

Region 4 Workforce Development Board

WIOA Youth Enrollment Policy

Purpose: To provide Region 4 guidance regarding youth enrollment for the Workforce Innovation and Opportunity Act (WIOA Youth Program). Youth services will have a priority on serving- out-of-school youth, high school dropout recovery, achievement of recognized postsecondary credentials, and successful employment outcomes. Career pathways and work-based learning will be promoted as learning approaches.

REFERENCES: The Workforce Innovation and Opportunity Act (WIOA) Section 3(27), 3(46), 129(2) WIOA regulations sections 681.200 through 681.310, WIOA sec., DWD Memorandum Interim Guidance on Youth Eligibility and Data Validation, and TAB 2014-04; WIOA section 129(A); WIOA 129 (c) (2), NPRM 681.460 20 CFR part 664, and DWD Youth Services Manual

Background: The Workforce Innovation and Opportunity Act (WIOA) provides economically disadvantaged young adults between the ages of 14 and 24, who face barriers to educational and/or workforce success, with year round employment and training services. In School youth age range is 14-21 and Out of School youth age range is 16-24.

Every youth participant shall have an Individual Service Strategy (ISS) jointly developed by the participant and Case Manager. The Individual Service Strategy (ISS) identifies employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to reach the goals. The ISS should be based on the objective assessment and should reflect the expressed interests and needs of the participant. The goals identified must be mutually agreed upon between the youth program case manager and the participant to ensure positive performance. The ISS is a "living document" and is remained open during participation until exit.

CONTENT:

A WIOA program youth is not considered a "participant," and subsequently included in performance calculations, until the youth has been **determined eligible, received an objective assessment, developed an individual service strategy, and received 1 of the 14 youth program elements**. These components should be completed in the order listed. The specifics of each component are described below.

Eligibility

US citizenship and/or eligibility-to-work in the US are not program eligibility requirements for WIOA Title I. While citizenship does not need to be validated, Indiana has determined that an individual's eligibility-to-work in the United States (regardless of citizenship) must be validated for all WIOA Title I youth prior to the receipt of work experience or occupational skills training services.

Eligibility responsibilities include the following three areas:

1. Compliance with applicable state and federal laws and regulations
2. Compliance with Region 4 Workforce Board (R4WDB) plan
3. Assurances of proper eligibility, data validation, and documentation maintenance

Eligibility determination includes the following steps:

1. Determining income eligibility as required

2. Determining barriers
3. Ensuring Selective Service Registration, if applicable
4. Determining School Status

Out of School Youth:

To be an Out of School youth, individual must not be attending any school, not be younger than 16 or not older than 24, and have at least one barrier.

To be eligible as an Out of School youth: The youth is not younger than age 16 or older than age 24

AND -

Not attending any school (as defined under State law)

AND -

One or more of the following barrier/s):

- A school dropout
- A youth who is within the age of compulsory school attendance (generally, ages 7 to and including 17 years of age) but has not attended school for at least the most recent complete school year calendar quarter. (See Attachment B of DWD Memorandum for full definition)
- An individual subject to juvenile or adult justice system
- Homeless: Multiple categories of - runaway, foster care, has aged out of foster care, eligible for assistance under Section 477 of Social Security Act (John H. Chaffee foster care independence program), Violence Against Women's Act, McKinney-Vento Homeless Assistance Act, or placed in an out-of-home placement
- An individual who is pregnant or parenting
- A youth who is an individual with a disability
- A recipient of a secondary school diploma or its recognized equivalent **who is a low-income individual and is-basic skills deficient** OR an English language learner**
- **A low-income individual who requires additional assistance** to enter or complete an educational program or secure or hold employment.

Only two of the barriers require income eligibility (low income includes living in a high poverty area)

1. *Those with a high school diploma or equivalent and are basic skills deficient or an English language learner*
2. *An individual "who requires additional assistance" for education or employment.*

If the Out of School youth have any of the other barriers listed, they do not have to be low income.

In School Youth:

In School youth are aged 14-21 and attending school, and low-income, and have a defined barrier. (Low income includes free and reduced lunch or living in a high poverty area).

