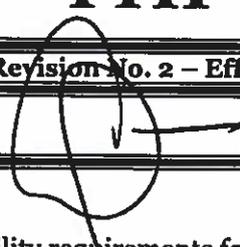


Workforce Connections Programs, Services and Activities Eligibility for WIOA Title I Services	YTH-040-01
	Revision No. 2 – Effective 07-01-2016
Policy Approved By: WC Executive Director Policy Adopted on: November 2013	

Purpose:

To establish policy and guidelines regarding eligibility requirements for participation in programs funded in whole or in part under Title I of the Workforce Innovation and Opportunity Act (WIOA).

Background

WIOA was signed into law on July 22, 2014. WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy. WIOA supersedes the Workforce Investment Act of 1998 and amends the Adult Education and Family Literacy Act, the Wagner-Peyser Act, and the Rehabilitation Act of 1973. WIOA outlines a broader youth vision that supports an integrated service delivery system and gives a framework through which states and local areas can leverage other Federal, State, and local resources to support in-school and out-of-school youth. WIOA affirms the DOL commitment to providing high quality services for youth and young adults beginning with career exploration and guidance, continued support for educational attainment, opportunities for skills training in in-demand industries and occupations, and culminating with quality employment along a career pathway, or enrollment in post-secondary education.

Policy:

All youth applying for WIOA Title I services must first be determined eligible and registered in the WIOA youth program. Registration is the process for collecting information to support the determination of eligibility prior to providing services to the program participant. This policy establishes eligibility requirements and criteria supported by Federal and State statutes and regulations and must be followed by eligible providers of youth workforce investment activities within the Sothern Nevada Workforce Development Area (SNWDA).

Reference

PL 113-128 WIOA [Sec. 3, 107, 121, 123, 129, 189, 194]; [20 CFR §681]; [TEGL 02-14]; [TEGL 37-14]; [TEGL 38-14]; [TEGL 8-15]; [TEGL39-11]; [TEGL 23-14]; [State TAG 15-3]

This policy may be subject to change as additional Federal statutes and regulations and/or State policy and guidelines are released.

All information required by Federal, State and local reporting requirements must be collected for each youth participant receiving services, including documentation of each eligibility requirement for the type of service that the participant has received, support documentation must be kept in participant files. Equal employment opportunity data must be collected on every individual applying for WIOA Title I financially assisted aid, benefits, services, or training.

I. General Provisions – Youth Participant Eligibility

To be eligible to participate in activities carried out under chapter 2, subtitle B of WIOA Title I an individual shall:

- Be an out-of-school youth;
- Be an in-school youth;
- Be between the ages of 14 and 24 at the time of enrollment;
- Be a U.S. citizen and/or comply with citizenship and eligibility to work requirements; Section 188 of WIOA contains specific nondiscrimination provisions providing the availability of participation in programs funded in whole or in part under WIOA Title I to citizens or nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, parolees, or other immigrants authorized by the Attorney General to work in the United States. Individuals with employment authorization, including individuals granted relief under the Deferred Action for Childhood Arrivals (DACA), may access any WIOA services.
- Comply with Selective Service registration requirements. An individual who becomes of age for Selective Service Registration (SSR) after enrollment must meet Selective Service requirements by or within 30 days of their 18th birthday. Additional guidance can be found at TEGL No. 11-11 change 1 and 2.
Providers of youth services shall ensure that each individual participating in any program or activity funded in whole or in part under Title I of WIOA, or receiving any assistance or benefit under Title I of WIOA, is in compliance with SSR requirements. Providers of youth services are responsible for determining if an individual seeking services under Title I of WIOA meets SSR requirements. As such, the provider of youth services must determine for any program applicant who was required to register with Selective Service and failed to do so, whether that failure was knowing or willful. It is the responsibility of the program applicant to demonstrate that such failure to register was not knowing or willful.
- Provide documentation of Social Security Number (SSN). Eligible provider of youth services must ensure that SSNs will be maintained in a secure and confidential manner.

A. Additional Eligibility Provisions

For the purpose of this policy and consistent with established Federal statutes and regulations:

1. Out-of-School Youth

An out-of-school youth (OSY) is an individual who is:

- a) Not attending any school (as defined under State law);
- b) Not younger than age 16 or older than age 24 at time of enrollment. Age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 24 once they are enrolled in the program; and
- c) One or more of the following:
 - 1) A school dropout;
 - 2) A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar quarter is based on how a local school district defines its school year quarters;
 - 3) 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;
 - 4) An individual who is subject to the juvenile or adult justice system;

- 5) A **homeless** individual (as defined in sec. 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e- 2(6))), a homeless child or youth (as defined in sec. 725(2) of the McKinney- Vento Homeless Assistance Act (42 U.S.C. 11434a (2))), a **runaway, in foster care or has aged out of the foster care system**, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
- 6) An individual who is pregnant or parenting;
- 7) An individual with a disability; and
- 8) A **low-income** individual who requires additional assistance to enter or complete an educational program or to secure or hold employment. (WIOA Sec. 3(46) and 129 (a) (1) (B)) (see complete definition and requirements for this barrier on page No. 10).

Only those OSY youth who are the recipients of a secondary school diploma or its recognized equivalent and are either basic skills deficient or are English learners and youth who require additional assistance to enter or complete an educational program or to secure or hold employment **must be low-income**. All other OSY, meeting OSY established eligibility requirements under I (A) (1) (c) (1), (2) and (4) through (7), are not required to be low-income.

2. An "In-School Youth"

An in-school youth (ISY) is an individual who is:

- a) Attending school (as defined by State law), including **secondary and post-secondary school**;
- b) Not younger than age 14 or (unless an individual with a disability who is attending school under State law) older than age 21 at time of enrollment. Because age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 21 once they are enrolled in the program;
- c) A **low-income individual**; and
- d) One or more of the following:
 - 1) Basic skills deficient;
 - 2) An English language learner;
 - 3) An offender;
 - 4) A **homeless individual** (as defined in sec. 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), a homeless child or youth (as defined in sec. 725 (2) of the McKinney- Vento Homeless Assistance Act (42 U.S.C. 11434a(2))), a **runaway, in foster care or has aged out of the foster care system**, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
 - 5) An individual who is pregnant or parenting;
 - 6) An individual with a disability;
 - 7) An individual who requires additional assistance to enter or complete an educational program or to secure or hold employment (WIOA Sec. 3 (27) and 129 (a) (1) (C)) (see complete definition and requirements for this barrier on page No. 10).

All ISY must be low-income to meet the ISY eligibility criteria, except for those that fall under the low-income exception item IV (C).

A youth living in a high poverty area automatically meets the low-income criterion. See item IV (D) page - 8 for definitions.

For the purposes of WIOA, providers of Adult Education under Title II of WIOA, YouthBuild programs, and Job Corps are not considered schools [20 CFR § 681.230].

Under Title I of WIOA youth program eligibility requirements, the term “school” refers to both secondary and post-secondary school. Therefore, an individual attending either secondary school or post-secondary school is considered ISY. The term “school dropout” refers to an individual who has dropped out of high schools and not completed their high school diploma or equivalent. The term “school dropout” does not include individuals who have dropped out of post-secondary education.

If a youth applies for enrollment in a program of workforce investment activities and either does not meet the enrollment requirements for that program or cannot be served by that program, the eligible provider of that program must ensure that the youth is referred for further assessment, if necessary, or referred to appropriate educational and training programs that have the capacity to serve the participant, either on a sequential or concurrent basis, to meet the service needs of the youth.

II. Lower Living Standard Income Level (LLSIL)

Title I of WIOA requires the U.S. Secretary of Labor (Secretary) to update and publish the LLSIL tables annually, for uses described in the law (including determining eligibility for youth).

- A. WIOA defines the term “low income individual” as one who qualifies under various criteria, including an individual who receives, or received for a prior six-month period, income that does not exceed the higher level of the poverty line or 70 percent of the LLSIL. These provisions in WIOA pertaining to LLSIL reflect no change from the prior language under the Workforce Investment Act of 1998, as amended.
- B. LLSIL is used for several purposes under WIOA. Specifically, WIOA Sec. 3 (36) defines the term “low income individual” for eligibility purposes, and Sections 127 (b) (2) (C) and 132 (b) (1) (B) (v) (IV) define the terms “disadvantaged youth” and “disadvantaged adult” in terms of the poverty line or LLSIL for State formula allotments.
- C. WIOA Section 3 (36) (B) defines LLSIL as “that income level adjusted for regional, metropolitan, urban and rural differences and family size determined annually by the Secretary [of Labor] based on the most recent lower living family budget issued by the Secretary.”
- D. Lower Living Standard Income Level (LLSIL) is released each year by the Nevada Department of Employment Training and Rehabilitation (DETR). This information is updated upon release and/or announcement. Changes to established income guidelines will be provided via technical assistance guidance (TAG) notice.

