued by the Department of Justice, Immigration and Naturalization Service (INS), or they have certification from INS that they are eligible to work. Such certification may be in the form of a card, a letter, or a notation in the alien’s current passport.

Documentation sources include Birth Certificate, a DD-214 if it shows place of birth, Baptismal Certificate, a Hospital Record of Birth, INS documents, Native American Tribal Document which documents U.S. Citizenship, Food Stamp Records, Public Assistance Records, collateral contact with INS, etc.

2. Selective Service Registrant as Required, Age 18 to 25.

To document registration with the Selective Service System, acceptable sources are a Selective Service Registration Certificate or an SSS Letter of Registration. For applicants who are unable to provide a document, staff should call the Selective Service System’s telephone number or verify on the SSS website.

3. Not less than 14 years of age and not more than 21 years old.

Acceptable documentation sources include Birth Certificate, Drivers License, School ID Card, School Record, Tribal Record, Work Permit, Passport, Military ID, UI document or other government agency referral form or document, or other Federal, State, or Local Government-Issued ID.

4. Meets one of the following low-income criteria.

a. Receives, or is a member of a family that receives cash payments under a Federal, State, or local income-based public assistance program; Documentation sources include Public Assistance Records, Social Service Agency contacts, interagency referrals, and/or TANF Award Letter. The applicant must be receiving or be a member of a family receiving cash welfare payments under a federal, state, or local welfare program.

b. Received an income, or is a member of a family that received a total family income, for the 6-month period prior to application for the program, that in relation to family size does not exceed the higher of the poverty line, for an equivalent period, or 70% of the lower living standard income level, for an equivalent period. Family size must first be determined by using the “Family Size Verification Form”. Family income must then be determined and may be documented by using the “Income Verification Form” or pay stubs or other sources of documentation which verify income for the last 6 months.

c. Is a member of a household that receives or has been determined within the 6-month period prior to application to be eligible to receive food stamps; Documentation sources are they same as category a.

d. Qualifies as a homeless individual as defined above.

e. Is a foster child on behalf of whom state or local government payments are made. Documentation may include court contact, court documentation,

medical card, verification of payments made on behalf of the child, or a written statement from a State or local agency.

- f. Is an individual with a disability whose own income meets the income requirements above but who is a member of a family whose income does not meet those requirements.

NOTE: when determining income level do not count income received from:

- Unemployment compensation
- **Needs-bases Scholarship assistance**
- Financial Assistance under Title IV of the Higher Education Act, i.e., Pell Grants, Federal Supplemental Educational Opportunity grants, and federal Work-Study. PLUS, Stafford, and Perkins Loans, like any other kind of loan, are debt and not considered income
- Child support payments
- Cash Welfare Payments (including TANF, SSI, RCA, GA, Emergency Assistance, and General Relief)
- One-Time Income received in lieu of TANF assistance
- Income earned while the veteran was in Active Military Duty, and certain other Veteran's Benefits (i.e., compensation for service-connected disability and service-connected death, vocational rehabilitation, and education assistance)
- Regular Payments from Social Security, OASI and Survivors
- Lump-sum payments received as assets in the sale of a home, where the assets are to be reinvested in the purchase of a new home (consistent with IRS guidance)
- Payments received as the result of an automobile accident insurance settlement that are being applied to the repair or replacement of the automobile
- Foster Care payments
- Any withdrawal from an Individual Development Account (IDA) for the purchase of a home, medical expenses, or educational expenses.

5. And; Possess one or more of the following characteristics:

- i. Deficient in basic literacy skills: The documentation can be in the form of an English reading or math test, a generally accepted standardized test, telephone verification with school or school records.
- ii. A school drop out: Documentation may be in the form of written statement from school, telephone verification with school or applicant statement.
- iii. Homeless, a runaway, or a foster child: Documentation may be in the form of a written statement from shelter, written statement from social service agency or written statement from individual providing temporary residence.
- iv. Pregnant or a parent: Documentation may be in the form of birth certificate, medical card, physician's note, or statement from school program for pregnant teens.
- v. An offender: Documentation may be in the form of court documents, letter of parole, or letter from probation officer.
- vi. Needs additional assistance to complete an educational program, or to secure and hold employment. (See definition for sixth eligibility criterion in Section

II): Documentation may be in the form of report cards, school records, physician's note, work history, or assessment tools administered by case managers or other officials.

