

## Youth Services Policy

### **Purpose**

To establish guidelines for the provision of WIA Title I Youth services.

### **Eligibility for Youth Services**

An eligible youth is, an individual who:

- (a) Is age 14 through 21;
- (b) Is a low income individual; and
- (c) Is within one or more of the following categories: (as defined here-in)
  - (1) Deficient in basic literacy skills;
  - (2) School Dropout
  - (3) Homeless, runaway, or foster child;
  - (4) Pregnant or parenting;
  - (5) Offender; or
  - (6) Is an individual (including a youth with a disability) who requires additional assistance to complete an educational program, or to secure and hold employment. *[WIA Sec. 101 (13)]*

In addition to the above listed criteria, all youth applying for services must meet these additional programmatic requirements:

- a) Must have complied with the requirements of the Military Selective Service Act by providing documentation to demonstrate compliance with those requirements. *[WIA, Section 189(h); 20 CFR 667.250]* and
- b) Be lawfully eligible to work in the United States.

A disabled youth whose family does not meet the income eligibility criteria under the Act may be eligible for services as a “low income individual” if an individual’s own income:

- a) Meets the income criteria established by WIA Section 101 (25)(B); **or**
- b) Meets the income eligibility criteria for cash payments under any federal, state or local public assistance program [WIA Section 101(25)(F)].

Workforce Guidance Memorandum PY ’11-02 provides additional guidance for documenting household income for disabled youth. LWIA Program Operators should comply with the guidance contained in the aforementioned Workforce Guidance Memorandum.

Up to five percent of youth participants served by youth programs in a local area may be individuals who do not meet the income criteria for eligible youth, provided that they are within one or more of the following categories:

1. School Dropout (a youth attending an alternative school is not a drop out under the Workforce Investment Act)
2. Basic Skills Deficient
3. Are one or more grade levels below the grade level appropriate to the youth’s age
4. Pregnant or parenting
5. Possess one or more disabilities (including learning disabilities)

6. Homeless or runaway
7. Offender
8. Face serious barriers to employment such as:
  - a) Is habitually truant as defined by state law.
  - b) Has failing grades as defined by having failed a minimum of 3 classes in most recent grading period.
  - c) Did not pass the Literacy Passport Test given in the 9th grade or the last Standard of Learning test given.
  - d) Has not made substantial progress in mastering skills that are appropriate for students of his or her age.
  - e) Poor work history for older youth (has not worked 13 consecutive weeks of thirty hours or more in the last calendar year).

For a Youth to be considered under the five percent rule, the Youth Program Operator must make a formal written request to the WIB Executive Director. The Program Operator must receive written approval from the WIB Executive Director before the youth can be registered to receive program services.

Program Operators should consider the definitions applicable to eligibility to youth services under WIA. WIA definitions for Title I eligibility can be found at [www.vccs.edu/Portals/0/ContentAreas/Workforce/VWN/vaeligibIXdef.pdf](http://www.vccs.edu/Portals/0/ContentAreas/Workforce/VWN/vaeligibIXdef.pdf).

## **Youth Program Design, Elements, and Parameters**

Local youth programs must be designed and built around the following framework:

**A. Provide an objective assessment** of the academic levels, skill levels, and service needs of each participant.

This assessment shall include a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes (including interests and aptitudes for nontraditional jobs), supportive service needs, and developmental needs of such youth, except that a new assessment of a youth is not required if the provider carrying out such a program determines it is appropriate to use a recent assessment of the youth conducted as part of another education or training program; and includes a review of the academic as well as the services needs, of each youth.

**Recent Assessment** means any assessment conducted **within the last 6 months** by an educational or training program; and includes a review of the academic as well as the services needs, of each youth. Assessments should be used to develop the necessary service strategies appropriate for each youth that identifies an employment goal (including participation in nontraditional employment opportunities), achievement objectives, and services for the participant utilizing the results of an objective assessment process, except that a new service strategy for a youth is not required if the provider carrying out such a program determines it is appropriate to use a recent service strategy developed for the youth under another education or training program; **and**

**B. Recent service strategy** means any service strategy developed **within the last 6 months** by an educational or training program; and includes a review of the academic as well as the services needs, of each youth.

