Youth Program

Pursuant to 20 C.F.R. Part 681
Approved and Published: December 2024

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Purpose

This Youth Policy is designed to provide local policy guidance to COWIB staff and local providers of WIOA Youth Program services. The policies and procedures described in this guide are intended to supplement and expand upon the guidance provided in the Workforce Investment and Opportunity Act, federal regulations, State issuances, and other local COWIB policies. In the event that any directions contained in this policy conflict with any State or Federal guidance, the State or Federal rule should be followed.

Authority

The authority for this policy is derived from the following:

- 20 C.F.R. Part 681
- TEGL 21-16
- TEGL 9-22
- WSD# 12-2024
- WSD# 21-2024
- WSD# 03-2024
- WSD# 03-2024 Attachment II
- WSD# 50-2024

Background

According to TEGL 21-16, WIOA outlines a broader youth vision that supports an integrated service delivery system and provides a framework through which states and local areas can leverage other Federal, State, Local, and philanthropic resources to support in-school youth (ISY) and out-of-school youth (OSY). WIOA affirms the Department of Labor's commitment to providing high-quality services for all 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, such as pre-apprenticeships or internships, and culminating with a good job along a career pathway, enrollment in post-secondary education, or a Registered Apprenticeship.

Eligibility / Target Population

The WIOA Youth Program is targeted at young people and is divided into 2 categories: In-School Youth (ISY) (between the ages of 14 – 21), and Out-of-School Youth (OSY) (between the ages of 16 – 24). The youth's program eligibility determination will made at the time of enrollment, and will remain unchanged throughout their enrollment. Youth Program Eligibility is discussed at length in separate policy titled, COWIB OSY Eligibility Policy, and/or COWIB ISY Eligibility Policy.

Minimum 75% Expenditure on OSY

OWDI 02-2016, Change 2 calls attention to the Department of Labor's focus on Out-of-School Youth (OSY), pointing to the requirement that a minimum of 75 percent of WIOA youth funds be spent on OSY. This minimum OSY expenditure applies to local workforce development area (LWDA) funds and funds reserved

by the Governor. 20 CFR § 681.430(a) provides that "only statewide funds spent on direct services to youth are subject to the OSY expenditure requirement. Funds spent on statewide youth activities that do not provide direct services to youth, such as many of the required statewide youth activities, are not subject to the OSY expenditure requirements." For example, the following activities are not considered direct services: conducting evaluations, disseminating a list of eligible providers of youth services, providing assistance to local areas, operating fiscal and management accountability information systems.

As stated in TEGL 21-16, DOL considers "direct services" as those services delivered by local program staff or service providers (e.g., staff-assisted services).

Minimum 20% Expenditure on Work Experience (WEX)

WIOA includes a major focus on providing youth with work experience opportunities while requiring that local areas spend a minimum of 20% of youth funds allocated to the local area, minus the local area expenditures for administration. These funds may be used to provide paid and unpaid work experiences, and must be tracked at the local level and reported on a monthly basis to the Oklahoma Office of Workforce Development (OOWD) for subsequent quarterly reporting to the Department of Labor. More information on (WEX) may be located in the COWIB Work Experience (WEX) Policy.

Partnering and Braiding Funds

The Oklahoma Office of Workforce Development encourages local programs to partner with existing local, State, or national entities that can provide program elements at no cost to the local youth program. To that end, the braiding of funds is a high priority under WIOA and occurs when different funding streams are used together to support different needs for the same customer. It allows a WIOA youth program to provide more comprehensive services to participants while maximizing partner resources available to assist youth.

WIOA Title I Youth Program Overview

The WIOA Title I Youth program is designed to assist youth with one or more barriers to employment prepare for post-secondary education and employment opportunities, attain educational and/or skills training credentials, and secure employment with career and promotional opportunities.

Intake / Application

Application is the process to gather information to determine eligibility and register youth as a participant. Eligibility criteria for the WIOA Title I Youth services is described in WSD 03-2024, WSD 03-2024 Attachment II and is addressed in separate COWIB Policy: COWIB OSY Eligibility Policy, and/or COWIB ISY Eligibility Policy. In addition, Youth Providers should consult the requirements established in the WIOA law and regulations.