To be eligible as In School Youth – must be attending school (as defined under state law)

And

Not younger than age 14 or older than age 21

And

Low income individual*

And

One or more of the following barriers:

- Basic skills deficient**
- English language learner
- Offender
- Homeless: Multiple categories of - runaway, foster care, has aged out of foster care, eligible for assistance under Section 477 of Social Security Act (John H. Chaffee foster care independence program), Violence Against Women's Act, McKinney-Vento Homeless Assistance Act, or placed in an out-of-home placement
- Youth who is an individual with a disability
- Pregnant or Parenting
- Individual who requires additional assistance (see Youth Requires Additional Assistance definition below) to complete an educational program or to secure and hold employment (*see limitation below*)

Note: WIOA requires a 5% limitation on using 'Requires Additional Assistance' as a barrier for In School youth.

**Exception to the low- income requirement allows that up to 5 percent of youth who meet all the other eligibility requirements need not be low-income. The 5 percent is calculated based on all youth served in the WIOA local youth program in a given Program Year.*

*** DWD has defined Basic Skills Deficient as:*

- Scores 8.9 or below on TABE in reading, writing, or computing skills or
- The Youth is unable to compute or solve problems, or read, write or speak English, at a level necessary to function on the job, in the individual's family or in society. This is defined as:
 - Lacks a high school diploma or equivalency and is not enrolled in secondary education; or
 - Enrolled in Title II (Adult Ed) or
 - Poor English language skills or
 - Is WorkIN eligible, or
 - Case manager make observations

BSD for In-School Youth:

- Behind in credits to graduate on time with peer cohort
- GPA 2.5 or below
- Have taken and did not pass the End of Course Assessment (ECA)

See Youth Services Logic Flow Chart for determining whether a youth is appropriate for in-school or out-of-school program

Region 4 Workforce Board defines individuals who "require additional assistance to complete an educational program, or to secure and hold employment" as youth who fall within at least one of the following categories:

- Is at risk of dropping out of High School due to grades/credits/attendance/not passing proficiency exam or has had an Out of School suspension or expulsion from school.(ISY)
- Has a court/agency referral mandating school attendance. (ISY)
- Is attending an alternative school / education program or has been enrolled in an alternative school within the past 12 months.(ISY)
- Is or was a Ward of the State
- Has been referred to or treated by an agency for substance abuse/ psychological problems
- A victim of domestic abuse or violence
- Has a currently incarcerated parent(s)

- *Has neither the work experience nor the credential required for an occupation in demand for which training is necessary and will be provided (OSY)*
- *Has been fired from a job within the 6 months (or long if last job) prior to application (OSY)*
- *Has never held a full-time job (30+ hours per week) for more than 13 consecutive weeks (OSY)*

Low Income means an individual who receives or in the past 6 months received or is a member of a family:

- that receives income-based public support (TANF, SNAP or other income based public support);
- A member of a family that lives at 100% of poverty threshold or at 70% of lower standard income level;
- Homeless; and/or
- Is an individual with a disability whose own income meets the income requirement of clause, but who is a member of a family whose income does not meet this requirement.
- Foster child
- Receives or is eligible to receive 'free and reduced' lunch
- Youth living in a high poverty area

Family Definition:

The term "family" means two or more persons related by blood, marriage, or decree of court, who are living in a single residence, **and** are included in one or more of the following categories:

- (A) A husband, wife, and dependent children.
- (B) A parent or guardian and dependent children.
- (C) A husband and wife.

Family Income - See DWD TAB 2014-04 Economically Disadvantage Criteria 2015

Income eligibility for disabled youth - If the family of a disabled youth does not meet the income eligibility criteria, the disabled youth should be counted as a family of one. The disabled youth may be considered income eligible if the youth's own income meets the WIOA income criteria. As a result, a youth with a disability may be income eligible for WIOA services, even if their parents' income exceeds the guidelines.

Per TEGL 26-13

Family – Further Defined

The term "family" means two or more persons related by blood, marriage, or decree of court, who are living in a single residence, **and** are included in one or more of the following categories:

- (A) A husband, wife, and dependent children.
- (B) A parent or guardian and dependent children.
- (C) A husband and wife.

