SOUTHERN WORKFORCE BOARD, INC.

WIOA TITLE I YOUTH PROGRAM

SWB - #104

August 27, 2015 Interim
Approved September 30, 2015 (Executive Committee)
Approved Dec. 2, 2015
Approved June 8, 2016
Approved August 10, 2016
Approved January 11, 2017
Approved October 18, 2017
Approved December 6, 2017 Exec Comm
Approved October 24, 2018
Approved August 14, 2019
Approved October 30, 2019
Approved June 24, 2020

I.   Purpose / Authority / Background

PURPOSE:

To provide staff with guidance on the changes to expenditure requirements, eligibility and program elements under WIOA to the Title I Youth Program. This policy defines the criteria for the design and parameters of the Title I Youth Program with emphasis on priority of service to out of school youth.

It shall be the policy of the Southern Workforce Board (SWB) and the Board of Directors of the Local Elected Officials (LEO) that all Workforce Innovation and Opportunity Act services shall be delivered in a manner that fully complies with the WIOA law and regulations.

AUTHORITY:

- Workforce Innovation and Opportunity Act (Public Law 113-128), Sections 116 and 129
- WIOA Regulations at 20 CFR part 681
- TEGL 23-14,
- Oklahoma Workforce Development Issuance # 02-2016
- TEGL 10-16, Change 1
- TEGL 19-16
- TEGL 21-16
- TEGL 2-16
- TEGL 23-14
- TEGL 38-14
- TEGL 8-15
- OWDI #04-2017 HHS Poverty Guidelines (To be updated on a yearly basis)
- Oklahoma Workforce Development Issuance #02-2016 Change 2
- OWDI #21-2017 Change 1 Data Validation and Supporting Documentation Policy
- Section 188 of WIOA

BACKGROUND:

On July 22, 2014, the President signed WIOA into law. WIOA supersedes the Workforce Investment Act of 1998. Under WIOA, Federal, State, and local partnerships that put the youths' interests first will help the nation's disconnected youth to succeed. The common performance measures across WIOA core programs, adult and youth programs under WIOA title I, and Adult Education and Vocational Rehabilitation programs under WIOA titles II and IV provide a mechanism to support youth service alignment. WIOA envisions the Department's youth programs, including Job Corps, Youth Build, and the youth formula-funded program, coordinating to support systems alignment and service delivery for youth. Local and State plans will articulate this vision of youth workforce development activities and help ensure a long-term supply of skilled workers and leaders in local communities.

MESSAGE:

This Southern Workforce Board (SWB) Title I Youth Policy is intended to align with Oklahoma Workforce Development Title I Youth Program Guidance, Change 2 and is intended to clarify procedures that minimize the burden of documenting eligibility, service provision, and outcomes while remaining respectful of the need to ensure data integrity and report accurate information. All documentation previously copied and kept in paper case files must now be electronically scanned and uploaded to participant records to develop a virtual case file. WIOA outlines a broad youth vision that supports an integrated service delivery system that leverages resources to support in-school youth (ISY) and out-of-school (OSY) with the primary focus on OSY. The WIOA Youth Program is targeted at young people between the ages of 16-24 to assist them in career guidance/exploration and educational attainment. Under WIOA, youth will be determined as either an Out-of-School Youth (OSY) or an In-School Youth

(ISY) at the time eligibility is determined and will remain as such throughout their enrollment. There is also an increased focus on work experience and an increase in the number of program elements bringing the total number of program elements to 14. WIOA funding allows the delivery of services that prepare youth for post-secondary educational and employment opportunities, attainment of educational and/or skills training credentials, and obtainment of employment with career opportunities. To accomplish this, each youth must be assessed to determine skills, interests, needs, and personal goals in order to create an Individual Service Strategy (ISS). This is accomplished in collaboration with the youth to expand the youth's connections to and understanding of the local economy, educational opportunities, and available community resources. This must be coordinated around 14 youth elements which must be made available to every youth participant. Programs may leverage partner resources to provide program elements as long as the activity is closely connected and coordinated with the WIOA youth program to ensure the activity is of high quality and beneficial to the youth participant.

In order to maximize resources the service provider must ensure that each youth participant can complete his/her activities, services within 5 years of his/her date of registration with exception of extension based on participants needs and approved by the Service provider Director in coordination with Board.

Braiding funds:

Braiding funds is a high priority under WIOA and occurs when different funding streams are used together to support different needs for the same customer. It allows a WIOA youth program to provide more comprehensive services to participants while maximizing partner resources available to assist youth. For example, The Title I WIOA youth program and the WIOA Title II Adult Education program can provide complementary services to youth and can be used together (braided) to serve eligible youth ages 16-24 where each program's age eligibility overlaps. When used together, these two funding sources can increase the capacity of programs to help you adults meet their employment and educational goals.

Funding Requirements and Priorities

WIOA shifts the primary focus of the Title I youth formula program to support the educational and career success of out-of-school youth (OSY) with an expectation that the shift in focus will result in a reconnection of out-of-school youth such as high school dropouts to education and jobs. The OSY focus is evident in the requirement that a **minimum** of 75 percent (75%) of WIOA youth funds be spent on OSY.

Additionally, under WIOA, opportunities for work experience are an important element of the program. A minimum of 20% of youth formula funds must be spent on work experience activities that include an academic and an occupational education component. Work experience activities may include paid and unpaid work experience, summer employment opportunities, job shadowing, on-the-job training, internships and pre-apprenticeships. The 20% may include all expenses related to the work based programs including staffing and curriculum development and should be calculated after subtracting the funds spent on administrative costs. Funds spent on work experience must be tracked and reported on a monthly basis to the Oklahoma Office of Workforce Development.

WIOA Youth Program Eligibility, Program Enrollment & Data Validation

Program enrollment is the point at which information used in performance begins to be collected. All applicable demographic information pertaining to a youth program participant must be accurately entered in the virtual case management system's Universal Demographics Screen. The demographic information entered will generate a potential eligibility and allow enrollment into the appropriate program. When the enrollment is complete a snapshot of the information that was entered in the universal demographics screen will exist in the program enrollment. The characteristics in the snapshot will remain unchanged throughout program participation. These characteristics will be verified by the participant's virtual self-attestation just prior to staff entering the program enrollment. Only the

characteristics used to qualify the youth as eligible for a WIOA program enrollment will require appropriate documentation be uploaded into the participant's virtual case file.

The WIOA Youth Eligibility Form," **Attachment E**, must be filled out completely indicating what criteria and source documents are being used to verify eligibility. The form and the applicable source documents must be uploaded into each participant's virtual case file at the time of the program enrollment.

In addition to documentation supporting program eligibility all youth must provide documentation of:
- Age/Date of Birth;
- Selective Service Registration (if applicable); and
- Eligibility to Work in the United States.
1. **Eligibility Requirements**

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. If a youth turns 18 while on the program, the staff must assist them in registering.

3. **Not less than 14 years of age and not more than 21 years old for In-School Youth and not less than 16 years of age and not more than 24 for the Out-of-School Youth.**
    Acceptable documentation sources include Birth Certificate, Driver's License, School ID Card, School Record, Tribal Record, Work Permit, form or document, or other Federal, State, or Local Government-Issued ID.