III. Determining Family Size and Income

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 husband, wife, and dependent child;
- A parent or guardian and dependent children;
- A husband and wife;
- Domestic partners registered with the State of Nevada.

Any individual not meeting the above definition of family is considered to be a family of one.

A. Family Size

The number of dependent children plus the number of parents or guardians who reside together. Use definition in "family" to arrive at the correct number.

B. Family Income

All income received by all members of the family during the six month period prior to application/registration, annualized by multiplying the six month income by two (6 month income x 2). This amount should be compared to the 70% LLSIL.

The composition of a family is determined as of the date of the application/registration. Therefore, the income of prior family members who may have comprised part of the family during the past six months, but are no longer members of the household (e.g., a divorce, separated or deceased spouse, or other family member) would not be counted for income determination purposes. Only the income of members of the current family should be counted and applied against the current family size.

- C.** For an individual with a disability, income level for eligibility purposes is based on the individual's own income rather than that of his or her family. Under Sec. 3 (36) (A) (vi) of WIOA, an individual with a disability whose own income meets the low-income definition in clause (ii) (income that does not exceed the higher of the poverty living standard line or 70 percent of the lower living standard income level), but who is a member of a family whose income exceeds this income requirement, is eligible for youth services.

D. Inclusion for Family Income

1. **Gross wages and salaries before deductions:** Total money earnings received from work performed as an employee. If a family's only source of income was from wages and salary payments, family income would be equal to gross wages and salary received.
2. **Income from non-farm self-employment:** Net income (gross income minus operating expenses) from a business or other non-farm enterprise in which a person is engaged on his/her own account. If the business or enterprise has suffered a loss, this loss will be allowed to offset wage earnings.
3. **Income from farm self-employment:** Net income from farm self-employment (income from a farm which operates as an owner, renter, or sharecropper, after deductions for farm operating expenses).
4. **Social Security Disability Insurance(SSDI):** pays benefits to individuals that have worked in the past, paid Social Security taxes, and are currently unable to work for a year or more because of disability. SSDI is considered income replacement. SSDI is different from Supplemental Security Income (SSI).
5. **Money received from such sources:**
 - a) Governmental and non-governmental pensions; (including military retirement pay)
 - b) Regular payments from railroad retirement benefits, strike benefits from union funds, worker's compensation, and training stipends;
 - c) Alimony;
 - d) Merit based scholarships, fellowships, and assistantships
 - e) Dividends, interest, net rental income, net royalties, periodic receipts from estates or trusts, and net gambling or lottery winnings;
 - f) Terminal leave pay, severance pay, or a cash-out of accrued vacation leave;
 - g) Disaster relief employment wages; and

h) On-the-job training wages.

E. Exclusions for Family Income

1. Unemployment compensation;
2. Child support payments;
3. Old age and survivors' insurance benefits received under Sec. 202 of the Social Security Act (42 U.S.C. 402);
4. Federal non-cash benefits such as: Medicare, Medicaid, Food Stamps, School Lunches, and Housing Assistance;
5. Assets drawn down as withdrawals from a bank;
6. Public Assistance Payments: Payments received under Temporary Assistance to Needy Families (TANF), Supplemental Security Income (SSI), General Assistance (GA), Refugee Cash Assistance (RCA);
7. One time cash payments, which include: tax refunds; loans (which are debt and not income); one-time insurance payments or compensation for injury; gifts and lump sum inheritances;
8. Job Corps payments;
9. Cash value of employer-paid or union-paid portion of health insurance or other employee fringe benefit;
10. Cash value of food or housing received in lieu of wages;
11. Payments received under the Trade Readjustment Act of 1994;
12. Needs-based scholarship assistance;
13. Financial assistance under Title IV of the Higher Education Act: e.g., Pell Grants; BEOG Grants; Federal Supplemental Educational Opportunity Grants and Federal Work Study; PLUS; Stafford; and Perkins loans (like any other kind of loan are debt and not income);
14. Stipends received in the following programs: Vista, Peace Corps, Foster Grandparents Program, Retired Senior Volunteer Program, Youth Works/AmeriCorps program;
15. Foster child care payments;
16. All WIOA payments except OJT; and
17. Income earned while a veteran was in active military duty, and certain other Veteran's Benefits: e.g., compensation for service connected disability and service connected death; vocational rehabilitation; education assistance.

When a Federal statute specifically provides that income or payments received under such statute shall be excluded in determining eligibility for the level of benefits received under any other Federal statute, such income or payments shall be excluded in WIOA eligibility determination.

IV. Exception for persons who are not low-income individuals

- A.** WIOA allows a low-income exception where five (5) percent of all WIOA youth participants may be participants who ordinarily would be required to be low-income for eligibility purposes and who meet all other eligibility criteria for WIOA youth, except the low-income criteria. Up to five (5) percent of the participants served by WIOA youth programs within the LWDA may qualify for this exception. LWDA approval related to five (5) percent income exceptions will be managed by WC Executive Director.

B. Five (5) Percent Exception

No more than five (5) percent of the individuals assisted may be persons who would be covered individuals, except that the persons are not low-income individuals.

Pursuant to WIOA Sec. 129 (a) (3) (A) (i) the term “covered individual” means an ISY or an OSY who meets the following criteria:

1. The individual is a recipient of a secondary school diploma or its recognized equivalent who is a low-income individual; or
2. The individual is a low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

C. ISY Limitation

Additionally there is a new limitation under WIOA Title I related to the “additional assistance” criterion that applies only to ISY. Sec. 129 (a) (3) (B) of WIOA states that in each local area, not more than five (5) percent of the ISY assisted may be eligible based on paragraph (1) (C) (iv) (VII) of above mentioned section, which refers to the barrier for an ISY who requires additional assistance to complete an educational program or to secure or hold employment. States and local areas must ensure that in a given program year, no more than five (5) percent of ISY enrolled in the program year are eligible only based on the “additional assistance” criterion.

D. All enrollments under the above listed exceptions must have written prior approval from WC.

V. Veterans Priority of Service

A. The Jobs for Veterans Act (JVA), [PL 107-288], signed into law on November 7, 2002, requires that there be priority of service for veterans and eligible spouses in any workforce preparation, development, or delivery program of service directly funded in whole or in part by the U.S. Department of Labor (38 U.S.C. 4215). The Priority of Service regulations, codified at [20 CFR 1010], were issued December 19, 2008 and require qualified job training programs to implement priority of service for veterans and eligible spouses, effective January 19, 2009. Additional guidance: [TEGL 10-09, VPL No. 07-09].

B. Providers of youth services must have processes in place to identify veterans and eligible spouses who are entitled to priority of service. Priority of service means the right of veterans and eligible spouses to take precedence over a not-eligible for priority of service person in obtaining all employment and training services. Depending on the type of service, this may mean veterans and eligible spouses receive services earlier in time, or instead of, a not-eligible for priority of service person. Additional guidance is provided by DOL/ETA on Training and Employment Notice (TEN) No. 15-10, and recommended protocols can be found at: <http://wdr.doleta.gov/directives/attach/TEN/ten2010/ten15-10.pdf>

VI. Definitions (For the purposes of this policy)

A. Basic Skills Deficient, Sec. 3 (5) of WIOA the Term “basic skills deficient” means, with respect to an individual: **a)** who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; **or b)** who is a youth or adult, that the individual 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.

B. Determination of School Status

Determination of whether a youth participant is an OSY or ISY is made at the time of program enrollment. Once the school status of a youth is determined, the school status remains the same throughout the youth’s participation in the WIOA Title I program.

C. Disability

For the purpose of this policy and with respect to an individual, the individual has a physical (motion, vision, hearing) or mental (learning or developmental) impairment which substantially limits one or more of such person’s major life activities and has a record of such impairment, or is regarded as having such impairment. Major life activities include, but are not limited to: caring for oneself, performing manual tasks, communicating, learning, mobility, self-direction, concentrating, and working.