Five Percent Window

1. Youth who do not meet the low-income eligibility criterion may still be eligible to receive WIA Title I-B services if they are in one or more of the following categories;
 - a. School dropout,
 - b. Basic skills deficient,
 - c. Educational attainment is one or more grade levels below the grade level appropriate to the age of the individual,
 - d. Pregnant or parenting,
 - e. Disabled, including learning disabled,
 - f. Homeless or a runaway,
 - g. Offender, or
 - h. Face serious barriers to employment.
2. Not more than 5% of youth participants served in the WIA youth program may be eligible under this subpart. Prior approval from the WIA Director is required for any 5% participant PRIOR to enrollment.
3. The 5% does not include disabled youth who are eligible under part B of this section.

V. Out of School Youth (OSY)

WIA emphasizes services to at risk youth, especially out of school youth. The WIA requires that 30% of youth funds be spent on OSY. This requirement emphasizes WIA's intent that the most vulnerable youth receive services.

OSY are not only youth who have dropped out of high school. They are also youth who are have graduated high school or have a GED, and are deficient in basic literacy skills, are unemployed or underemployed. This term includes all youth except those who are attending any school and have not received a secondary school diploma or its recognized equivalent, and **except** those who are attending post-secondary school and are **NOT** basic skills deficient.

For most OSY who have not completed high school, a year round strategy is to be developed to assist the youth to obtain a high school diploma or GED. This may include enrolling in an alternative school or other educational institution. These activities would be combined with other positive youth development activities that will prepare the OSY to obtain employment and further their education and training. Service strategies for OSY who do have their high school diploma or GED are to focus on personal development and educational and occupational preparation.

There are a number of key partners local programs that case managers should connect with to assist with recruitment of and services to OSY. These partners include, but are not limited to, School-to-Work Programs, Community and Faith Based Organizations, parents, human/social service agencies, local law enforcement, counseling services, and juvenile justice.

VI. Assessment

Assessment is the first step in determining the needs of participants and establishing goals and service strategies. Due to the uniqueness of each customer and their individual educational background, work history and barriers, a service strategy must be developed to provide for a sequence of activities and services. It takes a highly skilled staff, up-to-date resources, and a well-planned assessment process to successfully transition the customer from his/her current situation, particularly those out-of-school, to acquire the necessary skills and work experience to successfully transition into adulthood, careers, and further education and training. WIA case management staff will utilize a combination of interviewing and evaluation instruments, work-based and occupational strategies, training and follow-up services to ensure customer success.

Service Provider staff will ensure all youth that are registered into the youth program will be assessed. This process will objectively assess each participant's: 1) Academic Skill Level; 2) Occupational Skill Level; and 3) Service Needs including a review of the participant's:

1. Basic Skills – Include but are not limited to: reading, writing, computing, speaking and listening. To be assessed by using the TABE or other approved assessment tools.
2. Occupational Skills – Primary and secondary job specific skills. To be assessed by using the SDS or other approved assessment tools.
3. Prior Work Experience – Includes paid and unpaid, including volunteer activities. To be assessed using the work history form.
4. Employability – Level of readiness to obtain and retain employment. To be assessed by using the pre-employment assessment inventory or an appropriate assessment tool.
5. Interests – Include interest in non-traditional jobs. To be assessed by using the SDS or other approved assessment tools.
6. Aptitudes – Natural abilities. Include aptitude for non-traditional jobs. To be assessed by using the SDS or other approved assessment tools.
7. Supportive Service Needs – Determine what supports the youth needs to successfully participate in the activities included in the service strategy. To be assessed by using the Initial Assessment or case manager recommendation.
8. Developmental Needs – These will relate not only to work maturity skills, but also personal maturity and will be addressed by leadership activities in the ISS. To be assessed by using the work maturity assessment inventory or an appropriate assessment tool.

A new assessment is not required if the provider of youth activities determines it is appropriate to use an assessment completed within the last calendar year for another education or training program. Some performance goals will be measured based on pre and post assessment results. The use of standardized assessment procedures such as standardized tests or performance-based assessments with a standardized scoring method will be utilized.

