



**MID-CAROLINA
WORKFORCE & TALENT
DEVELOPMENT**

Policy Letter #14

TO: All Mid-Carolina Service Providers

FROM: Matthew Fowler, Director

SUBJECT: Youth Services

PURPOSE

This policy provides guidance regarding the operation of the Mid-Carolina Board's (MCWDB) Workforce Innovation and Opportunity Act (WIOA) Youth program. Supportive services are a critical dimension of youth development. Incorporating youth service elements by providing eligible youth seeking assistance in achieving academic and employment with supportive services will help them in achieving their goals. Program services will be administered by career advisors, mentors, and job coaches who will guide the youth participants through the challenges of entering and succeeding in the workforce.

BACKGROUND

WIOA was signed into law on July 22, 2014, and effective as of July 1, 2015. WIOA Law section 129 introduced and reauthorized the required elements of the WIOA Youth Program.

WIOA introduced key changes to the WIOA Youth Program, including new eligibility criteria for In-School (ISY) and Out-of-School (OSY) youth, a 75% Out-of-School Youth expenditure requirement, a minimum of 20% Work Experience expenditure requirement, and new program elements. Mid-Carolina places a priority on serving out of school youth, providing work based learning experience, promoting local area career pathways, and increased attainment of recognized credentials and post-secondary certificates or degrees. Youth Program Service Providers are responsible for developing a youth program plan that meets the requirements as described in the Request for Proposal (RFP) and subsequent contracts. The youth program must include the required youth program elements as described under WIOA Law, Department of Labor (DOL) and the North Carolina Division of Workforce Solutions (DWS) guidance. A program design framework consists of an objective assessment, an individual service strategy, case management, and follow-up services that lead toward successful outcomes for youth participants.

WIOA Youth Eligibility

Eligibility determination includes the following steps:

- Determining (low/family) income eligibility as required
- Determining barriers
- Ensuring Selective Service Registration (male only)

Equal Opportunity Employer/Program

Auxiliary aids and services are available upon request to individuals with disabilities

- Determining School Status

In School Youth:

An In School Youth is an individual who is-

- not younger than 14 and not older than 21 years.
- Attending school,
- **Low-income**, (Low income includes free and reduced lunch or living in a high poverty area) and
- One or more of the following:
 - Basic skills deficient;
 - An English language learner;
 - An offender;
 - A homeless individual, a homeless child or youth, a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under 477 of the Social Security Act (42 USC 677), or in an out-of-home placement;
 - Pregnant or parenting;
 - Individual with a disability; or
 - Requires additional assistance to enter or complete an education program or to secure or hold employment (refer to the guidelines below).

Students living in a high poverty area automatically meets the low-income criteria. Career Advisors must upload a copy of the Census map in color into the participant's documents.

Out-of-School Youth:

An Out of School Youth is an individual who is:

- Not younger than 16 and not older than 24 years
- Not attending school; and
- One or more of the following:
 - A school dropout (a youth attending an alternative school at the time of enrollment is not considered to be a drop-out);
 - Within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year's calendar quarter;
 - 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;
 - Subject to the 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 Chaffee foster care independence program), Violence Against Women's Act, McKinney-Vento Homeless Assistance Act, or placed in out-of-home placement.
 - Pregnant or parenting;
 - Individual with a disability; or
 - A low-income individual who requires additional assistance to enter or complete an educational program or to obtain or retain employment.

Youth that falls between the ages of 18-24 may be served as youth and/or adults. Career advisors must determine the participant's suitability of serving the participant as a youth, adult, or both. Should the participant be served under both the adult and youth funding stream, it is the responsibility of the Program Manager to notify Compliance Department.

Youth Requiring Additional Assistance

Per WIOA Sections 129 (1)(B)(iii)(VIII) and (1)(C)(iv)(VII), Local Workforce Development Boards are to use the following definitions when determining youth eligibility.

