

WIOA YOUTH PROGRAM REQUIREMENTS

PURPOSE

This policy provides the guidance and establishes the procedures regarding the *Workforce Innovation and Opportunity Act* (WIOA) youth program, including the 75 percent out-of-school (OS) youth and 20 percent work experience minimum expenditure requirements. This policy applies to Workforce Development Board of Ventura County (WDBVC), contractors and its subrecipients., and is effective immediately.

This policy supersedes Local Policy Bulletin #2019-10. Retain this policy until further notice.

This policy contains some state-imposed requirements. All state-imposed requirements are indicated by ***bold, italic*** type.

SCOPE

The Workforce Development Board of Ventura County (WDBVC), contractors and its subrecipients.

REFERENCES

WIOA (Public Law 113-128)

- Title 2 *Code of Federal Regulations* (CFR) Part 200: “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (Uniform Guidance)
- Title 2 CFR Part 2900: “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (Department of Labor [DOL] Exceptions)
- Title 20 CFR Part 681: “Youth Activities under Title I of the WIOA”
- Title 20 *United States Code* (U.S.C.) Section 1401: “Definitions”
- Training and Employment Guidance Letter (TEGL) 21-16, *Third WIOA Title I Youth Formula Program Guidance* (March 2, 2017)
- TEGL 8-15, Subject: *Second Title I WIOA Youth Program Transition Guidance* (November 17, 2015)
- TEGL 23-14, Subject: *WIOA Youth Program Transition* (March 26, 2015)
- TEGL 19-14, Subject: *Vision for the Workforce System and Initial Implementation of the WIOA* (February 19, 2015)
- TEGL 12-14, Subject: *Allowable Uses and Funding Limits of Workforce Investment Act (WIA) Program Year (PY) 2014 funds for WIOA Transitional Activities* (October 28, 2014)

- TEGL 13-09, Subject: *Contracting Strategies That Facilitate Serving the Youth Most In Need* (February 16, 2010)
- California *Education Code* (EC) Sections 47612.1, 58500, and 66010
- California Unemployment Insurance Code Section 14209
- Workforce Services Directive WSD16-1, Subject: *WIOA Youth Program Requirements* (September 16, 2016)

POLICY AND GUIDELINES

Definitions:

Adult Education – academic instruction and education services below the postsecondary level that increases an individual’s ability to: read, write, and speak in English, and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; transition to postsecondary education and training; and obtain employment (WIOA Section 203).

Alternative school – an alternative school is a type of school designed to achieve grade-level (K-12) standards and meet student needs (EC Section 58500). Examples of alternative schools include, but are not limited to, continuation, magnet, and charter schools. If the youth participant is attending an alternative school at the time of enrollment, the participant is considered to be in-school.

Attending School – an individual is considered to be attending school if the individual is enrolled in secondary or postsecondary school. If a youth is between high school graduation and postsecondary education, the youth is considered an In-School (IS) youth if they are registered for postsecondary education, even if they have not yet begun postsecondary classes. However, if the youth registers for postsecondary education, but does not follow through with attending classes, the youth is considered Out-of-School (OS) youth if the eligibility determination is made after youth decided not to attend postsecondary education. Youth on summer break are considered IS youth if they are enrolled to continue school in the fall (TEGL 21-16).

Not Attending School – an individual who is not attending a secondary or postsecondary school. In addition, individuals enrolled in the following programs would be considered an OS youth for eligibility purposes:

- WIOA Title II Adult Education, YouthBuild, Job Corps, high school equivalency program, or dropout re-engagement programs.
 - A youth attending a high school equivalency program funded by the public K-12 school system who is classified by the school system as still enrolled in school are the exception; the youth would be considered an IS youth (Title 20 CFR Section 681.230).
- Non-credit bearing postsecondary classes only (TEGL 21-16).

- ***A charter school program that provides instruction exclusively in partnership with WIOA, federally-funded YouthBuild programs, federal Job Corps training or instruction, California Conservation Corps, or a state certified local conservation corps (in alignment with EC Section 47612.1).***

Offender – An adult or juvenile subject to any stage of the criminal justice process or an adult or juvenile who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or convictions or for whom services under WIOA may be beneficial (WIOA Section 3[38]).

Postsecondary School – California community colleges, and accredited public and private universities (EC Section 66010).

School – any secondary or postsecondary school (Title 20 CFR Section 681.230). ***These include, but are not limited to, traditional K-12 public schools and private schools (e.g., continuation, magnet, charter, and home).***

School Dropout – an individual who is no longer attending any school and has not received a secondary school diploma or its recognized equivalent (WIOA Section 3[54]). Per TEGL 8-15, this term does not include individuals who dropped out of postsecondary school.

Secondary School – a nonprofit institutional day or resident school, including a public secondary charter school, that provides secondary education, as determined under state law, except that the term does not include any education beyond grade 12 (Title 20 U.S.C. Section 1401[27]).

Youth Eligibility Criteria

The WIOA Section 129(a)(1) provides new eligibility criteria for the WIOA youth program. To be eligible to participate in the WIOA youth program, an individual must be an OS youth or an in-school (IS) youth.

Youth enrolled after July 1, 2015, must meet the WIOA eligibility criteria. After July 1, 2015, all Workforce Investment Act (WIA) youth participants who are enrolled in the WIA youth program must be grandfathered into the WIOA youth program, even if the participant would not otherwise be eligible for the WIOA. Local youth programs are not required to complete an eligibility re-determination if the participant has been determined eligible and enrolled under the WIA. Furthermore, these participants must be allowed to complete the WIA services specified in their individual service strategy.

The Department of Labor (DOL) recognizes that documenting WIOA Youth participant eligibility can appear, and sometimes be, burdensome. It is important that programs are aware of flexibilities within WIOA statute, regulations, and guidance that may help reduce barriers for WIOA Youth programs to document eligibility. First, WIOA eliminated the need to document low-income status for eligibility determination for the majority of out-of-school youth. There are only three instances where low-income status must be documented for OSY. Only those out-of-

school youth who are determined eligible by virtue of using: 1) the “basic skill deficient,” 2) “English Language Learner,” or 3) “an individual who requires additional assistance to enter or complete an educational program or to secure or hold employment” barriers to document the WIOA Section 129(a)(1)(B)(iii) portion of out-of-school youth eligibility must be low income. Other out-of-school youth do not need to be low-income or document their income. Secondly, WIOA permits individuals who receive or are eligible to receive free or reduced lunch, foster youth, homeless youth, and youth living in a high-poverty area to automatically be considered low income. Lastly, self-attestation is an acceptable source of documenting almost all program elements related to WIOA Youth eligibility. As stated in TEGL 23-19, Change 1, the following youth eligibility data elements allow self-attestation as an acceptable source of documentation: school status at program entry, date of birth, individual with a disability, pregnant or parenting, youth who needs additional assistance, foster youth, homeless youth, offender, low income, and English Language Learner. The only data element related to WIOA Youth eligibility that does not permit the use of self-attestation for documentation is “basic skills deficient.”

Please note that as stated in TEGL 23-19, Change 1, self-attestation means a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. DOL broadly interprets what is an electronic/digital signature. Electronic signatures or a submission from the participant such as an email, text, or unique online survey response is considered an electronic signature or verification; it must be participant generated and traceable to the participant. Program operators must retain documentation of the self-attestation.

As stated in TEGL 23-19, Change 1, DOL encourages grant recipients to consider the impacts on equity and accessibility when developing their source documentation policies and procedures. For example, grantees considering restrictions on the use of self-attestation should consider that while other documentation sources are preferred when practical, self-attestation is an important option for populations with barriers to obtaining eligibility and reporting documents (such as disconnected youth, American Indian and Alaska Native populations, individuals experiencing homelessness, justice involved individuals, refugees, disaster impacted individuals, and others) and help ensure such populations are able to equitably access services. As a best practice, once enrolled, programs should assist the participant in obtaining the required documents through the use of supportive service funds as these documents are likely needed for employment and training related activities.