VII. Individual Service Strategy

All youth that are registered in the youth program will have an Individual Service Strategy (ISS) completed following Assessment. The case manager, and staffing team (if appropriate), in conjunction with the youth, is responsible for the planning and development of the ISS. The ISS

has been designed to allow case managers, staffing team and customer to progress according to the development and needs of the customer. It operates on the principles that assessment is an on-going process that each customer is unique, and progression or regression occurs according to his/her own situations and needs. A copy of the ISS must be provided to all youth participants. Copies of all assessment tools must also be included and provided to the participant. The provision of the ISS copy to the participant is extremely important, as this has been proved to assist with participant motivation, self-esteem, self-assessment, and program commitment.

To enhance youth participant choice, youth should be involved in the selection of educational and training activities. The ISS is to be a working tool that serves as a roadmap to attaining the goals identified through the assessment process. It is to outline a logical sequence of activities and services that will assist the youth to achieve the goals. It describes the services and activities that will be provided as well as the expectation for participation. The ISS may also include non-WIA funded services that are part of the strategy to address needs and achieve goals. The ISS is to be maintained as a current tool. It must be updated at least annually but should be updated whenever activities change, goals are attained, or additional service needs are identified.

General Data – To be completed by the case manager.

Assessment Results – Include the name of the test given as well as the score. Previous assessment tests may be use, however, the date assessed should be no more then 12 months prior to eligibility.

Service Considerations – Check all service considerations that apply to the participant. (There may be more than one)

Career Goal - The career goal is to be established based on the information gathered during the assessment process. Consideration should be given to nontraditional occupations and should be an age-appropriate career goal.

Planned Objective The planned objective is to be established based on the information gathered during the assessment process and should relate to the participant’s career goal.

Justification of Services - This section is to justify the need for WIA youth services. Indicate why the participant is in need of our services.

Service Plan - The activities and services that will be provided to the participant by either Big Five Community Services, Inc. or non-WIA partner programs.

Skill Attainment Goals - Skill attainment goals must be based on the assessment and include basic skills, work readiness skills or occupation skills. A maximum of three skill attainment goals per year may be set for younger youth performance purposes, however, additional goals may be set as appropriate. A target date for accomplishing each skill attainment goal must be set for **no later than one year**. These goals must be included in the ISS. Skill attainment goals should be goals that will challenge the youth but are attainable. Progress toward these goals should be continuously assessed. Once a goal has been met, a subsequent goal should be set.

For younger youth (14 – 18) who are in school, the ISS must include, at a minimum, one skill attainment goal per year. Younger youth who are in school or out of school and have been determined to be basic skills deficient must have a basic skills goal identified in their ISS. Other skill attainment goals for OSY should be set as appropriate based on the assessment. (See Goals Setting and Performance for detailed information.)

Youth Statement of Understanding – Self-certification for youth aged 18-21 is acceptable. For youth 14 through 17, the participant and parent or legal guardian signature is required. These signatures are a concurrence for participation. Therefore, it is critical that the customer understands and commits to the process for employment and/or educational goals.

Revision and Comments - A revision is required for a change in any section or item that directly relates to the planned objective or service plan of the participant. The date of the revision and the reasoning should be reflected in the comment section.

Case Manager Notes – The Service Provider Case Manager must complete a “Counselor Note” with every significant participant contact. The Counselor note may contain relevant information as listed below:

1. Rationale for a change in self-sufficiency levels.
2. Outcome of participant activities.
3. Documentation for “unavailability” of services within the community.
4. Rationale for selection of employment activities, transition from one type to another type, or transition to or from unsubsidized employment.
5. Rationale for a change in occupational goal.
6. Team case management meeting notes.
7. Rationale for Big Five Follow-up Services.
8. Rationale for Big Five Supportive Services.
9. Rationale for Training and/or Post Employment Educational Services.
10. Verification / Documentation of Basic Skills instruments or partner agency testing.
11. Rationale for relocation assistance.
12. Verification of provision of labor market information.
13. Employment opportunity documentation.
14. Verification of receipt of other services.
15. Other notes as relates to participant progress, professional counseling and case management, as required at least every 30 days.