Service strategies should document preparation for postsecondary educational opportunities, in appropriate cases; strong linkages between academic and occupational learning; preparation for unsubsidized employment opportunities, in appropriate cases; and effective connections to intermediaries with strong links to-- the job market; and local and regional employers.

The TABE test will be the primary tool for assessing youth basic skill levels and will include the locator test. The Career Scope assessment will be the primary tool for assessing youth interest and aptitude levels.

### **C. Availability of 10 program elements**

Local youth programs should incorporate the ten required program elements into the youth service delivery framework. The ten required program elements are:

1. Tutoring, study skills training, and instruction, leading to completion of secondary school, including dropout prevention strategies;
2. Alternative secondary school services;
3. Summer employment opportunities that are directly linked to academic and occupational learning;
4. Paid and unpaid work experiences, including internships and job shadowing;
5. Occupational skill training;
6. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors during non-school hours;
7. Supportive services;
8. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;
9. Follow-up services for not less than 12 months after the completion of participation, as appropriate; and
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate.

While the ten program elements shall be available to the youth in each local workforce area, the services provided to each youth must meet the individuals' needs and be based on the results of an objective assessment and individual service strategy.

Additional Requirements: Information and Referrals - Participant or applicants who meet the minimum income criteria to be considered an eligible youth should be provided with:

- Information on the full array of applicable or appropriate services that are available through the local workforce area, including eligible providers or one-stop partners, and including those receiving funds under this subtitle; and
- Referral to appropriate training and educational programs that have the capacity to serve the participant or applicant either on a sequential or concurrent basis.

For applicants not meeting the enrollment requirements - Each eligible provider of a program of youth activities shall ensure that an eligible applicant who does not meet the enrollment requirements of the particular program or who cannot be served shall be referred for further assessment, as necessary, and referred to appropriate programs to meet the basic skills and training needs of the applicant.

## **D. Involvement in Design and Implementation**

Parents, participants, and other members of the community with experience relating to programs for youth should be involved in the design, implementation and evaluation of youth programs.

## **E. Priority**

At a minimum, 30 percent of the local workforce area youth funds shall be used to provide youth activities to out-of-school youth.

## **F. Supportive Services for Youth:**

Supportive services may include the following:

- Linkages to appropriate community services;
- Assistance with child care and dependent care costs;
- Assistance with housing costs;
- Referrals to medical services;
- Transportation assistance;
- Assistance with uniforms or other appropriate work attire and work related tool costs, including such items as eyeglasses and protective eye gear. *[WIA, Sections 101(46) and 129(2)(G)].*
- Other assistance - Subject to approval by WIB Executive Director.

The complete Supportive Services Policy is available under the policies and procedures link on the WIB's website at <http://www.nrmrwib.org/>.

## **G. Employability; and Positive social skills. [WIA Section 129(c)(2)(F)].**

Positive social skills – the term “positive social skills” means those soft skills that may be incorporated into local programs as part of a menu of services. These skills may include:

- Positive attitudinal development;
- Self-esteem building;
- Cultural diversity training; and
- Work simulation activities. *[WIA Section 129(c)(2)(F)].*

Additional guidance to assist in ensuring positive employability impacts:

- Regular contact with a youth participant's employer, including assistance in addressing work-related problems;
- Assistance in securing better paying jobs, career development and further education;
- Work-related peer support groups;
- Adult mentoring; and
- Tracking the progress of youth in employment after training.
- All youth participants must receive some form of follow-up services for a minimum duration of 12 months.

## H. Work Experiences for Youth

Work experiences are planned structured learning experiences that take place in a workplace for a limited period of time. These activities are designed to provide youth with exposure to the working world and the demands and requirements of going to work. These experiences should assist youth in gaining the necessary personal attributes, knowledge, and skills needed to obtain a job and advance in employment. These experiences may be paid or unpaid.

Work experience workplaces may be in the private, for-profit sector; the non-profit sector; or the public sector under WIA and should be based on the needs identified by the objective assessment of the individual youth participant and documented in the youth's individual service strategy. Under the WIA Youth Program, Work Experience is one of the ten required Program Elements that must be made available to all youth.