Program enrollment is the point at which performance data collection begins. All applicable demographic information pertaining to a youth program participant must be accurately entered in the Universal Demographics screen of OKJobMatch. The demographic information entered will generate a potential eligibility and allow enrollment into the appropriate program. When the enrollment is complete, a

snapshot of the information that was entered in the universal demographics screen will exist in the program enrollment. The characteristics in the snapshot will remain unchanged throughout program participation. In accordance with WSD 03-2024, WSD 03-2024 Attachment II, these characteristics will be verified by the participant's virtual self-attestation just prior to staff entering the program enrollment. Enrollments, source documentation, and eligibility determinations are valid for 30 days to allow the supervisor time to review information and to approve/deny the pending request. Enrollments must be approved/denied by a supervisor after verifying the client's eligibility including uploaded documentation, self-attestation and program notes, before there is any expenditure of funds. At the end of the 30 days if the enrollment is still in the pending queue it is considered ineligible and will require a new enrollment, new source documentation collection, and a new eligibility determination.

Ineligible Youth

Youth applicants who do not meet the enrollment requirements of the youth program or who cannot be served by the program must be referred for further assessment, as necessary, and referred to appropriate training and educational programs that have the capacity to serve the individual.

Information and Referral

To encourage integration of services across programs (WIOA Title I Youth funded and non-WIOA Title I Youth funded) and recognize shared contributions toward outcomes, participants who receive non- WIOA Title I funded youth program services from partner programs can count in the WIOA core measures. To count these youth, the individual must be registered for WIOA Title I youth services (all individuals receiving youth services will be registered) and:

- concurrently receiving WIOA Title I funded youth services while receiving partner services;
- scheduled to receive WIOA Title I funded youth services at a future date while receiving partner services or upon exit of the partner services; or
- moves to partner services, and can be tracked while receiving and upon exit of partner services.

Tracking youth across WIOA Title I and non-WIOA Title I programs can be more effectively implemented in communities with strong school-to-work partnerships linking schools to workforce investment services. COWIB expects a high level of coordination and collaboration at the local level. COWIB envisions partners that include workforce development professionals, schools, community and faith- based organizations, Job Center partners, work-based learning providers such as youth apprenticeship and Tech-prep, postsecondary institutions, human/social service agencies and others to strategically align and leverage resources to increase community youth assistance strategies. Programs will be more closely linked to local labor market needs and will be based on the overall strengths and needs of local area youth. This identification of partners and available programs and services should include School-to- Work, Foster Care, Job Corps, SNAPWorks, Welfare to Work, and TANF funded programs such as Workforce Attachment and Advancement and Community Youth Grants.

Out of School Youth (OSY) Program

WIOA emphasizes services to opportunity youth, especially out of school youth. WIOA requires that a

minimum of 75% of youth funds be spent on OSY. OSY are not only youth who have dropped out of high school. They are also youth who are have graduated high school or have completed a High School Equivalency (HSE), and have a barrier to employment, (identified in OSY Target Population below). For OSY who have not completed high school or HSE, the career navigator should assist the youth to develop a strategy to assist the youth to obtain a high school diploma or GED. This may include enrolling in an alternative school or other educational institution. These activities would be combined with other positive youth development activities that will prepare the OSY to obtain employment and further their education and training. Service strategies for OSY who do have their high school diploma or HSE should focus on personal development and educational and occupational preparation.

There are a number of key partners local programs should connect with to assist with recruitment of and services to OSY. These partners include, but are not limited to, School-to Work Programs, Community and Faith Based Organizations, parents, human/social service agencies, local law enforcement and juvenile justice. Successful case management initiatives incorporate a number of fairly standard steps that allow the process to be orderly and structured while also being youth-centered and flexible. These steps vary in priority, sequencing, time allotted and content based upon individual goals and needs. Many are ongoing or regularly repeated rather than one-time activities. These steps include recruitment, intake and enrollment; 2) assessment of a youth's skills and abilities and mutual planning to develop goals, objectives and a service strategy; 3) labor market needs; 4) implementing the service plan and monitoring service delivery; 5) conducting follow-up; 6) documentation, record-keeping and case notes; 7) evaluation and measuring outcomes; and 8) engaging employers.