In North Carolina, “*requires additional assistance to complete an educational program or to secure and hold employment*” is defined for In-School Youth, including youth with a disability, who meet the criteria listed below:

- 1. In-School Youth, ages 14-21, low income, and**
 - a.** Has poor attendance patterns in an educational program during the last 12 calendar months; **or**
 - b.** Has been expelled from school within the last 12 calendar months; **or**
 - c.** Has been suspended from school within the last 12 calendar months; **or**
 - d.** Has below average grades of less than a “C” grade point average; **or**
 - e.** Has previously been in out-of-home care (foster care, group home, or kinship care) for more than 6 months between the ages of 14-21; **or**
 - f.** Has a currently incarcerated parent/guardian.

Not more than 5% of the newly enrolled In-School Youth assisted in the local area in a given program year may be eligible based upon WIOA Section 129(a)(3)(B) as *an individual who requires additional assistance to complete an educational program or to secure or hold employment* [Section 129(a)(1)(C)(iv)(VII)].

In North Carolina, “a low-income individual who requires additional assistance to enter or complete an educational program or to secure and hold employment” is defined for Out-of-School Youth, including youth with a disability, who meet the criteria listed below:

- 2. Out of School Youth, ages 16-24, low-income, and**
 - a.** Has dropped out of a post-secondary educational program during the past 12 calendar months; **or**
 - b.** Has a poor work history, to include no work history, or has been fired from a job in the last 6 calendar months; **or**
 - c.** Has previously been placed in out-of-home care (foster care, group home, or kinship care) for more than 6 months between the ages of 16-21; **or**
 - d.** Has a currently incarcerated parent/guardian.

Reference DWS Operational Guidance OG 14-2021.

5% Exception to Low-Income Requirement

WIOA allows for an exception to the low-income eligibility requirement. **No more than a total of 5%** of those enrolled in the following categories each program year may be enrolled without meeting the low-income criteria:

- All In-School Youth;
- Out-of-School individual that is a recipient of a secondary school diploma or its recognized equivalent and is either:
 - Basic skills deficient; or
 - An English language learner; **OR**
- Out-of-School individual who requires additional assistance to enter to complete an educational program or to obtain or retain employment.

The Service Provider must notify the Mid-Carolina Compliance Department prior to enrolling an individual who would fall within this 5% exception to low-income requirements.

Attending School Definition

For the purpose of determining ISY or OSY eligibility, a youth is considered to be attending school if the youth is:

Enrolled in a school that leads to the attainment of a state-recognized credential, including a:

- Public or private school; or
- Charter school; or
- Home school; or
- Alternative school; or
- Public or private colleges and universities; or
- Other credential or degree skills training program.

The following programs are **not** considered to be schools under WIOA:

- Adult education provided under Title II;
- Youth Build programs;
- Job Corps programs.

The Mid-Carolina Workforce Development Board 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 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
 - Career Advisor makes observations

- Behind in credits to graduate on time with peers
- GPA 2.0 or below
- Has taken and did not pass the End of Grade Assessment

Youth Program Elements

The following Youth Program Elements must be available to all youth participants:

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies

Strategies under this element must lead to the completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.

2. Alternative secondary school services, or dropout recovery services, as appropriate.

Alternative secondary school services, such as basic education skills training, individualized academic instruction, and English as a Second Language training, are those that assist youth who have struggled in traditional secondary education. Dropout recovery services, such as credit recovery, counseling, and educational plan development are those that assist youth who have dropped out of school. These services are to provide the goal of helping participants to re-engage and persist in education that leads to the completion of a recognized high school equivalent.

3. Paid and unpaid work experiences

Paid and unpaid work experience may include:

- a. Summer employment opportunities and other employment opportunities available throughout the year;
- b. Pre-apprenticeship programs;
- c. Internships and job shadowing;
- d. On-the-Job (OJT) opportunities

4. Occupational skills training

Youth Service Providers must give priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area.

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

This program element reflects an integrated education and training model and allows workforce preparation activities and/or basic academic skills to be taught within the same time frame and connected to hands-on occupational skills training in a specific occupation, occupational cluster, or career pathway.

6. Leadership development opportunities, as appropriate

Leadership development opportunities may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors. Activities may include:

- a. Exposure to postsecondary 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 the 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.