Participant:
For the title I Youth program, a participant is a reportable individual who has satisfied all applicable program requirements for the provision of services, including eligibility determination, an objective assessment, and development of an individual service strategy, and received at least 1 of the 14 WIOA Youth program elements identified in sec. 129(c)(2) of WIOA.

Two new definitions of low income for youth:

A youth living in a high-poverty area and a youth (ISY only) who receives or is eligible to receive a free or reduced-price lunch under the Richard B. Russell National School Lunch Act are considered low-income under WIOA. When a school does not use individual eligibility criteria to determine who is eligible for free or reduced-price lunch, entire school receipt of free or reduced price lunch must not be used to determine WIOA low-income status for ISY.

Income when determining a youth's low-income status:

The definition of what counts as income when determining a youth's low-income status has changed under WIOA. Under WIOA, there is no exclusion of payments for unemployment compensation, child support payments, and old-age survivor's insurance benefits from the income calculations for determining if an individual is low-income. These exclusions that were previously provided under WIA sec. 101(25) no longer apply.

Circumstances where only the youth's income is considered:
For ISY with a disability, the youth's own income, rather his or her family's income, must meet the low-income definition and not exceed the higher of the poverty line or 70 percent of the LLSIL.

Additionally, if an individual is not living in a single residence with other family members; that individual is not a member of a family for the purpose of WIOA income calculations. 20 CFR § 675.300 defines family as "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 married couple and dependent children;
➢ A parent or guardian and dependent children; or
➢ A married couple

Exception for youth with disabilities:
There is one exception to age eligibility for youth attending school. Youth with a disability who have an Individualized Education Program (IEP) may be enrolled as ISY after the age of 21. This allows youth with disabilities to be served by the K-12 public school system beyond the age of 21. Such youth may only be enrolled as ISY up to the age allowed by *Oklahoma Law Section 168. Student of Legal Age- Completion of Twelfth Grade* to receive secondary education services.

In-School-Youth Eligibility

Individuals 22 and older attending postsecondary education. Local programs should keep in mind that ISY, including those attending postsecondary education, must be between the ages of 14 through 21. A youth attending postsecondary education who is 22 at time of eligibility determination would not be eligible for the WIOA youth program because they are in school and over the age of 21. That individual could be served through the WIOA adult program.

In-School-Youth (ISY) must be attending school, **as defined under State law, Oklahoma Code, Title 70-1-106), including secondary and postsecondary schoo**l; not younger than 14 or **(unless an individual with a disability who is attending school under Oklahoma State Department of Education School Law Book Section 168. Students of Legal Age or Oklahoma Code, Title 70-5-132**), older than 21 **at time of enrollment.** Note: Youth who are home schooled or virtual leaners are ISY. Youth eligible to be served as ISY must be **low income*** *and* fall into one or more of the following categories:

1. Basic skills deficient
2. An English language learner
3. An offender (juvenile who is or has been subject to any stage of the criminal justice process)
4. A homeless youth or a runaway youth
5. In foster care or has aged out of foster care
6. Pregnant or parenting
7. Individual with a disability
8. An individual who requires additional assistance to complete an educational program or to secure and hold employment is an individual who is **low income*** and meets at least one of the following criteria:
   - With a parent or legal guardian that is currently or previously incarcerated for a felony conviction
   - With a parent or legal guardian who lacks a high school diploma or GED
   - Who attends or has attended chronically under performing schools listed as a priority or targeted intervention school on the State Department of Education website http://www.ok.gov/sde/priority-schools

- Low Income Youth between 18-21 years of age with a pattern of Poor Work History. Poor Work History includes non-reoccurring employment income, sporadic employment.

*The term low-income also includes a youth that lives in a high-poverty area. The Choctaw Nation "Promise Zone" is also considered a high-poverty area as designated by President Obama. Interactive map for specific locations can be found on Choctaw Nation's website.

http://1scivilizedtribe.maps.arcgis.com/apps/Viewer/index.html?appid=a7678b7727c0496c80127536445629d3

Because age eligibility is based on age at enrollment, in-school youth participants may continue to receive services beyond the age of 21 once they are enrolled in the program as long as he or she is receiving at least one program element other than follow-up services. However, it may be appropriate to also enroll the youth in the adult worker program to maximize program resources designed to meet the needs of the individual.

High Poverty Area - The Workforce Innovation and Opportunity Act (WIOA) Title I Youth Program contains a provision that allows for youth living in a high poverty area to automatically meet the low-income criterion that is one of the minimum eligibility criteria for all in-school youth, and for two barriers out-of-school youth in the WIOA youth program as referenced above. The WIOA regulations at 20 CFR § 681.260 define high-poverty areas as a Census tract, a set of contiguous Census tracts, an American Indian Reservation, Oklahoma Tribal Statistical Area (as defined by the U.S. Census Bureau), or other tribal land as defined by the Secretary in guidance or county that has a poverty rate of at least 25 percent as set every 5 years using American Community Survey 5-Year data. See Attachment N for the Instructions on using the American Community Survey Data to identify high-poverty area in urban or rural areas for WIOA Youth low income eligibility.

Please Note: Not every area in the Oklahoma Tribal Statistical Area is eligible, just as it is not every Census tract, or county in the country, but rather every Oklahoma Tribal Statistical Area that has a poverty rate of at least 25 percent. The OTSA's poverty rates may or may not have a Native American poverty rate of over 25 percent. Each OTSA poverty rate will have to be determined on an individual, case-by-case basis.

There is a 5% window for non-income eligible youth. 5% percent of the total number of **Youth** served may be non-income eligible as long as they meet other eligibility criteria. There must be uploaded documentation justifying the 5% in Oklahoma Job Match. These must be pre-approved by the Southern Workforce Board prior to enrollment. Southern Workforce Board will base approval on OSL 5% report at the time of request to ensure compliance however the service provider must ensure all eligibility requirements have been met according State and Local guidance. Service provider will provide the SWB with a process to insure 5% window equal opportunity access.

Limitation of the "requires additional assistance" barrier for In-school Youth:
The State has established the definitions and eligibility documentation requirements for the criteria, *"an individual who requires additional assistance to enter or complete an educational program or to secure or hold employment."* Not more than five percent (5%) of ISY in a given program year can be eligible based on this barrier.

Out of School Youth Eligibility

The WIOA Youth Program puts emphasis on out-of-school youth (OSY) between the ages of 16-24. **School status is determined at the time of program enrollment;**
- Must be based on the status at the time the eligibility determination portion of program enrollment is made;
- School status remains the same throughout the youth's participation in the WIOA youth program;
- School status is critical as it determines how a youth's expenditure will be reported**.**

In addition to not attending any school (as defined by state law, Oklahoma Code, Title 70-1-106)
The Department of Labor does not consider the following to be schools:

- Adult Education Under Title II of WIOA;

- YouthBuild;
- Job Corps;
- Dropout Re-Engagement Programs; and
- High School Equivalency Programs.

However, there is one exception. Youth attending high school equivalency (HSE) programs, including those considered to be dropout re-engagement programs, funded by the public K–12 school system that are classified by the school system as still enrolled in school are considered ISY.