OSY Target Population

- 16-24 years of age
- Not attending any school
- At least one of the following must apply:
  - Individual with a disability
  - School dropout
  - Within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter
  - A recipient of a secondary school diploma or its recognized equivalent who is a low- income individual and is either an English language learner or basic skills deficient
  - An offender
  - A homeless youth or a runaway youth
  - In foster care or has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement
  - Pregnant or parenting
  - An individual who is low income and "requires additional assistance" to enter or complete an educational program or to secure or hold employment as follows:

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- A youth with a parent or legal guardian that is currently or previously incarcerated for a felony conviction;
- A youth with a parent or legal guardian who lacks a high school diploma or GED;
- Who attends or has attended a chronically underperforming/low performing school listed on the State Department of Education website; or
- A youth between 18 – 24 years of age with a pattern of Poor Work History. Poor work history includes non-reoccurring employment income and sporadic employment.

In-School Youth (ISY) Program

WIOA recognizes the differences between the workforce development needs of In-School and Out of School youth. Therefore, they set up different expectations for each group. The In-School Youth Program serves 14 – 21 year olds. The focus for the ISY Programs is developmental services that prepare the youth to: Stay in school, learn about/choose a career cluster; and, be ready for further developmental assistance.

ISY Target Population

- Attending school (as defined by State law), including secondary and postsecondary school
- 14-21 years of age
- Low Income; and
- At least one of the following must apply:
  - Basic Skills Deficient
  - An English Language Learner
  - An offender
  - A homeless youth or runaway youth
  - In foster care or has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement
  - Pregnant or parenting
  - Individual with a disability
  - Meet the requirement of "Needs Additional Assistance"

*Not more than 5% of the newly enrolled ISY in a given program year may be eligible based on this criterion.

5% Exception

WIOA allows a low-income exception where 5% of youth may be participants who ordinarily would be required to be low income for eligibility purposes and meet all eligibility criteria for WIOA youth except the low-income criteria. A program must calculate the 5% based on the percent of newly enrolled youth in the local area's WIOA youth program in a given program year who would ordinarily be required to meet the low-income criteria.

Objective Assessment

Assessment is the foundation of good planning and overall case management. It is an ongoing extension of the intake process and guides the career navigator's development of the young person's initial individual service plan as well as subsequent updates and revisions.

Each youth shall receive an Objective Assessment of the academic levels, skill levels and service needs for the purpose of identifying appropriate services and career pathways. The assessment must include a review of the following:

- Basic Skills
- Occupational Skills
- Prior Work Experience
- Employability
- Interests
- Aptitudes
- Supportive Service Needs
- Developmental Needs

Assessments must also consider a youth's strengths rather than just focusing on areas that need improvement.

Prior Assessments: A new assessment is not required if it is determined that it is appropriate to use a recent assessment conducted pursuant to another education or training program conducted in the last 6 months. Objective assessments must be documented in OKJobMatch, and form the basis for the establishment of the Individual Service Strategy, (ISS).

Individual Service Strategy (ISS)

The Individual Service Strategy (ISS) must be based on the objective assessment and is an ongoing strategy jointly developed by the participant and the case manager, which identifies:

- the individual needs of the participant;
- is directly linked to one or more of the following performance indicators:
  o Employment Rate – 2nd Quarter After Exit;
  o Employment Rate – 4th Quarter After Exit;
  o Median Earnings – 2nd Quarter After Exit;
  o Credential Attainment;
  o Measurable Skill Gains; and
  o Effectiveness in Serving Employers.
- identifies career pathways that include education and employment goals;
- considers career planning and the results of the objective assessment;
- prescribes achievement objectives and services for the participant.

The ISS should be reviewed and updated periodically to reflect the participant's progress in meeting the objective of the ISS including progress in acquiring measurable skills gains, work readiness, occupational skills and the adequacy of the support services provided. The ISS should also include:

- Activities leading to the attainment of a secondary diploma or equivalent or a recognized post-secondary credential.
- Preparation for post-secondary educational and training opportunities.
- Strong linkages between academic instruction and occupational education that lead to the attainment of recognized post-secondary credentials.
- Preparation for unsubsidized employment opportunities if appropriate, and effective connections to employers, including small employers, that are in In-Demand industry sectors and occupations of local and regional labor markets.
- Documentation of supportive services needed for the participant to successfully meet their educational/employment goal.