The Case Manager should make copies of this section, as numerous pages will be needed. At a minimum, Counselor notes must be submitted to the Administrative Office once every 30 days for verification of participant contact and progress. The notes must be extensive enough to understand “at a glance” what activities the individual is currently participating in and what additional future or present services are needed. The outcomes for participation **must be reflected in Counselor Notes.**

VIII. Program

The general program design for the Southern Workforce Board’s WIA Youth Program is to be comprehensive and year round. Under WIA the service approach is to emphasize the long-term development of youth. The program design will reflect an age continuum of services with services being highly individualized and age appropriate. The intensity and method of service delivery will vary over time for participants and among participants. The program elements outlined in Part IX of this program guide are designed to address this broad program framework.

The program design will provide youth with:

1. Preparation for post-secondary educational opportunities;
2. Strong linkages between academic and occupational learning;
3. Preparation for unsubsidized employment opportunities; and
4. Effective connections to intermediaries with strong links to:
 - a. The job market; and
 - b. Local and regional employers.

IX. Program Elements

The Southern Workforce Board's WIA youth program will include all of the following program elements. Specific program elements will be provided to individual youth participants based on the results of the assessment and are to be outlined in the ISS. In some cases, the service will be provided through a provider other than Big Five. In those instances the services to be provided will occur without cost as they will be provided through referral systems and coordination strategies that are in place to ensure the needs of the youth are efficiently met. A ***Youth Element Availability List*** has been compiled and made available to all WIA youth case managers for availability, referral and coordination of youth elements. The case manager will have them available for all youth to access or take for future reference. Supportive Services and any other elements that are not provided by referral or coordination will require a competitive process for service provision by the other entity, such as a vendor or contractor utilizing the Southern Workforce Board's **Procurement and Contracting Policy** that was developed according to OETI 11-2003.

For example, the Southern Workforce Board's *Supportive Service Policy* and forms will be utilized to competitively procure Supportive Services from vendors and contractors. The Service Provider case manager will utilize the **Supportive Service Tracker**, the **Price Quote Sheet**, **Supportive Service Request Form**, and adhere to the Southern Workforce Board's **Supportive Services Policy**.

Exceptions to the competitive procurement process are the design framework component (services for intake, objective assessment and the development of the individual service strategy) and the summer employment opportunities element linked with academic and occupational learning when the grant recipient and/or designated fiscal agent provides these services.

In addition, for Element "d" Paid and Unpaid Work Experience, including Internships and Job Shadowing as provided in 664.460 and 664.470 will be automatically classified as a "Sole Source" without completing competitive procurement paperwork. However, the Service Provider case manager will be required to complete all appropriate Work Experience Agreements, Internship Agreements, Job Shadowing and On-the-Job Contracts with the appropriate parties as stated within the Southern Workforce Board's policies for these activities.

Education programs supported with WIA funds must be consistent with applicable state and local educational standards.

REASONABLE COSTS / EXPENDITURES

The Southern Workforce Board is responsible for the oversight of the WIA Title 1 B Youth Program to ensure both fiscal and programmatic accountability. All training-related expenses, services, activities and fees as reflected in the Southern Workforce Board Youth Program Procedures and Supportive Services Policy are allowable for

the WIA Title 1 B Youth Program. (See this policy and the Supportive Service Policy for further details). The WIA Title 1 B Youth Program is designed to assist those youth that meet the eligibility requirements as described in the Act, Regulations and Policy and Guidance provided by the Oklahoma Employment Security Commission and the United States Department of Labor. The United States Department of Labor provides the State of Oklahoma and the Southern Workforce Board with a specific allocation of youth funding each year.

In order to maximize resources the Service Provider case manager must ensure that each Youth Program participant can complete his/her activities, services and educational or training assistance with a **total maximum amount of \$12,000** for all costs incurred for all supportive services, Work Experience, OJT, Internships, Job Shadowing, Job-Specific Training, Occupational Skills Training or Classroom Training, or any other training-related expense. The "Summer Component" expenditures are EXCLUDED from this "Reasonable Cost/Expenditure" rule. All costs /expenditures, EXCEPT the "Summer Component" expenditures are to be recorded for each youth on the *File Folder Log* form that is attached to this policy so that the Service Provider case manager and monitors can know his/her expenditures at all times and upon request.