OS Youth Eligibility

In order to receive services as an OS youth, an individual must meet the following eligibility criteria:

1. Not attending any secondary or postsecondary school (not including Title II Adult Education, YouthBuild, Job Corps, high school equivalency programs [exceptions in definitions], non-credit bearing postsecondary classes, dropout reengagement programs ***or charter schools with federal and state workforce partnerships***).
2. Age 16-24 years old.

3. One or more of the following barriers:
 - a) A school dropout.
 - b) 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 quarter.
 - i. Note – If the school does not use school year quarters, Local Areas must use calendar quarters.
 - c) 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.
 - d) An offender.
 - e) A homeless individual or a runaway.
 - f) An individual in foster care or who has aged out of the 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 Section 477 of the *Social Security Act*, or in an out-of-home placement.
 - g) An individual who is pregnant or parenting (custodial and non-custodial parent including non-custodial fathers).
 - h) An individual with a disability.
 - i. A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

(Title 20 CFR Section 681.210)

A youth participant's eligibility is determined at intake. Therefore, the youth remains eligible for youth services until exited. For example, an individual who is an OS youth at time of enrollment and is subsequently placed in school is still considered an OS youth. Additionally, an individual who is an OS youth and between the ages of 16-24 at the time of enrollment, and is now beyond the age of 24, is still considered an OS youth until exited.

IS Youth Eligibility

In order to receive services as an IS youth, an individual must meet the following eligibility criteria:

1. Attending school, including secondary and postsecondary school.
2. Age 14-21 years old (A youth with disabilities who is in an individualized education program at the age of 22 may be enrolled as an IS youth [TEGL 21-16 and EC 56026]).
3. Low income individual.
4. Meets one or more of the following barriers:
 - a) Basic skills deficient.
 - b) An English language learner.
 - c) An offender.
 - d) A homeless individual or runaway.
 - e) An individual in foster care or who has aged out of the 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 Section 477 of the *Social Security Act*, or in an out-of-home placement.

- f) Pregnant or parenting (custodial and non-custodial parent including non-custodial fathers).
- g) An individual with a disability.
- h) An individual who requires additional assistance to complete an educational program or secure and hold employment.

(Title 20 CFR Section 681.220)

A youth participant's eligibility is determined at intake; therefore, the youth remains eligible for youth services until exited. For example, an individual who is an IS youth and between the ages of 14-21 at the time of enrollment, and is now beyond the age of 21, is still considered an IS youth until exited.

Low-Income

Under WIOA, a youth who receives or is eligible to receive a free or reduced lunch under the Richard B. Russell National School Lunch Act, is considered to be low-income. While the free/reduced lunch low-income category primarily applies to IS Youth, OS youth may also qualify as low income if the youth is a parent living in the same household as a child who receives or is eligible to receive free or reduced-price lunch based on their income level. However, not all youth who receive a free or reduced priced lunch automatically qualify as low-income for the WIOA youth program eligibility. In areas where a school district subsidizes all student meals under the Hunger-Free Kids Act of 2010, the Local Area must base low-income status on an individual student's eligibility to receive free or reduced-price lunch or on the youth's ability to meet one of the other low-income categories under WIOA.

A youth living in a high-poverty area is automatically considered to be a low-income individual. A high-poverty area is a Census tract or county that has a poverty rate of at least 25 percent as set every 5 years using American Community Survey (ACS) 5-Year data. Local Areas may access ACS 5-Year data on the U.S. Census Fact Finder website to determine the poverty rate. TEGL 21-16, [Determining Whether Youth are Living in a High Poverty Area](#), provides step-by-step instruction on how to calculate the poverty rate.

Calculating Income

For income calculation purposes, if an individual is not living in a single residence with other family members that individual is not considered a member of a family. When determining a youth's eligibility based on low-income status, Local Areas must do the following:

- Include Unemployment Insurance as income.
- Include child support payments as income.
- For IS youth with a disability, consider only the youth's own income rather than their family's income.

(TEGL 21-16)

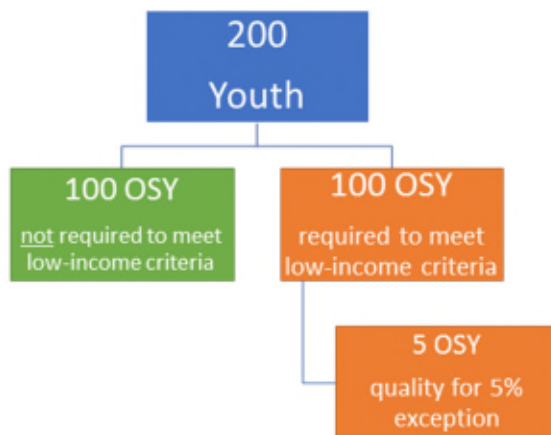
Low-Income Exception

The WIOA maintains a five percent low-income eligibility exception where five percent of Local Area youth participants who ordinarily would need to be low-income do not need to meet the

low-income provision. However, because not all OS youth are required to be low-income, the five percent low-income exception under WIOA is calculated based on the five percent of youth enrolled in a given program year who would ordinarily be required to meet the low-income criteria. The five percent low-income exception may include OS youth under eligibility categories 3c and 3i, IS youth, or a combination of both, not to exceed five percent of all WIOA youth participants served in a given program year. (TEGL 08-15)

For example, a local area enrolled 200 youth and 100 of those youth were out of school youth (OSY) who were not required to meet the low-income criteria, 100 were OSY who were required to meet the low-income criteria. In this example, the 100 OSY required to be low-income are the only youth factored into the five percent low-income exception calculation. Therefore, in this example 5 of the 100 youth who ordinarily would be required to be low-income do not have to meet the low-income criteria based on the low-income exception.

In this example, only 5 youth qualify for the 5% exception per WIOA requirements. This is different than WIA requirements where 5% could be taken from the total youth enrollments, which would result in 10 youth qualifying. Below is a graphical representation:



Please consult your assigned WDB Administration Manager for approval of youth participants who would be considered 5% low-income exception, prior to submission to the America’s Job Center of California (AJCC.) After reviewing CalJOBS, the WDB will determine if this prospective participant’s application can be submitted for enrollment.

Requires Additional Assistance

Under WIOA, no more than five percent of IS youth enrolled in a given program year may be found eligible based solely on meeting the criterion, “requires additional assistance.” This limitation applies to IS youth enrolled on or after July 1, 2015. Therefore, participants that were enrolled under WIA and carried into WIOA would not be factored in.

Local Boards are responsible for establishing local definitions and eligibility documentation requirements for “requires additional assistance” as it relates to both out-of-school (OS) and IS

youth. This local policy is reasonable, quantifiable, and based on evidence that the specific characteristic of the youth identified in the policy objectively requires additional assistance.

The below criteria are based on the California’s Unified Strategic Workforce Development Plan 2016-2020 (State Plan) and local factors.

