

AREA 2 | SUMMIT & MEDINA

WORKFORCE INNOVATION & OPPORTUNITY ACT (WIOA)

POLICY LETTER C-04 | YOUTH PROGRAM SERVICES

- I. **SUBJECT:** Youth Program Services
 - II. **PURPOSE:** The purpose of this policy is to communicate guidance and information regarding the provision of services for the Workforce Innovation and Opportunity Act (WIOA) Youth program.
 - III. **EFFECTIVE DATE:** July 1, 2018
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IV. BACKGROUND

The goal of the WIOA Youth program is to assist youth in making a successful transition to employment and further education. However, WIOA recognizes that simply providing training is not enough to enter a specific occupation. A wide range of activities and services must be available to assist youth, especially those who are disconnected and out-of-school, in making a successful transition to adulthood. The WIOA Youth program is designed to provide services, employment, and training opportunities to those who can benefit from, and who are in need of such services. Funds allocated to the local workforce development areas must be used to carry out a series of services to eligible youth.

V. REQUIREMENTS

The youth program is designed to provide the following:

1. Activities leading to the attainment of a secondary diploma or its recognized equivalent, or a recognized post-secondary credential;
2. Preparation for postsecondary educational and training opportunities;
3. Strong linkages between academic instructions and occupation education that lead to the attainment of recognized postsecondary credentials;
4. Preparation for unsubsidized employment opportunities, as appropriate; and
5. Effective connections to employers, including small employers, in in-demand industry sectors and occupations of the local and regional labor markets.

The Area 2 WDB shall ensure that parents, participants, and other members of the community with experience relating to programs for youth are involved in the design and implementation of the youth program, which includes the provision of the following to each participant:

1. Information on the full array of applicable or appropriate services which are available through the local board or other eligible providers or OhioMeansJobs center partners.
2. Referrals to appropriate training and educational programs that have the capacity to serve the participant either on a sequential or concurrent basis.

The Area 2 WDB must provide eligible youth with information about the full array of applicable or appropriate services available through the local board or other eligible providers, or OhioMeansJobs partners. The WDB must also refer eligible youth to appropriate services that have the capacity to serve them on a concurrent or sequential basis. Additionally, eligible providers must refer youth who either do not meet the enrollment requirements of a particular program or who cannot be served by that program for further assessment, as necessary, or to appropriate programs to meet the skills and training needs of the participant.

Per section 129(c)(8) of WIOA, the local WDB shall make opportunities available for individuals who have successfully participated in programs carried out under this section to volunteer assistance to participants in the form of mentoring, tutoring, and other activities.

VI. PROCUREMENT OF PROVIDERS OF YOUTH PROGRAM ACTIVITIES

Per section 123 of WIOA, the Area 2 WDB shall award grants or contracts on a competitive basis to providers of youth workforce investment activities. If an insufficient number of eligible providers of youth workforce investment activities in Area 2 are available, the WDB may award grants or contracts on a sole-source basis.

Youth providers will be selected based upon their ability to provide youth program activities, especially those that may be identified in the State Plan, as well as the ability to meet performance accountability measures. The WDB shall conduct oversight of the selected youth providers. The requirement that eligible providers of youth services be selected by awarding a grant or contract on a competitive basis does not apply to the design framework services when these services are more appropriately provided by WIOA staff.

The WDB retains the right to implement a pay-for-performance contract strategy for program elements for which the local board may reserve and not use more than 10% of the total funds. See [Area 2 WIOA Policy Letter A-05 Procurement of Youth Program Services](#) for further information on procurement.

VII. PRE-ENROLLMENT ACTIVITIES

There Are an array of activities that must occur before enrollment into the WIOA Youth program. These "pre-enrollment" activities include recruitment, intake, initial assessment including an initial

determination of barriers and appropriateness for the program, referrals, and the determination of WIOA Youth eligibility. None of these activities require enrollment in the Area 2 Youth program. Pre-enrollment activities are considered to be those activities leading up to the decision to register a participant for services in the Area 2 WIOA Youth program.

In addition to the "pre-enrollment" activities listed above, informational and self-help activities provided through the OhioMeansJobs centers or through OhioMeansJobs.com are not considered registered services in the WIOA Youth program.

VIII. DESIGN FRAMEWORK SERVICES

Framework services include the objective assessment, an Individual Opportunity Plan (IOP), general case management, and follow-up services that lead toward successful outcomes for WIOA Youth participants. Framework services are completed prior to participation in the WIOA Youth program. As a result, these services may be completed by local WIOA staff. WIOA staff providing framework services may be in the best position to provide such services and can ensure the continuity of WIOA Youth programming as youth service providers change.

