

**Sullivan County Center for Workforce Development  
Workforce Innovation and Opportunity ACT (WIOA)  
Youth Program Policies/Procedures**

As the Administrative Entity designated to administer the WIOA Title 1B Youth programs in Sullivan County, the Sullivan County Center for Workforce Development (SCCWD) has, with the approval of the Workforce Development Board of Sullivan Inc., developed the following policies and procedures for the WIOA Youth programs. All policies originate in or in compliance with the Workforce Innovations and Opportunity Act (WIOA).

**Program Description**

The Workforce Innovation and Opportunity Act of 2014 (WIOA), effective July 1, 2015, is a comprehensive reform impacting many of the federally funded workforce development training programs. The intent of the WIOA is to eliminate fragmentation among the numerous training, education and employment programs. Through WIOA local workforce areas have the flexibility to develop service delivery systems that meet local needs. To meet the new WIOA spending requirements for youth services, a minimum of 75% of the local allocation must be expended on services to Out of School Youth (OSY), up to 25% on In School Youth (ISY). In addition, a 20% minimum of funds allocated to the local area must be expended on Work Experience activities for enrolled youth.

WIOA envisions the creation and continuous improvement of a streamlined system that makes available a full range of services to eligible youth. Services such as job and career information, labor market information, job skills, career exploration, and job readiness should be made available to all youth so linkages with the universal access adult system can be developed at an early age. WIOA encourages the development and maintenance of programs that operate on a comprehensive system of identification, preparation and continuous assessment that develops youth toward career and educational goals.

The County and the SCWDB seek to identify providers that address specific barriers youth encounter in developing skills to attain the high school-equivalency diploma, occupational training and/or locating and maintaining long-term employment, including skills and knowledge related to self-sufficiency, financial stability, and career advancement.

**Eligibility and Certification**

Effective July 1, 2015, to participate in the WIOA Youth Program, at a minimum, a youth must:

1. Be a U.S. citizen or non-citizen authorized to work in the U.S.;
2. Register for Military Selective Service, if applicable; and
3. Meet the WIOA In-School Youth (ISY) or Out-of-School Youth (OSY) eligibility criteria specified in this Policy Issuance.

**Out-of-School Youth (OSY)** is defined under WIOA Section 129(a)(1)(b) as an individual who is:

1. Not attending any school;
2. Between the ages of 16-24 at time of enrollment (Note: Participants may continue to receive services beyond the age of 24 once they are enrolled in the program, because age eligibility is based on age at enrollment.); and,
3. One or more of the following:
  - A school dropout;
  - 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;
  - A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English Language Learner (ELL);
  - An individual who is subject to the juvenile or adult justice system;
  - A homeless individual, a runaway, an individual who is in foster care or has aged out of the foster care system, a child eligible for assistance under Section 477 of the Social Security Act (42 U.S.C. 677), or an individual who is in an out of home placement;

- An individual who is pregnant or parenting;
- An individual with a disability; and/or,
- A low-income individual who requires additional assistance to enter or complete an educational Program or to secure or hold employment, as defined by the LWDA Local Plan.

**IN-SCHOOL YOUTH (ISY)**

An ISY is defined by WIOA Section 129(a)(1)(c) as an individual who is:

1. Attending school;
2. Between the ages of 14-21 at the time of enrollment;
3. Low-income; and
4. One or more of the following:
  - Basic skills deficient;
  - An English language learner;
  - An offender;
  - A homeless youth or a runaway, in foster care or has aged out of the foster care system;
  - Pregnant or parenting;
  - A youth who is an individual with a disability; and/or,
  - An individual who requires additional assistance to complete an educational program or to secure or hold employment, as defined by the LWDA Local Plan.