Eligibility for the WIOA OSY program requires the youth to fall into one of the following categories:

1. Individual with a disability
2. School dropout
3. A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar quarter is based on how a local school district defines its school year quarters. In cases where schools do not use quarters, local programs must use calendar year quarters
4. A high school graduate who is **low income*** and either an English language learner or basic skills deficient
5. An offender (juvenile who is or has been subject to any stage of the criminal justice process)
6. A homeless youth aged 16 to 24 who meets the criteria defined in sec. 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6)), a homeless child or youth aged 16 to 24 who meets the criteria defined in sec. 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C.11434a(2)) or a runaway youth
7. In foster care or has aged out of foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
8. Pregnant or parenting
9. An individual who requires additional assistance to complete an educational program or to secure and hold employment is an individual who is **low income*** and meets at least one of the following criteria:
   - With a parent or legal guardian that is currently or previously incarcerated for a felony conviction
   - With a parent or legal guardian who lacks a high school diploma or GED
   - Who attends or has attended chronically under performing schools listed as a priority or targeted intervention school on the State Department of Education website http://www.ok.gov/sde/priority-schools
   - Low Income Youth between 18-24 years of age with a pattern of Poor Work History, Poor Work History includes non-reoccurring employment income, sporadic employment.

*The low income requirement applies to the OSY 4th and 9th categories only. The term low-income also includes a youth that lives in a high-poverty area of eligibility and new enrollment completed

The Enrollment Process
In order to meet the basic skills and training needs of youth who do not meet the eligibility requirements of a program or can't be served, the youth provider must ensure that the youth be referred to the appropriate programs to meet the basic skills and training needs of the youth.

> **NOTE:** All demographic characteristics that apply to the client must be correctly and accurately entered into the State case management system (ex. OkJobMatch.com) prior to the program enrollment. Characteristics used to verify program eligibility must be scanned and uploaded to the case management system as outlined in **Data Validation Policy** develop a virtual case file.

The enrollment process begins with the participant self-registering in OKJobMatch.   When the self- registration has been completed staff must meet with the participant and review the information completed by the participant and gather additional information needed to determine potential eligibility. Most of the information needed to determine

eligibility will be completed and entered into the system by staff, in consultation with the participant, after the self-registration is complete.

When an individual has satisfied all applicable program requirements for the provision of services, including eligibility determination, an objective assessment, development of an individual service strategy, and received one of the 14 WIOA Youth program elements; he or she is considered a participant. Please remember that all youth program elements, except follow-up services, trigger participation following eligibility determination, an objective assessment, and completion of the individual service strategy. For more information on eligibility and documentation requirements, please see OWDI #21-2017 Change 1 Data Validation and Supporting Documentation Policy.

Pending List:

Oklahoma's virtual case management system OKJobMatch generates enrollments and potential program eligibilities based on demographic information entered by the participant during self-registration and front-line staff during the intake process. Dislocated Worker and Youth enrollments are placed in a pending queue that require supervisory approval/denial once entered into OKJobMatch. Enrollments, source documentation, and eligibility determinations are valid for 30 days to allow the supervisor time to review information and to approve/deny the pending request. Enrollments must be approved/denied by a supervisor after verifying the client's eligibility including uploaded documentation, self-attestation and program notes, before there is any expenditure of funds. At the end of the 30 days if the enrollment is still in the pending queue it is considered ineligible <u>and will require a new enrollment</u>, <u>new source documentation collection, and a new eligibility determination.</u> When denying the enrollment the supervisor <u>must make a note as to why</u> the enrollment has been denied. *In order to avoid unintentional enrollment denials, the pending list must be worked by a supervisor on a weekly basis.*

Information and Referral
Eligible Youth – Eligible youth are to be provided with information on the full array of appropriate services that are available through the system including Title I, other eligible providers and one stop partners. Referrals to appropriate training, educational programs and services, 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 through a provider other than the WIOA Title I contracted service provider. In those instances the services to be provided will occur without cost as they will be provided through a referral system and coordinate 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 WIOA Title I 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
Ineligible Youth – Youth applicants who do not meet the enrollment requirement of the youth program or who cannot be served by the Title I youth program must be referred for further assessment, as necessary, and referred to appropriate training, educational and services programs that have the capacity to serve the individual.   WIOA Title I services provider will maintain an ineligible referral log to be submitted to the SWB on a monthly bases. Log will detail, reason for ineligibility, service requested and date and organization referred to.

Program Design and Service Delivery
The WIOA youth program places additional emphasis on individual participant needs. Career pathways have been incorporated as part of both the objective assessment and the development of the individual service strategy (ISS). Additionally, the ISS must be directly linked to one or more of the performance measures.

> **Objective Assessment** of the academic levels, skill levels and service needs of each participant for the purpose of identifying appropriate services and career pathways for youth. The assessment must include a review of the following:
> 1. Basic Skills
> 2. Occupational Skills
> 3. Prior Work Experience
> 4. Employability

5. Interests
   6. Aptitudes
   7. Supportive service
   8. Developmental needs

Assessments must also consider a youth's strengths rather than just focusing on areas that need improvement. A new assessment is not required if it is determined it is appropriate to use a recent assessment conducted pursuant to another education or training program conducted in the last 6 months. Objective assessments must be documented as outlined in Data Validation Policy. The assessment is the basis for the establishment of the Individual Service Strategy (ISS).

Individual Service Strategy (ISS) <u>must</u> be directly linked to one or more of the performance indicators and identify career pathways that include education and employment, appropriate achievement objectives, and services based on the objective assessment. The ISS is an ongoing strategy jointly developed by the participant and the case manager identifying the participant's educational/ employment goals, the appropriate achievement objectives, and the appropriate combination of services for the youth to successfully achieve their goals. The ISS must be reviewed on a regular basis and updated as needed. ISS must be accurately and correctly entered into the States virtual management system reference OOWDI 3-2019 Virtual IEP/ISS Instructions or attachment M of this policy. the ISS should also include:

   1. Activities leading to the attainment of a secondary diploma or equivalent or a recognized post-secondary credential.
   2. Preparation for post-secondary educational and training opportunities.
   3. Strong linkages between academic instruction and occupational education that lead to the attainment of recognized post-secondary credentials.
   4. Preparation for unsubsidized employment opportunities if appropriate, and
   5. Effective connections to employers, including small employers, that are in in-demand industry sectors and occupations of local and regional labor markets.
   6. Documentation of supportive services needed for the participant to successfully meet their educational/employment goal.

The Measurable Skills Gains, Goals and Interests screens will be used to document the components of the ISS. The ISS will be indicated by the date set and tracked by setting a "Goal Type" from the drop down with a status of "Set but Attainment Pending" and entering a "Planned Date of Attainment." In addition to setting the "Goal Type" case managers must also write detailed information outlining the need for the goal and the plan for successful attainment.

Updates to the ISS goals must be updated as changes occur in the employment, training or needs of the youth change. Prior to the entry of a new ISS goal, any previous goal of the same type must have the status updated as either "Attained" or "Set But Not Attained. Goal updates must occur when the status of the goal is no longer pending and/or a new goal is set.

WIOA legislation includes 14 program elements, including the original WIA 10 elements condensed into 9, and 5 new program elements. All elements must be included in WIOA Youth program design. While these program elements must be made available to all eligible youth participants between the ages of 14-24, not all elements must be funded with WIOA youth funds. Local programs may leverage partner resources to provide program elements as long as the activity is closely connected and coordinated with the WIOA youth program to ensure the activity is of high quality and beneficial to the youth participant. While local youth programs must make all 14 program elements available to WIOA youth participants, local programs have the discretion to determine which elements to provide to a participant based on the participant's assessment (ISS). The elements consist of:

Program Element 1: Tutoring, study skills training, instruction, and dropout prevention services

Element One includes "tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.