Examples:

Kara is a 21 year old single parent with two children. They live with her father and stepmother who both work.

What is the family size? Three: Kara and her two children"

The family includes Kara and her two children. Since Kara is a parent of dependent children, she and her children are a family of three.

You don't include her dad and stepmom because they are a separate "family" - husband, wife and dependent children. Kara and her parents fit this, but Kara's children don't. You can't separate mom from her children to define family. (B) Parent, guardian and dependent children. Kara and her girls fit here.

Janie is 18 and has a two-year old daughter, Emma. She and Emma live with her mom, Pat (Emma's Grandmother). Janie has come into the career office for child care assistance.

What is the family size? Two: Janie and Emma

Jason is 19 and lives with his sister. He has not worked in the last year, but she makes a high salary. What is the family size? One: Jason

You don't count his sister because she doesn't meet one of the category requirements:

-A husband, wife and dependent children

-a parent or guardian and dependent children

-a husband and wife

Additional Eligibility Requirement and Data Validation:

If a youth receives a work experience or occupational skill training Youth service, staff must validate the individual's eligibility-to-work in the United States.

See Data Validation Section of DWD Memorandum on Youth Eligibility

Objective Assessment

Objective assessment is a process to assist individuals in identifying strengths, transferable skills, interests, work values, and personal priorities as they relate to employment. It is **not** something that a case manager does to or for the young adult but, rather, an activity in which the case manager functions as a facilitator; helping the individual analyze data and information that will be used in a goal-setting process.

All program participants shall be assessed to properly identify academic levels including basic reading and math, deficiencies in basic occupational and work readiness skills, and supportive service needs to assist each youth participant in removing barriers to accomplish educational and employment goals.

The objective assessment in Indiana Career Connect (ICC) will be the approved objective assessment tool for Region 4.

Individual Service Strategy (ISS)

The Individual Service Strategy (ISS) should be developed to include work readiness, basic skills, occupational skills/training, employment, other and both short term and long term. ISS goals and strategies should be updated as short-term goals are achieved or the youth's needs change. The 14 youth program elements must be made available to every participant. See Region 4 WIB Youth Program Elements Policy. The ISS must be based on the objective assessment and must be developed within five (5) business days upon completion of the OA. The ISS in Indiana Career Connect will be the approved ISS for Region 4.

- A. **Developing an ISS and Participation** - Participation in WIOA begins after a youth is determined eligible, received an objective assessment, developed an Individuals service strategy and received 1 of the 14 youth program elements. The ISS shall be developed in partnership (mutually agreed) with the participant. The ISS is the framework for justifying decisions concerning the appropriate service mix and sequence of services. The customer must receive a copy, signed by both the staff member who developed it and customer.
- B. **Definitions** – An ISS is a specific plan developed for each youth that is based on the objective assessment and identifies an employment goal (including, in appropriate circumstances, nontraditional employment), an educational goal, appropriate achievement objectives, and appropriate services for the youth.

The ISS is used as the basic instrument for the local area to document appropriateness of decisions made about the mix and combination of services, including referrals to other programs for specified activities.

In general the ISS should:

- Identify employment goals, educational goals, needs and barriers, objective assessment results including testing information, and appropriate services for the youth. Both short and long-term goals should be included.
- Be based on the objective assessment and reflect the expressed interests and needs of the participant.
- Be jointly developed with the participant; meaning the participant's input shall be taken into account and the participant shall have full knowledge of its contents. The goals must be mutually agreed upon.
- Be reviewed quarterly or more frequently with the participant to review progress and make any needed adjustments. It is a living document that should be added to or adjusted as the participant and case manager deem necessary.
- When reviewing the ISS, case managers should document a participant's progress, activities completed, benchmarks reached, and any other accomplishments.
- The ISS must be updated to reflect changes in long-term or short term goals, significant change in household status, newly identified or changed barriers that would change objectives or services, a legal name change, or other life changes that may affect goal attainment.