D. High Poverty Area

A youth living in a high poverty area automatically meets the low-income criterion. A high poverty area is a census tract, a set of contiguous census tracts, Indian Reservation, tribal land, or Native Alaskan Village, or county that has a poverty rate for a single parent and/or two parent households of at least 40 percent based on a statistical methodology, as set every five (5) years using American Community Survey 5-Year data [20 CFR §681.260]. A list of the relevant census tracts and information is provided with this policy.

E. Homeless

The term “homeless youth” means an individual who lacks a fixed, regular, and adequate nighttime residence;

1. Youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement;
2. Youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
3. Youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
4. Migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (1) through (3).

F. Limited English Proficiency/English Language Learner

With respect to an individual who has limited ability in reading, writing, speaking, or comprehending the English language, and whose native language is not English, to communicate in English which results in a barrier to employment.

G. Low-Income

Low-Income Individual, Sec. 3 (36) of WIOA the term "low income individual" means an individual who:

1. Receives, or in the past six (6) months has received, or is a member of a family that is receiving or in the past six (6) months has received, assistance through the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), the program of block grants to States for temporary assistance for needy families program under part A of Title IV of the Social Security Act (42 U.S.C. 601 et seq.), or the supplemental security income program established under Title XVI of the Social Security Act (42 U.S.C. 1381 et seq.), or State or local income-based public assistance;
2. Is in a family with total family income that does not exceed the higher of:
 - a) The poverty line; or
 - b) 70% of the lower living standard income level;
3. Is a homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2 (6))), or a homeless child or youth (as defined under section 725 (2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434 a (2)));
4. Receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.);
5. Is a foster child on behalf of whom State or local government payments are made;
6. Is an individual with a disability whose own income meets the income requirement of item 2, but who is a member of a family whose income does not meet this requirement; and
7. WC determination: For the purpose of this section, the term "low-income" used with respect to an individual, also includes a youth living in a high poverty area.

H. Not Attending School/Compulsory School Attendance

The youth is at an age where they are required to attend school, do not have an exception to the regular school attendance as outlined in NRS, or have not graduated. However, the provider of youth services must make school attendance a priority and provide services outside of the regular school day. Through the ISS, the provider of youth services makes school attendance a priority by providing services that direct a youth back to school. The first goal of the ISS must be to have the youth participant return to school. The provider of youth services can also provide services that encourage regular school attendance, such as counseling, tutoring, or exploring career options.

I. Offender

With respect to an individual who:

1. Is, or has been, subject to any stage of the criminal justice process, for whom services under WIOA may be beneficial; or
2. An individual who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

J. Out-of-home Placement

Foster care, including family foster care, kinship care, treatment foster care, and residential and group care.

K. Pregnant or Parenting

1. An individual who is under 22 years of age, and who is pregnant; or
2. A youth (male or female) who is providing custodial care for one or more dependents under age 18.

L. Requires Additional Assistance

Established criteria for the definition of a “Youth Who Requires Additional Assistance to Enter or Complete an Educational Program, or to Secure or Hold Employment”

The program participant file and MIS must document one of the following:

1. Has repeated at least one secondary grade level or is one or more grade level behind age appropriate level;
2. Has a core GPA of less than 1.5 or is a post-secondary student deemed by a school official to be on academic probation;
3. Is at least two (2) semester credits behind the rate required to graduate from high school for each year of secondary education;
4. Has a family history of chronic unemployment (during the two (2) years prior to application, family members were unemployed longer than employed);
5. Is an emancipated youth;
6. Is a current or previous dropout or is deemed at risk of dropping out of school by a school official;
7. Has been suspended two (2) or more times from school, or has been expelled.
8. Has been referred to, or is being treated by, an agency for depression or a substance abuse related problem;
9. Has experienced a recent traumatic event (within two (2) years of application), is a victim of abuse, or resides in an abusive environment as documented by a school official or professional;
10. Is a youth 16 years of age or older who has not held a job for longer than three (3) months, or is currently unemployed and was terminated from a job within six (6) months of application; and
11. A youth that is not currently attending any school (including a youth with a diploma or equivalent) who has not held a full-time job for more than three consecutive months, or has a poor work history to include no work history, or has been fired from a job in the last 6 calendar months, or lacks work readiness skills necessary to obtain and/or retain employment.

M. School Dropout

Sec 3 (54) of WIOA the term “school dropout” means an individual who is no longer attending any school and who has not received a secondary school diploma or its recognized equivalent.

N. Selective Service Registration [TEGL No. 11-11 Change 2]

Men born on or after January 1, 1960 are required to register with Selective Service within 30 days of their 18th birthday (i.e., 30 days before or 30 days after their 18th birthday). This includes males who are:

1. Citizens of the U.S.;
2. Non-citizens, including illegal aliens, legal permanent residents, seasonal agricultural workers and refugees who take up residency in the U.S. before their 26th birthday; and/or
3. Dual nationals of the U.S. and another country regardless of whether they live in the U.S.

Note: For more information about the registration requirements visit www.sss.gov. The Selective Service System also provides a quick reference chart showing who must register located at: <http://www.sss.gov/PDFs/whoMustRegisterChart.pdf>.

workforce CONNECTIONS
High Poverty Designation by Census Tract

Links to determine census tract by street address:

<https://geomap.ffiec.gov/FFIECGeocMap/GeocodeMap1.aspx>

<http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?ref=addr&refresh=t>

2 Parent Household

1 Parent Household

<u>Census Tract</u>	<u>High Poverty Area</u>	<u>High Poverty Area</u>
Census Tract 1.01, Clark County, Nevada		Yes
Census Tract 1.05, Clark County, Nevada	Yes	Yes
Census Tract 1.06, Clark County, Nevada	Yes	Yes
Census Tract 1.07, Clark County, Nevada		Yes
Census Tract 1.08, Clark County, Nevada	Yes	Yes
Census Tract 1.09, Clark County, Nevada		Yes
Census Tract 2.01, Clark County, Nevada		Yes
Census Tract 2.03, Clark County, Nevada		Yes
Census Tract 3.02, Clark County, Nevada	Yes	Yes
Census Tract 4.01, Clark County, Nevada		Yes
Census Tract 4.02, Clark County, Nevada	Yes	Yes
Census Tract 4.03, Clark County, Nevada	Yes	Yes
Census Tract 5.13, Clark County, Nevada	Yes	Yes
Census Tract 5.15, Clark County, Nevada		Yes
Census Tract 5.16, Clark County, Nevada		Yes
Census Tract 5.17, Clark County, Nevada		Yes
Census Tract 5.18, Clark County, Nevada		Yes
Census Tract 5.19, Clark County, Nevada		Yes
Census Tract 5.20, Clark County, Nevada	Yes	Yes
Census Tract 5.21, Clark County, Nevada		Yes
Census Tract 5.22, Clark County, Nevada	Yes	Yes
Census Tract 5.23, Clark County, Nevada	Yes	Yes
Census Tract 5.24, Clark County, Nevada	Yes	Yes
Census Tract 5.25, Clark County, Nevada		Yes
Census Tract 5.27, Clark County, Nevada	Yes	Yes
Census Tract 5.28, Clark County, Nevada		Yes
Census Tract 6, Clark County, Nevada	Yes	Yes
Census Tract 8, Clark County, Nevada		Yes
Census Tract 10.04, Clark County, Nevada		Yes
Census Tract 10.05, Clark County, Nevada		Yes
Census Tract 11, Clark County, Nevada	Yes	Yes
Census Tract 12, Clark County, Nevada		Yes
Census Tract 13, Clark County, Nevada	Yes	Yes

workforce CONNECTIONS

High Poverty Designation by Census Tract

Links to determine census tract by street address:

<https://geomap.ffiec.gov/FFIECGeocMap/GeocodeMap1.aspx>

<http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?ref=addr&refresh=t>

2 Parent Household

1 Parent Household

<u>Census Tract</u>	<u>High Poverty Area</u>	<u>High Poverty Area</u>
Census Tract 14.01, Clark County, Nevada	Yes	Yes
Census Tract 15.01, Clark County, Nevada	Yes	Yes
Census Tract 15.02, Clark County, Nevada		Yes
Census Tract 16.07, Clark County, Nevada	Yes	Yes
Census Tract 16.08, Clark County, Nevada		Yes
Census Tract 16.09, Clark County, Nevada		Yes
Census Tract 16.10, Clark County, Nevada	Yes	Yes
Census Tract 16.11, Clark County, Nevada	Yes	Yes
Census Tract 16.12, Clark County, Nevada	Yes	Yes
Census Tract 16.13, Clark County, Nevada		Yes
Census Tract 17.08, Clark County, Nevada	Yes	Yes
Census Tract 17.09, Clark County, Nevada		Yes
Census Tract 17.12, Clark County, Nevada		Yes
Census Tract 17.15, Clark County, Nevada	Yes	Yes
Census Tract 17.16, Clark County, Nevada		Yes
Census Tract 17.18, Clark County, Nevada	Yes	Yes
Census Tract 18.01, Clark County, Nevada		Yes
Census Tract 18.04, Clark County, Nevada	Yes	Yes
Census Tract 19.01, Clark County, Nevada	Yes	Yes
Census Tract 19.02, Clark County, Nevada		Yes
Census Tract 20, Clark County, Nevada	Yes	Yes
Census Tract 22.01, Clark County, Nevada	Yes	Yes
Census Tract 22.03, Clark County, Nevada	Yes	Yes
Census Tract 22.04, Clark County, Nevada	Yes	Yes
Census Tract 22.06, Clark County, Nevada		Yes
Census Tract 22.07, Clark County, Nevada	Yes	Yes
Census Tract 24.03, Clark County, Nevada	Yes	Yes
Census Tract 24.04, Clark County, Nevada	Yes	Yes
Census Tract 24.05, Clark County, Nevada	Yes	Yes
Census Tract 24.06, Clark County, Nevada		Yes
Census Tract 25.05, Clark County, Nevada		Yes
Census Tract 25.06, Clark County, Nevada	Yes	Yes
Census Tract 26.03, Clark County, Nevada		Yes

workforce CONNECTIONS
High Poverty Designation by Census Tract

Links to determine census tract by street address:

<https://geomap.ffiec.gov/FFIECGeocMap/GeocodeMap1.aspx>

<http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?ref=addr&refresh=t>

2 Parent Household

1 Parent Household

<u>Census Tract</u>	<u>High Poverty Area</u>	<u>High Poverty Area</u>
Census Tract 26.04, Clark County, Nevada		Yes
Census Tract 26.05, Clark County, Nevada	Yes	Yes
Census Tract 27.06, Clark County, Nevada	Yes	Yes
Census Tract 27.08, Clark County, Nevada	Yes	Yes
Census Tract 28.22, Clark County, Nevada		Yes
Census Tract 28.25, Clark County, Nevada		Yes
Census Tract 28.48, Clark County, Nevada		Yes
Census Tract 29.05, Clark County, Nevada	Yes	Yes
Census Tract 29.19, Clark County, Nevada		Yes
Census Tract 29.35, Clark County, Nevada		Yes
Census Tract 29.37, Clark County, Nevada		Yes
Census Tract 29.40, Clark County, Nevada		Yes
Census Tract 29.41, Clark County, Nevada	Yes	Yes
Census Tract 29.44, Clark County, Nevada		Yes
Census Tract 29.46, Clark County, Nevada		Yes
Census Tract 29.54, Clark County, Nevada		Yes
Census Tract 29.58, Clark County, Nevada		Yes
Census Tract 29.62, Clark County, Nevada		Yes
Census Tract 29.64, Clark County, Nevada		Yes
Census Tract 29.65, Clark County, Nevada		Yes
Census Tract 29.66, Clark County, Nevada		Yes
Census Tract 29.67, Clark County, Nevada		Yes
Census Tract 29.74, Clark County, Nevada		Yes
Census Tract 29.78, Clark County, Nevada		Yes
Census Tract 29.79, Clark County, Nevada		Yes
Census Tract 29.95, Clark County, Nevada		Yes
Census Tract 29.96, Clark County, Nevada		Yes
Census Tract 30.03, Clark County, Nevada		Yes
Census Tract 31.02, Clark County, Nevada	Yes	Yes
Census Tract 31.03, Clark County, Nevada		Yes
Census Tract 31.04, Clark County, Nevada		Yes
Census Tract 32.15, Clark County, Nevada		Yes
Census Tract 32.20, Clark County, Nevada		Yes

workforce CONNECTIONS
High Poverty Designation by Census Tract

Links to determine census tract by street address:

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<http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?ref=addr&refresh=t>

2 Parent Household

1 Parent Household

<u>Census Tract</u>	<u>High Poverty Area</u>	<u>High Poverty Area</u>
Census Tract 32.28, Clark County, Nevada	Yes	Yes
Census Tract 32.37, Clark County, Nevada		Yes
Census Tract 32.40, Clark County, Nevada		Yes
Census Tract 32.48, Clark County, Nevada		Yes
Census Tract 32.53, Clark County, Nevada		Yes
Census Tract 32.61, Clark County, Nevada		Yes
Census Tract 33.06, Clark County, Nevada		Yes
Census Tract 34.12, Clark County, Nevada		Yes
Census Tract 34.15, Clark County, Nevada		Yes
Census Tract 34.18, Clark County, Nevada		Yes
Census Tract 34.20, Clark County, Nevada	Yes	Yes
Census Tract 34.21, Clark County, Nevada		Yes
Census Tract 34.22, Clark County, Nevada		Yes
Census Tract 34.26, Clark County, Nevada		Yes
Census Tract 34.28, Clark County, Nevada	Yes	Yes
Census Tract 34.29, Clark County, Nevada		Yes
Census Tract 34.30, Clark County, Nevada		Yes
Census Tract 34.31, Clark County, Nevada		Yes
Census Tract 35, Clark County, Nevada	Yes	Yes
Census Tract 36.16, Clark County, Nevada		Yes
Census Tract 36.28, Clark County, Nevada		Yes
Census Tract 36.31, Clark County, Nevada		Yes
Census Tract 36.33, Clark County, Nevada		Yes
Census Tract 36.36, Clark County, Nevada		Yes
Census Tract 36.38, Clark County, Nevada		Yes
Census Tract 38, Clark County, Nevada	Yes	Yes
Census Tract 40, Clark County, Nevada	Yes	Yes
Census Tract 41, Clark County, Nevada	Yes	Yes
Census Tract 42, Clark County, Nevada	Yes	Yes
Census Tract 43.01, Clark County, Nevada	Yes	Yes
Census Tract 43.02, Clark County, Nevada	Yes	Yes
Census Tract 44.01, Clark County, Nevada	Yes	Yes
Census Tract 44.02, Clark County, Nevada	Yes	Yes

workforce CONNECTIONS
High Poverty Designation by Census Tract

Links to determine census tract by street address:

<https://geomap.ffiec.gov/FFIECGeocMap/GeocodeMap1.aspx>

<http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?ref=addr&refresh=t>

2 Parent Household

1 Parent Household

<u>Census Tract</u>	<u>High Poverty Area</u>	<u>High Poverty Area</u>
Census Tract 45, Clark County, Nevada	Yes	Yes
Census Tract 46.01, Clark County, Nevada	Yes	Yes
Census Tract 46.02, Clark County, Nevada	Yes	Yes
Census Tract 47.03, Clark County, Nevada		Yes
Census Tract 47.07, Clark County, Nevada		Yes
Census Tract 47.09, Clark County, Nevada		Yes
Census Tract 47.10, Clark County, Nevada		Yes
Census Tract 47.12, Clark County, Nevada		Yes
Census Tract 47.13, Clark County, Nevada		Yes
Census Tract 47.14, Clark County, Nevada	Yes	Yes
Census Tract 47.16, Clark County, Nevada		Yes
Census Tract 47.17, Clark County, Nevada		Yes
Census Tract 49.10, Clark County, Nevada		Yes
Census Tract 49.11, Clark County, Nevada		Yes
Census Tract 49.12, Clark County, Nevada		Yes
Census Tract 49.16, Clark County, Nevada	Yes	Yes
Census Tract 49.20, Clark County, Nevada		Yes
Census Tract 49.21, Clark County, Nevada		Yes
Census Tract 49.24, Clark County, Nevada		Yes
Census Tract 50.05, Clark County, Nevada		Yes
Census Tract 50.10, Clark County, Nevada	Yes	Yes
Census Tract 51.05, Clark County, Nevada		Yes
Census Tract 52, Clark County, Nevada		Yes
Census Tract 53.12, Clark County, Nevada		Yes
Census Tract 53.18, Clark County, Nevada		Yes
Census Tract 53.51, Clark County, Nevada		Yes
Census Tract 54.21, Clark County, Nevada	Yes	Yes
Census Tract 54.22, Clark County, Nevada		Yes
Census Tract 54.23, Clark County, Nevada		Yes
Census Tract 54.35, Clark County, Nevada		Yes
Census Tract 54.38, Clark County, Nevada		Yes
Census Tract 56.07, Clark County, Nevada		Yes
Census Tract 56.14, Clark County, Nevada	Yes	Yes

workforce CONNECTIONS

High Poverty Designation by Census Tract

Links to determine census tract by street address:

<https://geomap.ffiec.gov/FFIECGeocMap/GeocodeMap1.aspx>

<http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?ref=addr&refresh=t>

2 Parent Household

1 Parent Household

<u>Census Tract</u>	<u>High Poverty Area</u>	<u>High Poverty Area</u>
Census Tract 56.15, Clark County, Nevada		Yes
Census Tract 57.02, Clark County, Nevada	Yes	Yes
Census Tract 57.03, Clark County, Nevada		Yes
Census Tract 57.04, Clark County, Nevada		Yes
Census Tract 58.03, Clark County, Nevada		Yes
Census Tract 58.09, Clark County, Nevada		Yes
Census Tract 58.18, Clark County, Nevada		Yes
Census Tract 58.25, Clark County, Nevada		Yes
Census Tract 58.32, Clark County, Nevada		Yes
Census Tract 58.48, Clark County, Nevada		Yes
Census Tract 60.01, Clark County, Nevada		Yes
Census Tract 61.03, Clark County, Nevada		Yes
Census Tract 62.01, Clark County, Nevada	Yes	Yes
Census Tract 62.03, Clark County, Nevada		Yes
Census Tract 62.04, Clark County, Nevada		Yes
Census Tract 68, Clark County, Nevada	Yes	Yes
Census Tract 71, Clark County, Nevada	Yes	Yes
Census Tract 72, Clark County, Nevada		Yes
Census Tract 78, Clark County, Nevada		Yes
Census Tract 9501, Esmeralda County, Nevada		Yes
Census Tract 9501, Lincoln County, Nevada		Yes
Census Tract 9502, Lincoln County, Nevada		Yes
Census Tract 9601, Nye County, Nevada		Yes
Census Tract 9602, Nye County, Nevada		Yes
Census Tract 9603, Nye County, Nevada		Yes
Census Tract 9604.01, Nye County, Nevada	Yes	Yes
Census Tract 9604.02, Nye County, Nevada		Yes
Census Tract 9604.03, Nye County, Nevada		Yes
Census Tract 9604.05, Nye County, Nevada		Yes

Workforce Connections Programs, Services and Activities WIOA - Youth Program Design	YTH-040-02
Policy Approved By: WC Executive Director Policy Adopted on: November 2013	Effective 07-01-2016 

Purpose:

To establish Workforce Connections (WC) policy and guidelines regarding the youth program design for programs funded in whole or in part under Title I of WIOA.

Background:

Youth programs and service provisions under Title I of the Workforce Innovation and Opportunity Act (WIOA) are designed to: **1) assist eligible out-of school youth (OSY) and eligible in-school youth (ISY), seeking assistance in achieving academic and employment success, with effective and comprehensive services and activities that include a variety of options for improving educational and skill competencies and provide effective connections to educational institutions and employers; 2) implement integrated strategies for career pathway approaches that support postsecondary education, training and employment; 3) implement work-based training strategies and employment approaches to help participants develop essential skills that are best learned on the job; 4) implement progressive levels of education and training approaches that will help individuals with higher levels of skills and experiences earn marketable credentials, engage in further education and employment, and achieve economic success; 5) provide continued supportive services to individuals who need them to participate and succeed in workforce investment and training activities.**

Policy:

The design framework services of local youth programs must: a) conduct intake; b) provide for an objective assessment of each eligible participant; c) development of an individual service strategy (ISS) for each eligible participant that is directly linked to one or more of the performance indicators; d) provide case management of youth participants, including follow-up and referral services.

Providers of youth services must ensure that each one of the 14 program elements listed in Sec. 129 (c) (2) of WIOA must be made available to eligible youth participants.

Reference:

WIOA PL 113-128 [Secs. 3, 107, 121, 123, 129, 189, 503]; [20 CFR Part 681]; [20 CFR Part 683]; [TEGL 23-14]; [TEGL 8-15]; [State TAG 15-3]; [SCP 2.1]

This policy may be subject to change as additional Federal statutes and regulations, and State policies and guidelines are released.

WIOA makes two (2) significant changes to prior requirements for service strategies by adding new components to the objective assessment (OA) and the individual service strategy (ISS).

- 1) The ISS must be linked to one or more of the indicators of performance found at Sec. 116 (b) (2) (A) (ii) of Title I of WIOA.
- 2) The OA and ISS must identify career pathways that include appropriate education goals.

Workforce Connections Policy YTH-040-02	Youth Programs, Services and Activities
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Workforce Connections is an equal opportunity employer/program.

I. Required Program Design Framework

Overall, program design framework is an essential element in helping providers of youth services develop comprehensive service strategies based upon individual needs.

Pursuant to established regulations, all youth who are enrolled must meet WIOA eligibility criteria. Youth service providers are responsible for intake, assessment, and the development of an individual service strategy (ISS) for each WIOA-eligible youth. A brief description of each activity is provided below:

A. Orientation

An orientation must be provided to each eligible youth. This includes information on the full array of services that are available through the network of funded programs within the local workforce development area (LWDA), including the One-Stop Career Center (OSCC) partners. Additional topics for orientation may include, but are not limited to, the following: As previously indicated, WIOA provides different levels of services for youth program participants. Additional topics for orientation may include, but are not limited to, the following: 1) introduction to the program's purposes and goals; 2) regulations of the program; 3) provider of youth services responsibilities; 4) program participant responsibilities; 5) Program resources and services available; 6) provide information on follow-up services that may be available to program participants, as appropriate; 7) provision of accurate information relating to the availability of supportive services, other available services in the LWDA, and referral to such services as appropriate.

B. Intake

Intake involves services such as registration, eligibility determination, and collection of information to support verification of eligibility of services. It may also include pre-screening of potential participants and general orientation to self-help services. Other activities include referrals to other services for further assessment, as necessary, and referred to appropriate programs to meet the basic skills and training needs of the applicant.

C. Objective Assessment

Assessment is a process that identifies service needs, academic levels, goals, interests, skills levels, abilities, aptitudes, and supportive service needs; it also measures barriers and strengths. It includes a review of basic and occupational skills, prior work experience, employability potential, and developmental needs. Assessment results are generally used to develop the ISS.

D. ISS

The ISS is the plan that identifies the employment goals, educational objectives, and prescribed appropriate services for the participant. The ISS is essential in identifying service strategies for each participant that are directly linked to one or more of the indicators of performance, and that shall identify career pathways that include education and employment goals (including, in appropriate circumstances, nontraditional employment), appropriate achievement objectives, and appropriate services for the participant taking into account the assessment conducted pursuant to subparagraph (A), except that a new service strategy for a participant is not required if the provider carrying out such a program determines it is appropriate to use a recent service strategy developed for the participant under another education or training program.

E. Career Coaching

Youth programs must provide case management services to assist youth in making informed choices and successfully completing the program. Support may be provided on an individual or group basis. Career coaching principles and methods must be incorporated throughout the program design. A case manager is assigned to follow the progress of each youth from enrollment to program exit, and through follow-up services. Documentation of all services and activities must be recorded on the youth's ISS.

F. Support Services

Programs must provide supportive services to eligible youth participants that are necessary to enable an individual to participate in activities authorized under Title I of WIOA.

G. Follow up Services

Follow-up services are critical services provided following a youth's exit from the program for no less than 12 months to help ensure the youth is successful in employment and/or post-secondary education and training. The youth service provider must establish and implement procedures to ensure that follow up services are conducted and documented in the most efficient possible way.

II. General Provisions for Local Youth Programs

A. Local youth program services will, at a minimum, incorporate the required youth program design, program elements, and additional requirements in accordance with Section 129 of WIOA.

B. The youth program design and service delivery must be based upon the following program components:

1. Preparation for post-secondary educational opportunities;
2. Occupational training services (that lead to the attainment of a recognized post-secondary credential);
3. Work-based opportunities;
4. Youth development services; and
5. Employment services.

C. Program elements that must be made available to each eligible program participant

1. Preparation for Postsecondary Education Opportunities

- a) Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized post-secondary credential; and
- b) Alternative secondary school services, or dropout recovery services, as appropriate.

2. Occupational Training Services

- a) Occupational skills training, which includes priority consideration for training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the local area involved;

- b) Education offered concurrently with, and in the same context, as workforce preparation activities and training for a specific occupation or occupational cluster.