Secondary school dropout prevention strategies include services and activities that keep a young person in-school and engaged in a formal learning and/or training setting. This program focus is on in-school services relating to attainment of a high school diploma.

The element includes:

➢ tutoring, study skills training, and instruction that lead to a high school diploma;
➢ secondary school dropout prevention services intended to lead to a high school diploma.

However, this element does not include:

➢ dropout recovery strategies that lead to completion of high school equivalency. Those are included in program element 2;
➢ training services leading to a postsecondary credential. Those are included in program element 4.

Program Element 2: Alternative secondary school services or dropout recovery services

Element two includes alternative secondary school services such as basic education skills training, individualized academic instruction, and English as a Second Language training, or those services that assist youth who have struggled in traditional secondary education. Dropout recovery services, such as credit recovery, counseling, and educational plan development, are those that assist youth who have dropped out of school. While the activities within both types of services may overlap, each are provided with the goal of helping youth to re-engage and persist in education that leads to the completion of a recognized high school diploma equivalency.

Program Element 3: Paid and unpaid work experience

Element Three is a planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience may be paid or unpaid, as appropriate. A work experience may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act and State law. Funds provided for work experiences may not be used to directly or indirectly aid in the filling of a job opening that is vacant because the former occupant is on strike, or is being locked out in the course of a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving a work stoppage. Work experiences provide the youth participant with opportunities for career exploration and skill development.

TEGL No. 8-15 provides further discussion of allowable expenditures that may be counted toward the work experience expenditure requirement and articulates that program expenditures on the work experience program element can be more than just wages paid to youth in work experience. Allowable work experience expenditures include the following:

➢ Wages/stipends paid for participation in a work experience;
➢ Staff time working to identify and develop a work experience opportunity, including staff time spent working with employers to identify and develop the work experience;
➢ Staff time working with employers to ensure a successful work experience, including staff time spent managing the work experience;
➢ Staff time spent evaluating the work experience;

➢ Participant work experience orientation sessions;
➢ Employer work experience orientation sessions;
➢ Classroom training or the required academic education component directly related to   the work experience;
➢ Incentive payments directly tied to the completion of work experience; and
➢ Employability skills/job readiness training to prepare youth for a work experience.

Supportive services are a separate program element and cannot be counted toward the work   experience expenditure requirement even if supportive services assist the youth in participating   in the work experience.

This element is a critical component in the youth program, as this is the only element that has a   minimum percentage of expenditure requirements. WIOA requires a minimum of 20% of local   area youth funds to be expended on work experience. Please note that:

➢ Local area administrative funds not subject to 20% requirement; and
➢ Leveraged resources cannot count toward the 20%.

Work experiences must include academic and occupational education:

➢ The educational component may occur concurrently or sequentially with the work experience;
➢ The academic and occupational education component may occur inside or outside the work site;
➢ The work experience employer can provide the academic and occupational component   or such components may be provided separately in the classroom or through other means;
➢ Local areas have the flexibility to decide who provides the education component;
➢ The academic and occupational education component refers to contextual learning   that accompanies a work experience. It includes the information necessary to   understand and work in specific industries and/or occupations;
➢ Local programs have the flexibility to determine the appropriate type of academic and occupational education necessary for a specific work experience.

Categories of work experience. WIOA identifies four categories of work experience:

➢ Summer employment opportunities and other employment opportunities throughout the year;
➢ Pre-apprenticeship programs;
➢ Internships and job shadowing; and
➢ On-the-job training opportunities.

Please remember that the job shadowing work experience is a temporary, unpaid exposure to the workplace in an occupational area of interest to the participant.

Program Element 4: Occupational Skills Training

Element Four is an organized program of study that provides specific vocational skills that lead   to proficiency in performing actual tasks and technical functions required by certain   occupational fields at entry, intermediate, or advanced levels. Local areas must give priority consideration to training programs that lead to recognized postsecondary credentials that align   with in-demand industry sectors or occupations in the local area.

Such training must:

➢ be outcome-oriented and focused on an occupational goal specified in the individual service strategy;
➢ be of sufficient duration to teach the skills needed to meet the occupational goal; and
➢ lead to the attainment of a recognized postsecondary credential.

The Department of Labor and the State of Oklahoma allow WIOA Individual Training Accounts (ITAs) for OSY, ages 16 to 24, using WIOA youth funds, when appropriate. ITAs allow participants the opportunity to choose the training provider that best meets their needs. To receive funds from an ITA, the training provider must be on the Eligible Training Provider List. However, the Department of Labor prohibits the use of youth program-funded ITAs for ISY. In-School Youth between the ages of 18 and 21 may co-enroll in the WIOA Adult program if the young adult's individual needs, knowledge, skills, and interests align with the WIOA adult program and may receive training services through an ITA funded by the adult program.

The State of Oklahoma allows competitive procurement of ISY occupational skills training. The process is detailed in **Attachment H**. This process is also supported by DOL's National Office.

Program Element 5: Education offered concurrently with workforce preparation and training for a specific occupation

Element Five reflects an integrated education and training model (IET) and 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.

This program element refers to the concurrent delivery of:

Program Element 2: Alternative Secondary School Services or Dropout Recovery Services;
Program Element 3: Work Experience; and
Program Element 4: Occupational Skills Training.

Element 6: Leadership Development Opportunities

Element Six includes opportunities that encourage responsibility, confidence, employability, self-determination, and other positive social behaviors such as:

➢ Exposure to postsecondary educational possibilities;
➢ Community and 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 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
➢ Activities that place youth in a leadership role such as serving on a WDB's Standing Youth Committee.

Program Element 7: Supportive Services

Element Seven includes services that enable an individual to participate in WIOA activities. These services 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 for (youth ages 18-24 enrolled in WIOA youth training services)
➢ Assistance with educational testing;
➢ Reasonable accommodations for youth with disabilities;
➢ Legal aid services;
➢ Referrals to health care;
➢ Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear;
➢ Assistance with books, fees, school supplies, and other necessary items for students enrolled in

postsecondary education classes; and

➢ Payments and fees for employment and training-related applications, tests, and certifications.

Program Element 8: Adult Mentoring

Element Eight defines the timeframe for adult mentoring as lasting at least 12 months. Adult mentoring may take place both during the program and following exit from the program. It may 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:

➢ The local youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis;

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

➢ Case managers are allowed to serve as mentors in areas where adult mentors are scarce.

Program Element 9: Follow-up services

Element Nine includes critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-up services may include regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise. Follow-up services may begin immediately following the last expected date of service in the Youth program when no future services are scheduled. Follow-up services do not cause the exit date to change and do not trigger re-enrollment in the program.

Five program elements are permitted as follow-up services during the follow-up period:

➢ Supportive Services;

➢ Adult Mentoring;

➢ Financial Literacy Education;

➢ Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and

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

Please Note: Any program element other than the 5 listed above requires reenrollment in the program in order for a youth to receive them.