Note: All participants must have a signed copy of the ISS in their paper or scanned file. Additionally, JAG students must have an IDP in e-NDMS and the ISS in Indiana Career Connect.

- C. **Components of an ISS** – An effective ISS will have all of the components necessary to assist a youth in making a successful transition to education and employment. The case manager works with the youth to create a plan for that transition. The youth must be involved in the process of developing the ISS so that he or she has a stake in making it work.

The components of an ISS are

- Long-term and short-term employment and educational goals (how to get the youth from where he or she is – a high school graduate – to where he or she wants to be – a registered nurse)
- Activities under program elements to meet the youth's immediate needs, supportive service needs, and developmental needs to attain long-term and short-term employment and educational goals
- Supportive services that enable the youth to participate in WIOA youth program services
- Benchmarks, action steps, and responsibilities for both the youth and the case manager
- Projected dates for completion of youth's needs and objectives
- Services provided by partners, if applicable
- Signatures of both the youth and the case manager to show mutual commitment

- D. **Update the ISS** – Review the ISS periodically, ideally at least every 90 days. In addition, review the ISS whenever there are significant changes in the youth's circumstances or when you or other program staff sees the need for change. Be sure to involve the youth in any modification of the ISS.

If significant modifications are made, the newly revised copy should be signed and provided to the participant.

Once an ISS is developed and approved, it can be used in the ongoing process of monitoring and reevaluating the youth's progress toward his or her employment and educational goals.

Youth 14 Program Elements

Successful Workforce Investment Opportunity Act (WIOA) youth programs, make available high-quality programs and services in all program elements to all youth served by WIOA youth programs, fund programs and activities that meet the needs of individual youth and contribute to meeting local needs and goals and demonstrate success through positive. The Workforce Investment Act requires that 14 program elements be made available to all youth who are served by the WIOA youth system. These program elements are designed to fill the gaps in the lives of youth who lack the family, educational, and social frameworks to meet their essential needs.

The goal of the WIOA youth system is to assist youth in making a successful transition to employment and further education. Programs should be designed using effective practices, should be held accountable for success, and should make a clear contribution to the overall goal of the WIOA youth system WIOA recognizes that simply providing training is not enough to enter a specific occupation. A wide range of activities and services must be available to assist youth, especially at-risk youth, in making a successful transition to adulthood. The 14 WIOA youth program elements provide those activities and services.

CONTENT: The 14 youth program elements are:

- **Tutoring, study skills training, and instruction leading to secondary school completion**, including dropout prevention strategies;
- **Alternative secondary school offerings;**
- **Education Concurrent with Workforce Preparation;**
- **Labor Market and Employment Information for Local Area;**
- **Paid and unpaid work experiences**, including internships and job shadowing;
- **Occupational skill training: (only for Out of School Youth)**
- **Financial Literacy;**
- **Leadership development opportunities**, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors during non-school hours;
- **Entrepreneurial Skills;**
- **Adult mentoring** for the period of participation and a subsequent period, for a total of not less than 12 months;
- **Comprehensive guidance and counseling**, which may include drug and alcohol counseling and referral;
- **Supportive services;** and
- **Follow-up services** for not less than 12 months after completing participation
- **Activities that prepare Youth to Transition to post-secondary education and training**

Staff must ensure the 14 WIOA youth program elements are **made available** to all youth participants. Region 4 has imbedded the 14 elements in the Youth IEP and developed a Youth 14 elements handout that should be provided to each youth (attachment A)

Local programs must make all of these program elements available to youth participants. This does not mean, however, that every youth participant must receive services from all program elements but that the appropriate elements are provided to assist the youth to remove barriers and obtain short and long term goals. Specific program services will be provided to a youth participant, based on each participant's objective assessment and individual service strategy.

ICC Data Entry: A case note must be recorded stating the 14 youth elements have been provided and discussed with the participant and an IEP will be developed with the youth determining the best way to implement the needed youth elements. As with all case notes, this must be individualized.

Revised: October 2017

Let Us Help You *Find Your Future*



Do you need help finishing high school or getting a HSE?