Both the objective assessment and the IOP are integral to the youth program, and are intended to be on-going throughout program participation. These two activities serve as the basis for which decisions are made that lead to the receipt of the array of the 14 program elements.

When completing either the objective assessment or the IOP, a new assessment of the youth is not required if the youth provider determines it is appropriate to use a recent assessment (within 6 months) of the participant conducted pursuant to another education or training program. This may include evaluations completed by a secondary school, Vocational Rehabilitation, Aspire (f.k.a. ABLE, Adult Basic Literacy and Education), or other education or training providers.

Objective Assessment

Per section 129 (c)(1)(A) of the WIOA, local areas are required to provide an objective assessment of the academic levels, skill levels, and service needs of each youth participant. The purpose of the objective assessment is to identify the appropriate services, including the identification of career pathways, for each youth participant. The objective assessment shall include a review of all the following information:

- Basic skills;
- Occupational skills;
- Prior work experience;
- Employability;
- Interests;
- Aptitudes (including interests and aptitudes for nontraditional jobs);
- Supportive service needs; and
- Developmental needs.

All the information captured as part of the objective assessment must be contained within the participant's case file.

Individual Opportunity Plan (IOP)

Per section 129 (c)(1)(B) of WIOA, local areas are required to develop service strategies for each participant that are directly linked to one or more performance measures and include the identification of a career pathway that includes education and employment goals, appropriate achievement objectives, and appropriate services for the participant. The personalized service strategy for each WIOA Youth participant is called an Individual Opportunity Plan (IOP). Per OAC 5101:14-1-04 (F), an IOP is mutually developed, implemented, and revised to include:

- A set of employment, education, and personal development goals;
- Service objectives and a service plan of action needed to achieve the identified goals; and
- To document services provided and results.

Program Elements

Per section 129 (c)(2) of WIOA, in order to support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for participants, the Area 2 youth program shall make each of the following services available to youth participants:

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies.

These strategies must lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate or attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.

2. Alternative secondary school services or dropout recovery services.
3. Paid and unpaid work experiences.

Work experience helps youth understand proper workplace behavior and what is necessary in order to attain and retain employment. They are designed to enable youth to gain exposure to the working world and its requirements. Work experiences can serve as a stepping stone to unsubsidized employment and is an important step in the process of developing a career pathway for youth. This is particularly important for youth with disabilities.

A work experience may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employer/employee relationship, as defined by the Fair Labor Standards Act or applicable State law, exists. Work experiences provide the youth participant with opportunities for career exploration and skill development.

Work experiences must include academic and occupational education. The types of work experiences include the following categories:

- Summer employment opportunities and other employment opportunities available throughout the year;
- Pre-apprenticeship programs;
- Internships and job shadowing; and
- On-the-job training (OJT) opportunities.

Not less than 20% of the youth program funds shall be used to provide in-school and out-of-school youth with work experience activities. WIOA Youth programs must track program funds spent on paid and unpaid work experiences, including wages and staff costs for the development and management of work experiences, and report such expenditures as part of the local WIOA Youth financial reporting. The percentage of funds spent of work experience is calculated based on the total local area youth funds expended for work experience rather than calculated separately for in-school and out-of-school. Local administrative costs are not subject to the 20% minimum work experience expenditure requirement.

Guidance and requirements pertaining to paid and unpaid work experiences for youth participants in Area 2 are outlined in **Area 2 WIOA Policy Letter C-07 Work Experience for Youth**.

4. **Occupational skills training.**

Occupational skills training shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with state and local in-demand industry sectors or occupations. Such training must:

- Be outcome-oriented and focused on occupational goals specified in the IOP;
- Be of sufficient duration to impart the skills need to meet the occupational goal; and
- Result in the attainment of a recognized post-secondary credential.

An individual training account (ITA) is one of the primary methods through which training is financed and provided. ITAs are established on behalf of a WIOA participant to purchase a program of training services from eligible training providers. The use of an ITA is allowed for out-of-school youth, ages 18 to 24, using WIOA Youth funds when appropriate.