Eligibility Criteria	Acceptable Documentation
Have repeated at least one secondary grade level or are one year over age for grade	School records; school counselor statement
Have a core grade point average of less than 1.5.	School records; school counselor statement
For each year of secondary education, are at least two semester credits behind the rate required to graduate from high school	School records; school counselor statement
Are emancipated youth	Court records; social services records
Have aged out of foster care	Court records; social services records
Are previous dropouts or have been suspended five or more times or have been expelled	School records; court records
Have received court/agency referrals mandating school attendance	School records; court records
Are deemed at risk of dropping out of school by a school official	School records; school counselor statement
Have been referred to or are being treated by an agency for a substance abuse related problem	Medical records; court records; social services records; self-attestation
Have experienced recent traumatic events, are victims of abuse, or reside in an abusive environment as documented by a school official or other qualified professional	Medical records; school counselor statement; social services records
Have serious emotional, medical or psychological problems as documented by a qualified professional	Medical records; school counselor statement; social services records
Have never held a job (applies to OS youth)	Wage records; self-attestation
Have been fired from a job within the 12 months prior to application (applies to OS youth)	Employer records; school representative statement; corrections officer statement; self-attestation
Have never held a full-time job for more than 13 consecutive weeks (applies to OS youth)	Wage records; school representative statement; self-attestation
Attends continuation school	School records; school ID card
Is involved in gang-related activities	School representative statement; corrections officer statement; self-attestation

Has an incarcerated parent/legal guardian	Letter from a corrections facility; corrections officer statement; court records; background check; self-attestation
Immigrant/refugee youth with substantial cultural barriers	School records; documentation from agencies that work with immigrant/refugee populations; employer statement

OS Youth

The WIOA shifts the primary focus of youth formula funds to support the educational and career success of OS youth. As a result of this shift, the cost per participant under WIOA may increase as many OS youth require more intensive and costly services. Consequently, fewer participants might be served under the WIOA youth program due to the more intensive and costly services for the increased emphasis on the OS youth population.

OS Youth Expenditure Requirement

Local Areas must spend at least 75 percent of their WIOA youth formula allocation on youth workforce investment activities for OS youth (WIOA Section 129[a][4]). The OS youth expenditure rate is calculated after subtracting funds spent on administrative costs.

Recruiting OS Youth

Under WIA, some Local Areas may have been serving low numbers of OS youth. These Local Areas should have used the first year of WIOA implementation (i.e., July 1, 2015, through June 30, 2016) to align their youth program design to start increasing recruitment and outreach to move towards meeting the 75 percent OS youth expenditure requirement.

Youth outreach and recruitment are among the limited instances in which WIOA youth funds may be expended on costs related to individuals who are not yet participants. However, youth program services may not be provided until a formal eligibility determination being made.

For tips and best practices regarding outreach and recruiting OS youth see [Outreach and Recruitment of OS Youth](#).

WIA 30 Percent Expenditure Requirement

The WIA 30 percent OS youth expenditure requirement continued to apply to Local Areas serving OS youth with WIA funds after July 1, 2015. The OS youth expenditure rates are tracked and reported on a specific program year’s allocation.

Work Experience

The WIOA places a priority on providing youth with occupational learning opportunities through work experience.

Work Experience Criteria

Work experience provides IS and OS youth an invaluable opportunity to develop work place skills. Paid and unpaid work experiences must include academic and occupational education (provided either concurrently or sequentially) and may include the following:

- Summer employment opportunities and other employment opportunities available throughout the school year. Local Areas may, but do not have to, provide summer employment opportunities. Under WIA, summer employment was its own program element. Under WIOA, it is incorporated into work experience. Local Areas have the flexibility to decide which work experiences are provided as long as the Local Area spends at least 20 percent of their WIOA youth formula allocation on work experience (Title 20 CFR Section 681.620).
- Pre-apprenticeship programs. Pre-apprenticeship is a program designed to prepare individuals to enter and succeed in an apprenticeship program. Pre-apprenticeship programs include the following elements:
 - Training and curriculum that aligns with the skill needs of employers in the economy of the state or region involved.
 - Access to educational and career counseling and other supportive services, directly or indirectly.
 - Hands-on, meaningful learning activities that are connected to education and training activities.
 - Opportunities to attain at least one industry-recognized credential.
 - A partnership with one or more registered apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship program in a registered apprenticeship program (Title 20 CFR Section 681.480).
- Internships and job shadowing. Job shadowing is a temporary, unpaid exposure to the workplace in an occupational area of interest to the participant and may last anywhere from a few hours to a week or more (TEGL 21-16).
- On-the-job training (OJT) opportunities. OJT means training by an employer that is provided to a paid participant while engaged in in a job that meets the following criteria:
 - Provides knowledge or skills essential to the full and adequate performance of the job.
 - Is made available through a program that provides reimbursement to the employer of up to 50 percent of the wage rate of the participant or up to 75 percent in circumstance of extraordinary costs of providing the training and additional supervision related to the training.
 - Is limited in duration to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the

participant, and the service strategy of the participant as appropriate (WIOA Section 3[44]).

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 or occupations. For example, if a youth is in a work experience in a hospital, the occupational education could be learning about the duties of different types of hospital occupations such as a phlebotomist, radiology tech, or physical therapist. Whereas, the academic education could be learning some of the information individuals in those occupations need to know such as why blood type matters, the name of a specific bone in the body, or the function of a specific ligament.

Local programs have the flexibility to determine the appropriate type of academic and occupational education necessary for a specific work experience. Further, Local Areas may decide who provides the academic and occupational education component. The academic component may take place inside or outside the work site, and the work experience employer may provide the academic and occupational education component or such components may be provided separately in the classroom or through other means (TEGL 21-16).

Youth formula funds may be used to pay a participant's wages and related benefits for work experience in the public, private, for-profit or non-profit sectors when the participant's objective assessment and individual service strategy indicate that a work experience is appropriate. Additionally, youth formula funds may be used to pay wages and staffing costs for the development and management of work experience. Allowable expenditures beyond wages may include the following:

- Staff time spent identifying potential work experience opportunities.
- Staff time working with employers to develop the work experience.
- Staff time spent working with employers to ensure a successful work experience.
- Staff time spent evaluating the work experience.
- Classroom training or the required academic education component directly related to the work experience.
- Orientation sessions for participants and employers.
- Incentive payment to youth for an achievement directly tied to the work experience.
- Employability skills/job readiness training to prepare youth for a work experience.

Work Experience Local Policy

The Workforce Innovation and Opportunity Act and the Final Regulations published in the Code of Federal Regulations permit the provision of paid and unpaid work experience as an Individualized Career Service for eligible Adults, and Dislocated Workers, and as an allowable activity for Youth. It is **the policy of the Workforce Development Board of Ventura County** to allow the provision of these services to eligible adults, youth and dislocated workers who:

1. are unemployed and are unable to obtain employment through basic career or youth program services and who have been determined to be in need of more individualized services in order to obtain employment; or
2. are underemployed, and who have been determined to be in need of such services in order to obtain or retain employment that allows for self-sufficiency.

In general, work experience 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 worksite may be in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience placement where an employer/employee relationship, as defined by the Fair Labor Standards Act, exists.

For the purposes of implementation in Ventura County, the following provisions will apply:

Work experience may be provided, where determined as appropriate through the Individual Employment Plan development process, for eligible Youth program participants for whom one or more of the following conditions exist:

- the individual has no previous work history,
- the individual has had no work history within the past five years, and/or
- the individual is otherwise eligible for WIOA individualized career or youth services and is in need of this service to assist them in preparing for participation in another appropriate training service or activity or to successfully obtain and retain unsubsidized employment.

This type of work experience activity is intended to provide training and skill development in the skills necessary to successfully obtain and retain employment, including punctuality, attendance, communication, team work, dependability, and task completion, and is not required to provide training in technical or job specific skills. There is no requirement that the individual will be retained by the worksite following the successful completion of this type work experience activity.

Work experience may be provided concurrently with other appropriate career or training services and will not exceed **480 hours or 9 months**. This activity requires the development of a training plan or outline which will be included in the worksite agreement between the one-stop or program operator and the work experience site. Regular time sheets and evaluations of participant progress are required no less frequently than twice per month throughout the duration of the activity.