New River/Mount Rogers Workforce Investment Area Consortium Board is requiring Youth Program Operators to use the following guidelines when assigning hours for all paid Work Experience.

- 1) The maximum amount of hours that may be assigned for any single work experience assignment at any worksite is 500 hours.
- 2) The minimum amount of hours that may be assigned is 250 hours. If the work experience is solely for career exploration purposes, less hours may be assigned.
- 3) When determining the amount of hours to be assigned for any single work experience assignment at any worksite, a Program Operator must evaluate the participants needs and the job that is being assigned based on the following:
  - a) Past work experience- if a participant has no work experience or a poor work history, then more hours are justified. On the other hand, if a participant has a good work history, then fewer hours should be assigned.
  - b) Barriers- if a participant has multiple barriers such as, a criminal record, a severe learning disability, is a teen parent, etc. then more hours should be assigned. If a participant has few barriers then fewer hours should be assigned.
  - c) Complexity of the Tasks to be Learned- the higher the O\*Net Job Zone for the job assigned, the higher the hours assigned. If a job has a low O\*Net Job Zone then the fewer hours should be assigned.
  - d) The goal of the Work Experience- if the work experience is to be used to help aid the participant in learning good work habits, then more hours are justified. Conversely, if the goal of the work experience is to provide career exploration, then no more than 300 hours should be assigned. As mentioned herein, fewer than 250 hours may be assigned if the purpose of the work experience is solely for career exploration.

The New River/Mount Rogers Workforce Investment Area Consortium Board will allow the Program Operator to determine the amount of hours that will be assigned for each Work Experience; however, the WIB is requiring the Program Operator to justify in the Youth ISS the reason for the hours assigned. Finally, a waiver to the above maximum specifications may be requested from The WIB Executive

Director on an individual case-by-case basis. The need for additional assistance must be sufficiently justified in order for a waiver to be considered.

Required documentation for any work experience includes: the WIB approved worksite agreement (including the statement of entitlement and addendum), progress report, attendance sheets, and statement of employability skills. A worksite supervisor orientation should be completed prior to the commencement of any work experience. Each worksite supervisor must be present for the orientation and each worksite supervisor's signature must be obtained on the worksite agreement. The orientation should include a thorough discussion of the content of the worksite agreement and worksite manual.

At a minimum, the program operator representative should make bi-weekly worksite visits to evaluate the progress of the participant. The progress report should be completed by the worksite supervisor once the participant has completed 50% of the assigned hours.

Attendance sheets are to be retrieved at the end of each program operator pay period and should contain the signature of the participant, worksite supervisor, and program operator representative. Attendance sheets should never be completed or signed prior to the end of the pay period.

At the completion of the work experience, the statement of employability skills should be completed by the worksite supervisor to evaluate the participant's employability skills proficiency levels. The supervisor's evaluation of the participant's employability skills will be used to determine if the work experience was completed successfully. A client must demonstrate some proficiency in each assigned employability skill in order for the work experience to be considered a successful completion. Feedback gathered from the progress report and statement of employability skills should be provided to the participant and used to continue to develop the skills of the youth.

### **I. Concurrent Enrollment for Youth**

For purposes of WIA, eligible youth are 14 through 21 years of age. Adults are defined as individuals 18 and older. Individuals 18 through 21 may be eligible for both adult and youth programs.

Eligible individuals who are 18 through 21 years old may concurrently participate in adult and youth programs. These individuals must meet the eligibility requirements of both the youth and adult programs applicable to the services they are receiving.

### **J. One-Stop-Services to Youth:**

Connections between local youth programs and the local One-Stop system should be developed to accommodate older youth and facilitate:

- The coordination and provision of youth activities;
- Linkages between the job market and employers;
- Access for eligible youth to information and services, to include the 10 required program elements described above.
- Other activities designed to achieve the purposes of the youth programs in the local areas.
- One-stop services for non-eligible youth must be funded by programs that are authorized to provide services to these youth.