- A. ***Tutoring, study skills training, instruction leading to completion of secondary school, including dropout prevention strategies*** - includes summer education activities, summer academic activities to attain basic skills or achieve higher standards. Includes after school activities either at the school or another community based setting, which are designed to assist youth with academic achievement and stress the importance of staying in school. Dropout prevention strategies may include, but are not limited to pregnancy prevention activities and drug and violence prevention activities.
- B. ***Alternative secondary school services*** - includes services provided at alternative secondary school sites. This program element may also include activities for which a youth can earn high school credit.
- C. ***Summer employment opportunities*** - are to link academic and occupational learning. This program element is not intended to be a stand-alone program. Youth may be enrolled in summer employment opportunities and exit at the end of the summer, however, this is to be the exception. Youth who participate only in summer activities must have follow-up services provided for a minimum of 12 months. These youth may also be included in the performance measurements. Most youth are to have summer employment opportunities included as part of their year-round service strategy. The intensity of services may increase during this time.
- D. ***Paid and unpaid work experiences*** - including internships, job shadowing and On-the-Job Training; are to provide youth with an opportunity to develop work place skills. WIA funds may be used to pay wages and related benefits for work experiences in the public; private, for-profit or non-profit sectors when the objective assessment and the ISS indicate that work experiences are appropriate.

1. Work Experiences - planned, structured learning experiences that take place in a workplace for a limited period of time in the private, for –profit sector; the non-profit sector; or the public sector. Work Experiences are designed to enable youth to gain exposure to the working world and its requirements. Work Experiences are appropriate and desirable activities for many youth throughout the year. (See Southern Workforce Board’s Work Experience Policy for detailed information)
2. On-the-Job Training (OJT) is an allowable work experience activity for youth. However, the appropriateness of this activity is to be determined on a case by case situation as identified by the objective assessment of the individual youth participant.. Requirements for OJT’s for youth are the same as the requirements for OJT’s for adults. (See Southern Workforce Board’s OJT Policy.)
3. Job Shadowing – Provides career exploration opportunities. (See Southern Workforce Board’s Job Shadowing Policy)
4. Internships/Externships – May be paid or unpaid and provide exposure to various aspects of an industry. (See Southern Workforce Board’s Internship Policy)

E. ***Occupational skill training*** - eligible youth may receive skill occupational training based on his/her objective assessment. Older youth may be eligible for occupational skills training through this youth program element or through the WIA Adult program and receive an Individual Training Account (ITA) (See Southern Workforce Board *ITA Policy*).

1. Training may be in occupational clusters or for a specific occupation. Training in occupational clusters involves teaching a fairly standardized set of competencies which are generally applicable to a wide range of work settings. Training for a specific occupation or individual job prepares participants in an in-depth fashion using specific job specifications. Customized job skills training to meet the specifications of individual employers or occupational settings may be conducted, or to teach more general transferable skills. Because the specific skills required for some jobs are quite complex and extensive, training participants for a sequence of jobs within a career area ranging from less skilled to more skilled, rather than cover the total set of competencies will be optional. Skill clusters can be divided into basic entry level, intermediate and advanced skills.
2. Job specific skills programs can be modified for special needs youth by:
 - a. Adjusting instructional methods and the speed at which new material is introduced;
 - b. Providing opportunities for additional practice under close supervision;
 - c. Using more step by step explanations and demonstrations; and
 - d. Furnishing more frequent and focused performance feedback.
3. Employer involvement is important on several levels in the development of job specific skills:
 - a. Identification of current and projected skill training needs;
 - b. Determination of entry level competencies for new employees;
 - c. Establishment of performance criteria for entry level hiring;

- d. Assistance in curriculum design, instructor preparation and development of training materials;
- e. Provision of worksites, and occasionally classrooms, as well as hiring commitments at the completion of training;
- f. Donation of training equipment, space and supplies; and
- g. Development of criteria to measure competency.

Skills Attainment and Proficiencies - When job site training is used to teach occupational skills, written competency statements which identify the skills to be learned, the proficiency level to be attained, and how they will be evaluated may be used. These statements will be included in a written training plan which is shared with the trainer/supervisor. These statements will be developed through joint planning with the job site supervisor, by using the Dictionary of Occupational Titles or some other reference source for identifying general occupational skills, or by individual job task analysis. Proficiency levels are to be established based on the requirements (current and anticipated) of the local labor market. Levels should at a minimum reflect the entry level requirements for a specific job or occupational cluster.

