

Youth Program Design Policy

Reference:

WIA Sec. 129, 134, 136, and 169; 20 CFR 664.400 – 664.830; TEGL 9-00; TEGL 5-12; and TEGL 33-12.

Background:

Passage of WIA led to major reforms in youth programming and placed new emphasis on serving youth within a comprehensive youth development approach that focuses on long-term services that provide the education, skills, work experience, and support that youth need to successfully transition to careers and productive adulthood. The program design framework is an essential ingredient in helping Local Areas and Youth Councils develop comprehensive service strategies based on individual needs. WIA encourages local decision making in the area of youth policy, youth program design, the proportion of funding for each program element, and determining appropriate program offerings for each individual youth. Delivering effective and comprehensive services that provide low-income youth with the educational and employment skills necessary to succeed in the workforce is becoming more challenging with declining resources. It is essential that established policies both help to achieve program quality and successful outcomes for youth, and meet WIA objectives. This policy defines criteria for the design, elements and parameters of youth programs in the local areas as prescribed by the Workforce Investment Act (WIA) and the Rules and Regulations.

Action:

After the 10 day public review period, this policy is considered final. Questions and comments should be submitted in writing to Jan Fox, Policy Coordinator, jan.fox@nebraska.gov.

Policy:

Purpose

Workforce Investment Act funds for youth must:

- provide 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 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
- provide opportunities for eligible youth in activities related to leadership, development, decision making, citizenship, and community service

Required Statewide Youth Activities –Youth funds **must** be used to carry out statewide youth activities, as follows:

1. disseminate a list of eligible providers of youth activities described in WIA section 123
2. carry out activities described in clauses (ii) through (vi) of section 134(a)(2)(B), except that references in such clauses to activities authorized under section 134 shall be considered to be references to activities authorized under this section
3. provide additional assistance to local areas that have high concentrations of eligible youth to carry out the activities described in local elements and requirements

Allowable Statewide Youth Activities –Youth funds **may** be used to carry out additional youth activities, as follows:

- carry out activities described in clauses (i), (ii), (iii), (iv)(II), and (vi)(II) of section 134(a)(3)(A), except that references in such clauses to activities authorized under section 134 shall be considered to be references to activities authorized under this section
- carry out on a statewide basis activities described in local elements and requirements

Local Program Elements and Requirements

There are 10 required youth program elements which local youth programs must make **available** to all eligible youth participants, throughout the entire age range of 14-21. However, an individual youth participant need not **participate** in all 10. Local programs have the discretion to determine the specific program services provided to a youth participant, based on each participant's objective assessment and individual service strategy and tailored to a participant's needs balanced by evidence of what will lead to success. Local programs are not required to provide all 10 program elements with WIA funds if certain services are already accessible for all eligible youth in the local area. Local providers should work together to leverage those services.

The 10 required youth 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, as appropriate
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, as appropriate
6. Leadership development opportunities encourage responsibility, employability, and other positive social behaviors such as:
 - exposure to post-secondary educational opportunities
 - community service 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
 - citizenship training, including life skills training such as parenting, work behavior training, and budgeting of resources
 - employability
 - positive social behaviors

An outcome of providing leadership opportunities is positive social behaviors, often referred to as soft skills. Soft skills are incorporated by many local programs as part of their menu of services that focus on areas that may include the following:

- positive attitudinal development
- self-esteem building

- cultural diversity training
 - work simulation activities
7. Supportive services
 - Supportive services for youth, as defined in WIA sec. 101(46), may include the following:
 - linkages to community services
 - assistance with transportation costs
 - assistance with child care and dependent care costs
 - assistance with housing costs
 - referrals to medical services
 - assistance with uniforms or other appropriate work attire and work-related tool costs, including such items as eye glasses and protective eye gear
 8. Adult mentoring for a minimum duration of 12 months that may occur both during and after program participation
 9. Follow-up services for a minimum duration of 12 months after the completion of participation, as appropriate
 10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate

The required elements are grouped around four major themes:

1. **Improving Education Achievement:** tutoring, study skills training, dropout prevention, and alternative secondary school services. [TEGL 18-11 provides guidance on this theme.]
2. **Preparing for and Succeeding in Employment:** summer employment, paid and unpaid work experience and occupational skills training. [TEGL 27-09 and TEGL 30-10 provide guidance on this theme.]
3. **Providing Adequate Support in Completing Learning and Employment Goals:** supportive services, adult mentoring, appropriate follow-up services, and comprehensive guidance and counseling. [TEGL 5-12 provides guidance on this theme.]
4. **Developing the Potential of Youth as Citizens and Leaders:** leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors during non-school hours. [TEGL 5-12 provides guidance on this theme.]

