

TRANSMITTAL #1

MEMORANDUM

October 28, 2016

TO: Youth Committee

FROM: Susan Simmons, Deputy Director 

SUBJECT: Youth Program Design

ACTION REQUESTED: Approve Elements for Implementation for WIOA Youth Service Delivery

BACKGROUND:

To establish a new WIOA youth program design, the Youth Committee must make recommendations to the Workforce Development Council in three areas: 1) Who will be served? 2) What services will be delivered? and 3) How will services be provided? A review of progress and related information is provided in this section.

1. WHO WILL BE SERVED?

The Youth Committee reviewed input from other service providers across the state to identify gaps in services to youth and to discuss how WIOA resources might best be utilized in leveraging other partner resources. The committee also reviewed extensive amounts of demographic data as well as national strategic direction to serve those most in need youth in Idaho. The Youth Committee's priority groups for WIOA youth program services were identified below and are followed by additional criteria recommended for implementation that were approved by the Workforce Development Council:

- Low-income youth involved with the juvenile justice system;
 - Low-income youth exiting foster care;
 - Low-income youth that are pregnant and/or parenting; and
 - Low-income youth with disabilities.
- a) Have program enrollment and participation reflect the incidence of population in the areas where programs operate.
 - b) Focus WIOA youth program services exclusively to out-of-school youth throughout the state.

2. WHAT SERVICES WILL BE DELIVERED?

The WIOA Act requires access to program elements that, if not commonly available to eligible youth, must be made available with WIOA youth program resources. WIOA outlines a broader youth vision that supports an integrated service delivery system and provides a framework through which states and local areas can leverage other federal, state, local, and philanthropic resources to support eligible youth. *If an activity is not funded with WIOA funds, the Workforce Development Council must ensure that those activities are closely connected and coordinated with the state's workforce development system.* States are expected to determine which elements youth programs will provide as part of their youth service design.

WIOA section 129(c)(2) includes 14 program elements, which include the original 10 program elements under WIA (which have been consolidated to nine as the summer employment opportunities program element is now a sub-element under paid and unpaid work experiences) and 5 new program elements. The five new program elements are: financial literacy education; entrepreneurial skills training; services that provide labor market and employment information about in-demand industry sectors or occupations available in the local areas; activities that help youth prepare for and transition to post-secondary education and training; and education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster. The 14 elements may be provided in combination or alone at different times during a youth's development, as determined appropriate for each individual youth based on each participant's objective assessment and individual service strategy. The 14 elements are:

- 1) *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;
- 2) *Alternative secondary school offerings;*
- 3) *Paid and unpaid work experiences* that have as a component academic and occupational education, which may include—(i) *summer employment opportunities* and *other employment opportunities* available throughout the school year; (ii) *pre-apprenticeship programs;*(iii) *internships and job shadowing;* and (iv) *on-the-job training opportunities;*
- 4) *Occupational skill training*, which shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area involved, if the local board determines that the programs meet the quality criteria prescribed for eligible training providers;
- 5) *Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster-* This program element reflects the integrated education and training model and requires integrated education and training to occur concurrently and contextually with workforce preparation activities and workforce training. This program element describes how workforce preparations 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.

- 6) *Leadership development opportunities*, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate;
- 7) *Supportive services*;
- 8) *Adult mentoring*- Mentoring may take many forms, but at a minimum must include a youth participant matched with an individual adult mentor other than the participant's career planner. Mentoring services may include group mentoring, mentoring via electronic means, and other forms as long as it also includes individual mentoring from an assigned mentor.
- 9) *Follow-up services for a minimum of 12 months after last program activity*- the services provided to youth participants after program exit to ensure success in established outcomes, such as placement into post-secondary education and training or employment.
- 10) *Comprehensive guidance and counseling, including drug and alcohol abuse counseling, and referrals.*
- 11) *Financial literacy education* - supporting the ability of participants to create budgets and manage spending, credit and debt, initiate savings plans, and make informed financial decisions
- 12) *Entrepreneurial skills training* - Entrepreneurship education that provides an introduction to the values and basics of starting and running a business. This may also include business plan development and the skills associated with them.
- 13) *Labor market information and career information services*
- 14) *Activities that help youth prepare for and transition to postsecondary education and training*

Attachment #1 includes a One Stop Survey of the availability of the elements in the service area. It also includes a more in-depth analysis of what is expected of states as they implement the WIOA youth program and the required elements. One of the expectations of WIOA youth programs is to avoid duplication and be as efficient as possible. This ensures most of the available resources are directed towards youth. Those elements found to be commonly available to youth, especially low-income youth, will be *coordinated* with other providers in the communities, rather than purchased with WIOA funds.