**REQUIRES ADDITIONAL ASSISTANCE DEFINED**

In accordance with WIOA Section 129(a)(1): An individual (including a youth with a disability) who requires additional assistance to enter or complete an educational program, or to secure and hold employment is locally defined by the Sullivan Workforce Development Board as a low-income youth who has been determined to demonstrate any of the following behaviors:

- (a) Chronic absenteeism and truancy from school;
- (b) Chronic underachievement in school;
- (c) Chronic behavior or legal offenses;
- (d) Physical, mental, social/developmental immaturity or impairment or disability;
- (e) Lack of occupational skills/goals; or
- (f) Victim of physical/sexual/psychological abuse and or neglect.
- (g) Has unstable housing.
- (h) Has no access to consistent transportation.
- (i) Has been fired from a job.
- (j) Has been unemployed or underemployed for six out the last twelve months.
- (k) Lives alone or is the main financial support for family.
- (l) Has no family support to complete an education or training program or to secure and hold employment.

Additional indicators of need are:

- (m) Youth who are not currently served by other programs within the community;
- (n) Youth who are living with adults who are substance abusers; or
- (o) Chronic absenteeism from employment

**Documentation:** New York State Department of Labor guidance allows the following documentation for verifying “Youth Requiring Additional Assistance” eligibility:

- Case notes

- WIOA application form signed by applicant
- School records and/or documentation from school official
- Pay stubs, Unemployment system verification, W-2, employer statement
- ISS
- Department of Social Services or other agencies from whom the youth is receiving services
- Self-attestation is acceptable when there is no other way to document. Self- attestation is not acceptable for chronic absenteeism or truancy.

### **BASIC SKILLS DEFICIENT DEFINED**

Basic Skills Deficient with respect to an individual:

- A. who is a youth that the individual has English reading, writing, or computing skills at or below the 8<sup>th</sup> grade level on a generally accepted standardized test; or
- B. is a youth or an adult, that the individual is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual’s family or in society.

### **ENGLISH LANGUAGE LEARNER DEFINED**

WIOA Section 203(7) defines the term “English Language Learner” as an individual who has limited ability in reading, writing, speaking, or comprehending the English language, and (A) whose native language is a language other than English; or (B) who lives in a family or community environment where a language other than English is the dominant language.”

### **OTHER ELIGIBILITY**

In addition to eligibility guidelines above, not more than 5 percent of youth participants may be persons who are not low-income individuals, but who would be an ISY, or an OSY with a secondary school diploma (or its recognized equivalent) and is basic skills deficient, an English Language Learner (ELL), or an individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

### **CO-ENROLLMENT**

In support of the focus on providing an integrated service delivery system that leverages resources across all partners, youth participants may be co-enrolled in both the WIOA Youth Program and other related programs when appropriate. Youth participants must meet eligibility criteria for participation within each program before co-enrollment occurs.

### **OBJECTIVE ASSESSMENT**

Once eligibility has been determined, WIOA youth staff or contracted youth program provider shall conduct an objective assessment of each participant’s academic levels, skill levels, and service needs to properly identify the appropriate services and career pathways.

The assessment must include a review of:

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

If the participant has been assessed by a provider to pursue another education or training program within the last year, the WIOA Youth Program provider may use that existing assessment to fulfill program requirements. When used, the provider must retain copies of previous assessment(s) and/or assessment result(s) in the participant’s case file.

## **INDIVIDUALIZED SERVICE STRATEGY (ISS)**

The Individualized Service Strategy (ISS) serves as a guide for both the participant and staff by outlining the necessary and recommended next steps. Through the ISS, staff should aim to identify the appropriate combination and sequence of services to help the participant fulfill goals and program requirements. Of critical importance to the development of an effective ISS, staff must interpret assessment results and incorporate those results into service planning and activities. This will help to ensure that youth achieve established goals and obtain desired career and educational outcomes. Considering individual needs, abilities and goals, the ISS must map out anticipated progress.

WIOA Youth Program providers must develop an Individualized Service Strategy (ISS) with each youth participant after he or she has been objectively assessed. When developing the ISS, the Youth staff and participant must jointly take the objective assessment results into account. The Youth staff must also take the performance measures into account when developing goals for the ISS.