Improving Educational Achievement

- Tutoring, Study Skills, and Dropout Prevention Strategies
- Alternative Secondary School Services
- Education Concurrent with Workforce Preparation

Do you need a job or training to develop job skills?

Preparing for and Succeeding in Employment and Post Secondary Education:

- Labor Market and Employment Information for Local Area
- Paid and Unpaid Work Experience
- Occupational Skills Training
- Financial Literacy
- Activities that Prepare Youth to Transition to post-secondary education and training

Services Intended to Develop the Potential of Youth as Citizens and Leaders

- Leadership Development Opportunities
- Entrepreneurial Skills

Do you need help financing your college dreams or staying motivated?

Supporting Youth:

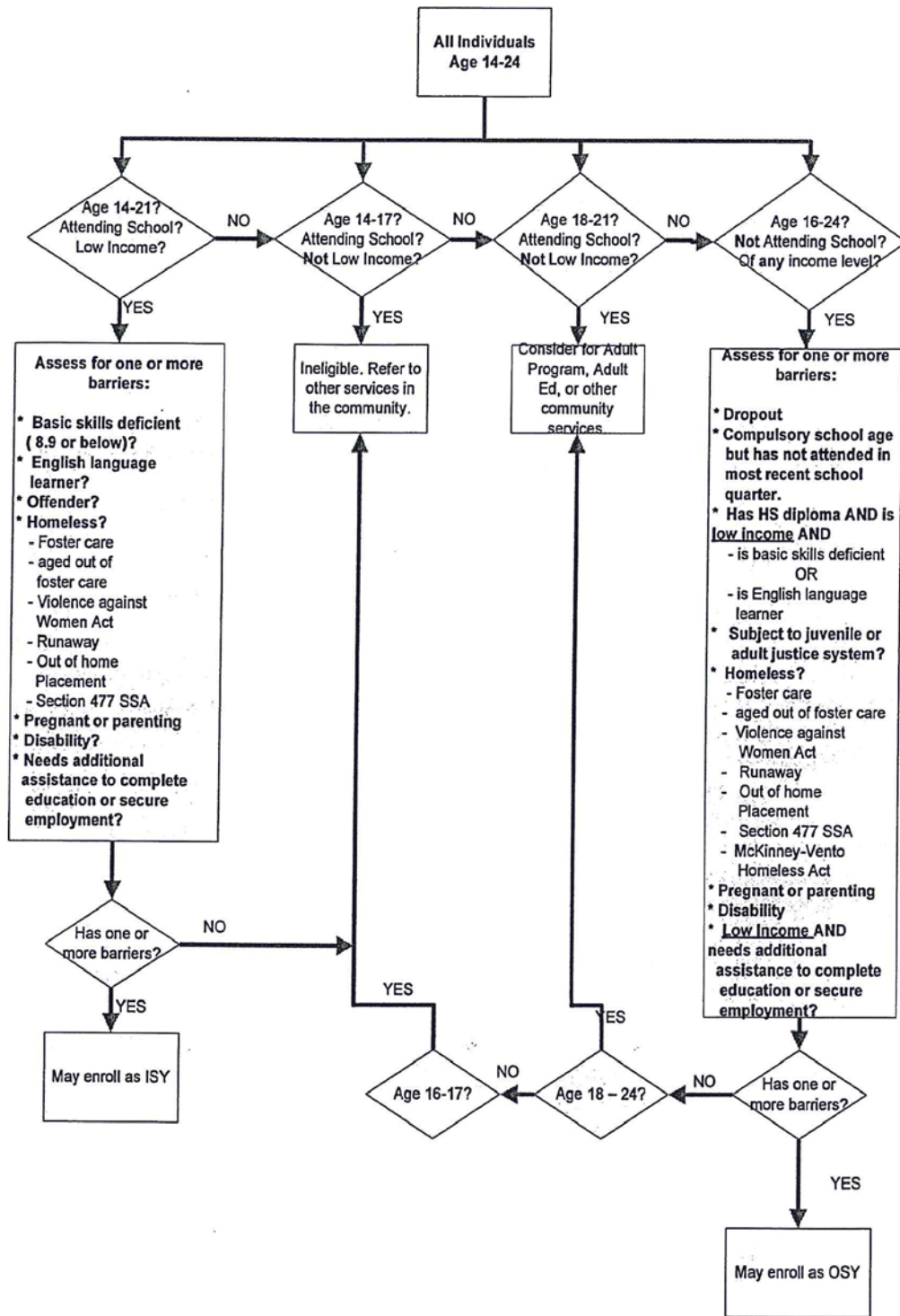
- Adult Mentoring
- Comprehensive Guidance and Counseling
- Supportive Services
- Follow-Up Services