Virtual work experiences are allowable under the WIOA youth program. With COVID-19 pandemic, virtual services, such as virtual work experiences, became necessary. Virtual work experiences can offer more flexibility and broaden work experience opportunities, particularly in rural areas. They can also promote equity and access for youth that might not otherwise have the opportunity for certain types of work experiences. Therefore, local WIOA Youth programs are permitted to continue to provide virtual work experiences beyond the COVID-19 pandemic.

And while WIOA section 681.600 states that work experiences must take place in a workplace, this includes a virtual workplace when remote work experiences are possible and practical.

Work Experience Expenditure Requirement

Local Areas must spend at least 20 percent of their WIOA youth formula allocation on work experience (WIOA Section 129[c][4]). Leveraged resources cannot be used to fulfill any part of the 20 percent minimum work experience expenditure requirement (TEGL 21-16). The work experience expenditure rate is calculated after subtracting funds spent on administrative costs. Additionally, the expenditure rate is not applied separately for IS youth and OS youth.

TEGL 21-16 stated that “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.” However, DOL’s policy on this issue has evolved. DOL recently determined that supportive services that enable WIOA participants to participate in training can count toward training expenditures. Therefore, to be consistent with this policy, supportive services that enable WIOA participants to participate in work experience can now count toward the work experience expenditure requirement.

WIOA and 20 CFR § 681.590(a) require that a minimum of 20 percent of local area funds for the Title I Youth program be spent on work experience. TEGL Nos. 8-15 and 21-16 provide further discussion of allowable expenditures that may be counted toward the work experience expenditure requirement and articulate that program expenditures on the work experience program element can be more than just wages paid to youth in work experience.

An important reminder is that expenditures for pre-apprenticeships count toward the work experience expenditure requirement. In addition, if the pre-apprenticeship program includes an occupational skills training component, separate from the work experience, WIOA Youth programs may report pre-apprenticeship under both the work experience program element and the occupational skills training program element. Also, while not explicitly listed in WIOA as a type of work experience, WIOA Youth expenditures related to Registered Apprenticeship programs count toward the minimum work experience expenditure requirement.

State Technical Assistance

The EDD calculates work experience expenditures at the end of the first program year of the two-year availability of the funds, and provides the results of these interim calculations to each Local Area and their Regional Advisor by September 30th. The Regional Advisor will assist Local Areas that appeared to be in jeopardy of not meeting the 20 percent work experience expenditure requirement by the end of the funding period.

Calculating OS Youth and Work Experience Expenditures

The Local Area’s OS youth and work experience expenditure rates are tracked for a specific program year youth allocation. The EDD will determine whether Local Areas met their expenditure requirements upon completion of expenditures of all funds in the specific program year’s youth allocation as follows:

Each Local Area's total youth allocation is issued as a sub grant under grant code 301. This amount is located on Line I item 5 of the *Summary of WIOA Expenditures Report* for Grant Code 301. At the end of the two-year life of the youth formula funds, the total allocation is adjusted by subtracting the actual administration costs (Line III item 3) reported on the June 30 expenditure report for Grant Code 301. The remaining dollar amount for a Local Area that fully spent its allocation (which is equal to the program dollars spent shown on Line V item 3) is the amount upon which the 75 percent OS youth and 20 percent work experience expenditure requirement will be based. The amount reported for OS youth (Line V, item 2) must be at least 75 percent of the total program expenditures (Line V, item 3). The amount reported for work experience (Line V item 3b) must be at least 20 percent of the total program expenditures (Line V, item 3).

IS Youth

Under WIOA, fewer resources are available to serve IS youth. As a result, Local Areas should identify resources and/or establish partnerships with youth providers that can provide services to IS youth. Local Boards, in collaboration with youth standing committees, may consider leveraging resources and establishing partnerships to continue serving IS youth that are cost effective, and reach more students.

Although there was a shift in emphasis under WIOA to OS youth, Local Areas should not have prematurely exited WIA IS youth from the program.

Local Areas could still provide services to IS youth in order to assist them in successfully completing the program, consistent with the minimum 75 percent OS youth expenditure requirement on OS youth. The WDB requires separate tracking of expenditures for IS if providers choose to enroll IS youth participants.

Permissible Use of Youth Funds

Individual Training Accounts

In order to enhance individual participant choice in their education and training plans and provide flexibility to Local Areas, Local Areas may use youth funds for Individual Training Accounts (ITA) for OS youth between the ages of 16 to 24. When using youth funds for ITAs, only training providers on the Eligible Training Provider List can be used.

Braiding Funds

Braiding funds is the process of using different funding streams to support different needs for the same participant while maintaining documentation to support the charging and allocations of cost to the separate funds. Local Areas may use braided funds to provide more comprehensive services to participants and maximize partner resources available to assist youth. Braiding funds must meet the following criteria:

The cost to each funding stream is tracked, documented, and allocated based on the proportional benefit.

- The cost benefits two or more programs in proportions that can be determined without undue effort or cost.
- The youth meets the eligibility requirements for each program from which they are receiving funds.

An example is when the WIOA Title I youth program and the WIOA Title II adult education program are used to serve eligible youth. The WIOA Title I resources can provide career guidance, work experiences, and leadership development, while the WIOA Title II resources can provide adult education and literacy activities. (TEGL 21-16)

Incentives

Local Areas may provide incentive payments to youth participants for recognition and achievement directly tied to training activities and work experiences. When offering incentive payments, Local Areas must do the following:

- Tie the incentive to the goals of the specific program.
- Outline in writing the incentive before the commencement of the program providing the payment.
- Align the incentive with the local program's organizational policy.
- Meet the requirements in 2 CFR part 200.

(Title 20 CFR Section 681.640)

An appropriate activity code for incentives shall be entered in CalJOBS during program participation. If participant receive incentives during follow-up, designated activities code for follow-up incentives shall be entered. Refer to WDB Policy on Stipends and Incentive Payments for specific instructions on CalJOBS activity code recording.

Youth Standing Committees

Youth councils are not required under WIOA. However, Local Boards may continue to operate a youth council as a standing committee. The Youth Standing Committee may provide information and assist with planning, operations, oversight, and other issues related to the provision of services to youth. Youth Standing Committees should recommend youth policy direction, ensure quality services, and leverage financial and programmatic resources. If so delegated by the Local Board after consultation with the chief elected official, the Youth Standing Committee may oversee eligible youth providers.

An existing youth council may be designated as the Youth Standing Committee or a Local Board may design a Youth Standing Committee to meet the needs of the Local Area's youth program. If a Local Board does not establish a Youth Standing Committee, the Local Board is still responsible for conducting the oversight of youth activities under WIOA Section 129(c).

Local Boards that choose to design a new Youth Standing Committee are reminded that the membership must include: (1) a member of the Local Board, who must chair the committee, (2) members of community based organizations with a demonstrated record of success in serving eligible youth, and (3) other individuals with appropriate expertise and experience who are not

members of the Local Board. The committee may include parents, participants, and youth. (Title 20 CFR Sections 681.100 - 681.120).

Procurement of WIOA Youth Service Providers

Local Boards may directly provide some or all of the youth workforce service activities. If a Local Board serves as the youth service provider and performs other roles such as fiscal agent or AJCC Operator, the Local Board must have appropriate firewalls in place between the staff providing services, the staff responsible for oversight and monitoring of services, and the Local Board. The firewalls must conform to Title 20 CFR Section 679.430 for demonstrating internal controls and preventing conflicts of interest.