In the ISS, career pathways must be identified and must, at a minimum, include an examination of short-term and long-term:

- Education goals;
- Employment goals;
- Appropriate achievement objectives or benchmarks/milestones; and,
- Appropriate services to meet identified goals.

Once completed, the ISS must be signed by the Youth staff and the participant. It is a requirement that each participant receives a signed copy of his or her ISS and all subsequent updates as progress is documented.

If an ISS has been developed for a participant to pursue another education or training program within the last quarter, then the Youth staff may use the existing ISS to fulfill program requirements.

The Youth staff must review the ISS with each youth participant **every 90 days**, at a minimum, to review progress and make necessary adjustments. As the ISS is a living document that should be adjusted as the participant and assigned staff deem necessary, Youth staff should update the document to reflect changes and update the OSOS system. Examples of updates include, but are not limited to: participant progress; completed activities or benchmarks; rewriting new goals once objectives have been met; outlining a clear direction or career pathway for the participant.

## **YOUTH PROGRAM ELEMENTS**

Based on assessment results and the ISS, youth participants shall be provided access to WIOA Youth Program elements that will support attainment of a secondary school diploma, entry into postsecondary education, and career readiness. All activities must be documented within the NYS One Stop Operating System (OSOS).

The WIOA Youth Program consists of 14 key program elements:

1. Tutoring, skills training, and dropout prevention;
2. Alternative secondary school services;
3. Paid and unpaid work experiences;
4. Occupational skills training;
5. Leadership development opportunities;
6. Supportive services;
7. Mentoring;
8. Follow-up services;
9. Counseling;
10. Concurrent education and workforce preparation activities;
11. Financial literacy education;
12. Entrepreneurial skills training;

13. Labor Market Information (LMI);
14. Preparing for Post-Secondary Education and training.

### **TUTORING, SKILLS TRAINING & DROPOUT PREVENTION**

Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies 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 post-secondary credential.

### **ALTERNATIVE SECONDARY SCHOOL SERVICES**

At the federal level, an alternative school is defined as a public secondary school that addresses needs of students that typically cannot be met in a regular school, provides nontraditional education, serves as an adjunct to a regular school, or falls outside the categories of regular, special, or vocational education.

Of these programs, most target students with behavioral issues, students who were in contact with law enforcement, and/or students who were having academic difficulties, as evidenced by low grades or being behind grade level. Many also target students with attendance problems.

### **PAID & UNPAID WORK EXPERIENCES**

Paid and unpaid work experiences, which involve academic and occupational education, are prioritized under WIOA. Annually, the program must spend a minimum of 20 percent of non-administrative funds on work experience, which may include:

- Summer employment opportunities;
- Employment opportunities during the school year;
- Pre-Apprenticeship programs;
- Internships;
- Job shadowing; and,
- On-the-job training (OJT) opportunities.

### **OCCUPATIONAL SKILLS TRAINING**

Occupational skills training leads participants to proficiency in performing actual tasks and technical functions that are required by certain industries. After completing this training, participants may receive industry recognized certificates. Priority consideration will be given for training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the local area involved.

### **CONCURRENT EDUCATION & WORKFORCE PREPARATION ACTIVITIES**

When offered concurrently, evidence suggests that the combination of education and workforce preparation activities and training, for a specific occupation, is beneficial to WIOA Youth Program participants. Examples include, but are not limited to:

- Internships or job shadowing combined with NY TASC Prep classes;
- Computer training coupled with basic skills training or literacy activities;
- Summer work activities coupled with contextual learning on the job;
- Job readiness activities (resume writing, interviewing skills, applying for jobs online) combined with
- TASC Exam classes or tutoring; or,
- Occupational skills training coupled with intensive medical terminology tutoring

### **LEADERSHIP DEVELOPMENT OPPORTUNITIES**

Leadership development opportunities encourage responsibility and immerse participants in positive social and civic behaviors. Examples include, but are not limited to:

- Exposure

- Community and service learning projects;
- Peer-centered activities, including peer mentoring and tutoring;
- Organizational and team work training;
- Training in decision making, including determining priorities;
- Life skills training such as parenting, work behavior training, and budgeting of resources; civic engagement activities; or,
- Activities which put youth in a leadership role.