As part of the determination of the appropriateness for occupational skills training, a review of "family self-sufficiency" must be completed for those youth participants whose eligibility was not based upon being a low-income individual. In these cases, WIOA Youth-funded ITAs may only be approved for those who have been determined to be below a locally defined standard of "family self-sufficiency." This requirement is intended to ensure that participants whose eligibility was not based upon being a low-income individual and who are seeking youth-funded ITAs are those whose families lack or have limited ability to pay for training and supportive services needed in order to obtain or retain employment.

Guidance and requirements pertaining to the use of ITAs are outlined in **Area 2 WIOA Policy Letter C-05 Use of Individual Training Accounts (ITA)**.

5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.

This element requires integrated education and training to occur concurrently and contextually with workforce preparation activities and training for a specific occupation or occupational cluster for the purpose of educational and career advancement. This program element describes how workforce preparation activities, basic academic skills, and hands-on occupational skills training are to be taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway. Youth participants will not be required to master basic skills before moving on to learning career-specific technical skills.

6. Leadership development opportunities.

Leadership development opportunities include:

- Exposure to post-secondary education opportunities;
- Community and services learning projects;
- Peer-centered activities, including peer mentoring and tutoring;
- Organizational and team work training, including team leadership training;
- Training in decision-making, including determining priorities and problem solving;
- Citizenship training, including life skills training such as parenting and work behavior training;
- Civic engagement activities which promote the quality of life in a community; and
- Other leadership activities that place youth in a leadership role such as serving on youth leadership committees.

Positive social behaviors are outcomes of leadership opportunities. Benefits of leadership development may include:

- Positive attitudinal development;
- Self-esteem building;
- Openness to work with individuals from diverse backgrounds;
- Maintaining healthy lifestyles;
- Maintaining positive social relationships with responsible adults and peers, and contributing to the well-being of one's community;
- Maintaining a commitment to learning and academic success;
- Avoiding delinquency;
- Postponing parenting and responsible parenting;
- Positive job attitudes and work skills; or
- Keeping informed in community affairs.

The purpose of leadership development activities is to develop skills and attitudes that are important in all areas of life. It provides encouragement and support to youth, developing skills, and instilling confidence as they transition to adulthood.

7. Supportive services.

Supportive services for youth may include, but are not limited to:

- Linkages to community services;
- Assistance with transportation;
- Assistance with child care and dependent care;
- Assistance with housing;
- Needs-related payments;
- Assistance with educational testing;
- Reasonable accommodations for youth with disabilities;
- Referrals to health care; and
- Assistance with uniforms or other appropriate work attire and work-related tool costs

Supportive services may be provided to youth both during participation and after program exit. Further guidance on supportive services can be found in [**Area 2 WIOA Policy Letter C-12 Supportive Services**](#).

8. Adult mentoring for the period of participation and subsequent period, for a total of not less than 12 months.

Adult mentoring for youth must:

- Last at least 12 months and may take place both during the program and following exit from the program;
- 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;
- Include a mentor who is an adult other than the assigned youth case manager; and
- While group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the local youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis.

The purpose of adult mentoring is to build positive, supportive relationships between youth and adults and to provide positive adult role models for youth. High-quality adult mentoring programs include an adult role model who builds a working relationship with a youth and who fosters the development of positive life skills in youth.

Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company.

9. Follow-up services.

Follow-up services are critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or post-secondary education and training.

Follow-up services may include:

- Leadership development and supportive service activities;
- Regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise;
- Assistance in securing better paying jobs, career pathway development, and further education or training;
- Work-related peer support groups;
- Adult mentoring; and/or
- Services necessary to ensure the success of youth participants in employment and/or post-secondary education.

All youth participants must receive some form of follow-up services for a minimum duration of 12 months. Follow-up services may be provided beyond the 12 months at the local board's discretion. The types of services provided and the duration of services must be determined based on the needs of the youth and therefore, the type and intensity of follow-up services may differ for each participant. However, follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome.

10. Comprehensive guidance and counseling.

Comprehensive guidance and counseling provides individualized counseling to participants. This includes career and academic counseling, drug and alcohol counseling, mental health counseling, and referral to partner programs.

The purpose of comprehensive guidance and counseling is to promote growth in each youth's educational, personal, social, and employability skills. Comprehensive guidance and counseling programs impart through counselor-directed learning opportunities that help youth achieve the success through academic, career, personal, and social development.

When referring participants to necessary counseling that cannot be provided by the youth program or its service providers, the local youth program must coordinate, including obtaining releases of information to obtain information regarding appropriateness of WIOA services, with the organization it refers to in order to ensure continuity of service.