If a Local Board chooses to award grants or contracts to youth service providers for some or all activities, the Local Board must award such grants or contracts through a competitive process that does the following:

- Takes into consideration the ability of the youth service provider to meet performance accountability measures.
- Meets the procurement standards specified in Uniform Guidance and the DOL Exceptions.
- Follows state and local procurement laws.
- Local Boards must also identify youth service providers based on criteria in the State Plan (Title 20 CFR Section 681.400). The State Plan establishes that Local Boards should select service providers that do the following:
 - Employ proven recruitment strategies of effective outreach, engagement, enrollment, and retention of OS youth.
 - Demonstrate meaningful partnerships with eligible training providers, institutions of higher education, and employers from in-demand industries.
 - Offer a continuum of services that allow participants to obtain a GED/High School diploma, enroll into postsecondary education, and obtain employment within their chosen career path.
 - Utilize career pathways and sector strategy models with a structured sequence of activities, as well as multiple entry and exit points that provide adequate supportive services.
 - Use structured work-based learning, such as paid and unpaid work experiences and career exploration that leads to gainful employment.
 - Provide intensive case management and support services to help youth overcome complex barriers, successfully complete the program, and retain employment.

Local Boards may do the following:

- Award youth service provider contracts on a sole source basis where the Local Board determines there is an insufficient number of eligible youth providers in the Local Area.
- Assign the function of selecting service provider contracts to the standing youth committee (if the Local Board has established a standing youth committee).

When the Local Board awards a grant or contract to a youth service provider who also fulfills another role in the Local Area, a written agreement with Local Board and the Chief Elected Official must provide clarity on the expectation for those roles and clear methods of tracking execution and accountability for the distinct roles.

Program Elements

The 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 five new program elements: (1) financial literacy, (2) entrepreneurial skills training, (3) services that provide labor market and employment information about in-demand industry sectors or occupations available in the Local Areas, (4) activities that help youth prepare for and transition to postsecondary education and training, and (5) education offered concurrently with and in the same context as workforce preparation activities and training for specific occupation or occupational clusters.

Local Areas are not required to provide all 14 required elements to each participant. Local Areas have the flexibility to determine which specific services a youth will receive based upon the youth's assessment and service strategy. Local Boards, however, must ensure that all 14 program elements are available in their Local Area.

WIOA requires an objective assessment of academic levels, skill levels, and service needs of each participant, which includes a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs. TEGL 21-16 stated that "local programs may use previous basic skills assessment results if such previous assessments have been conducted within the past six months." While this continues to be true, state and/or local programs may use previous assessments older than six months if they deem appropriate and if there is a state/local policy in place that allows the use of such assessments. It is important that assessments do not serve as a deterrent to program enrollment. In addition, it is critical that local programs incorporate the results of the objective assessment into a participant's Individual Service Strategy and the services, such as career counseling, that participants receive.

The table below provides a list of the 14 youth program elements, identifies which program elements relate to one another, lists the DOL Participant Individual Record Layout (PIRL) data element, and provides federal citations where the program element requirements are described. In addition, the program elements are hyperlinked to the [WorkforceGPS Youth Connections](#) corresponding webpage. The Youth Connection webpage provides additional materials and resources to help service providers deliver youth services.

WIOA Youth Program Element	Relates to or Overlaps with Other Program Element(s)	Applicable DOL-only PIRL Data Element Number(s)	Program Description Citation
1. Tutoring, study skills training, instruction, and dropout prevention	Program elements 2 and 4	1402	TEGL 21-16
2. Alternative secondary school services or dropout recovery services	Program element 1	1403	TEGL 21-16
3. Paid and unpaid work experiences		1205,1405	Title 20 CFR Sections 681.540, 681.550 and TEGL 21-16
4. Occupational skills training	Program element 1	1300,1302,1303, 1306, 1307, 1308	Title 20 CFR Sections 681.540, 681.550 and TEGL 21-16
5. Education offered concurrently with workforce preparation and training for a specific occupation	Program elements 2, 3, and 4	1407	Title 20 CFR Section 681.630 and TEGL 21-16
6. Leadership development opportunities		1408	Title 20 CFR Sections 681.520, 681530 and TEGL 21-16
7. Supportive Services		1409	Title 20 CFR Section 681.570 and TEGL 21-16
8. Adult mentoring		1410	Title 20 CFR Sections 681.490 and TEGL 21-16

9. Follow-up services	Program elements 7, 8, 11, 13, and 14	1412	Title 20 CFR Section 681.580 and TEGL 21-16
10. Comprehensive guidance and counseling		1411	Title 20 CFR Section 681.510 and TEGL 21-16
11. Financial literacy education		1206	Title 20 CFR Section 681.500 and TEGL 21-16
12. Entrepreneurial skills training		1413	Title 20 CFR Section 681.560 and TEGL 21-16
13. Services that provide labor market information		1414	Title 20 CFR Section 651.10 and TEGL 21-16
14. Postsecondary preparation and transition activities		1415	TEGL 21-16

Program Element 1 – Tutoring, Study Skills Training, Instruction, and Dropout Prevention Services

Tutoring, study skills training and instruction that lead to a high school diploma or its equivalent, including a recognized certificate of attendance or similar document for individuals with disabilities, are reported under program element 1. These services focus on providing academic support, helping a youth identify areas of academic concern, assisting with overcoming learning obstacles, and providing tools and resources to develop learning strategies. Local Areas may provide tutoring, study skills training, and instruction in a one-on-one or group setting, through resources and workshops.

Program element 1 also includes secondary school dropout prevention strategies that keep a youth in school and engaged in formal learning or training. These activities include, but are not limited to, tutoring, literacy development, active learning experiences, after-school opportunities, and individualized instruction (TEGL 21-16).

Program Element 2 – Alternative Secondary School Services or Dropout Recovery Services

Alternative secondary school services that assist youth who have struggled in traditional secondary school education, are reported under program element 2. These services include, but are not limited to, basic education skills training, individualized academic instruction, and English as a Second Language training.

Program element 2 also includes dropout recovery services aimed at getting youth who have dropped out of secondary education back into a secondary school or alternative secondary school/high school equivalency program (TEGL 21-16). Examples of these services include credit

recovery, counseling, and educational plan development. While there is some overlap with dropout prevention strategies (program element 1), the activities within both program elements are provided with the goal of helping youth re-engage and persist in education that leads to the completion of a recognized high school equivalent.

Program Element 3 – Paid and Unpaid Work Experience

[Work experience is covered in detail starting on page 9 of this policy.](#)

Program Element 4 – Occupational Skills Training

Occupational skills training 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 occupation 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.

Occupational skills training must meet the following criteria:

- Be outcome-oriented and focused on an occupational goal specified in the individual service strategy.
- Be of sufficient duration to impart the skills needed to meet the occupational goal.
- Lead to the attainment of a recognized postsecondary credential.
- Meet the quality standards in WIOA Section 123.

(Title 20 CFR Section 681.540)

Program Element 5 – Education Offered Concurrently with Workforce Preparation and Training for a Specific Occupation

This program element reflects an integrated education and training model. Additionally, it describes that 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. While programs developing basic academic skills, which are included as part of alternative secondary school services and dropout recovery services, workforce preparation activities that occur as part of a work experience, and occupational skills training can all occur separately and at different times (and are counted under separate program elements), this program element refers to the concurrent delivery of these services which make up an integrated education and training model (TEGL 21-16).

Program Element 6 – Leadership Development Opportunities

This program element encourages responsibility, confidence, employability, self-determination, and other positive social behaviors. Positive social behaviors include the following:

- Exposure to postsecondary educational possibilities.
- Community and service learning projects.
- Peer-centered activities, including peer mentoring and tutoring.
- Organizational and team work training
- Training in decision-making such as determining priorities and problem solving.

- Citizenship training, including life skills training such as parenting and work behavior training.
- Civic engagement activities which promote quality of life in a community
- Other leadership activities that place youth in a leadership role such as serving on the Standing Youth Committee.