3. Work-Based Opportunities

Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, which may include the following types of work experiences:

- a) Summer employment opportunities and other employment opportunities available throughout the school year;
- b) Pre-apprenticeship programs;
- c) Internships and job shadowing; and
- d) On-the-job training opportunities;

4. Youth Development Services

- a) Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate;
- b) Supportive services;
- c) Adult mentoring for a duration of at least 12 months, which may occur both during and after program participation;
- d) Follow-up services for not less than 12 months after the completion of participation, as appropriate;
- e) Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, as well as referral to counseling, as appropriate to the needs of the individual youth;
- f) Financial literacy education;
- g) Entrepreneurial skills training;
- h) Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
- i) Activities that help youth prepare for and transition to post-secondary education and training.

5. Employment Services

- a) Career exploration
- b) Pre-employment
- c) Job search
- d) Job placement
- e) Support service
- f) Follow-up services

D. Program and Service Delivery for Youth Programs

1. Program Delivery Additional Requirements – ISY

- a) In addition to the five (5) program components indicated above (item II (C)), the ISY program must include strategies to outreach and engage youth 14-21 at-risk of dropping out of school by implementing a career pathway approach that will include a link between academic learning, work-based experience and youth development services.

- b) Provider of youth services must establish strong partnerships with educational institutions that have the existing career and technical programs and/or career pathways programs.
- c) ISY programs shall include continuous educational opportunities that connect participants to their school, community and work, as appropriate. These activities should lead to the attainment of a high school diploma, strong connections to post-secondary education, and career pathways options.

2. Program Delivery Additional Requirements – OSY

In addition to the five (5) program components indicated above (item I (C)), the OSY program design must include strategies to outreach to and engage youth 16-24 who are no longer attending school, and who have not achieved their high school diploma or GED. These strategies include, but are not limited to:

- a) Tutoring: instruction designed to coach, teach, and guide youth participants to increase academic success potential. Tutoring can be provided as a group activity, one-on-one service or via computer based programs through partnering agencies or workforce centers;
- b) Study skill training: strategies and methods of focused learning. Study skills training is designed to improve learning ability and may include, but is not limited to, learning styles, time management, study habits, and listening and writing skills;
- c) Alternative secondary school offerings: a public school or public contracted educational program that serves youth who have not been successful in mainstream traditional academic programs and provides leading to high school diploma;
- d) Innovative and developmental approaches to deliver educational activities such as GED classes, credit recovery, alternative education programs to complete a secondary school program; and
- e) Occupational skills development that lead to an industry recognized credential or certificate.

OSY programs should address both educational and employment development strategies that prepare the youth for postsecondary education, career pathways, long term careers, and full time employment. The overall OSY program design should provide continuous pathways to postsecondary education and training activities that will enable the youth participants to attain a diploma and/or an industry recognized credential and enter into the workforce.

3. Program Delivery Additional Requirements Reentry and Re-engagement Pre - Post Release Services (whichever is provided): In addition to the five

(5) program components (item I (C)), must include:

- a) Career Coaching;
- b) Counseling and guidance;
- c) Career exploration through work experience and internships;
- d) Basic skills training;
- e) Educational skills training;
- f) Tutoring, mentoring;
- g) High school diploma equivalency preparation;
- h) Credit retrieval;
- i) Restorative justice opportunities;

- j) Occupational skills training;
- k) Work experience, summer jobs linked to academic and occupational learning,;
- l) Job placement, staff and leadership development activities; and
- m) Follow-up and supportive services.

4. Program Delivery Additional Requirements for Foster Youth (Current and Former)

In addition to the five (5) program elements (item II (C)), the programmatic approach shall include:

- a) Strategies to assist participant youth in transitioning to self-sufficiency;
- b) Occupational skills development activities that lead to an industry recognized credential or certificate;
- c) Occupational training and services necessary to obtain and retain employment;
- d) Preparation for entry into post-secondary education institutions;
- e) Personal and emotional support, including mentors and counseling;
- f) Financial, housing, counseling, employment, education and other support; and
- g) Supportive services, and follow-up services.

5. Program Delivery Additional Requirements for Youth with Disabilities (YWD)

In addition to the five (5) program components (item II (C)), the programmatic approach must include:

- a) Physical and programmatic accessibility to employment and training services;
- b) Provide occupational opportunities to practice and improve workplace skills;
- c) Provide strategies to facilitate performance-based and individualized activities to enable the YWD to progress at their own pace;
- d) Provide academic support and enrichment to improve academic performance;
- e) Provide strategies that will support a more personalized learning environment and instructional process;
- f) Provide rigorous and relevant instruction to better engage program participants;
- g) Provide personal and emotional support, including mentors and counseling;
- h) Provide strategies that support self-exploration, career exploration and career planning and management; and
- i) Provide youth participants with the support they need, including extended services that will enable them to obtain competitive employment.

III. Consistent with Sec. 129 of Title I of WIOA in order to support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for participants, all youth programs shall provide elements consisting of:

A. Tutoring, study skills training, and instruction leading to secondary school completion, including dropout prevention strategies;

- 1. **Tutoring:** instruction designed to coach, teach, and guide youth participants to increase academic success potential. Tutoring can be provided as a group activity, one-on-one service or via computer based programs through partnering agencies or workforce centers.
- 2. **Study skill training:** strategies and methods of focused learning. Study skills training is designed to improve learning ability and may include, but is not limited to, learning styles, time management, study habits, and listening and writing skills.

3. **Dropout prevention strategies:** student-centered intensive individualized attention and instruction through tutoring, mentoring programs, alternative secondary school offerings, and instruction technologies to assist participant youth with the completion of high school.

Effective programs also characteristically feature a wide range of student assistance services to address such things as substance abuse, teen pregnancy and young parenthood, suicide prevention, and other mental and physical health issues.

B. Alternative secondary school services

1. A public school or public contracted educational program that serves youth who have not been successful in mainstream traditional academic programs and provides leading to high school diploma;
2. To be classified as an “alternative school” or “alternative course of study” for WIOA purposes, a specialized structured curriculum is required that is distinguishable from the regular curriculum offered to students in corresponding grades or classes. Although alternative education programs are often referred to as “schools,” they are actually programs within a school.

C. Paid and unpaid work experiences (WEX) that have, as a component, academic and occupational education, which may include: summer employment opportunities and other employment opportunities available throughout the school year; pre-apprenticeship programs; internships and job shadowing; and on-the-job training opportunities.

1. Work experiences are a planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience may be paid or unpaid, as appropriate. A work experience may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists. Work experiences provide the youth participant with opportunities for career exploration and skill development. Work experience must include academic and occupational education.
2. The types of work experiences include the following categories: 1) summer employment opportunities and other employment opportunities available throughout the school year; 2) pre-apprenticeship programs; 3) internships and job shadowing; and 4) on-the-job training opportunities.
 - a) Summer employment opportunities are a component of the work experience program element. These work-based models can be effectively used to target job seeker needs.
 - b) Pre-apprenticeship is a program or set of strategies designed to prepare individuals to enter and succeed in a registered apprenticeship program and has a documented partnership with at least one, if not more, registered apprenticeship program(s).
 - c) An internship is a temporary position which emphasizes on on-the-job training rather than merely employment, and it may be paid or unpaid. Internships and work experiences provide a helpful means for an individual to gain experience that leads to unsubsidized employment.
 - d) Job shadowing is typically a part of a career exploration/development activity. A participant youth follows an employee at a firm for one or more days to learn about a particular occupation or industry. Job shadowing can also help the participant youth to explore a range of careers and a specific career objective in

order to select a career pathway. Participating several times a year, participant youth gain first-hand experience in a variety of career choices so they can: 1) understand the daily duties and activities involved with each job and career; 2) ask questions about the job and workplace; 3) identify their career interests; 4) become aware of the technical and academic skills they would need to enter each career; 5) develop communication skills; 6) apply a connection between academic classroom work and their career goals.