3. HOW WILL SERVICES BE PROVIDED?

The decisions regarding who will be served and what services will be provided will be incorporated into options regarding how services will be provided in the future. In addition, other federal and state decisions must also be incorporated in the service delivery of the youth program. The information that follows will help the Youth Committee understand how service delivery under WIOA may be structured.

The WIOA Act specifies three program design components and requires that local boards ensure that all 14 program elements are available in their local area. The Act permits program flexibility in determining the definition, scope and characteristics of the elements.

The three components, discussed at 681.420, provide the framework for the youth program design.

- 1) an objective assessment of each participant, including intake;
- 2) individual service strategies for each participant that identifies appropriate pathways including education and employment goals; and

- 3) provide case management for youth participants, including follow up services.

Federal and State Decisions

- a. Federal regulations and USDOL guidance have advocated enhanced integration of youth services through the One Stop system. Any options for service delivery will incorporate *out-of-school youth* services through the One Stop offices.
- b. To maximize delivery of participant services with dwindling dollars, the Workforce Development Council has previously asked for a 50/50 split between staff and participant expenditures in all WIA programs. This policy will continue to be applied to out-of-school youth funds unless a recommendation is made otherwise.
- c. The new Act and regulations (681.400(b)) clarify awarding a grant on a competitive basis **does not apply to the design framework component** where these services are provided by the grant recipient/fiscal agent. In Idaho, the grant recipient/fiscal agent is the Idaho Department of Labor. The design framework includes intake, assessment, development of an individual's service plan and overall case management. The list below, carried over from WIA, describes each of the activities that make up the design framework component:
 - **Intake** activities may involve registration, eligibility determination, pre-screening potential participants and general orientation and **referrals to other services which may include providers of the 14 program elements**.
 - **Objective assessment** is a process that identifies service needs, academic levels, goals, interests, skill levels, abilities, aptitudes, and supportive service needs and measures barriers and strengths. It includes a review of basic and occupational skills, prior work experience, employability potential and development needs. The result of an assessment is an individual service strategy.
 - **Individual Service strategy** is the plan which identifies the employment goals, educational objectives and prescribes appropriate services for the participant. Individual service strategies should also include providing information on local youth activities and **referrals to the providers of those services**.
 - **Case management** is appropriate to review service strategies with the participant periodically and make modifications when needed. In fulfilling its overall service strategy for youth, the entity providing the program design framework component may use a case management approach to determine whether goals in the individual service strategy are being met. This approach ensures that youth are actively engaged in receiving services from eligible service providers, and that participants receive **follow-up services** (#9 from the elements list on page 3) when exiting the program. These types of case management services may be provided directly by the local grant recipient without a competitive selection, as part of the overall activities provided by eligible service providers or may be competitively selected separately.

Staff Recommendation:

Staff recommend the Youth Committee identify the elements the state’s WIOA Youth program will implement as part of its youth service design. This will allow staff to proceed with the development of service delivery options - section #3 of the transmittal, *How will services be provided?* – for the next Youth Committee meeting and subsequent recommendation to the Workforce Development Council. Youth Committee members are also strongly encouraged to review this section in preparation for the next meeting.

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ATTACHMENT 1

**WIOA YOUTH PROGRAM DESIGN
WHAT ELEMENTS TO PROVIDE?**

A. ONE STOP COMMUNITY SURVEY

All One Stop Centers and youth service providers were asked to report on the availability of the 14 youth program elements to low income youth without WIOA resources. Attachment #2 provides specific detail for each One Stop response. The results below summarizes the responses.

1. Tutoring, study skills training, instruction and evidence-based dropout prevention strategies
AVAILABLE IN ALL COMMUNITIES
2. Alternative secondary school offerings or dropout recovery services
AVAILABLE IN ALL COMMUNITIES
3. Paid/unpaid work experiences, including summer employment opportunities, pre-apprenticeship programs, internships and job shadowing and on-the-job training.
LIMITED IN ALL COMMUNITIES
Opportunities broaden when economy is on up-swing, however not necessarily linked to academic/occupational training; opportunities further limited by participant barriers
4. Occupational skill training
PELL GRANTS AVAILABLE BUT LIKELY NOT AVAILABLE WITHOUT WIOA RESOURCES
5. Education offered concurrently with workforce preparation/training
SEE #3 ABOVE
6. Leadership development opportunities, which include community service and peer-centered activities encouraging responsibility and other positive social behaviors
HISTORICALLY INTERTWINED WITH WORK-LEARNING
7. Supportive services
COLLABORATING W/OTHER ORGANIZATIONS, HOWEVER NOT ALL NEEDS COVERED
8. Adult mentoring
NOT AVAILABLE IN APPROX ½ OF COMMUNITIES
9. Follow-up services for a minimum of 12 months after last program activity
NOT AVAILABLE WITHOUT WIOA RESOURCES

10. Comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals

AVAILABLE IN ALL COMMUNITIES

11. Financial literacy education

AVAILABLE IN MOST COMMUNITIES, BUT LIMITED IN FOUR SMALLER LOCATIONS. FURTHER STUDY IS RECOMMENDED, I.E. INTERNET OPTIONS

12. Entrepreneurial skills training

LIMITED AVAILABILITY IN ALL COMMUNITIES

13. Labor Market Information

AVAILABLE IN ALL COMMUNITIES

14. Transition activities to post-secondary education/training

HISTORICALLY WOVEN INTO SERVICES TO YOUTH THAT ARE PLANNING TO ENTER THOSE AREAS

YOUTH COMMITTEE ~ Which of the 14 elements are commonly available to Idaho's low income youth without WIOA resources? These 14 elements may be accessed via partnerships and referrals rather than dedication of WIOA resources.

B. DELIVER INDIVIDUALIZED SERVICES OR BRING A FOCUS TO SPECIFIC INDUSTRIES OR MODALITIES?

Individualization of youth services is reiterated throughout the youth program regulations.

Flexibility is key to these regulations and determining appropriate program offerings for each individual youth. It is expected that programs and activities will provide needed guidance for youth that is balanced with appropriate consideration of each youth's involvement in his or her training and educational plan.

WIOA calls for customer-focused services based on the needs of the individual participant. This includes the creation of career pathways for youth in all title I youth programs, including a connection to career pathways as part of a youth's individual service strategy in the youth formula funded program. In addition, many services under title I youth programs are based on the individual needs of participants.

To the extent possible, local programs must ensure that youth participants are involved in the selection of their educational and training activities.

WIOA includes a major focus on providing youth with work experience opportunities. WIOA prioritizes work experiences with the requirement that local areas must spend a minimum of 20 percent of local area funds on work experience. Under WIOA, work experience becomes the most important of the program elements.

Section 681.420(a) makes it clear that the local board must ensure that all 14 elements are available for youth in their local area. However, 681.460(b) provides that a local program is not required to provide all 14 program elements to every participant. Local program operators must determine what program elements will be provided to each youth participant based on the participant’s objective assessment and service strategy.

All youth must receive at least 12 months of follow-up services, fully described in 681.460(a)(9).

YOUTH COMMITTEE ~ Should the youth program pursue a participant-based approach to serving youth? Or should it incorporate a sector-strategy approach, targeting high-demand, high-growth occupations in expanding industries?

C. BRING YOUTH INTO THE ONE STOP SYSTEM

Subpart D of the regulations explains that the youth program is a required One-Stop partner. Links between the youth program and the One-Stop system may include those that facilitate:

- The coordination/provision of youth activities
- Connections to the job market and employers;
- Access for eligible youth to information and services; and
- Other activities designed to achieve the purposes of the youth program.

The Summary and Explanation of the WIOA Interim Rules, “...reiterates the connections between the youth program and the One-Stop system that were provided in the WIA regulations...The intent behind this section is to encourage staff working with youth under titles I, II, and IV of WIOA to coordinate better services for youth. This could include youth-focused One-Stop centers in locations where youth tend to gather and making One-Stops more accessible to youth.” Below is an excerpt from the WIA Final Rules which is referenced above, noting the program’s focus and purpose in helping youth access services:

WIA’s intent is to introduce youth, particularly out-of-school youth, to the services of the One-Stop system early in their development and to encourage the use of the One-Stop system as an entry point to obtaining education, training and job search services.

Further, the regulations support strong connections between youth program activities and the One-Stop service delivery system, so that youth learn early in their development how to access the services of the One-Stop system and continue to use those services throughout their working lives.

D. BROAD COORDINATION AND LINKAGES

681.430 clarifies that concurrent enrollment is allowable for youth served in the adult program, dislocated worker program, adult education programs under title II of WIOA, and other programs, in order to broaden options for serving youth.

Youth who are 18 through 24 years old may participate in youth and adult programs concurrently, as appropriate for the individual. Such individuals must meet the eligibility requirements under the applicable youth or adult criteria for the services received.

Section 681.420 of the WIOA Interim Rules clarifies the required objective assessment and/or individual service strategy is not required if the program provider determines it is appropriate to use a recent assessment/service strategy that was developed under another education or training program.

Youth programs should provide a systematic approach that offers a broad range of coordinated services. Availability of all 14 elements must be established in the youth program design. If an element is available via other local youth services organizations, linkages and coordination must be established for seamless service, rather than duplication of the service with WIOA funds. Programs must ensure non-duplication of services.