Youth Program Design

The program design framework is an integral component of a local area's youth services. The program design component creates an opportunity for a central access point to both determine eligibility and make appropriate referrals for youth. Program design is an essential ingredient in helping local areas develop comprehensive service strategies for youth based upon their individual needs, and consists of intake, an objective assessment, individual service strategy development and information referrals for youth participants, as follows:

- **Intake activities** – Intake activities may involve services such as registration, eligibility determination and collection of information to support verification of eligibility for services. It may also include pre-screening potential participants and general orientation to self-help services. Other activities include referrals to other services which may include providers of the 10 program elements.
- **Objective Assessment** – The objective assessment is a process that identifies service needs, academic levels, goals, interests, skill levels, abilities, aptitudes, and supportive service needs, and measures barriers and strengths. It includes a review of basic and occupational skills, prior work experience, employability potential and developmental needs.

The assessment process involves gathering information from multiple sources, including observations and personal interviews, youth-completed forms, and any activities or tools designed to determine a young person's career interests. It also includes more formal assessments, generally using standardized tests to assess specific abilities, such as literacy and numeracy skills for out-of-school, basic skills-deficient youth. Assessments should help identify the strengths of individuals, and should not be used for purposes of excluding youth from programs. The assessment process should be customized to the youth's individual needs and should be ongoing, continually reviewing participant interests, abilities, etc., that allows the case manager an opportunity to evaluate how effective services are in meeting particular needs, and ensuring flexibility in adapting service delivery strategies to a youth's needs and employment goals. The result of an assessment is an individual service strategy.

Resources for selecting assessment instruments include:

- USDOL's reference guide: *Tests and Other Assessments: Helping You Make Better Career Decisions*, found at: http://www.onetcenter.org/dl_files/testAsse.pdf.
- Additional information on assessment can be found in the *Toolkit for Frontline Services for Youth*, found at: http://www.doleta.gov/youth_services/Toolkit-improve.cfm.

- **Individual Service Strategy** – The individual service strategy (**ISS**) is a detailed, unique, individual strategy for each participant that is the basis for the overall case management strategy. It identifies the employment goals, educational objectives, and prescribes appropriate services for the participant. The ISS should be a “living” document, reviewed and updated on an ongoing basis as strategies change, activities occur and/or as life changes require. The ISS should be used to document referral and contact information for services obtained from partner organizations, and should document a participant's progress, activities completed, benchmarks reached, and any other accomplishments. The ISS should be developed and modified in partnership with the participant, and should document achievements in measurable and attainable short-term and long-term goals that both reflect the young person's interests and incorporate career pathway planning. It is critical that all services provided to participants match participant needs, as identified in the assessment plans articulated in the ISS. The ISS should be reviewed with the youth at each meeting with the case manager to reinforce the youth's familiarity with the goals and for periodic updates. Youth should receive a copy of the jointly-developed and completed ISS, and services should be documented in the participant's case file.

The individual service strategy plan should also provide for:

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

Resources for creating or enhancing ISS development and implementation strategies include:

- USDOL's *Toolkit for Frontline Services for Youth*, assists programs with improving case management including development of an ISS, found at: http://www.doleta.gov/youth_services/Toolkit-improve.cfm
- Focused Futures Youth Development System Builder found at: <http://cle.osu.edu/lwc-publications/focused-futures/downloads/Developing-as-ISS.pdf>
- ETA's Youth Connections Community of Practice on Workforce 3One includes sample ISS documents, found at: <https://youth.workforce3one.org/page/resources/1001200332592308266>
- TEGL No. 05-12 provides information on developing an ISS, as well as links to samples and examples of states with effective ISS development.

Information and Referrals

Local boards must ensure that the referral requirements in WIA sec. 129(c)(3) for youth who meet the income eligibility criteria are met, which includes:

- providing these youth with information regarding the full array of applicable or appropriate services available through the local board, providers found eligible by the board, or American Job Center partners
- referring these youth to appropriate training and educational programs that have the capacity to serve them either on a sequential or concurrent basis.