### **Youth Follow-Up and Performance Accountability**

WIA Final Rule requires that all youth participants receive some form of follow-up services for a minimum duration of 12 months following exit from program activities. The goal of follow-up services is to ensure job retention, wage gains and career progress. The types of services provided and the

duration of services must be determined based on the needs of the individual.

*For example:*

A participant who has multiple employment barriers and a limited work history may need significant follow-up services to ensure long-term success in the labor market. However, a participant that has few barriers to employment may need less follow-up services.

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

- 1) Leadership development and referral to supportive services available in the community
- 2) Regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise
- 3) Assistance in securing better paying jobs, career development and additional education
- 4) Work-peer support groups
- 5) Adult mentoring;
- 6) Tracking the progress of youth in employment after training

The policy of the WIB is to follow the spirit of the law and make follow-up services available to each youth participant after they have exited the program. The extent of the specific follow-up services offered to each participant, is at the discretion of the program operator. The Board is requiring at least one personal contact every four weeks for the first nine months on all participants to ensure employment or education retention. For the remainder of the required follow-up period, the WIB is requiring at least two contacts during this three month period. If participants require more assistance, it is the responsibility of the program operator to see that the assistance is provided.

Participants will have a follow-up log in their client folder indicating, at a minimum, the date the follow-up contact was made, initials of the follow-up interviewer and the results of the follow-up contact. It is at the program operator's discretion as to what form the follow-up log will take. Follow up activities must be entered quarterly in the Virginia Workforce Connection.

### **Performance & Data Collection**

The Virginia Workforce Connection will be used to assess the effectiveness of local areas in achieving continuous improvement of workforce investment activities. To assist the New River/ Mount Rogers Workforce Investment Area Consortium Board in achieving continuous improvement, it is the responsibility of the program operators to track and gather data on youth performance. It is critical that all performance data is entered in the Virginia Workforce Connection. Therefore, all performance data must be entered in the Virginia Workforce Connection as supplemental data will be used to determine performance outcomes. Data entry of performance information should occur at the time performance verifications are obtained.

## All Youth

The WIB is requiring that all Program Operators collect the following performance data on all youth participants during the follow-up period:

- 1) During the first four weeks of the first quarter after exit, program operators must verify if participants are in one of the four categories listed below:
  - a) Attending post-secondary education or advanced training/occupational skills training – A program at an accredited degree-granting institution that leads to an academic degree (e.g. A.A., A.S., B.A., B.S.). Programs offered by degree granting institutions that do not lead to an academic degree (e.g. certificate programs) do not count as placement in post –secondary education, but may count as a placement in “advanced training/occupational skills training.” To count as a placement for the Youth Common Measures, advanced training constitutes 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. Such training should include: (1) be outcome-oriented and focused on a long-term goal as specified in the Individual Service Strategy, (2) be long-term in nature and commence upon program exit rather than being short-term training that is part of service received while in enrolled in ETA-funded youth programs, and (3) result in the attainment of a certificate.
  - b) Employed - The individual is considered employed in a quarter after the exit quarter if wage records for that quarter show earnings greater than zero. When supplemental data sources are used, individuals should be counted as employed if, in the calendar quarter of measurement after the exit quarter, they did any work at all as paid employees (i.e., received at least some earnings), worked in their own business, profession, or worked on their own farm.
  - c) In the military
  - d) In a qualified apprenticeship program – a program approved and recorded by the ETA Bureau of Apprenticeship and Training or by a recognized state apprenticeship agency or council. Approval is by certified registration or other appropriate written credential.

If a participant is not in one of the four categories listed above at the beginning of the first quarter after exit, then it is the responsibility of the program operator to make every effort to assist the participant in obtaining employment or enrolling in one of the categories previously mentioned. The effort made by the program operator must be documented in a follow-up log. Prior to the end of the first quarter, the program operator must verify each participant’s employment and/or education status for the quarter. Performance data and follow up results should be entered in the Virginia Workforce Connection.

2) During the second quarter after exit, the program operator is not required to gather any verification for performance; however, the program operator is required to continue the monthly contacts with the participants, offer follow-up services, and document follow up results in the Virginia Workforce Connection. If the program operator discovers that the participant has attained a degree or certificate since exiting from the program, verification should be obtained and the data should be entered in the Virginia Workforce Connection.