Attachment #2 - One Stop Survey Detail

PY2015 WIOA Youth Program Elements - Availability	Blackfoot	Boise	Bonnors Ferry	Canyon	Grangeville	Idaho Falls	Lewiston	Magic Valley	McCall	Meridian	Mini-Cassia	Moscow	Mt. Home	Orofino	Pocatello	Rexburg	Salmon	Sandpoint	Silver Valley	St. Maries
(A) (i) tutoring, (ii) study skills training, (iii) instruction, and (iv) evidence-based dropout	Available at No Cost	Available at No Cost	Available at No Cost	Available at No-Cost	Available at No-Cost	Available at No-Cost	Available at No Cost	Available at No Cost	Available at No Cost	Available at No-Cost	Available at No-Cost	Available at No Cost	Available at No-Cost	Available at No Cost	Available at No-Cost	Available at No-Cost				
(B) (i) alternative secondary school services or (ii) dropout recovery services, as	Available at No Cost	Available at No Cost	Available at No Cost	Available at No-Cost	Available at No-Cost	Available at No-Cost	Available at No Cost	Available at No Cost	Available at No Cost	Available at No-Cost	Available at No-Cost	Available at No Cost	Available at No-Cost	Available at No Cost	Available at No-Cost	Available at No-Cost				
(C) paid and unpaid work experiences, which may include— (i) summer employment opportunities; (ii) pre-apprenticeship programs;(iii) internships/job shadowing; and (iv) OJT opportunities;	Limited	Limited	Not Available	Limited	Not Available	Limited	Limited	Limited	Not Available	Limited	Limited	Not Available	Not Available	Not Available	Limited	Limited	Not Available	Limited	Not Available	Not Available
(D) occupational skill training,	Not Available																			
(E) education offered concurrently with workforce prep/training;	Limited	Limited	Not Available	Limited	Limited	Limited	Not Available	Limited	Limited	Limited	Not Available	Not Available	Not Available	Not Available						
(F) leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate;	Limited	Limited	Limited	Limited	Not Available	Limited	Limited	Limited	Not Available	Limited	Limited	Not Available	Not Available	Not Available	Limited	Limited	Not Available	Not Available	Not Available	Not Available
(G) supportive services;	Limited																			
(H) adult mentoring	Limited	Limited	Limited	Limited	Not Available	Limited	Limited	Limited	Not Available	Limited	Limited	Limited	Not Available	Not Available	Limited	Limited	Not Available	Limited	Not Available	Not Available
(I) 12-mos followup;	Not Available																			
(J) comprehensive guidance and counseling;	Available at No Cost	Available at No Cost	Available at No Cost	Available at No-Cost	Available at No-Cost	Available at No-Cost	Available at No Cost	Available at No Cost	Available at No Cost	Available at No-Cost	Available at No-Cost	Available at No Cost	Available at No-Cost	Available at No Cost	Available at No-Cost	Available at No-Cost				
(K) financial literacy education;	Available at No Cost	Available at No Cost	Available at No Cost	Available at No-Cost	Limited	Available at No-Cost	Available at No Cost	Available at No Cost	Limited	Available at No-Cost	Available at No-Cost	Available at No Cost	Available at No Cost	Limited	Available at No Cost	Limited	Limited	Available at No Cost	Limited	Available at No-Cost
(L) entrepreneurial skills training;	Not Available	Limited	Not Available	Limited	Not Available	Limited	Limited	Limited	Not Available	Limited	Not Available	Limited	Not Available	Not Available	Limited	Limited	Not Available	Not Available	Not Available	Not Available
(M) Labor Market Info	Available at No Cost	Available at No Cost	Available at No Cost	Available at No-Cost	Available at No-Cost	Available at No-Cost	Available at No Cost	Available at No Cost	Available at No Cost	Available at No-Cost	Available at No-Cost	Available at No Cost	Available at No-Cost	Available at No Cost	Available at No-Cost	Available at No-Cost				
(N) Transition activities to postsecondary ed/training.	Available at No Cost	Available at No Cost	Available at No Cost	Available at No-Cost	Available at No-Cost	Available at No-Cost	Available at No Cost	Available at No Cost	Limited	Available at No-Cost	Available at No-Cost	Available at No Cost	Limited	Available at No Cost	Limited	Limited				

Available at No-Cost - Services available to youth participant at no charge. A sufficient number of service providers available in the local area to offer these services to meet the need of area youth.

Limited - Services may be available to a youth but in somewhat of a limited capacity, usually due to a reduced number of providers. Other providers may be available to offer services at a cost.

Not Available - Services may be provided to youth but usually at such a significant cost that they can't obtain the service.