11. Financial literacy education.

Financial literacy includes activities which:

- Support the ability of youth participants to create household budgets, initiate savings plans, and make informed financial decisions about education, retirement, home ownership, wealth building, or other savings goals;
- Support participants in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards;
- 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;
- Support a participant's ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed decisions;

- Educate participants about identity theft, ways to protect themselves from identity theft, and how to resolve cases of identity theft and in other ways under their rights and protection related to personal identity and financial data; and
- 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.
- 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
- 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 instructions.

12. Entrepreneurial skills training.

Entrepreneurial skills training must develop skills associated with entrepreneurship. Such skills include, but are not limited to the ability to:

- Take initiative;
- Creatively seek out and identify business opportunities;
- Develop budgets and forecast resource needs;
- Understand various options for acquiring capital and the trade-offs associated with each option; and
- Communicate effectively and market oneself and one's ideas.

Approaches to teaching youth entrepreneurial skills include, but are not limited to, the following:

- Entrepreneurship education that provides an introduction to the values and basics of starting and running a business;
- Enterprise development which provides supports and services that incubate and help youth development their own business; and
- Experiential programs that provide youth with experience in the day-to-day operation of a business.

13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in Area 2, such as career awareness, career counseling, and career exploration services.

14. Activities that help youth prepare for and transition to postsecondary education and training.

Local areas must make all these program elements available to youth participants. This does not mean, however, that every youth participant must receive services from all program elements. Local areas have the discretion to determine what specific program elements will be provided to a youth participant, based on each participant's objective assessment and IOP.

Although the fourteen program elements must be provided and/or made available to WIOA eligible youth participants in each local area, they are not the sole array of services that made up the local youth programs.

Local areas are not required to use WIOA Youth funds for each of the program elements. Local programs may leverage partner resources to provide some of the readily available program elements. However, the local area must ensure that if a program element is not funded by the WIOA, the local program has an agreement in place with the partner organization to ensure that the program element will be offered. The local board must ensure that the program element is closely connected and coordinated with the WIOA Youth program.

IX. REPORTING REQUIREMENTS

There is no self-service concept for the WIOA Youth program and every individual receiving services under the WIOA must meet eligibility criteria and formally enroll in the program.

Program participation begins when the youth is determined eligible and receives an assessment and a program element. Therefore, at the point of participation, a youth participant will be enrolled in the youth program and reported in the Ohio Workforce Case Management System (OWCMS). All youth participants will be counted in the WIOA Youth program performance measure calculations.

X. MONITORING

The Area 2 WDB must conduct oversight of the implementation of the WIOA Youth program to ensure that participants enrolled in the program have an objective assessment and IOP and that identified services have been provided. For additional guidance, see **Area 2 WIOA Policy Letter A-08 Monitoring and Compliance**.

Through the state's monitoring system, program monitors will review the local area's implementation of the WIOA youth program, including a participant file review, during the annual onsite monitoring review for compliance with federal and state laws and regulations. Any issues will be handled through the state's monitoring resolution process.

XI. REFERENCES

1. ODJFS WIOA Policy Letter 15-08.1 Career Services for Adults and Dislocated Workers
2. ODJFS WIOA Policy Letter 15-10 Youth Program Services
3. WIOA Public Law 113-128 Sections 3(59); 134(d)(2) and (3); and 129(c)(2)(G)
4. Ohio Administrative Code 5101:14-1-04 (F)

ADDENDUM TO OHIO WORKFORCE AREA 2 YOUTH POLICY

This Addendum to the Workforce Innovation & Opportunity Act (WIOA) Policy Letter C-04, Youth Program Services Workforce Area 2 Policy (“Policy”) is made by and between the Summit and Medina Workforce Area Council of Governments (“SAMWACOG”), on behalf of the State of Ohio’s Workforce Area 2, comprised of Summit and Medina Counties (“Summit-Medina Workforce Development Board (“SMWDB”), and the County of Summit Department of Job and Family Services (“CSDJFS”).