### **SUPPORTIVE SERVICES**

Supportive services provide financial assistance to participants who would not be able to participate otherwise. As needed, the WIOA Youth Program may offer supportive services to eligible participants with housing, transportation, business attire, tools, work or training equipment, child or dependent care, graduation fees, union fees, clothing for interviews or job fairs, and more.

Before a participant is approved for supportive services, Youth staff should ensure that other resources have been explored and no other resource is available to pay for the necessary service. Youth Staff must work with fiscal staff and follow established county/federal fiscal policies on procurement of services, approvals and required documentation.

**Any exceptions to the supportive service limits must be approved in writing by the Director.**

#### ✓ **Transportation Allowance**

Transportation allowances may be available to participants who are in approved training programs. The transportation allowance may only cover the cost of traveling to and from Youth Program-related activities.

Google Maps may be used to determine mileage. Mileage is calculated from the participant's home address to the training, interview, job fair, or job site.

- a. Assistance with car insurance payments not to exceed \$1,000.  
Assistance with car repairs not to exceed \$1,000  
*Car must be registered to the youth. Must provide 3 quotes for insurance; must provide 3 estimates for vehicle repairs from a certified auto repair business.*
- b. Gas cards to offset costs of participating in activities.  
Maximum gas cards allowed - \$300
- c. Bus tickets and/or taxis. Staff must obtain three (3) quotes for taxis and utilize the least expensive. Any exceptions must have written justification and must be approved by the Director.
- d. Driving lessons, required 5-hour course, defensive driving class. If a youth fails their driving test they may receive 2 WIOA supported additional driving lessons before retake.

#### ✓ **Business Attire, Tools, and Related Equipment – Maximum Allowed - \$500**

The WIOA Youth Program may assist participants with the costs of business attire, tools and/or equipment that are required for participation in approved training programs or new, full-time jobs. Examples of covered items include: laptop computers, tablets, uniforms, steel toe boots, nursing scrubs, stethoscopes, blood pressure cuffs, and worker tools.

Payments will be made on the services identified on the ISS or documented follow-up activities. Payments must be made based on the market value for uniforms, tools and/or related equipment.

#### ✓ **Needs Related Payments – Maximum Allowed - \$1,500**

These include, but are not limited to Utilities i.e.: Electricity, Water, Internet Service, Cell Phones and Prepaid Cell Phone Installments. All utility payments must be based on service provider's authentic billing indicating participant's name and

address, which must match the address on file at Center for Workforce Development. In the case of shared utility billing, supportive services will only be made available to satisfy the participant's divided portion of any shared expense.

✓ **Housing Assistance – Maximum Allowed - \$2,000**

The WIOA Youth Program may assist participants with housing costs that include security deposit, rent and/or dorm fees. All other sources of funding must be explored first.

✓ **Academic Fees**

The WIOA Youth Program may provide funding for graduation fees, exam fees, and certificate fees that directly relate to a participant's ISS. Payments are based on the costs of academic fees for the participant's degree or certificate program.

✓ **Clothing for Interviews and Job Fairs – Maximum Allowed - \$300**

The WIOA Youth Program may assist participants with the costs associated with clothing for job interviews and/or job fairs. Examples of the items that this supportive service covers include: dress shirts, ties, business suits or suit coats, dresses, dress pants, and dress shoes. Payments are based on documentation of an upcoming interview or job fair. The payment must be made on the market value of the item.

✓ **Child or Dependent Care – Maximum Allowed - \$1,500**

When daycare costs for a child or dependent are not subsidized, or exceed the amount subsidized, the WIOA Youth Program may assist participants with the costs.

To receive this payment, the dependent needing daycare must be:

1. Under the age of 13;
2. A spouse who is physically or mentally incapable of self-care and has the same principal address of the program participant; or,
3. A parent who is physically or mentally incapable of self-care.