COWIB's Objective Assessment and ISS Process

Oklahoma requires the assessment and ISS processes to be facilitated by the Career Navigator, and the ISS is to be jointly developed between the Career Navigator and participant. The State Policy requires specific tasks and documentation by Career Navigators (Case Managers) during and after the performance of this process. The processes include:

- Determine Career Goal(s) – Identify career goal(s) and/or career pathway
- Assess Needs – Identify Basic Skills, Work Readiness Skill, Occupational Skills, and Supportive Service Needs
- Develop an ISS – Set goals, develop achievement objectives, assign services to address identified needs and attain positive outcomes
- Conduct Progress Reviews – Conduct periodic reviews of the participant and their plan to determine progress and any related problems that may arise
- Provide Follow-up Services – Assess needs and plan follow-up services

The order in which these processes occur may be flexible, based on the youth's needs, but generally follow the logical order listed. Deviation from these procedures may become necessary in certain cases by the Career Navigator. When these exceptions occur, rationale should be provided in the "Additional Notes" field of the OKJobMatch Employment Plan or the program notes.

Each process is more specifically described in the following sections.

Development of a Career Goal

Participants' career goals will be determined or confirmed using one of the three categories listed below:

(a) Individuals currently enrolled in training and needing assistance for completion

    (1) Verify participants have a career goal that matches their training. This may be determined through

interview. If not, they must complete the job matching process described in the "All Other Individuals" category described later in this section.

(2) Review the "Demand Occupations List" to determine if the occupation in which they are training is in demand.

(3) Conduct a review of their training/education progress to assure that they have a probable chance to successfully complete the training.

The above process verifies that participants have selected a demand occupation that leads to self-sufficiency, and indicates other related occupations that may be used with their training. Using this process helps to confirm they have made an informed choice.

(b) Individuals having gone through a job match or career decision-making process

(1) Review all career assessment results

(2) Review the demand occupations list to determine if the occupation, for which they are training, is a demand occupation. (Refer to demand occupation definition in section II.)

(3) Obtain the name of the LMI or occupational information used in the career research.

(4) All other individuals

(c) Case Managers will conduct a decision-making or job matching process in conjunction with participants to determine their career goals using:

(1) An assessment tool or tools, approved for use by COWIB;

(2) An equivalent procedure that has been approved by the Chief Executive Officer of the COWIB.[1]

Documenting Development of Career Goal(s)

The following steps are to be followed when documenting the development of the Career Goal(s):

- File the Objective Assessment's Career Compatibility Report, career instrument score or codes
- sheet in the ISS section of case file
- Any related notes in "Additional Notes" section of the OKJobMatch Employment Plan

Assess Needs – Identify Basic, Work Readiness, and Occupational Skills, and Supportive Service Needs

For the purpose of this policy and procedures manual, employable youth are those who have their

- basic skills,
- work readiness skills, and,
- occupational skills

appropriate to their occupational goal. When performing a needs assessment, staff will be reviewing three categories.

Basic Skills Assessment

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[1] A request to use an alternate procedure must be submitted in writing to the CEO of the Central Oklahoma Workforce Innovation Board, 3813 N. Santa Fe, Ste. 135, Oklahoma City, OK 73118.

When performing an assessment of basic skills, Youth Providers should pay particular attention to guidance given in 20 CFR §681.290

A youth is "Basic Skills Deficient" if he or she:

1. Have English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or

2. Are unable to compute or solve problems, or read, or speak English at a level necessary to function on the job, in the individual's family, or in society.

For the purpose of the basic skills assessment of the objective assessment, local programs must use assessment instruments that are valid and appropriate for the target population, and must provide reasonable accommodation in the assessment process, if necessary, for individuals with disabilities. TEGL 21-16 goes on to explain that local programs are not required to use assessments approved for use in the Department of Education's National Reporting System (NRS), nor are they required to determine an individual's grade level equivalent or educational functioning level (EFL), although use of these tools is permitted.

For the purpose of measuring EFL gains after program enrollment under the Measurable Skills Gains (MSG) indicator, WIOA requires standardized assessments for accountability in documenting client educational gains that are aligned with NRS educational functioning levels. TABE 11/12 is the locally approved assessment for EFL gains. This must go into effect ASAP for clients in which you are using BSD for eligibility and EFL gains.