Also note these additional requirements:

➢ All youth participants must be offered an opportunity to receive follow-up services that align with their individual service strategies for a <u>minimum of 12 months</u> unless the participant declines to receive follow-up services or the participant cannot be located or contacted;

➢ The types of services provided and the duration of services must be determined based on the needs of the individual and therefore, the type and intensity of follow-up services may differ for each participant;

➢ Follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome;

➢ Local programs should have policies in place to establish how to document and record when a participant cannot be located or contacted;

➢ At the time of enrollment, youth must be informed that follow-up services will be provided for 12 months following exit. If at any point in time during the program or during the 12 months following exit the youth requests to opt out of follow-up services, they may do so.

➢ **Documentation:** Career Navigators are responsible for ensuring Youth are offered an opportunity to receive follow-up for a minimum of 12 months after exit. Career Navigators at the time of exit, will document in a detailed program note identified as (Exit Note) ensuring Youth are offered an opportunity to receive Follow-up. Services. Follow up services will be offered at least one time every month for a minimum of 12 months

documented in a detailed program note identified as (Follow up Note). Youth receiving follow up services will need to be entered in OKJobMatch with a detailed program note. If a Career Navigator is not able to make follow contact with a client utilizing the primary contact number and the two alternative contact methods, (i.e., Facebook, friend or family etc.;) for 3 consecutive months, the Career Navigator needs to document in a program note what methods of contact were used on what dates, and that the client is being removed from follow up services due to "refusal of follow-up services .

If at any point in time during the program or during the 12 months following exit the youth requests to opt out of follow-up services Career Navigator must document in a detailed program note.

Program Element 10: Comprehensive guidance and counseling

Element Ten includes comprehensive guidance and counseling that provides individualized counseling to participants. This includes drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate.

When referring participants to necessary counseling that cannot be provided by the local youth   program or its service providers, the local youth program must coordinate with the organization it refers to in order to ensure continuity of service. When resources exist within   the local program or its service providers, it is allowable to provide counseling services directly to participants rather than refer youth to partner programs.

Program Element 11: Financial Literacy Education

Element Eleven is financial literacy education. Youth providers may use the free resource below to deliver "Financial Literacy Education" which will satisfy this specific Youth Program Element. The State of Oklahoma released this resource to local areas in 2015 and it is continues to be a viable tool.
- ➢ Developed by the Consumer Financial Protection Bureau (CFPB) Federally Sponsored;
- ➢ It is a financial empowerment toolkit for social programs to equip frontline staff with fundamental financial empowerment principles, an understanding of consumer   protection issues, tools and skills to help clients understand what financial empowerment and stability mean for them and to refer clients to other related local financial empowerment services.
- ➢ Link: http://www.consumerfinance.gov/your-money-your-goals/
- ➢ Videos: https://www.youtube.com/watch?v=Q-3X6ciTjP0&feature=youtu.be&list=PLrfmdUlWzRF2-wzQblJaR3vVERdc3Thqk

Program element 11 may include activities:
- ➢ To support the ability of participants to create budgets, initiate checking and savings accounts at banks, and make informed financial decisions;
- ➢ To support participants in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards;
- ➢ That 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, how to correct inaccuracies, and how to improve or maintain good credit;
- ➢ That support a participant's ability to understand, evaluate, and compare financial   products, services, and opportunities and to make informed financial decisions;
- ➢ That educate participants about identity theft, ways to protect themselves from identify   theft, and how to resolve cases of identity theft and in other ways understand their   rights and protections related to personal identity and financial data;
- ➢ That 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;
- ➢ That support activities that address the particular financial literacy needs of youth with   disabilities, including connecting them to benefits planning and work incentives counseling;
- ➢ That 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 instruction.

Program Element 12: Entrepreneurial Skills Training

Element Twelve includes entrepreneurial skills training, which provides the basics of starting   and operating a small business. Such training must develop the skills associated with   entrepreneurship. Such skills may 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 may include, but are not limited to:

➢ Entrepreneurship education that provides an introduction to the values and basics of starting and running a business. Entrepreneurship education programs often guide youth through the development of a business plan and also may include simulations of business start-up and operation,
➢ Enterprise development which provides supports and services that incubate and help youth develop their own businesses. Enterprise development programs go beyond entrepreneurship education by helping youth access small loans or grants that are needed to begin business operation and by providing more individualized attention to the development of viable business ideas; and
➢ Experiential programs that provide youth with experience in the day-to-day operation of   a business. These programs may involve the development of a youth-run business that young people participating in the program work in and manage. Or, they may facilitate placement in apprentice or internship positions with adult entrepreneurs in the community.

Program Element 13: Services that provide labor market information

Element Thirteen includes services that provide labor market and employment information   about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services.

WIOA youth programs and providers should become familiar with state and federal LMI data and LMI tools, which are provided for free by agencies, in order to share relevant LMI with   youth. DOL electronic tools particularly relevant to youth include My Next Move at   https://www.mynextmove.org/, and Get My Future at https://www.careeronestop.org/GetMyFuture.

Another resource available is OKCareerGuide.org at https://okcareerguide.kuder.com/landing- page, where youth can learn about their interests, skills and values with Journey's research-   based assessments; plan their education and career goals based on real-time assessments; and succeed by making confident career choices via Journey's career planning tools.

Program Element 14: Postsecondary preparation and transition activities

Element Fourteen prepares ISY and OSY for advancement to post-secondary education after attaining a high school diploma or its recognized equivalent. These services include exploring post-secondary education options including technical training schools, community colleges, 4- year colleges and universities, and Registered Apprenticeship. Additional services include, but are not limited to:

➢ Assisting youth to prepare for SAT/ACT testing;

- ➢ Assisting with college admission applications;
- ➢ Searching and applying for scholarships and grants;
- ➢ Filling out the proper Financial Aid applications and adhering to changing guidelines; and
- ➢ Connecting youth to postsecondary education programs such as OkCollegeStart.org at https://www.okcollegestart.org/.

Additional Notes on Documenting and Reporting Program Elements:

Documenting receipt of program elements is critical to ensure that youth who are actively participating in programs do not get unintentionally exited due to 90 days of no service. All 14 WIOA youth program elements are contained in the PIRL and local youth programs should ensure that services received are reported in the applicable program element in the PIRL.

Contact with a participant for case management purposes is not considered a program service and will not prevent a program exit from occurring.

In addition, case management is the act of connecting youth to appropriate services and not a program element. Case managers providing case management should not be reported as one of the 14 youth program elements in the PIRL. Exited participants must have eligibility re-determined and a new enrollment approved to receive additional program services. However, if a participant has completed the last service in the ISS such as work experience and enters follow-up, but later determines that they need additional services beyond the 5 elements allowed in follow-up and the youth has not exited; the case manager could revise the ISS in agreement with the youth and provide elements as needed beyond the 5 allowed in follow-up.

Each element may be tied to multiple services. All services, including those not funded with Title 1 youth funds, must be documented by entry into the youth's service and training plan as outlined in Attachment A of this policy with the provider of the service documented accordingly. The provider of the service should be the entity, employer or training provider actually providing the service and not the local contracted youth service provider. All services entered must have a correlating program note entry. A program service must be given every 90 days at a minimum. Participants that go over 90 days without a staff assisted program service will exit from the program. Exited participants must have eligibility re-determined and a new enrollment approved to receive additional program services.

Contact with a participant for case management purposes is not considered a program service and will not prevent a program exit from occurring.