- e) The term “on-the-job training” means training by an employer that is provided to a paid participant while engaged in productive work in a job that: a) provides knowledge or skills essential to the full and adequate performance of the job; b) is made available through a program that provides reimbursement to the employer of up to 50 percent of the wage rate of the participant, except as provided in section 134(c)(3)(H) of Title I of WIOA, for the extraordinary costs of providing the training and additional supervision related to the training; and c) is limited in duration as appropriate 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.
- D. Occupational skills training as an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels. Providers of WIOA Title I youth services must give priority consideration to training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the local area. Such training must: 1) be outcome-oriented and focused on an occupational goal specified in the individual service strategy; 2) be of sufficient duration to impart the skills needed to meet the occupational goal; and 3) result in attainment of a recognized post-secondary credential.**
- E. Education offered concurrently with, and in the same context as, workforce preparation activities and training for a specific occupation or occupational cluster. This program element reflects the integrated education and training model and requires integrated education and training to occur concurrently and contextually with workforce preparation activities and workforce training. This program element describes how workforce 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.**
- F. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate. Leadership development opportunities are opportunities that encourage responsibility, confidence, employability, self-determination and other positive social behaviors such as: a) exposure to post-secondary educational possibilities; b) community and service learning projects; c) peer-centered activities, including peer mentoring and tutoring; d) Organizational and team work training, including team leadership training; e) training in decision-making, including determining priorities and problem solving; f) citizenship training, including life skills training such as parenting and work behavior training; g) civic engagement activities which promote the quality of life in a community; and h) other leadership activities that place youth in a leadership role such as serving on youth leadership committees, such as a standing youth committee.**

G. Supportive services

Supportive services for youth, as defined in WIOA sec. 3(59), are services that enable an individual to participate in WIOA activities. These services include, but are not limited to, the following: a) linkages to community services; b) assistance with transportation; c) assistance with child care and dependent care; d) assistance with housing; e) needs-related payments; f) assistance with educational testing; g) reasonable accommodations for youth with disabilities; h) referrals to health care; and i) assistance with uniforms or other appropriate work attire and work-related tools, including such items as eye glasses and protective eye gear.

H. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months.

Adult mentoring for youth must: a) last at least 12 months and may take place both during the program and following exit from the program; b) be a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee; c) include a mentor who is an adult other than the assigned youth case manager; and d) while group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the local youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis.

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

I. Follow up services for not less than 12 months after the completion of participation, as appropriate.

1. Follow-up services are critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or post-secondary education and training. Follow-up services for youth may include: a) leadership development and supportive service activities; b) regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise; c) assistance in securing better paying jobs, career pathway development, and further education or training; d) work-related peer support groups; e) adult mentoring; and/or f) services necessary to ensure the success of youth participants in employment and/or post-secondary education.
2. All youth participants must receive some form of follow-up services for a minimum duration of 12 months. Follow-up services may be provided beyond 12 months at the State or local board's discretion. The types of services provided and the duration of services must be determined based on the needs of the individual and therefore, the type and intensity of follow-up services may differ for each participant. However, follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome [WIOA sec. 129 (c) (2) (I)].

J. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate.

1. Comprehensive guidance and counseling provides individualized counseling to participants. This includes career and academic counseling, drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate [WIOA sec. 129 (c) (1) (C) (J)].

2. When referring participants to necessary counseling that cannot be provided by the local youth program or its service providers, the local youth program must coordinate with the organization it refers to in order to ensure continuity of service.

K. Financial literacy education.

In general the financial literacy education program element includes activities that will help participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high quality, age-appropriate, and relevant strategies and channels, including, where possible, timely and customized information, guidance, tools, and instruction.

L. Entrepreneurial skills training.

Entrepreneurial skills training provides the basics of starting and operating a small business. Such training must develop the skills associated with entrepreneurship. Such skills include, but are not limited to, the ability to: a) take initiative; b) creatively seek out and identify business opportunities; c) develop budgets and forecast resource needs; d) understand various options for acquiring capital and the trade-offs associated with each option; and e) communicate effectively and market oneself and one's ideas.

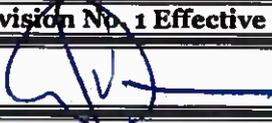
Note: Youth programs have the discretion to determine what specific program services a youth participant receives, based on each participant's objective assessment and individual service strategy. Local programs are not required to provide every program element to each participant.

IV. Youth Programs and The One-Stop.

WIOA sec. 121 (b) (1) (B) (i) requires that the youth program function as a required one-stop partner and fulfill the roles and responsibilities of a one-stop partner described in WIOA Sec. 121(b)(1)(A). In addition connections between the youth program and the one-stop system may include those that facilitate: 1) the coordination and provision of youth activities; 2) linkages to the job market and employers; 3) access for eligible youth to the information and services required in section III of this policy; 4) services for non-eligible youth such as basic labor exchange services, other self-service activities such as job searches, career exploration, use of career center resources, and referral as appropriate; and 5) other activities described in WIOA Sec. 129 (b) – (c). Local boards must either collocate WIOA youth program staff at one-stop centers and/or ensure one-stop centers and staff are equipped to advise youth in order to increase youth access to services and connect youth to the program that best aligns with their needs.

V. Limitation

- A. Follow-up services are critical following a youth's exit from the program. Follow-up services must be provided, at a minimum, for 12 months, which ensures a youth's success in employment and/or post-secondary education and training. All youth elements are available to youth during the follow-up period. The type of services provided must be determined based on the needs of the participant and, therefore, the type and intensity of follow-up services may differ for each participant. However, service providers must seek prior approval from their contract administrator to provide the following youth elements during the 12 month follow-up period:
1. Paid work experiences and/or internships;
 2. Occupational skills training; and
 3. On-the-job training.
- B. A suitable justification linking progression in employment and/or post-secondary education must be provided at the time of request for approval. These services should be planned and included in the participant's ISS prior to exiting the program. If the request is denied, sub-recipients may appeal WC's decision. The service provider must file a written request within 10 business days following the receipt of notification by WC. Appeals should be sent to the Director, Workforce Development Programs. A response and final decision to the appeal will be issued within 15 days of the receipt of the appeal.

Workforce Connections Programs, Services and Activities Work Experience (WEX) – Internships	YTH-040-06
	Revision No. 1 Effective 07-01-2016
Policy Approved By: WC Executive Director Policy Adopted on: November 2013	

Purpose:

The purpose of this policy is to provide guidelines and set forth standards with regard to the provision of Work Experience (WEX) to eligible youth in programs funded in whole or in part under Title I of the Workforce Innovation and Opportunity Act (WIOA).

Background:

Work experiences are a planned, structured learning experience that take place in a workplace for a limited period of time. A work experience may be paid or unpaid, as appropriate, and may take place in the private for-profit sector, the non-profit sector, or the public sector. Work experiences shall: provide the youth participant with opportunities for career exploration and skill development; be designed to enable youth participants to gain exposure to the working world and its requirements; and should help youth acquire the personal attributes, knowledge, and skills needed to obtain a job and advance in employment. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists.

Providers of youth services must establish written internal policies/procedures that meet the requirements of this policy.

Policy:

Workforce Connections (WC) has established that successful implementation of work experiences and summer youth employment opportunities will be appropriate when the need for such activities has been identified in the Individual Service Strategy (ISS) wherein the participant's interests, abilities, and needs have also been identified. Therefore, the following guidelines are designed to assist providers of youth services in the planning and execution of a WEX program activity. The guidelines will also assist in meeting local regulations which require that, to be permissible, costs incurred in WEX program activities must be necessary, reasonable, and allowable.

Reference:

PL 113-128 WIOA [Secs. 107, 121, 123, 129, 189, 503]
[20 CFR Part 681 – youth activities under Title I of WIOA]; [TEGL 37-14]; [TEGL 23-14]; [TEGL 39-11]; [State Compliance Policy (SCP) 2.2]; [State TAG 15-3]; [Nevada Revised Statutes (NRS) 609]

All information required by Federal, State and local reporting requirements must be collected for each individual receiving WIOA Title I funded services. The appropriateness of any service provided to an eligible program participant should be documented in the Individual Service Strategy (ISS) and should show a clear linkage with program participant career/objective goals.

I. General provisions for Work Experience (WEX)

A. Work experience is a planned, structured learning experience that takes place in a worksite for a limited period of time that is solely based upon identified needs of the youth program participant. A WEX worksite may be in the private for-profit sector, the non-profit sector, or the public sector. Work experiences may be paid and/or unpaid.

1. A WEX is designed to enable youth participants to gain exposure to the working world requirements.
2. A WEX is an appropriate and desirable activity for many youth participants throughout the program year.
3. A WEX should help youth participants acquire the personal attributes, knowledge, and skills needed to obtain a job and advance in employment.
4. A WEX main purpose is to provide the youth participant with the opportunities for career exploration and skill development and is not to benefit the employer.
5. In addition, other elements and strategies are provided to serve the needs and goals of the youth participant such as:
 - a) Instruction in employability skills or generic workplace skills;
 - b) Exposure to various aspects of an industry;
 - c) Progressively more complex tasks;
 - d) Internships and job shadowing;
 - e) The integration of basic academic skills into work activities;
 - f) Supported work, work adjustment, and other transition activities;
 - g) Entrepreneurship;
 - h) Service learning;
 - i) Unpaid community service; and
 - j) Other elements designed to achieve the goals of work experience.