Payments are based on services identified on the ISS of actively engaged youth participants, or as part of documented follow-up activities. Daycare costs are approved only for days that the participant is in training or at work. Before submitting a payment request, the following conditions must be met.

To receive child care payments, the participant must complete ALL of the following steps:

1. Provide proof that participant has contracted with an approved child care provider; AND,
2. Document familial relationship to person in care.

To receive dependent care payments, the participant must complete ALL of the following steps:

1. Provide legal proof of adult dependent's condition that causes the need for care;
2. Provide proof that participant has contracted with an approved daycare provider; AND,
3. Document relationship to person in care.

**\*\*\*NOTE\*\*\* SUPPORTIVE SERVICES ARE A SEPARATE PROGRAM ELEMENT AND CAN'T BE USED TOWARD THE 20% WORK EXPERIENCE REQUIREMENT, EVEN IF THESE SUPPORTIVE SERVICES ASSIST THE YOUTH IN PARTICIPATING IN THE WORK EXPERIENCE.**

## **MENTORING**

Adult mentoring should occur both during and after program participation, for duration of at least 12 months.

Mentoring should 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. It should, when possible, include a mentor who is an adult other than the assigned youth staff. While group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a

minimum, the local youth program should 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.

### **FOLLOW-UP SERVICES**

After a youth participant has completed the program, the applicable follow-up services will occur for at least 12 months to assist with the participant's long-term success. Examples of follow-up services include, but are not limited to:

- Transportation assistance;
- Childcare or dependent care assistance;
- Referrals to community resources;
- Referrals to medical services;
- Assistance with uniforms or other work attire and work-related tools;
- Tracking progress on the job;
- Assistance in securing a better paying job, career development, or further education;
- Assistance with work-related problems;
- Adult mentoring;
- Tutoring; or,
- Leadership development.

### **COUNSELING**

Counseling and comprehensive guidance should be offered to youth participants as needed, and could include referrals to drug and alcohol abuse counseling or other counseling outside of the WIOA Youth Program.

### **FINANCIAL LITERACY EDUCATION**

WIOA recognizes that establishing good financial knowledge and behaviors early in life is important for achieving long-term personal financial well-being. Research on knowledge retention and program effectiveness suggests that people may absorb information and advice best when it is most relevant to their lives. This suggests that the most effective programs for youth participants would focus on decisions regarding bank account, debit and credit cards, consumer rights and protections, interest rates, budgeting in the short- and long-run, paychecks and benefits, emergency savings and retirement funds, housing, health coverage and student financial aid including loan disbursement and repayment.

### **ENTREPRENEURIAL SKILLS TRAINING**

WIOA identifies entrepreneurship and small business development as an important employment option for populations that have barriers to employment. Youth may benefit from the leadership and financial management skills provided by entrepreneurship work experience, particularly in a tight labor market where traditional jobs for youth may be scarce. For unemployed youth, entrepreneurship may offer an income stream to support a family in the interim. Self-employment may offer youth participants with disabilities greater workplace flexibility and income opportunities. Similarly, youth participants in rural areas may have geographic and transportation barriers to employment, or they may have to travel outside of the region for employment. Entrepreneurship may allow these individuals to work locally, even at home, to contribute to their economic stability.

Entrepreneurship comes in many forms, and results in businesses that range in size and scope from very small, low-cost ventures, to large, high-cost ventures. Approaches to training and support for entrepreneurship vary greatly along this continuum. Microenterprise typically refers to very small businesses with just a few employees that require very little capital to start. The term encompasses businesses such as repair or cleaning services, pet-grooming, computer technology, specialty foods, jewelry, arts and crafts, gifts, clothing and textiles, childcare, environmental products and services, etc. These small companies create employment for the owner and often other family members, or they may grow large enough to employ other members of the community. On the other end of the size and scope spectrum, entrepreneurship takes the form of high growth/high-value companies that focus on innovation and growth. These companies facilitate the transfer of innovative research to the commercial marketplace and generate jobs and tax



revenue. Between microenterprise and high-growth/high-value companies are the many small businesses that employ between 10 – 100 employees.