7. Support services

For further detail on supportive services, see Policy #13 regarding Supportive Services.

8. Adult mentoring

Adult mentoring must last at least 12 months and may take place during the period of participation or following program exit. Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of the company. Service providers should ensure appropriate processes, to include employer orientation and training, are in place to adequately screen and select mentors. If mentors are sparse, Career Advisors may serve as mentors.

9. Follow-up services

Follow-up services are critical services provided for a minimum of 12 months after a youth exits from the program to help ensure the youth is successful in employment and/or postsecondary education. All youth participants must be offered an opportunity to receive follow-up services that align with their ISS and must be provided follow-up services for a minimum of 12 months unless the participant declines to receive follow-up services, or the participant cannot be located or contacted

Follow-up services must include more than only a contacted attempted or contact made for securing documentation in order to report a performance outcome.

Follow-up services may begin immediately following the last expected date of service in the youth program when no future services are scheduled. Follow-up services do not cause the exit date to change and do not trigger re-enrollment in the program.

Follow-up services may include (must be provided after exit to count as follow-up services):

- a. Regular contact with the youth participant's employer, including assistance in addressing work-related problems that arise;
- b. Supportive Services
- c. Adult mentoring
- d. Financial literacy education
- e. 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
- f. Activities that help youth prepare for and transition to postsecondary education and training

10. Comprehensive guidance and counseling

Comprehensive guidance and counseling provide individualized counseling to participant. This may include drug and alcohol abuse counseling and referral to partner programs, as appropriate. When referring participants to necessary counseling that cannot be provided by the local youth program or its services providers, the local youth program must coordinate with the organization it refers to in order to ensure continuity of service.

11. Financial literacy education

Financially literacy education may include activities which include:

- a. Support the ability of participants to create budgets, initiate checking and savings account at banks, and make informed financial decisions;
- b. Support participant in learning how to effectively manage spending, credit and debit, including student loans, consumer credit, and credit cards;
- c. Teach participants about the significance of credit reports and credit scores, what their rights are regarding their credit and financial information, how to determine the accuracy of credit report and how to correct inaccuracies; and, how to improve or maintain good credit.

12. Entrepreneurial skills training – Training that provides the basics of starting and operating a small business.

13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the workforce area, such as career awareness, career counseling, and career exploration services;

14. Activities that help youth prepare for and transition to postsecondary education and training- activities that may include information about time management, practice interviews, independent living, and how to prepare for postsecondary education (e.g., applications, financial aid, scholarships), and legal responsibilities after the age of 18.

Work Experience

Reference Policy #10 WIOA Work Experience Opportunities.

Individual Training Accounts and Procedures

Reference Policy #8 Individual Training Accounts and Procedures.

Supportive Services

Reference Policy #13 regarding Supportive Services.

Needs-Related Payment / Stipends for Out of School Youth

To offset the growing cost of living expenses for students who are enrolled in vocational skills-related training or GED classes, active participants will be provided needs-based payment / supportive service assistance for the following criteria and expenses:

Transportation

Transportation assistance may be provided to participants who demonstrate financial need and that have no other resources available. Transportation is only paid to and from the participant's home address and the training facility (round trip), at one trip per day.

Mileage is calculated using \$0.56 per mile and not to exceed \$168.00 per week or 300 miles per week. Career Advisors will utilize the "Bi-Weekly attendance voucher" when reimbursing transportation cost to participants. Mileage reimbursement is paid directly to the participant in accordance with the payment scheduled set by the service provider. If another person provided transportation, they are required to complete and sign the mileage reimbursement form and reimbursement is paid to that individual.

Note: if the other (receiving individual) is also enrolled in WIOA Title I, the career Advisor must obtain documentation from the other program that the individual has not already received mileage reimbursement to avoid duplication of payment of services.

Needs-Related Payment or Stipends payments must have prior approval of the Workforce Development Board Executive Director. The needs related payments/stipend will be processed biweekly. Supplements will be provided only to the participants who meet the following requirements:

- **Attendance**

Each student enrolled in the program under the GED component or designated pilot project will be required to attend class as applicable to the course requirements. A bi-weekly attendance form will be required for verification.