WHEREAS, the Governor’s office of the State of Ohio has designated Summit and Medina Counties as local workforce Area 2 for the purpose of implementing the Workforce Area Innovation Act (WIOA), establishing the partner driven one-stop employment service delivery system, administering workforce development programs including the management of WIOA funds and development of service delivery policy;

WHEREAS, the State of Ohio’s 2016/2017 budget bill (HB 64) created the Comprehensive Case Management and Employment Program (CCMEP) that integrates WIOA and Temporary Assistance to Needy Families (TANF) funds to serve eligible youth ages 14 to 24 to overcome barriers to educational and employment opportunities;

WHEREAS, the State of Ohio requires that for a local workforce area to participate in CCMEP its Workforce Development Board (WDB) must pass a resolution citing its WIOA youth allocation may be used for CCMEP purposes, integrating WIOA and TANF;

WHEREAS, the State of Ohio requires the County Commissioners or County Executives to designate a CCMEP Lead Agency to implement a CCMEP model and select either the county level department of Job and Family Service or the local workforce area through its WDB;

WHEREAS, the WDB for local workforce Area 2 passed the required resolution allowing the use WIOA youth funds for CCMEP in both of their counties; and the Medina County Commissioners and the Summit County Executive designated their respective local Job and Family Services Departments as the Lead CCMEP Agencies;

WHEREAS, the Ohio Department of Job and Family Services (ODJFS) requires a CCMEP plan is jointly developed between each local workforce Area and CCMEP Lead Agency with the requirement that the plan incorporates policy to support the implementation of CCMEP;

WHEREAS, since a local workforce Area is required under WIOA to develop service delivery policy for all programs it administers including youth services, through this Addendum the SAMWACOG and CSDJFS have determined it is prudent to adopt joint policy created under WIOA youth services for CCMEP and note any differences between WIOA and TANF; and

NOW, THEREFORE, the following additional terms and conditions shall apply to the policy named herein:

The following provisions shall be adopted by the CSDJFS as cited below, to the local workforce Area 2 original policy for Workforce Innovation & Opportunity Act (WIOA) Policy Letter C-04, Youth Program Services:

- Section VII Design Framework Services, 9. Follow-up Services

ADDENDUM TO OHIO WORKFORCE AREA 2 YOUTH POLICY

This Addendum to the Workforce Innovation & Opportunity Act (WIOA) Policy Letter C-04, Youth Program Services Workforce Area 2 Policy (“Policy”) is made by and between the Summit and Medina Workforce Area Council of Governments (“SAMWACOG”), on behalf of the State of Ohio’s Workforce Area 2, comprised of Summit and Medina Counties (“Summit-Medina Workforce Development Board and the Medina County Department of Job and Family Services (“MCJFS”).

WHEREAS, the Governor’s office of the State of Ohio has designated Summit and Medina Counties as local workforce Area 2 for the purpose of implementing the Workforce Area Innovation Act (WIOA), establishing the partner driven one-stop employment service delivery system, administering workforce development programs including the management of WIOA funds and development of service delivery policy;

WHEREAS, the State of Ohio’s 2016/2017 budget bill (HB 64) created the Comprehensive Case Management and Employment Program (CCMEP) that integrates WIOA and Temporary Assistance to Needy Families (TANF) funds to serve eligible youth ages 14 to 24 to overcome barriers to educational and employment opportunities;

WHEREAS, the State of Ohio requires that for a local workforce area to participate in CCMEP its Workforce Development Board (WDB) must pass a resolution citing its WIOA youth allocation may be used for CCMEP purposes, integrating WIOA and TANF;

WHEREAS, the State of Ohio requires the County Commissioners or County Executives to designate a CCMEP Lead Agency to implement a CCMEP model and selects either the county level department of Job and Family Service or the local workforce area through its WDB;

WHEREAS, in local workforce area 2 the WDB passed the required resolution allowing the use WIOA youth funds for CCMEP in across both of their counties and the Medina County Commissioner and the Summit County Executive designated their local Job and Family Services Departments as the Lead Agencies in their respective counties;

WHEREAS, the State of Ohio’s Ohio Department of Job and Family Services (ODJFS) requires a CCMEP plan is jointly developed for every county in the State by the local workforce area and the Lead Agency and the plan is required to have policy to support its implementation of CCMEP;

WHEREAS, a local workforce area is required under WIOA to develop service delivery policy for all program it administers with youth services included the SAMWACOG and MCJFS have determined adopting joint policy created under WIOA youth services for CCMEP is prudent and



through an Addendum to such policy will cite where the policy does not apply to TANF programs; and

NOW, THEREFORE, the following additional terms and conditions shall apply to the policy named herein:

The following provisions shall be adopted by the MCJFS as cited below, to the local workforce Area 2 original policy for Workforce Innovation & Opportunity Act (WIOA) Policy Letter C-04, Youth Program Services:

- Workforce Innovation & Opportunity Act (WIOA) Policy Letter C-04, Youth Program Services