(Title 20 CFR Section 681.520)

Program Element 7 – Supportive Services

Supportive services are services that enable an individual to participate in WIOA activities. Supportive services include, but are not limited to, the following:

- Linkages to community services.
- Assistance with transportation.
- Assistance with child care and dependent care.
- Assistance with housing.
- Needs-related payments.
- Assistance with educational testing.
- Reasonable accommodations for youth with disabilities.
- Legal aid services.
- Referrals to health care.
- Assistance with work attire and work-related tools including eyeglasses and protective eye gear.
- Assistance with books, fees, school supplies, and other necessary items for student enrolled in postsecondary education classes.
- Payments and fees for employment and training-related application, tests, and certifications

(Title 20 CFR Section 681.570)

Section 101 of WIOA authorizes state workforce development boards to use WIOA funding to support digital literacy efforts. Additionally, Section 107 states that local boards shall “identify strategies for better meeting the needs of individuals with barriers to employment, including strategies that augment traditional service delivery, and increase access to services and programs of the one-stop delivery system, such as improving digital literacy skills.” Jobs in almost every industry are increasingly requiring workers to have digital literacy skills. While many youth are considered “digital natives,” or people who have grown up with technology and the internet, it is still important to ensure that young people have the digital skills needed to successfully enter and remain in the workforce.

It is important to note that WIOA funds can also be used to pay for devices and broadband internet service that will allow a participant to create or maintain a wireless connection for distance learning, search for jobs, and engage in other employment and training services where such services are already allowable. A local area must have written policies and procedures in place that outlines the steps/factors it will consider to approve a cost and ensure that costs are reasonable, necessary, allowable, and allocable to the WIOA grant. In addition, DOL encourages

local WIOA Youth programs to inform participants about the Affordable Connectivity Program that helps families access affordable broadband.

Program Element 8 – Adult Mentoring

Adult mentoring must last at least 12 months and may take place both during the program and following the youth's exit from the program. Local Areas may use group mentoring and electronic mentoring, but at a minimum, the youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis. Case managers may serve as adult mentors in areas where adult mentors are sparse, however, Local Areas are strongly encouraged to find adult mentors who are not case managers (TEGL 21-16).

Program Element 9 – Follow-up Services

Follow-up services for youth may include supportive services, adult mentoring, financial literacy education, services that provide labor market and employment information about in-demand industry sectors, and activities that help youth prepare for and transition to postsecondary education and training. When Local Areas provide these program elements as follow-up services, they must occur after the exit date in order to count as follow-up services. Additionally, Local Areas should document in the case file that the program elements were provided as follow-up services post exit (TEGL 21-16).

Both mentoring and follow-up services provide critical support to youth that help youth succeed in their career pathway progression. One potential explanation for the low numbers in these two program elements is that perhaps these services are being provided, just not for the full twelve months specified in WIOA. While both program elements require their provision for a minimum of 12 months, it is not necessary to wait until a participant receives these services for the full 12 months prior to reporting them. For example, if a participant receives mentoring services, such services can be reported in the first quarter in which mentoring is received. Likewise, follow-up services can be reported in the first quarter in which it is received. As a reminder, as stated in WIOA section 681.580, mentoring is one of the types of services that is permitted during follow-up.

Element 10 – Comprehensive Guidance and Counseling

This program element provides individualized counseling to participants and may include drug and alcohol abuse counseling, mental health counseling, and referral to partner programs. Local Areas and youth service providers may directly provide counseling. When a Local Area or youth service provider refers a youth for counseling services that they are unable to provide, the Local Area or service provider must coordinate with the referred counseling organization to ensure continuity of service (TEGL 21-16).

The youth workforce system plays a critical role in supporting the mental health of participants through assessments, comprehensive guidance and counseling, including referrals to partner organizations, as well as providing sufficient supportive services to help alleviate additional barriers to education and work. Understanding the challenges and building new or strengthening

existing partnerships with local mental health agencies and organizations can help ensure that youth are receiving the support and treatment they need.

Comprehensive guidance and counseling is one of the WIOA Youth program's 14 program elements. As defined in 20 CFR 681.510 of the WIOA final rule, comprehensive guidance and counseling "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 providers must coordinate with the organization to which it refers in order to ensure continuity of service in the WIOA Youth program.

It is important to note that while youth workforce development practitioners are not expected to be experts in mental health, there are many ways to assess mental health needs at program enrollment and throughout their participation in the program and that mental health assessments are an allowable cost under WIOA. DOL strongly encourages integrating mental health assessments into the objective assessment process to identify potential mental health needs that must be addressed through mental health services or through referrals to mental health professionals for youth to be successful in the program.

Additionally, professional development for youth workforce development practitioners is essential for ensuring staff have the appropriate skills, knowledge, and abilities to effectively serve the young adults in the WIOA Youth program. Professional development is an allowable cost under WIOA. DOL strongly encourages local workforce development boards to offer professional development training to all staff that work with youth, and quality mental health training along with training related to trauma informed care principles should be included.

Program Element 11 – Financial Literacy Education

Financial literacy education includes information and activities such as creating budgets, setting up checking and saving accounts, managing spending, understanding credit reports, and protecting against identity theft. Local Areas may find the Financial Literacy Education Commission's guide, "Incorporating Financial Capability with Youth Employment Programs", a useful resource on how to partner with financial institutions (TEGL 21-16).

Program Element 12 – Entrepreneurial Skills Training

This program element helps youth develop the skills associated with starting and operating a small business. Such skills may include 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 the following:

- Entrepreneurship education that provides an introduction to the values and basics of starting and running a business, such as developing a business plan and simulations of business start-up and operation.

- Enterprise development which provides supports and services that incubate and help youth develop their own businesses, such as helping youth access small loans or grants and providing more individualized attention to the development of viable business ideas.
- Experiential programs that provide youth with experience in the day-to-day operation of a business.

(Title 20 CFR Section 681.560)

Program Element 13 – Services that Provide Labor Market and Employment Information

These services provide labor market and employment information about in-demand industry sectors or occupations available in the Local Area. Services may include career awareness, career counseling, and career exploration. Career counseling provides advice and support in making decisions about what career path to take and may include providing information about resume preparation, interview skills, potential opportunities for job shadowing, and the long-term benefits of postsecondary education and training. In addition to connecting youth to self-service labor market information (LMI) tools, youth providers should share and discuss state and local LMI with youth participants (TEGL 21-16).

As stated in TEGL 21-16, case management is the act of connecting youth to appropriate services and is not considered a program element. Another program element that often is misreported as comprehensive guidance and counseling is the program element entitled “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.”

As discussed in TEGL 21-16, career counseling services may include providing information about resume preparation, interview skills, potential opportunities for job shadowing, and the long-term benefits of postsecondary education and training. This type of career counseling, often provided by a case manager, should be reported as the “services that provide labor market information” program element and should not be reported as the comprehensive guidance and counseling program element. As mentioned above, youth are experiencing significant mental health and substance abuse issues, and it is important to have a clear understanding of when WIOA Youth providers deliver services within the comprehensive guidance and counseling program element to youth participants.

Program Element 14 – Postsecondary Preparation and Transition Activities

This program element prepares IS youth and OS youth for postsecondary education after attaining a high school diploma or its recognized equivalent. Activities include exploring postsecondary education options such as registered apprenticeships, technical training schools, community colleges and four-year colleges and universities. Additional services may include, but are not limited to, the following:

- Preparing youth for the SAT/ACT
- Assisting with college admission applications
- Searching and applying for scholarships and grants
- Filling out financial aid applications

- Connecting youth to postsecondary programs
(Title 20 CFR Section 681.460)

Program Design

The WIOA enhances the youth program design through an increased emphasis on individual participant needs by adding new components and incorporating career pathways to the objective assessment and individual service strategy. Additionally, the WIOA requires that the individual service strategy be directly linked to one or more of the performance indicators. A program design framework is an essential step to help Local Areas develop comprehensive service strategies based upon individual needs. Local Boards, in collaboration with a youth standing committee, can provide direction and leadership to assist local youth programs on improving the quality and effectiveness of youth services. A program design framework consists of an objective assessment, an individual service strategy, case management, and follow-up services that lead toward successful outcomes for youth participants (WIOA Section 129[c][1]).