3) Prior to the end of the third quarter after exit, the program operator is required to verify if the participant has attained a degree or certificate (including a GED), since exiting from the program. If the participant has attained a degree or certificate, verification should be obtained and the data should be entered in the Virginia Workforce Connection. The program operator is required to continue monthly contacts with the participants, offer follow-up services, and document follow up information in the Virginia Workforce Connection.

4) The program operator is required to continue required contacts with the participants, offer follow-up services, and document follow up results in the Virginia Workforce Connection.

### **Out-of-School Youth**

In addition to the performance data listed above, the WIB is requiring that all Program Operators collect the following performance data on all Out-of-School Youth prior to the follow-up period:

1) At time of exit, all program operators must have verified literacy and numeracy gains for all out-of-school youth determined to be basic skills deficient. Program operators should make every effort to ensure that out of school youth who are basic skills deficient demonstrate literacy and numeracy gains.

### **Approved Documentation for Performance Data**

#### **Employment**

In order to ensure the accuracy of customer employment status at the time of closure and during the applicable performance time periods, the WIB is requiring that one of the following supplemental sources be used to verify employment:

- An employer written affidavit/signed employment verification.
- Documentation of telephone conversation with employer indicating that customer was employed during the period(s) required by the applicable measure. Telephone contact must document the name and title of the employer representative who verified the information. (Note: If documentation of telephone conversation with employer is used for any reason other than case closure, reasonable efforts must be made to obtain the employer written affidavit/signed employment verification. Follow-up log should clearly document the efforts made to obtain the aforementioned form of verification.
- Copy of paycheck stub covering the period required by the applicable measure. (Note: Paycheck stubs should only be used after reasonable efforts have been made to obtain the employer written affidavit/signed employment verification and documentation of telephone conversation. Follow-up log should clearly document the efforts made to obtain the aforementioned forms of verifications.
- Self-attestation covering the period required by the applicable measure. (Note: Self-attestations should only be used as a last resort and only after reasonable efforts have been made to obtain the employer written affidavit/signed employment verification, documentation of telephone conversation, and a copy of paycheck stub. Follow-up log should clearly document the efforts made to obtain the aforementioned forms of verification.

- For those self-employed: self-attestation covering the period required by the applicable measure. Tax returns will be the preferred supporting document for those self-employed.

### **Degree or Certificate**

The WIB is requiring that one of the following sources be used by program operators to verify degrees and certificates:

- Diplomas
- Certificates
- Licenses
- Training provider records
- A copy of a participant's examinee form or certificate may be used to verify a GED

### **Literacy and Numeracy Gains**

The WIB is requiring that one of the following sources be used by program operators to verify literacy and numeracy gains:

- Copy of pre-test and post-test. Post-test scores must demonstrate an increase of one educational functioning level beyond the level of the initial pre-test. For subsequent participant years, the most recent test must be used to determine if the post test results in an increase of one educational functioning level.

### **Career Readiness Certificates**

The Virginia Workforce Council has established the attainment of a Career Readiness Certificate (CRC) as a performance measure. The WIB is requiring that the following sources be used by program operators to verify degrees and certificates:

- Copy of the career readiness certificate that contains the signature of the Governor of Virginia

### **Performance Reports**

It will be the responsibility of the program operator to provide the WIB with monthly status reports on youth programs. In addition, each program operator is required to maintain a file on each participant in which all performance verifications and follow-up logs must be kept.

## **Global Exclusions**

Youth are excluded from common measures/performance calculations if any of the following conditions/circumstances occur during participation or up to the third quarter after exit.

- Invalid or missing social security number
- Institutionalized
- Health/Medical or Family Care
- Deceased
- Reservists called to active duty
- Relocation to a residential or non-residential program (such as foster care)

Note: Condition/circumstance must be expected to last for at least 90 days. Documentation of the condition/circumstance and the expected time frame is required. If condition/circumstance is discovered during the follow up period, documentation should be obtained and the global exclusion entered in the Virginia Workforce Connection.