In order to maximize resources the Service Provider must ensure that each Youth Program participant can complete his/her activities, services and educational or training assistance with a total maximum amount of $12,000.00 for all cost incurred to include only tuition, fees and books. All expenditures are to be tracked by service provider

Indicators of Performance

1. Placement in Employment, Education or Training:
   The percentage of program participants who are in education, training activities or in unsubsidized employment during the second quarter after exit from the program.
2. Retention in Employment, Education or Training:
   The percentage of program participants who are in education, training activities or unsubsidized employment during the fourth quarter after exit from the program.
3. Earnings after entry into Employment
   Median earnings in the second quarter after exit.
4. Credential/Diploma Rate:

Attainment of a secondary diploma or equivalent, or a recognized post-secondary credential during participation or within one year after exit from the program.

5. Skills Gain:

Percentage of participants in education leading to credential or employment during the program year and achieving measurable gains towards the credential or employment.

Documentation

All characteristics that apply to the client **must** be correctly and accurately entered into the State's virtual case management system and self-attested to by the participant prior to each program enrollment. Basic demographic characteristics not used for eligibility must be verified by **virtual self-attestation**. Characteristics used to determine eligibility **must** be indicated on **Attachment E**
the WIOA Youth Eligibility Form. In addition to **Attachment E,** the documents used to verify eligibility and service provision **must be scanned and uploaded** as outlined in **Attachment A** of this policy.

1. **Self-Attestation** prior to enrollment into the WIOA Youth Program requires that all demographic information entered in the virtual case management system by the client during the self-registration be reviewed for accuracy. In addition, demographic information needed for eligibility determination must be added by the participant and case manager prior to the participant's self-attestation by virtual signature. If the youth is under the age of 18, a parental, guardian or other responsible adult must sign the virtual signature for self-attestation. *It is imperative that this information be correct prior to the participant's self-attestation.* Self-Attestation occurs when:

   - Staff and participant will review all basic demographic characteristics recorded in the participant's Demographic Snapshot prior to the participant's enrollment into a WIOA funded program. The participant then self-attests that the information reviewed prior to the program enrollment is true and correct by entering a "virtual signature." Staff may at that point proceed to the appropriate WIOA Program enrollment and, after the upload of Attachment A and the documents used to verify eligibility, the entry of the first program service.

   - If it is determined that the demographic characteristics obtained prior to the virtual signature and program enrollment were not accurate, a request for a correction to the snapshot can be made to the Oklahoma Office of Workforce Development. ***If the snapshot is corrected or changed after the initial self-attestation, the participant is required to return to the office and virtually resign the Demographic Snapshot in the virtual case file. The virtual signature can't be done remotely and must be done in the presence of the participant's case manager.***

2. **Staff Verification** of eligibility and/or source documentation in the form of a detailed program note will be allowed for some program services and will be used to comply with some requirements as indicated in **Data Validation Policy** when:

   - Staff reviews allowable source document to determine accuracy of the data being validated and ensures the corresponding data entry match the information on the source document. Staff then records in Program Notes, as indicated in **Data Validation Policy**.
   The following information *must* be included in the program note:
   a. Specific data element being validated;
   b. Specific source document used for verification;
   c. Date the verification occurred, if different from the data entry date; and
   d. Pertinent information as presented on the source document

NOTE: It is required that the staff person verifying the "source" document and information be the one entering the Program Note.

3. **Scanned and uploaded documentation** is required to verify eligibility, data elements and service provision, as indicated in **Data Validation Policy**. Eligibility must be documented prior to the participant's receipt of any program services. Documentation requirements are met when the following procedures

are followed:
- Staff reviews and scans a copy of the appropriate source document used to verify the eligibility/data validation item and uploads the scanned document as outlined in **Data Validation Policy**.

4. **Virtual Case Files** may be used as a source for some criteria if detailed information is provided. For example, the system may be used to verify the date of the first training service if all of the following information is included in the service entry: actual start date, O*NET-SOC, CIP, Training Agent ID and Training Provider name.

5. **Telephone Verification** is yet another method of documenting eligibility criteria and/or the validity of certain data elements as indicated in **Data Validation Policy**. The information obtained must be documented by completing the sample "Telephone Verification Form for Youth Programs" included as **Attachment L** or a similar board developed form. This form must be scanned and uploaded to the proper screens once complete.

6. **Program Notes** are required each time a participant receives a service, has a service update or outcome, and every time the case manager has contact with the participant. Program notes must be detailed and outline the facts pertaining to participation in the program. Changes in case managers and monitoring functions necessitate accurate and regular documentation of service delivery.

I. **Types of Validation Rules**

1. **Match** means the document used to verify the information must be exactly the same as the source document outlined in **Data Validation Policy. T**he information from the source document must match what has been entered in the case management system. For example, if the allowable source document is a birth certificate and date of birth is being verified, the date on the birth certificate must be exactly the same date entered in the virtual case file as the date of birth. It should be noted that whenever a date is entered into a virtual case file it must match exactly the date on the document used to verify the information.

2. **Support** means that the information contained in the documentation that was scanned and uploaded, documented in the Service and Training plan or detailed in a program note provides enough information to support the accuracy of the information in the participant's virtual case file.

II. **Specific Program Interpretations**

1. **Selective Service Registration** – A male youth between the ages of 18-24 that cannot provide proof of Selective Service registration at the point of program enrollment is not eligible for participation in the WIOA programs and must be referred to the Selective Service for registration. Program enrollment may commence after the registration process has been completed. If a youth is less than 18 years of age at the time of enrollment into the WIOA Youth Program but turns 18 while still receiving WIOA funded services, the Case Manager must verify the youth has registered with Selective Service and document the registration per validation method and data entry requirements outlined in **Data Validation Policy**. Additional information on the registration process is available at www.sss.gov.

2. **Veteran Status and Priority of Service** – Service to veteran youth will follow the Priority of Service guidelines as established under the Veteran's Employment and Training Service (VETS) program. There is a discrepancy between the allowed source documents used to validate veteran status under USDOLETA's WIOA Data Element Validation policy, and verification requirements for participation in the VETS Program, which significantly hinders service delivery under the WIOA Youth Program. Specifically, the VETS Program eligibility allows self-attestation of veteran status with no source documentation to support the claim; whereas a veteran that receives services under WIOA Title I programs, including the Youth Program, must provide a DD-214, a letter from the Veterans Administration or cross-match with veteran data. To maintain compliance with WIOA Title I Data Element Validation and provide veterans with the priority services they deserve, staff should not deny provision of services to a veteran who does not have a document verifying veteran

status at the time the service is provided. The service must be given <u>and</u> a program note entered indicating that service was provided in keeping with the Veterans Priority of Service Policy and that the documentation will be obtained when the veteran returns for additional services.

3. **Participant Characteristics: Needs and Barriers** – The virtual case management system will be used as the verification source for participant self-attestation of all demographic characteristics not used for eligibility determinations. All screens must be reviewed with the individual prior to the receipt of the first staff assisted service. Any characteristics that apply to that individual must be correctly and accurately entered prior to self-attestation and the entry of a program enrollment.

   <u>NOTE:</u> Individuals must have paper or scanned documentation *only* for the characteristics, income status and needs and barriers used *to establish eligibility* to receive WIOA Youth services. Any characteristics not used to establish eligibility will be verified using self-attestation as the source.