Assessment Requirements

The WIOA youth program design requires an objective assessment of academic levels, skill levels, and services needs of each participant, which includes a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs. Assessments must also consider a youth's strengths rather than just focusing on areas that need improvement. Local Areas must use assessments that are valid and appropriate for the target population, and must provide reasonable accommodation in the assessment process. Any formalized testing must also be cost effective, well-matched to the test administrator's qualifications, and easy to administer and interpret results. For basic skills assessment, Local Areas are not required to use assessments approved by the Department of Education's National Reporting System (NRS), nor are Local Areas required to determine an individual's grade equivalent or educational functioning level, although use of both tools is permitted. Local Areas may also use previous basic skills assessment results if such previous assessments have been conducted with the past six months.

In contrast to the initial assessment requirements described above, If Local Areas measure Educational Functioning Level (EFL) gains after program enrollment under the measurable skills gain indicator, the Local Area must use an NRS-approved assessment for both the EFL pre- and post-test to determine a youth's educational functioning level.

In addition to the initial assessment, a career assessment can help youth understand how a variety of their personal attributes affect their potential success and satisfaction with different career options and work environments. Local Areas may provide career assessments through the WIOA youth program staff and/or through referrals to national and community-based partners and resources.

(TEGL 21-16)

ACTION

Bring this policy to the attention of all affected staff.

INQUIRIES

Inquiries regarding this policy can be addressed to the WDBVC at 805-477-5306.

/S/ Rebecca Evans, Executive Director
Workforce Development Board of Ventura County

ATTACHMENTS:

Attachment I - DOL Priorities for Youth Workforce Development

*ETA Priorities for Youth Workforce Development:
Equity, Job Quality, Mental Health, and Youth Voice.*

Vision

The Department envisions a no-wrong-door youth workforce system that offers seamless access to resources, programs, and wrap around services; offers guaranteed paid work experiences for young people; and coordinates with critical partners—including but not limited to employers, sector-based industry coalitions, workforce intermediaries, labor unions, and philanthropy—committed to high quality career pathways for young workers.

Priorities

Equity: On January 21, 2021, his first day in office, President Biden issued [Executive Order 13985 On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#). The Executive Order defines equity “as the consistent and systemic, fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment.”

Advancing equity to ensure youth have equal access to and outcomes in high quality education and training is a key priority for the Department. Equity must be integrated into everything programs do; from outreach and recruitment to service delivery strategies to partnership development and to using data to inform decision making. Equity in the WIOA Youth program means that not only do youth have equitable access to services and supports but also that youth are achieving equitable outcomes.

On January 20, 2022, ETA hosted a webinar, “Technical Assistance to Meet Equity Goals in WIOA Youth Programs” which reviewed resources and provided audience members an opportunity to share their technical assistance needs as it relates to how WIOA youth providers can improve youth outcomes through more equitable and inclusive programming. Presenters and audience members on this webinar engaged in a rich discussion of what integrating equity principles into WIOA youth programming can look like. ETA encourages those who were unable to attend the webinar to view the recording of the webinar at: <https://www.workforcegps.org/events/2021/10/25/19/36/Technical-Assistance-to-Meet-Equity-Goals-in-WIOA-Youth-Programs>. For additional resources on equity, visit: <https://youth.workforcegps.org/resources/2022/08/08/19/05/Resources-on-Advancing-Workforce-Equity-for-Youth>.

Additional information on integrating equity into workforce development programming can be found at: <https://youth.workforcegps.org/resources/2022/08/08/19/05/Resources-on-Advancing-Workforce-Equity-for-Youth>

Job Quality: Ensuring equity in WIOA Youth programs means that programs must not only connect youth to a job, but ensure youth have access to quality jobs by creating opportunities for on-ramps to quality career pathways. The Department leads the [Good Jobs Initiative](#), focused on job quality by providing “critical information to workers, employers, and

government as they work to improve job quality and create access to good jobs free from discrimination and harassment.” The Department, in partnership with the U.S. Department of Commerce created eight principles framework, known as the [Good Jobs Principles](#), for a shared vision of job quality. These principles focus on hiring and recruitment; family-sustaining benefits for full- and part-time workers; diversity, equity, inclusion, and accessibility (DEIA) in the workplace; empowerment and representation; job security and working conditions that include a safe and healthy workplace; pay that is stable and a living wage; and skills and career advancement opportunities to progress to good jobs.

[TEGL 07-22](#), *Increasing Employer and Workforce System Customer Access to Good Jobs*, defines a good job, explains why job quality is important, and outlines how the workforce system integrates good job strategies into its employer relationships and workforce training. It also clarifies the workforce system’s role as supporter and developer of good jobs, in an effort to make the workforce system more equitable and responsive to worker and business needs. Strong State and Local Workforce Development Boards and State Workforce Agencies use the information in that guidance to develop a strategy for identifying and creating long-term partnerships with employers offering good jobs; helping other employers to provide good jobs; and creating strategic, flexible career pathways to good jobs that respond to local labor market needs.

Quality Work Experiences: Integrating equity and job quality principles into the WIOA Youth program is achieved by ensuring youth have access to quality work experiences, in particular, paid work experience whenever possible, that have on-ramps to career pathways. The decade between ages 14 and 24 is marked by critical transitions as youth begin to enter adulthood and make decisions about how to continue their education or enter the workforce. The opportunities and support available to young people during this time influences their long-term trajectories into adulthood.¹ Early employment represents one experience that is generally associated with better labor and wage outcomes in the future, potentially because it helps youth to develop soft skills, a job history, and connections to employer networks.²

Early employment is also an experience that youth and young adults from low-income households have greater difficulty accessing than higher-income peers.³ Black and Hispanic teenagers from low-income households experience even greater challenges in the labor market due to structural barriers to opportunities faced by people of color in the American job market.⁴ This inherent inequity makes it critical that the WIOA Youth program provide quality work experience opportunities to youth participants.

¹ Abdul Latif Jameel Poverty Action Lab (J-PAL);

https://www.povertyactionlab.org/sites/default/files/publication/SYEP_EvidenceReview-5.25.22.pdf

² 1 Kahn, Lisa B. 2010. “The Long-Term Labor Market Consequences of Graduating from College in a Bad Economy.” *Labour Economics* 17, no. 2 (April): 303–316. doi: <https://doi.org/10.1016/j.labeco.2009.09.002>; Neumark, David. 2002. “Youth Labor Markets in the United States: Shopping around vs. Staying Put.” *The Review of Economics and Statistics* 84, no. 3: 462–482. <https://doi.org/10.1162/003465302320259475>.

³ 2 Sum, Andrew, Ishwar Khatiwada, Mykhaylo Trubskyy, Martha Ross, Walter McHugh, and Sheila Palma. 2014. “The Plummeting Labor Market Fortunes of Teens and Young Adults.” Brookings Institution. https://www.brookings.edu/wp-content/uploads/2014/03/Youth_Workforce_Report_FINAL-1.pdf.

⁴ Spievack. 2019. “For People of Color, Employment Disparities Start Early.” Urban Institute. <https://www.urban.org/urban-wire/people-color-employment-disparities-start-early>.

According to MDRC’s meta-analysis on career pathway programs, [systematic biases](#), especially against people of color and women, social networks that limit which jobs and employers workers can connect to, and employers’ strong preference to hire those who already have relevant work experience can all combine to make it difficult for people to get access to employers and careers that offer family-supporting wages. Work-based learning can help offset those disadvantages by using a college or training program’s relationships and credibility to open doors. Apprenticeships offer another potential avenue by which work-based learning could increase college completion rates, earnings, and equity, if they were expanded to include more diverse participants. Apprenticeships are already often connected to colleges that deliver classroom training components leading to college credentials.”