Non-Traditional Occupations – Occupational training is to include opportunities for training in non-traditional occupations. An occupation is considered to be non-traditional when employment in the occupation or field of work for which individuals of the participant’s gender comprise less than 25% of the individuals employed in such occupation or field of work. Both males and females can be in nontraditional employment.

F. *Leadership development opportunities* - are activities that provide youth with the opportunity to take on new roles and responsibilities. They encourage responsibility, employability, and other positive social behaviors. Examples of leadership development opportunities include, but are not limited to:

- 1. Exposure to post-secondary educational opportunities;
- 2. Community and service learning projects;
- 3. Peer-centered activities, including peer mentoring and tutoring;
- 4. Organizational and teamwork training, including team leadership training;
- 5. Training in decision-making, including determining priorities;
- 6. Citizenship training, including life skill training such as parenting, work behavior training; budgeting of resources; and
- 7. Other activities that lead to positive social behavior. Positive social behaviors are outcomes of leadership opportunities, often referred to as soft skills. Positive social behaviors focus on areas that may include the following:
 - a. Positive attitudinal development;
 - b. Self esteem building;
 - c. Openness to working with individuals from diverse racial and ethnic backgrounds;
 - d. Maintaining healthy lifestyles, including being alcohol and drug free;
 - e. Maintaining positive relationships with responsible adults and peers;
 - f. Contributing to the well being of ones community, including voting;
 - g. Maintaining a commitment to learning and academic success;
 - h. Avoiding delinquency;

- i. Postponed and responsible parenting; and
- j. Positive job attitudes and work skills.

G. *Supportive services* - are to be provided to youth who need support to ensure successful participation. All training-related expenses, services, activities and fees as reflected in the Southern Workforce Board ***Supportive Service Policy*** are allowable for the WIA Title 1 B Youth Program. This also includes any element described here within this ***Youth Program Policy***. Supportive services for youth may include, but are not limited to:

1. Transportation;
2. Child care;
3. Work related expenses;
4. Housing;
5. Linkages to community services; and
6. Referrals to medical services.

H. *Adult Mentoring* - is to be available to youth program participants for the period of participation and a subsequent period, for a total of *not less than 12 months*. The long-term connection to a caring adult is an important element to positive youth development. Mentor relationships can be:

1. Employment based;
2. School based; or
3. Community based.

H. *Follow-up services* - all youth participants must receive some form of follow-up services for a *minimum of 12 months after exit*. As long as youth are receiving WIA or WIA partner services they are considered active participants. An “Exit”, and therefore follow-up, does not occur until the youth is no longer active in any WIA funded or partner services. Follow-up services may be provided beyond 12 months. The intensity and type of follow-up services is determined based on the needs of the youth as well as the goals and objectives for the local workforce investment system. Examples of follow-up services include: job shadowing; adult mentoring and tutoring; leadership development activities; supportive services and work related follow- up activities.

Follow-Up services are also provided on a coordinated and referral basis as the services described on page 14 of the *WIA Youth Program Operational & Administration Policy*, as all follow-up services are the same as, or a part of, the other elements described in section 664.410. When a follow-up service is considered a “Supportive Service” under the *Supportive Service Policy*, then a competitive process is utilized as described above as Element #7.

I. *Comprehensive guidance and counseling* - which is appropriate to the needs of the individual youth. This may include career counseling and guidance, as well as drug and alcohol abuse counseling primarily provided to assist a youth in achieving employment-related success. Counseling may be provided by appropriately trained program staff or through referrals to other entities within the community.

X. Goal Setting and Performance Measures

Goals identified through the objective assessment process can be categorized in a number of ways. Each type of goal that is identified is equally important to the development of the individual, the effectiveness of the program for the individual as well as the overall performance of the program. Goals that are set should lay the groundwork for completion of secondary school, prepare the participant for post-secondary educational opportunities, unsubsidized employment and to become a responsible caring adult.

Performance Measures – Case managers and others who are working directly with WIA eligible youth participants must be aware of the WIA core indicators of performance. In general, performance is measured when a participant exits the program. However, the younger youth skill attainment goals are measured at least annually while the youth is registered in WIA. Each Service Provider case manager is required to complete the Performance Measure Worksheet for youth and update it as required according by their supervisor or Board staff.