B. Work Experience Wages: WEX program participants shall be paid an hourly wage for hours worked, and shall be compensated at the same rates as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills, and such rates shall be in accordance with applicable law, but in no event less than the higher of the rate specified in section 6(a)(1) of the Fair Labor Standards Act of 1938 (FLSA) (29 U.S.C. 206 (a) (1)) or the applicable State or local minimum wage law, [Sec. 181(a)(1)(A) of WIOA Title I]; [20 CFR §683.275].

1. The U.S. Department of Labor's Wage and Hour Division (WHD) has developed the six (6) factors below to evaluate whether a worker is a trainee or an employee for purposes of the FLSA:
 - a) The training, even though it includes actual operation of the facilities of the employer, is similar to what would be given in a vocational school or academic educational instruction;
 - b) The training is for the benefit of the trainee;
 - c) The trainee does not displace regular employees, but works under their close observation;
 - d) The employer that provides the training derives no immediate advantage from the activities of the trainee, and on occasion the employer's operations may actually be impeded;
 - e) The trainee is not necessarily entitled to a job at the conclusion of the training period; and
 - f) The employer and the trainee understands that the trainee is not entitled to wages for the time spent in training.

2. If all of the factors listed above are met, the worker is a “trainee”, an employment relationship does not exist under the FLSA, and the FLSA’s minimum wage and overtime provisions do not apply to the worker. Because the FLSA’s definition of “employee” is broad, the excluded category of “trainee” is necessarily quite narrow. Moreover, the fact that an employer labels a worker as a trainee and the worker’s activities as training, and/or a State unemployment compensation program develops what it calls a training program and describes the unemployed workers who participate as trainees, does not make the worker a trainee for the purpose of the FLSA unless the six (6) factors are met [TEGL 12-09].

C. Unemployment Insurance (UI) Benefits

A youth participant receiving work training, such as a funded WIOA Title I WEX activity, is not to be considered an employed individual for the purpose of being able to qualify for unemployment insurance benefits, even though they might be on a regular payroll, receiving wages, and are considered employed under FLSA. Therefore, a youth participant placed in a WEX, then filing for unemployment insurance, will not be eligible on the basis of the work experience.

Nevertheless, work experience wages are counted as earnings when a youth participant is currently on a UI claim. This income has the potential to affect the amount and duration of the UI claim on the basis of the work experience.

- D. A WEX is provided under a worksite agreement in the private for-profit sector, the non-profit sector, or the public sector. Prior to entering into an agreement an assessment must be conducted to ensure that the employer and/or worksite meets the minimum standards and can properly provide adequate training to youth participants.**

1. The employer/worksite assessment must include, at a minimum, compliance with:

- a) Federal, State and local regulations
- b) Fair Labor Standards Act of 1938
- c) Non-discrimination and equal opportunity provisions of WIOA and its regulations
- d) Americans with Disability Act
- e) Health and safety standards
- f) Worksite summary and profile

2. Safety and Child Labor Laws/Work Permits

The Worksite:

- a) General worksite safety is to be monitored by the youth service provider. Any identified issue(s) must be immediately reported to WC.
- b) The selected worksite shall be in compliance with the nondiscrimination and equal opportunity provisions under Sec. 188 of WIOA and 29 CFR Part 38. An organization that agrees to be a worksite and host a WEX for a youth participant should be aware of obligations imposed by WIOA and its associated regulations, and must ensure compliance.
- c) Worksite must ensure, when applicable, that they will adhere to child labor laws and OSHA compliance.
- d) Any worksite accident must be reported immediately by the youth program participant to their worksite supervisor and to WIOA staff, providers of youth services must implement written and very specific procedures to ensure that all reporting is properly done and in a timely accurate manner.

- e) Providers of youth services must maintain worker's compensation insurance for each youth participant placed in a WEX program and are not allowed to provide this program element unless worker's compensation insurance is in place.
- f) Providers of youth services must comply with requirements set forth by NRS 609 with respect to the employment of minors.
- g) Worksite needs to have a clear understanding and expectation of the skills needs, interests, and attitudes/habits that the youth participant may exhibit.
- h) Effort shall be made to place youth participants at a worksite that matches the youth participant interest and abilities.
- i) The worksite must provide general liability insurance coverage.
- j) Worksite must ensure that youth participants may not be involved in religious sectarian instructions or activities while participation on a work experience.
- k) Worksite must ensure that youth participants may not be involved in political activities of any form while participation on a work experience.

E. Duration of Work Experience and Hours Limitation:

- 1. The total maximum number of hours for each subsidized work experience must not exceed 480 hours.
- 2. Subsidized work experiences during the school year for in-school youth and for all youth who have not yet attained their high school diploma (HSD) must not exceed six (6) hours per day and total 20 hours per week.
- 3. Participant youth shall not be placed in more than two (2) subsidized work experiences during the WIOA program year.
- 4. Work experience must be limited to a period of time that is reasonable in duration. The length of the work experience assignment is to be based on the needs of the youth participant and actual purpose of placing the youth participant in a WEX. These elements must be addressed on the participant's ISS.
- 5. Neither overtime nor overtime pay is allowed. As previously indicated child labor laws must be observed when scheduling work hours for youth participants under 18 years of age.
- 6. In the event there might be an exception, a written notice/request must be submitted to WC oversight staff. Source support documentation must be attached, if applicable, as well as proper justification.

II. Work Experience

The Worksite Agreement

- A. The purpose of the worksite agreement is to establish a formal working relationship with a worksite, to specify the responsibilities of each party to the agreement, and to provide a successful, enriching work experience for youth program participants. A properly signed and dated original of the worksite agreement must become part of the program participant's file.
- B. The worksite agreement must be fully executed and will not be considered valid unless it is properly signed and dated by both the employer and the provider of youth services authorized representative(s).

C. The provider of youth services and program participant shall mutually review and determine the feasibility of utilizing a work experience activity. The activity must focus on the development of appropriate work habits and work ethics to include an understanding of employer/employee relationship. The WEX must focus on career exploration, skill development, and/or skills needed to obtain a job. The worksite agreement shall reflect these elements in alignment with the youth participant objective assessment and ISS.

D. **General provisions for the WEX worksite agreement:** Prior to the youth participant commencing the WEX program a worksite agreement must be in place. The agreement must include the following provisions:

1. Worksite name and contact information
2. Service provider name and contact information
3. Name of person in charge of training and supervision
4. WEX start date and end date
5. Specific job description
6. Specific skills/competencies to be learned
7. Hourly wage [Item (I) (B)]
8. Total hours
9. WEX program schedule
10. Health and safety standards assurances - worksite
11. Liability insurance assurances - worksite
12. Worker's compensation assurances - worksite
13. Provision of equal opportunity - worksite
14. Child labor law assurances (when applicable) - worksite

III. Required Support Documentation

- A. Fully executed worksite agreement
- B. Job description
- C. Worksite assessment
- D. Copy of WEX schedule
- E. Properly signed and dated time sheets (corrections must be done by "cross out" and initialed by all parties)
- F. Copy of paychecks
- G. Training plan
- H. Evaluation form

IV. Summer Work Experience – Prerequisites.

As part of the program design elements offered to youth participants, a WEX is not intended as a stand-alone program activity and must be tied to an objective in the ISS. Summer work experiences must provide direct linkages to academic and occupational learning. WC has established guidelines for in-school and out-of-school youth participants.

In-School	Out-of-School
Youth participant must be enrolled and attending summer school, if determined credit deficient. If youth participant drops out of school, WEX immediately terminates.	Must be enrolled/participating in GED program; or enrolled/participating in HSD program. Youth participant must complete two (2) work readiness activities prior to WEX approval/start.

- V. **Resources Related to Workplace Guidelines**
www.dol.gov/esa/regs/compliance/whd/brg.htm
www.dol.gov/dol/topic/youthlabor
www.dol.gov/esa/WHD
www.opm.gov/flsa
www.youthrules.dol.gov
www.osha.gov/teens
www.dol.gov/whd
www.osha.gov/SLTC/teenworkers
www.youth.eeoc.gov