- **Progression**

a. Each student must show progress during the term of the course. Graded homework, assignments, tests, and contact hours for hands-on learning must be documented. Documentation must be completed and signed by the instructor or training official.

- Documentation must be submitted to the case advisors for validity of progression.
- b. Participants who fail to adhere to the rules and regulations of the training facility will be removed from the class immediately.

Mid-Carolina Youth Program Incentives

WIOA allows for youth participating in a WIOA youth-funded program to be awarded incentives for recognition and achievement in WIOA-related activities as a means to encourage attainment of individual goals that lead to the completion of a secondary school diploma or its equivalent, an occupational skills credential, a Career Readiness Certificate, or other programmatic outcomes. Incentives must be distributed in compliance with the requirements of 2 CFR part 200 of the Uniform Administrative Requirements and cannot be spent on entertainment costs (e.g., movie or sporting events, gift cards to movie theaters or other venues whose sole purpose is entertainment). Incentives are based on funding availability and must be earned and paid during the period of Youth participation (after program enrollment and prior to program exit).

All incentives must apply to a measurable activity and an achievement related to a goal such as the completion of training, obtaining employment, work readiness skills, occupational skills, basic skills attainment, or other forms of progress toward a credential or employment. WIOA Youth Career Advisors must verify that the participant is eligible for an incentive, document the achievement in case notes, and update the participant’s ISS.

CHART OF INCENTIVE AWARDS:

Achievement Milestone	Incentive Amount
Basic Skills Education / Secondary Education / Postsecondary Education	\$50 for ‘A’ semester average \$40 for ‘B’ semester average \$30 for ‘C’ semester average
<ul style="list-style-type: none"> • Completion of high school diploma or high school equivalency. • Completion of industry-recognized occupational credential, which may include, but is not limited to, a degree, licensure, and/or certificate 	<p>\$100 for Completion of high school diploma or high school equivalent.</p> <p>\$150 for Completion of occupational credential, which may include, but is not limited to, a degree, licensure, and/or certificate.</p>
<ul style="list-style-type: none"> • Obtained employment (indirect job placement) <u>and</u> maintained employment for at least 30 days. • Employment Retention 	<p>\$50 (the quote of \$ amount, what is the retention rate)</p> <p>\$25 for 3-month retention \$50 for 6-month retention \$75 for 9-month retention \$100 for 12-month retention</p>

<p>POST TABE TEST SCORES:</p> <ul style="list-style-type: none"> • 1st Scenario: score reflects an increase of 1 functioning level (NOT reaching the 9th grade level) or; • 2nd Scenario: score reflects an increased functioning level (at or above 9th grade level) 	<p>1st Scenario: \$25 incentive payment or;</p> <p>2nd Scenario: \$50 incentive payment</p>
<p>Activity (which may include, but is not limited to, satisfactory or better progress reports for training/educational activities, etc.) The recognition and achievement of the activity must be directly tied to goals outlined.</p>	<p>\$25 value (refer to Guidance)</p>
<p>Completion of Work Training Experience (which may include, but is not limited to, On- the-Job Training, Pre-Apprenticeship, Summer Work Training Experience, etc.).</p> <p>Direct job placement at work-based learning site from a Work Training Experience (which may include, but is not limited to, On-the-Job Training, Pre-Apprenticeship, Summer Work Training Experience, etc.).</p>	<p>1st Scenario: \$100</p> <p>2nd Scenario: \$200</p>

Unless otherwise approved, incentive disbursements will be in the form of a hard check or direct deposit. WIOA Youth Incentives are not intended for emergency assistance, but rather as a compliment to services provided and/or recognition. Unless otherwise approved by the Workforce Development Executive Director. ***Mid-Carolina incentive disbursements are not to exceed the corresponding amount.*** Incentives may not include cash, entertainment costs, event tickets, or gift cards. Incentives payments may only be awarded in recognition of an achievement directly tied to training, work experience, or goals of the program. It is the responsibility of the service provider to maintain required documentation detailing the distribution and management of incentives.

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