Follow-Up Services for Youth

All youth participants **must** receive some form of follow-up services for a *minimum* duration of 12 months, and **may** be provided *beyond* 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 individual. The scope of these follow-up services may be less intensive for youth who have only participated in summer youth employment opportunities. A follow-up service provides support and guidance after placement to facilitate:

- sustained employment and educational achievement
- advancement along a job and/or educational ladder
- personal development

Follow-up services may include:

- leadership development and supportive services 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 development and further education
- work related peer support groups
- adult mentoring
- tracking the progress of youth in employment after training

A follow-up service should include more than just a contact attempted or made for securing documentation for the case file in order to report a performance outcome. Regular contact with the participant will help ensure the youth successfully continue in their placement of employment or post-secondary education and may be a sufficient follow-up service as long as the case manager has assessed whether the participant needs anything beyond the regular contact and determined they do not need additional services. If a case manager learns from communication with the youth that he/she is, at that time, not in need of additional services or assistance, case managers must fully document the details of that conversation in the case file. This would include documenting the questions that led the case manager to assess the youth is not in need of services or assistance, such as those pertaining to whether or not a youth is in need of transportation, child care, appropriate work attire, support or mentoring to retain employment or remain in education, health and/or mental health services, or any other services or assistance that can help a youth achieve goals outlined in his/her ISS.

Any allowable WIA Youth service is allowable as a follow-up service **if** it is determined an individual needs such a service. As long as the participant is still in his/her follow-up period, there is no need to re-enroll a participant in the WIA Youth program following exit in order to receive further services. Such services are considered part of follow-up services.

Resources to assist in developing follow-up services and strategies to conduct follow-up include:

- USDOL's *Toolkit for Frontline Services for Youth*, assists programs with improving case management including development of an ISS, found at:
http://www.doleta.gov/youth_services/Toolkit-improve.cfm

- TEGL No. 05-12 provides information on developing an ISS, as well as links to samples and examples of states with effective ISS development.

Work Experiences for Youth

Work experiences are planned, structured learning experiences that take place in a workplace for a limited period of time. Work experiences may be paid or unpaid and may be 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 should help youth acquire the personal attributes, knowledge, and skills needed to obtain a job and advance in employment. The purpose is to provide the youth participant with the opportunities for career exploration and skill development and is not to benefit the employer, although the employer may, in fact, benefit from the activities performed by the youth. Work experiences may be subsidized or unsubsidized and may include the following elements:

- instruction in employability skills or generic workplace skills such as those identified by the Secretary's Commission on Achieving Necessary Skills (SCANS)
- exposure to various aspects of an industry
- progressively more complex tasks
- internships and job shadowing
- the integration of basic academic skills into work activities
- supported work, work adjustment, and other transition activities
- entrepreneurship
- other elements designed to achieve the goals of work experience

In most cases, on-the-job training is not an appropriate work experience activity for youth participants under age 18. Local program operators may choose, however, to use this service strategy for eligible youth when it is appropriate based on the needs identified by the objective assessment of an individual youth participant.

Funds under the Act may be used to pay wages and related benefits for work experiences in the public; private; for-profit; or non-profit sectors where the objective assessment and individual service strategy indicate that work experiences are appropriate.

Linkages

Local boards must ensure appropriate links to entities that will foster the participation of eligible local area youth. Such links may include connections to:

- local area justice and law enforcement officials
- local public housing authorities
- local education agencies
- Job Corps representatives
- representatives of other area youth initiatives, including those that serve homeless youth and other public and private youth initiatives

Applicants Not Meeting Enrollment Requirements

In order to meet the basic skills and training needs of eligible applicants who do not meet the enrollment requirements of a particular program or who cannot be served by the program, each eligible youth provider must ensure these youth are referred:

- for further assessment, as necessary
- to appropriate programs that have the capacity to serve them

All referrals must be documented in NWorks.

Involvement in Design and Implementation

Local boards must ensure that parents, youth participants, and other members of the community with experience relating to youth programs are involved in both the design and implementation of its youth programs.

Volunteers

Local boards must ensure that successful youth program participants have opportunities to volunteer to help other youth participants through mentoring, tutoring, and other activities.

Individual Training Accounts

Individual Training Accounts are not allowed for youth participants. However, individuals age 18 and above, who are eligible for training services under the adult and dislocated worker program, may receive Individual Training Accounts through that program. Requirements for concurrent participation requirements are set forth in Sec. 664.500 of the WIA Rules and Regulations. To the extent possible, in order to enhance youth participant choice, youth participants should be involved in the selection of educational and training activities.

Summer Employment Opportunities

Local boards are required to offer summer employment opportunities in the local youth program that link academic and occupational learning as part of the menu of services required in Sec. 664.410(a).

Summer youth employment must provide direct linkages to academic and occupational learning, and may provide other elements and strategies as appropriate to serve the needs and goals of the participants.

Local boards may determine how much of available youth funds will be used for summer and for year-round youth activities.

The summer youth employment opportunities element is not intended to be a stand-alone program. Local programs should integrate a youth's participation in that element into a comprehensive strategy for addressing the youth's employment and training needs. Youths who participate in summer employment opportunities must be provided with a minimum of 12 months of follow-up services, as required in Sec. 664.450.