4. **Disability Status** – Even though WIOA requires that we inquire about an individual's disability status, additional documentation/validation is not required <u>unless</u> needed for WIOA program eligibility. Customers are asked to *voluntarily respond* to a question about their disability status to comply with Equal Employment Opportunity programmatic eligibility requirements.

III. **Document Uploader for Paperless Case Management**
Oklahoma Job Match has been programmed with the ability to store scanned PDF documents and attach those documents to the virtual case file of a client receiving youth services. As defined in **Data Validation Policy**, scanned and uploaded documentation will be required to verify eligibility, DEV, and service delivery.   Documents must be scanned and uploaded as a PDF file. Although **complete** participant demographic characteristics must be recorded electronically in the case management system, scanned and uploaded documentation will be required only to verify criteria used for program eligibility, DEV, service delivery, and any other criteria as outlined in **Data Validation Policy**.   Program monitoring of the WIOA Youth program will be completed following the documentation requirements outlined in the policy. Hard copy case files will not be reviewed, all documentation pertaining to eligibility, service delivery must be uploaded and program outcomes must be documented in the exit questions screen and the program outcome screens as indicated by this policy.

Any information documented directly in the case management system such as program notes, eligibility snapshot, and the service and training plan does not need to be printed out and uploaded. Although program notes may be in order to clarify services, the virtual case management system is considered to be the source of the documentation.

EQUAL OPPORTUNITY AND NONDISCRIMINATION: All providers must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity. Section 188 of WIOA, which prohibits exclusion of an individual from participation in, denial of the benefits of, discrimination in, or denial of employment in the administration of or in connection with any programs and activities funded or otherwise financially assisted in whole or in part under Title I of WIOA because of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status, or participation in a program or activity that receives financial assistance under Title I of WIOA. Section 188 of WIOA

POLICY ADDENDA: The Executive Director/Board Staff is authorized to issue additional instruction, guidance, forms, etc., to further implement the requirements of this policy.

Note: Service provider must utilize source document applicable for eligibility criteria as indicated in the (Data Validation Policy). If applicable attachments must be completed in their entirety.

Applicant Statement: The applicant statement may be used in limited circumstances to document low income for participants when income is not verifiable for the prior 6 months of the enrollment date or obtaining the acceptable source documentation will cause undue hardship for the individual (i.e. natural disasters, domestic violence, etc.). An applicant statement is to be used only after all practicable attempts to secure documentation have failed. The applicant statement must explain all missing pay stubs and non-working periods during the last six months, indicate the resources relied upon for support during the last six months, be supported with a detailed statement documenting all attempts to secure the listed source documentation, and supported by a corroborative contact or reliable witness signature attesting to the accuracy of the statement. The applicant statement must be signed by the participant, reliable witness, and case manager.

ATTACHMENTS:

- Attachment A – Eligibility Documentation and Uploader Requirements
- Attachment A – WIOA Client Involvement Statement
- Attachment B – WIOA Individual Training Account (ITA) Agreement
- Attachment C – WIOA Individual Training Voucher Form
- Attachment D – WIOA Coordination of Training Funds
- Attachment E – WIOA Youth Eligibility Form
- Attachment F - WIOA Youth Support Form
- Attachment G –WIOA School Dropout Status Form
- Attachment H – WIOA Training Provider Procurement Form
- Attachment I - WIOA Documents to Verify Eligibility to Work
- Attachment J - WIOA Applicant Statement
- Attachment K - WIOA Income Eligibility Form Part I,II
- Attachment L - Telephone Verification Form
- Attachment M - OOWDI 3-2019 Virtual IEP/ISS Instructions
- Attachment N – Instructions for using American Community Survey Data to identify High-poverty area in urban or rural areas for WIOA Youth Low Income Eligibility

5-21-20

New directions for using American Community Survey Data to identify high-poverty area in urban or rural areas for WIOA Youth low income eligibility:

Note that these are new directions given that the Census Bureau has changed its web site since last year for obtaining American Community Survey Data.

Section 1: Determining if an Overall City or County has a Poverty Rate of 25 percent.

1. First, check to see if your overall city or county has a poverty rate of 25 percent or above. Go to Census.gov or click on https://www.census.gov. In the middle of the page, go to **Quick Facts: Access Local Data** and click on the arrow. On the top of the page that comes up, type in the name of your city or county and then click on your city or county from the list provided of places with the same name. Scroll down near the bottom of the table to **Income and Poverty** and it will give you the poverty rate of your city or county. If the poverty rate is 25 percent or above, that is all that you need to do to show that your city or county is a high-poverty area.

Section 2: Determining if an Individual Lives in a High-Poverty Area Based on Their Street Address.

There are two steps to this—first determining the Census tract in which the street address is located, and second determining the poverty rate of the Census tract.

For the first step, click on https://geocoding.geo.census.gov/geocoder/geographies/address?form. There will be two choices: Find Locations Using… and Find Geographies Using…Click on the second option to Find Geographies.

Type in the street address, city, and state. You don't need to type in the zip code. The click on Find.

A list of information will appear giving geographic identifiers first by Matched Address, then by Census Blocks, States, Counties, then by Census Tracts. Scroll down near the bottom of the page to Census Tract. In the middle of the information for Census tracts there will be column listed as **NAME**. This will give the Census tract number of the street address. For Example; Census Tracts is:

NAME: Census Tract 1030, Oklahoma County, Oklahoma

For the second step, go to the American Community Survey home page by clicking on https://www.census.gov/programs-surveys/acs.

On the left side of the American Community Survey (ACS) home page, click the fourth option which is **Data**.

When the Data page comes up in the middle column in the middle of the page under Data Tables and Tools, click on **Subject Tables**.

On the top right hand corner of the page in the Search Box type in **S1701**.

Click on the table title **Poverty Status in the Past 12 Months**.

At the top of the page it will say 2018: ACS 1-Year Estimates Subject Tables. Click on the drop down arrow and a list of tables will appear. Click on **2018: ACS 5-Year Estimates Subject Tables**. You need 5-year data because 1-year data will have too small of a sample size to show data on Census tracts. Then right next to where you have selected the 2018 ACS 5-Year Estimates click on **CUSTOMIZE TABLE**.

After you have clicked on CUSTOMIZE TABLE you will be taken to a page with several options across the top of the page. Click on **Geographies**.

After you click on Geographies you will be taken to a page with a list of options on the left of the page, including Nation, Region, Division, State, County, Tract...etc. Click on **Tract**.

There is a dropdown menu for you to select your state. After you have done that, there is a dropdown menu for you to select your county, and then a dropdown menu of the various Census tract numbers in the county. Select the Census Tract number you have found for the street address. Keep clicking on the Census Tract number until you see that it registers at the bottom page as **Selected Geographies**. You have to keep clicking on it until it shows up there.

After your Census tract shows up next to Selected Geographies at the bottom of the page, go up to the top of the page and click on the data set you selected **2018: ACS 5- Year Estimates Subject Tables**. A table will appear showing the total population of the Census Tract, the population for whom poverty status is determined, Below poverty level, and Percent below poverty level.

OKJobMatch Virtual IEP/ISS

The following instructions are for the completion of the Individual Employment Plan/Individual Service Strategy found in the WIOA Program Enrollment section of OKJobMatch. A summary or narrative of each IEP/ISS component must be entered in the virtual IEP, as described in OWDI #XX-2019.