In addition to ensuring youth have access to paid work experience opportunities, it is critical that such work experiences be in industries and occupations that put youth on a career pathway to high quality jobs. As discussed in CLASP’s research brief entitled *Toward a Vision of Quality Summer Employment for All Youth*, recent interviews with Summer Youth Employment Program funders, providers, advocates, and participants in six U.S. cities explored what it would take to guarantee a high-quality summer job to all youth. Among the insights that emerged, one theme became clear: Young people want more than a summer job; they want career-focused work experience that is worth their time and responsive to their day-to-day realities.⁵ Creating targeted job opportunities with deliberate focus on equity and exposing youth to careers and connecting them to social networks in fields where they are underrepresented will help youth enter career pathways that will lead to family-sustaining wages.”

Apprenticeships and Pre-Apprenticeships: One way to connect youth to work experiences that will lead to career pathways is through pre-apprenticeship and Registered Apprenticeship opportunities. Registered Apprenticeship programs (RAP) offer learn while you earn opportunities and are appropriate for many youth participants. The average wage for a RAP completer is \$70,000, and 94 percent of completers retain employment.⁶ Furthermore, RAP participants earn an average of \$98,718 more than nonparticipants over their career.⁷

Historically, many individuals, including youth, have faced significant barriers to accessing RAPs. Quality pre-apprenticeship programs, however, can play a key role in removing these barriers and creating accessible pathways to RAPs and to rewarding careers. While a quality pre-apprenticeship program can play a valuable role in providing work-based learning for all Americans, as identified in recent evaluations of the American Apprenticeship Initiative (AAI) grant program, pre-apprenticeship programs may also serve as an effective tool for promoting DEIA by helping individuals facing barriers to employment acquire the practical and foundational skills needed to successfully participate in the workforce and to gain entry into RAPs. Pre-apprenticeship programs use varied program strategies which place an

⁵ CLASP, https://www.clasp.org/wp-content/uploads/2022/05/2022_TowardAVision.pdf

⁶ “*Career Seeker Fact Sheet*,” (September 2020), Department of Labor;

⁷ Reed, Debbie, et al., “*An Effectiveness Assessment and Cost-Benefit Analysis of Registered Apprenticeship in 10 States*,” (July 2012), Mathematica.

individual on the potential career pathway to employability through a RAP. They utilize a wide range of program designs and approaches, and often vary in duration to meet the needs of diverse populations and employers.

The Department has invested significant funding in recent years on building pre-apprenticeship and RAPs for youth and encourages states and local areas to work with their apprenticeship partners to leverage and align WIOA Youth program resources and further expand these quality work and learning opportunities. The Department encourages states and local areas to develop or strengthen existing relationships with their State Apprenticeship Agency in those states that have them or with an ETA Apprenticeship and Training Representative in states that don't have a State Apprenticeship Agency.

Mental Health: The workforce system must play a key role in addressing the youth mental health crisis. Even before the pandemic, demand for mental health services was increasing, especially for our nation's young people. The COVID-19 pandemic intensified the situation, subjecting many young Americans to social isolation, loss of routines, and traumatic grief⁸. These challenges are documented in the White House's Fact Sheet: Improving Access and Care for Youth Mental Health and Substance Use Conditions found at:

<https://www.whitehouse.gov/briefing-room/statements-releases/2021/10/19/fact-sheet-improving-access-and-care-for-youth-mental-health-and-substance-use-conditions/>.

Additionally, in December 2021, the Office of the Surgeon General released an advisory report, "Protecting Young People's Mental Health," found at <https://www.hhs.gov/sites/default/files/surgeon-general-youth-mental-health-advisory.pdf> in which the devastating impacts of the pandemic and the alarming increases in mental health needs of young people are outlined.

In August 2022, the Department hosted a webinar entitled: *Supporting Youth Mental Health in the Workforce System*, where the Office of the Surgeon General presented on its Advisory mentioned above, National Youth Employment Coalition provided an overview of the findings from their report summarizing findings from their national survey, entitled:

[*Identifying Gaps in Youth Employment Programs' Capacity to Address Youth Mental Health Needs*](#), and offered policy and practice solutions, and Substance Abuse and Mental Health Services Administration showcased a number of resources that may be useful to program practitioners when helping youth access mental health services and supports. The webinar recording is available at:

<https://www.workforcegps.org/events/2022/07/01/18/50/Supporting-Youth-Mental-Health-in-the-Workforce-System>.

During the webinar, ETA showcased the Youth Mental Health Resource Guide which was designed to help youth workforce practitioners deliver on the WIOA youth program element of providing youth with comprehensive guidance and counseling. The Resource guide can be found at: <https://youth.workforcegps.org/resources/2022/08/16/15/26/Youth-Mental-Health-Resource-Guide>.

⁸ The White House, FACT SHEET: Improving Access and Care for Youth Mental Health and Substance Use Conditions, <https://www.whitehouse.gov/briefing-room/statements-releases/2021/10/19/fact-sheet-improving-access-and-care-for-youth-mental-health-and-substance-use-conditions/>.

Trauma-Informed Care. Trauma is a major contributor of poor mental health. When working with youth it is important to understand the effects trauma may have. Trauma affects the way a person learns, plans, and interacts with others; a young person may be combative, non-responsive at times, or misuse substances to cope with these past traumas. Youth programs have increasingly adopted different types of trauma-informed care approaches, which seek to support individuals who have experienced trauma or distressing events in their lives. Several local programs have adopted trauma-informed care into their program offering. ETA encourages all WIOA Youth program providers to fully incorporate trauma-informed care principles and practices into program planning, staffing, training, and implementation.

Resources on Trauma and Trauma-Informed Care can be found at:

<https://youth.workforcegps.org/resources/2020/03/24/11/13/Resources-on-Trauma-and-Trauma-Informed-Care>. These resources can help workforce system providers better understand the impacts of trauma on the young people they serve and that professional development and training in trauma-informed care is critical to achieving positive outcomes. ETA will continue to share up-to-date resources and research and encourages the system to fully integrate trauma-informed practices into service delivery to help youth feel safe, supported, and engaged while participating in education, training, and employment.

Youth Voice: Youth play an important role in strengthening programs and improving youth outcomes. Empowering youth to identify and respond to community needs helps them become leaders and assist them in civic engagement. Finding ways to incorporate youth in program development, recruitment strategies, and execution of activities is pivotal. The Interagency Working Group on Youth Programs, composed of representatives from 22 federal agencies that support programs and services focusing on youth, created a tool, [“Assessing Youth Involvement and Engagement,”](#) to assist organizations and community partnerships in determining how they involve youth in programs, whether youth are becoming more engaged in the community, and if certain strategies are helping to retain youth. ETA created a tip sheet entitled, [“Civic Engagement for Leadership Development,”](#) which notes that by supporting youth in finding the issues they are passionate about increases their investment. Involving youth as partners in making decisions that affect them increases the likelihood the decisions will be accepted and adopted. Further, providing participants a safe platform to express their ideas, opinions, and advice to others is pivotal in developing leadership skills, which is a requirement of the WIOA Youth program.

Youth involvement can benefit organizations and their programs as well as the youth themselves. Youth voices assist programs with assessing the resources required to meet the needs of current and future participants. Learning from best practices shared from the IWGYP, programs developed in partnership with youth are more likely to be effective at engaging the population and, therefore, to have a greater impact. States and local programs are encouraged to engage youth in leadership development opportunities to enhance their confidence, employability, self-determination, and other positive social behaviors.

For more resources on how programs can engage youth and incorporate youth voices into their programs, visit: <https://youth.workforcegps.org/resources/2022/08/08/17/41/Resources-on-Engaging-Youth-Voice>.