Youth expressing an interest in starting their own business may be connected with the County Planning Department, County Chamber of Commerce or Partnership for Economic Development for services.

### **LABOR MARKET INFORMATION (LMI)**

Labor Market Information (LMI) is important, as data provide clear insight into a local area's current and projected in-demand industry sectors, employment, unemployment, wages, jobs, and more.

### **PREPARING FOR POST-SECONDARY EDUCATION & TRAINING**

Post-secondary education and training afford participants long-lasting economic and job opportunities. Therefore, activities that help youth prepare for, and transition to, post-secondary education and training are key to successful outcomes.

### **INDIVIDUAL TRAINING ACCOUNTS (ITAs)**

OSY participants aged 18-24 years old may access training services through either an Individual Training Account (ITA) or a training contract, when determined appropriate through the objective assessment and ISS. Training services may be provided if the youth staff determine that the individual:

- Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to, or higher than, wages from previous employment;
- Is in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to, or higher than, wages from previous employment;
- Has the skills and qualifications, with or without reasonable accommodations, to successfully participate in the selected program of training services.

Training services must be linked to in-demand employment opportunities in the LWDA or the geographic area in which the participant is willing to commute or relocate. The local demand occupation list can be found on the [www.labor.ny.gov](http://www.labor.ny.gov) website. The selection of training services must be:

1. Conducted in a manner that maximizes customer choice;
2. Linked to in-demand occupations, based on LMI;
3. Informed by the performance of relevant training providers; and,
4. Coordinated with other sources of assistance to the fullest extent possible.

### **TRAINING CONTRACTS**

Certain circumstances may instead deem a contract for training services appropriate. The following are examples of instances which may warrant a training contract versus an ITA:

- OJT, which may include placing participants in a Registered Apprenticeship (RA) program;
- Customized training;
- Incumbent worker training;
- Transitional jobs;
- If there is a training service program of demonstrated effectiveness that is offered in a LWDA by a community-based organization, a private organization,
- If the Local Board determines that the most appropriate training could be provided by an institution of higher education;

## **PERFORMANCE**

The performance accountability system is critical in assessing the effectiveness of programs with the goal of ensuring that participants gain the skills needed to succeed in the 21st century economy.

Effective July 1, 2016, the WIOA Title I Youth Program's performance is measured by the following six indicators of performance:

1. Placement in employment, education, or training during 2nd quarter after exit;
2. Placement in employment, education, or training during 4th quarter after exit;
3. Median earnings;
4. Credential rate;
5. Measurable skills gain; and,
6. Effectiveness in serving employers.

### **1. Placement in Employment, Education or Training – Q2 after Exit**

This performance indicator measures the percentage of program participants who are in education or training activities, or in unsubsidized employment, during the second quarter after exit from the program.

### **2. Placement in Employment, Education or Training – Q4 after Exit**

This performance indicator measures the percentage of program participants who are in education or training activities, or in unsubsidized employment during the fourth quarter after exit from the program.

### **3. Median Earnings**

This performance indicator measures the median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program. This indicator measures earnings in the second quarter after exit, which is the same time frame in which states will measure if program participants are in education or training activities or subsidized employment.

### **4. Credential Rate**

This performance indicator measures the percentage of program participants who obtain a recognized Postsecondary credential, or a secondary school diploma or its recognized equivalent, during participation in or within 1 year (365 days) after exit from the program.

Program participants who obtain a secondary school diploma or its recognized equivalent shall be included in the percentage counted as meeting the criterion only if such participants, in addition to obtaining the diploma or its recognized equivalent, have obtained or retained employment, or are in an education or training program leading to a recognized postsecondary credential within 1 year after exit from the program.

### **Measurable Skills Gain**

This performance indicator measures the percentage of program participants who, during a program year, were in an education or training program that leads to a recognized postsecondary credential or employment, and who are achieving measurable skill gains toward such a credential or employment goal.