	IEP / ISS Components	Instructions
1.	**Comprehensive/Objective Assessment & Career Research**.	• Identify all comprehensive/objective assessment tools used, including any known assessments given by partner entities. • List the date or dates assessments were completed. • Summarize assessment results. • Provide a brief overview of the participant's employment history. • Document any career research completed by/reviewed with the participant. • Indicate whether participant has a clear understanding of job requirements based on research completed, including labor market information (LMI), when appropriate. • Address the action taken when results of the career research are not in alignment with assessment results. • For information regarding the Objective Assessment required for each Youth participant refer to OWDI #02-2016, Change 1.
2.	**Employment Goals & Achievement Objectives**.	• Identify the employment goal(s) and address alignment with assessment results. • Identify a timeline for achieving the major employment goal, including achievement objectives leading to the goal. • If applicable, identify short term and long term employment goals (e.g., a participant's career pathway).

3.	**Training Goals and Achievement Objectives**.	- Document that training is necessary to achieve the identified employment goal and/or career pathway goals. - Identify whether the participant is currently enrolled in training and needs assistance for completion. - List the type of training, including occupational skills training (OST), on-the-job training (OJT), or other work-based training such as work experience, registered apprenticeship, or a transitional job. **Note:** The justification for work experience or a transitional job must be entered in section 5. - Ensure training is for a demand occupation or required for a career pathway that leads to a demand occupation. - Provide a detailed description of the participant's training plan, including the training provider, the dates of training, and identification of achievement objectives expected or resulting from the training program attendance. - Modifications to the training plan must be documented in the IEP as they occur, including: (1) Date of modification (2) Modification number (3) Identification of what is being modified (i.e., record the need and necessary actions to resolve the need). **Note:** A modified training goal must remain aligned with the participant's career pathway/employment goal and any change to the training plan will require an updated Client Involvement Statement.
4.	**Client Strengths and Attributes**.	- Summarize skills and experiences from prior employment, training, hobbies, volunteer work, and home/family responsibilities as they relate to the employment goal. - Consider any personal characteristics, assets, and resources that can be related to the employment goal.
5.	**Combination of Services to Overcome Needs/Barriers.**	- Address the appropriate combination of services for the participant to achieve their employment goals. The following barriers must be addressed if identified, and necessary services to overcome all identified barriers must be entered. - Basic skills deficient; - School Drop Out; - Lacks skills, training, or a credential; - Criminal record; - English as a Second Language (ESL); - Lack of transportation; - Substance Abuse; - No Driver's License;

		- Lack of Child Care; - Difficulty finding employment; - Poor work history, i.e., chronic unemployment or inconsistent work history; - Homeless; and - Other identified barriers, as observed, stated by the participant, or listed in the client's Demographics section of OKJobMatch. - Include a statement regarding the need for a Transitional Job or Work Experience. - List any short term prevocational skills to be provided, such as communications skills, development of learning skills, personal maintenance skills, professional conduct, etc. - List identified solutions to the needs/barriers listed, including - Who will provide the service - Date service is expected to be started and completed - Document any referrals made to partner agencies and community partners.
6.	**Assistive Technology Needs for Achieving Goals.**	- Address any requested reasonable accommodations without the mention of a disability or details of a disability. - If applicable, enter a general statement regarding requested assistive technology needs, if any, for seamless customer service delivery. - Enter N/A if this section does not apply.
7.	**Client Responsibilities and Agency Responsibilities**.	Include responsibilities required by local policy and/or local procedures that are <u>not</u> addressed in the Client Involvement Statement. **Client Responsibility examples:** - Frequency for contacting the designated WIOA case manager; - Frequency for face-to-face meetings with the WIOA representative; - Requirement to actively seek and accept training related employment upon completion of services, which may include feedback regarding employment search, e.g., application and resume submission, interviews scheduled or completed, and follow-up with employers; - Attend training regularly and provide verification of satisfactory training progress, as requested; - Provision of specific information regarding attained employment before leaving the program, including the name of employer, job title, start date, rate of pay, benefits received or eligible to receive, etc.; - Respond to all surveys and other requests for information after leaving the program, including the follow-up interview; - Timely notification of changes in training status, including non-attendance and adding or dropping classes; - Reporting eligibility for Pell or other grants or financial assistance; - Reporting address or phone number changes; and

		• Other responsibilities, as determined by local policy and procedures. **Responsibilities of WIOA staff may include:** • Oversight/regular monitoring of training activities, • Submission of appropriate paperwork in a timely manner, • Providing regular support and assistance as necessary for program success, • Providing career and job search guidance, • Ensuring appropriate referrals to workshops and partner entities to enhance the client's success in the job market, and • Other responsibilities, as determined by local policy and procedures.
8.	**Economic Need Statement and Planning.**	• Summarize the financial needs articulated by the client through the interview, assessment, and enrollment process. • For the Adult program, enter the Priority of Service Category. • Document Pell eligibility/ineligibility, as well as exploration and documentation of other financial aid options such as Tribal funds, scholarships, TAA, education funding for Veterans, etc. • Note if the participant is in default on student loans and document any steps taken to help the individual get out of default, e.g., the provision of financial literacy information. • Other information as per local policy and procedures.
9.	**Supportive Service Needs.**	This section pertains specifically to supportive services provided with Title I funds, not partner provided services, which are addressed in section 5. • Enter the supportive services provided and a brief statement as to the necessity of the service. • Document the date of provision, amount, etc.; • Provide an explanation of why any requested supportive services were not provided.
10.	**Follow-up Services Planned.**	For individuals in the Adult and DLW programs: • Enter details about planned follow-up services after employment attainment. • Document the services as they occur.
11.	**Performance Goals & Accountability Indicators.**	• List measurable skills gains that are expected according to the training plan. • List the credentials that are expected outcomes of the training goals/training plan. • List planned credential attainment dates.

12.	**Client Progress Review.**	- Include a brief summary of how the individual is progressing in the current phase of their employment plan, based on feedback from the participant, an instructor or supervisor, or documents provided such as grades, certificates of completion, etc. - Indicate the progression made or difficulties encountered during the review period. <u>For example</u>: *Training was successfully completed four months ago but Joe has not yet attained employment. A mock interview was set up with ABC, Inc. and it was determined that he does not interview well and also needs resume assistance. A new entry has been entered in section 5, Combination of Services to Overcome Needs/Barriers.* - Any modifications to the IEP resulting from a progress review must be documented in the appropriate section. For example, employment goal, training goals, supportive services, etc.
13.	**Additional Notes**.	Enter any additional information necessary to the IEP/ISS and success of the client, such as why there is a gap in service. <u>For example</u>: *Joe's mother passed away and he will travel to New York to attend the services and settle her estate. He has made arrangements with the training provider to resume training in three weeks when he returns to Oklahoma.*
14.	**Client Involvement Statement.**	- Virtual attestation to the Client Involvement statement is made in OKJobMatch. - For modifications to the original IEP not conducted in person with the participant, the case manager must schedule an appointment with the participant as soon as possible to review the IEP and obtain the virtual signature to the Client Involvement Statement. - For case management only updates, check the box indicating a client agreement is not required.

Information found in the IEP, does not have to be duplicated in Program Notes, unless required by current Data Validation policy.