If you are between the ages of 17 to 24 and you need help with any of these services, contact your local WorkOne office to assist you!

Find the nearest WorkOne office on this website: www.workonewestcentral.org

The WorkOne System is an equal opportunity employer and does not discriminate in the programs and services offered. Auxiliary aids and services are available upon request to individuals with disabilities. The TDD/TTY number is 1-800-743-3333. • El Programa de Financiamiento asistido de acuerdo con el Título 1 de WIA es un programa de Igualdad de Oportunidades de Empleo. Ayuda y servicios auxiliares están disponibles a solicitud para personas con discapacidad. El número de TDD/TTY es 1-800-743-3333.



In-School vs. Out-of-School Youth Enrollment Flowchart

INCOME CALCULATION WORKSHEET

Client Name: _____ Client SS# _____

Date: _____ Site: _____

FAMILY SIZE & INCOME STATEMENT

(List all family members here; include member's income such as employment income, social security payments, etc. if they have no

Please provide the information for all family members residing in the household in the last 26 weeks.

Number in Household: _____

Family – two or more persons related by blood, marriage or decree of court, who are living in a single residence, and are included in one or more of the following categories: • a husband, wife, and dependent* children • a parent or guardian and dependent* children • a husband and wife o The definition of family and the phrase "husband and wife" includes same-gender married couples

** EMPLOYMENT INCOME **

Use average hours per week x hourly wage **OR** average weekly or bi-weekly pay multiplied by Number of Weeks (or pay periods) in last 26 weeks. Remember overtime & tips.

Average Hours Per Week **multiplied by** Hourly Wage **multiplied by** Number Of Weeks Employed or Average Pay **multiplied by** Number of Weeks/Pay Periods in Last 26 Weeks. **Include Unemployment Insurance, Old Age Survivors Insurance and Child Support.**

Family Member	Relationship	Age	Income Source	Income (Last 6 months)	Annualized Income
_____	_____	_____	_____	_____	<input type="checkbox"/> X2 _____
_____	_____	_____	_____	_____	<input type="checkbox"/> X2 _____
_____	_____	_____	_____	_____	<input type="checkbox"/> X2 _____
_____	_____	_____	_____	_____	<input type="checkbox"/> X2 _____
_____	_____	_____	_____	_____	<input type="checkbox"/> X2 _____
_____	_____	_____	_____	_____	<input type="checkbox"/> X2 _____
_____	_____	_____	_____	_____	<input type="checkbox"/> X2 _____
_____	_____	_____	_____	_____	<input type="checkbox"/> X2 _____

If no income is reported, explain source of support. _____

Do you provide 50% or more of your own support? Yes No

Will you be claimed as a dependent on another's tax return? Yes No

What documentation was used to determine income eligibility? (Attach Documentation) _____

EXCLUDABLE/ASSISTANCE INCOME (Answer all that apply.)

Currently receiving TANF Yes____ No____ Currently receiving food stamps Yes____ No____

Determined eligible or received

Food stamps in last 6 months Yes____ No____ Currently receiving Trustee Assistance Yes____ No____

Currently receiving Refugee Assistance Yes____ No____ Currently receiving SSI Yes____ No____

If youth with documented disability (with personal includable income under the economic guidelines), but **household income** is over economic guideline limit, check here: **HOUSEHOLD OVER INCOME * INDIVIDUAL WITH DISABILITY * TAKEN AS FAMILY OF ONE** Yes_____

Comments:

Signatures

Participant Signature: _____ Date: _____

Case Manager Signature: _____ Date: _____