1. **Younger Youth Performance Measures** – These performance measures apply to any eligible youth registered in the WIA youth program who, at the time of registration was 14 through 18 years old.
 - a. Attainment of basic skills, work readiness or occupational skills. All younger youth who are determined basic skills deficient must have a basic skills goal.
 - b. Attainment of secondary school diplomas and their recognized equivalents, e.g. HSED, GED.
 - c. Placement and retention in post-secondary education, advanced training, military service, employment or qualified apprenticeships.
2. **Older Youth Performance Measures** – these measures apply to eligible youth registered in the WIA youth program who, at the time of registration was 19 through 21 years old.
 - a. Entry into unsubsidized employment.
 - b. Retention in unsubsidized employment six months after entry into the employment.
 - c. Earnings received in unsubsidized employment six month after entry into the employment.
 - d. Attainment of a recognized credential relating to achievement of educational skills, which may include attainment of a secondary school diploma or its recognized equivalent, or occupational skills, by participants who enter unsubsidized employment or who enter post secondary education, advanced training or unsubsidized employment.

XI. When to Count Outcomes

1. All of the core measures for youth are assessed at the time a youth exits the younger youth skill attainment rate. For that measure, positive outcomes are recorded as they occur. The youth has one year from the anniversary of the date the goal was set to achieve the goal.
2. For the exit-based measures, outcomes are determined when the individual leaves the program (i.e., exit). The Department of Labor developed a definition of “exiter” to determine when to count an individual in a specific reporting period.

Exiter is defined as: a customer who does not receive any WIA-funded or non-WIA funded partner service for 90 days and is not scheduled for future services except follow-up services. Participants may have a gap in services greater than 90 days and be excluded from the core measures due to health/medical conditions and delays before training begins. Once a participant has not received a WIA service for 90 days except follow-up services and there are no future services scheduled (or there is no planned gap in service), then that participant has exited WIA for the purposes of measurement in the exit based measures.

a. Setting Appropriate Goal(s)

Within the skill attainment rate, three types of skills are being assessed within this one measure: basic skills, work readiness skills, and/or occupational skills. All younger youth who are determined basic skills deficient (defined as an individual who has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test or a comparable score on a criterion-reference test) must have a basic skills goal that will be held accountable to in the skill attainment rate. In addition to that basic skills goal, the participant may also have a work readiness goal and/or an occupational skills goal. If the participant is not basic skills deficient and therefore does not have a basic skills goal, the individual must have a work readiness and/or an occupational skills goal if they are an in-school youth. If the participant is an out of school youth (not in need of basic skills), it is a local option whether or not a work readiness skills goal and/or an occupational skills goal is necessary. In the example of a younger youth who only participates in the summer activity, exits, and returns to secondary school following the summer activity, if that participant is not deemed to be basic skills deficient, then a work readiness skills goal would be most appropriate for that youth. This work readiness skills goal could be tied to their summer youth experience in order to make it feasible to attain such a goal. If the participant is basic skills deficient, they must have a basic skills goal and it would be more appropriate to continue serving such a participant beyond their summer experience.

b. Timing of Skill Attainment Measure

For those youth who will have skill attainment goals (see discussion above), at least one goal must be set upon initial assessment of the participant. Once a goal is set, the participant has up to one year to achieve each goal set. Attainment of a goal is counted as it is achieved (i.e. goal attainment counted in the quarter in which the goal was achieved). If the goal is not achieved by the one year anniversary of the dates the goal was set, the failure is counted in the quarter of the anniversary date. New goals may be set as initial goals are achieved; however, each participant is allowed only three goal attainments each year. Participants may have any combination of the three types of skill goals (three skill goals in the same category, two skill goals in one category and one skill goal in another, or one skill goal in each category, etc.).

XII. Common Measures

The United States Department of Labor ETA has developed a common measures policy and system that the WIA Case Managers and others who are working directly with WIA eligible youth participants must equally be aware of. The common measures are an integral part of the performance accountability system.

Three of the common measures apply to programs serving youth:

1. Placement in Employment or Education – The number of participants who are in employment or military or enrolled in post-secondary education ad/or advanced training/occupational skills training in the first quarter after exit.
2. Attainment of a Degree or Certificate – The number of participants who attain a diploma, GED, or Certificate by the end of the third quarter after exit.
3. Literacy and Numeracy Gains – The number of out-of-school youth who are basic skills deficient who increase one or more educational functioning levels within a year.