Chief elected officials and local boards are responsible for ensuring that the local youth program provides summer employment opportunities to youth. The chief elected officials are the grant recipients for local youth funds, unless another entity is chosen to be grant recipient or fiscal agent under WIA sec. 117(d)(3)(B). If, in the administration of the summer employment opportunities element of the local youth program, providers other than the grant recipient/fiscal agent are used to provide summer youth employment opportunities, these providers must be selected by awarding a grant or contract on a competitive basis, based on the recommendation of the youth council and on criteria contained in the State Plan.

The summer employment opportunities element is one of a number of activities authorized by the WIA youth program. The law provides specific core indicators of performance for youth, and requires that all participating youth be included in the determination of whether the local levels of performance are met. Program operators can help ensure positive outcomes for youth participants by providing them with continuity of services.

American Job Center Services to Youth

The chief elected official (or designee under WIA sec. 117(d)(3)(B)), as the local grant recipient for the youth program, is a required American Job Center partner and is subject to the requirements that apply to such partners, described in 20 CFR part 662. American Job Centers can serve as the entry

points for all youth in the local area. They are the gateways to services provided for WIA eligible youth and to services funded from other sources for both WIA eligible and non-eligible youth.

In addition to the provisions of 20 CFR part 662, connections between the youth program and the American Job Center system may include those that facilitate:

- coordination and provision of youth activities
- linkages to the job market and employers
- access to information about WIA Youth programs and youth service providers

Local boards have the flexibility to offer services to area youth who are not eligible under the youth program through the American Job Centers. However, American Job Center services for non-eligible youth must be funded by programs that are authorized to provide services to such youth. For example, basic labor exchange services under the Wagner-Peyser Act may be provided to any youth.

Youth Opportunity Grants

Youth Opportunity Grants are awarded through a competitive selection process. The Secretary establishes appropriate application procedures, selection criteria, and an approval process for awarding Youth Opportunity Grants to accomplish the purpose of the Act and use available funds in an effective manner in the Solicitation for Grant Applications announcing the competition.

The Secretary distributes grants equitably among urban and rural areas by taking into consideration such factors as the following:

- poverty rate in urban and rural communities
- number of people in poverty in urban and rural communities
- quality of proposals received [WIA section 169(a) and (e)]

A local board is eligible to receive a Youth Opportunity Grant if it serves a community that:

1. has been designated as an empowerment zone (EZ) or enterprise community (EC) under sec. 1391 of the Internal Revenue Code of 1986
2. is located in a State that does not have an EZ or an EC and that has been designated by its Governor as a high poverty area
3. is one of two areas in a State that has been designated by the Governor as an area for which a local board may apply for a Youth Opportunity Grant, and that meets the poverty rate criteria in sec. 1392 (a)(4), (b), and (d) of the Internal Revenue Code of 1986

An entity other than a Local Board is eligible to receive a grant if that entity:

- is a WIA Indian and Native American grant recipient under WIA sec. 166
- serves a community that meets the poverty rate criteria in sec. 1392(a)(4), (b), and (d) of the Internal Revenue Code of 1986; and is located on an Indian reservation or serves Oklahoma Indians or Alaska Native villages or Native groups, as provided in WIA sec. 169 (d)(2)(B) [WIA sec. 169(c) and (d)]

All individuals ages 14 through 21 who reside in the community identified in the grant are eligible to receive services under the grant.

Performance measures for Youth Opportunity Grants are determined by the following:

- the Secretary negotiates performance measures, including appropriate performance levels for each indicator, with each selected grantee, based on information contained in the application
- performance indicators for the measures negotiated under Youth Opportunity Grants are the indicators of performance provided in WIA sec. 136 (b)(2)(A) and (B) [WIA sec. 169(f)]

Prohibitions

1. **Prohibition Against Federal Control Of Education** – The Workforce Investment Act (WIA) has no authority over any educational institution, school, or school system; its curriculum, program of instruction, administration, or personnel; or the selection of library resources, textbooks, or other printed or published instructional materials.
2. **Non-Duplication** – WIA Youth funds may not be used to duplicate services, programs or activities funded through the School-to-Work Opportunities Act of 1994.
3. **Noninterference and Non-Replacement of Regular Academic Requirements** – WIA funds may not be used to provide an activity for eligible youth who are not school dropouts if participation in the activity would interfere with or replace the regular academic requirements of the youth.
4. **Prohibition** – Youth funds may **not** be used to develop or implement education curricula for school systems in the State.