Testing youth with Disabilities: When administering assessment tools, individuals with disabilities are to be provided with reasonable accommodations, as appropriate. Because youth with disabilities are expected to achieve the same gains as other youth, it is critically important that appropriate accommodations be provided for the assessment process, to ensure that the gains achieved by these youth can be determined accurately.

Such accommodations may include:

1. Changes to the methods of Presentation of the test used as an assessment tool;
2. Changes to the methods of Response to the test questions;
3. Changes to the setting in which the test is provided;
4. Changes to the Timing/Scheduling of the test.

XIII. Concurrent Enrollment

Eligible youth who are 18 through 21 years old may also be eligible for the WIA adult/dislocated worker programs. Individuals who meet all respective eligibility criteria may participate in youth and adult programs concurrently. The determination of whether to concurrently enroll a participant in the youth and adult programs is to be determined by the Big Five Case Manger. Concurrent enrollment requires that the participant be registered in both the adult and youth programs. Specific services and associated costs must be tracked back to the program, i.e., youth, adult or dislocated workers. Youth funds may only be spent on allowable youth activities, for example, youth funds may not be used to pay for an Individual Training Account. Concurrent enrollment offers participants and local programs maximum flexibility. For example; an eligible 19 year-old OSY may be enrolled in occupational training services as a youth program element using youth funds or as a training service through an ITA using adult program funds. The appropriate level and balance of youth and adult services is to be determined for each individual. Individuals who are concurrently enrolled will be counted in both youth, either older or younger depending on there age at registration into the WIA youth program, and adult performance measurements.

XIV. Information and Referral

- A. Eligible Youth - Eligible youth are to be provided with information on the full array of appropriate services that are available through the local board, other eligible providers or one-stop partners. Referrals to appropriate training and educational programs that have the capacity to serve the participant or applicant either on a sequential or concurrent basis are also to be provided. Specific program elements will be provided to individual youth participants based on the results of the assessment and are to be outlined in the ISS. In some cases, the service will be provided through a provider other than Big Five. In those instances the services to be provided will occur without cost as they will be provided through referral systems and coordination strategies that are in place to ensure the needs of the youth are efficiently met. A **Youth Element Availability List** has been compiled and made available to all WIA youth case managers for availability, referral and coordination of youth elements. The case manager is required to provide a copy to each youth participant for reference, selection and referral.
- B. Ineligible Youth - Youth applicants who do not meet the enrollment requirements of the youth program or who cannot be served by the program must be referred for further assessment, as necessary, and referred to appropriate training and educational programs that have the capacity to serve the individual.

XV. Linkages to Partner Services

To encourage integration of services across programs (WIA Title I funded and non-WIA Title I funded) and recognize shared contributions toward outcomes, the following strategy for obtaining common measures or services across programs will be used. WIA Title I funded youth programs can count participants who receive services provided by non-WIA Title I funded school-to-work (i.e., schools) and one-stop partner programs in the WIA core measures as long as the individual has been registered for WIA Title I youth services (all individuals receiving youth services will be registered) and:

1. is concurrently receiving WIA Title I funded youth services while receiving partner services;
2. is scheduled to receive WIA Title I funded youth services at a future date while receiving partner services or upon exit of the partner services; or
3. moves to partner services, and can be tracked while receiving and upon exit of partner services.

Providing youth services across WIA Title I and non-WIA Title I programs can be more effectively implemented in communities with strong education and business partnerships linking schools to workforce and economic development strategies and career pathways.

XVI. Coordination

The Southern Workforce Board expects a high level of coordination and collaboration at the local level. The Board envisions partners that include workforce development professionals, schools, community and faith based organizations, Job Corp partners, work-based learning providers such as youth apprenticeship and Tech-prep, post-secondary institutions, human/social service agencies and others to strategically align and leverage resources to increase community youth assistance strategies. Programs will be more closely linked to local labor market needs and will be based on the overall strengths and needs of local area youth. This identification of partners and available programs and services should include many programs including, Foster Care, Job Corps, and TANF funded programs such as Workforce Attachment and Advancement and Community Youth Grants.

Approved by the Southern Workforce Board this 27 day of July, 2005.

Keith Buelow, Chairman

Revised by the Southern Workforce Board this 30 day of November, 2005.

Keith Buelow, Chairman