A pre-assessment should assess the learner in the areas that are the focus of instruction. Pre- assessment scores must be documented in OKJobMatch once the assessment is provided, the MSG is entered into the system, and documentation is uploaded. Post-assessment scores can only be documented in OKJOBMATCH once the required number of instruction hours have been completed and documented. TABE 11/12 – Entry Levels 1-6 require a minimum of 40 hours of instruction but recommend 50-60 hours.

Documentation may include:

- Khan coach reports https://khanacademy.zendesk.com/hc/en-us/articles/360002532492-How-does-Khan- Academy-calculate-time-for-coach-reports-
- Lesson Plans with sign-in sheets signed by the tutor/instructor

- ABE attendance records

To ensure valid results, administration and scoring guidelines state:

- The TABE Locator and CASAS Appraisal tests should be administered first and used to determine the appropriate Education Level to administer in each subject area.
- Different Forms of the same Level of the TABE and CASAS will be used for the pre- and post-assessments. Example: If a student is pre-assessed using TABE Form 11, Level M, they would then be post-assessed using TABE Form 12, Level M.
- A student's lowest scale score will be used for placement in an EFL and to document learning gains in accordance with NRS guidelines. If this is not the case, written documentation should be placed in the student file explaining why the lowest scale score subject area is not being tracked for learning gain. Subject area scores to be used for measuring learner gain include reading, total math, or language are located in attachment A.

TEGL 21-16 does state that local programs may use previous basic skills assessment results if such previous assessments have been conducted within the past six months.

Work Readiness and Occupation Skills Assessment

Once the youth has completed an objective assessment, staff will then begin to assess the youth's work readiness and occupational skills. The assessments and the Work History Form will assist the staff and youth to identify his/her skills in these areas.

Employment History Form

The youth's work history, beginning from the most recent job and back will be listed, and the youth will sign and date at the bottom of the last page.

Documenting Assessment Results

OKJobMatch will be used to document the assessment results. Reading and math test score sheet (pre-test) will be filed in the ISS section of the case file. In addition, test scores are to be recorded in the OKJobMatch under the "Testing Information" section of the Client Enrollment Details screen. Specific instructions include:

- Find the customer in OKJobMatch.
- Click on "Program Registrations.
- Click on the appropriate WIOA funding source in which the youth is enrolled.
- Click on testing information and click "add"
- Click on the type of test and input the scores

Documenting Needs

Any participant needs will be documented in the ISS, and any related notes will be included as a case note

in OKJobMatch.

Program Participant Status

The point of program participation does not begin until after the youth:

- Determined Eligible for Program Participation, and
- Has received an Objective Assessment; and
- Has developed an Individual Service Strategy with their Career Navigator; and
- Has participated in any of the 14 WIOA Youth Program Elements

Fourteen Program Elements

WIOA legislation includes 14 program elements. All elements must be included in WIOA Youth Program design and made available to all eligible youth participants, but it is not necessary that Title I youth funds are used exclusively for all elements. Local programs may leverage partner resources to provide program elements as long as the activity is closely connected and coordinated with the WIOA youth program to ensure the activity is of high quality and beneficial to the youth participant.

Although the program design must offer each of these elements, each will only be provided to a youth based on the needs found during the assessment process. Organizations providing workforce development services to youth must employ strategies that assist youth in developing the skills required for success in the current workplace and beyond. Youth service providers must understand the needs of youth, particularly the neediest youth, in order to increase the effectiveness and success in the delivery of program services. Case management can provide the infrastructure for effectively delivering the appropriate mix of services that has proven to be effective in identifying education, employment, and training needs, as well as personal barriers inhibiting workplace success. It is particularly helpful for serving youth that are disconnected from mainstream institutions and systems. This approach ensures that appropriate services are received and attained outcomes are documented. A successfully implemented case management system also will efficiently facilitate the achievement of individual, organizational, employer, and workforce community goals. However, case management as an activity is not an end in itself; rather it is a means to an end – skills attainment, obtaining a credential, and/or employment.

- Tutoring, Study Skills Training, Instruction, and Dropout Prevention activities that lead to completion of a high school diploma or recognized equivalent
- Alternative Secondary School and Dropout Recovery Services assist youth who have struggled in traditional secondary education or who have dropped out of school
- Paid and Unpaid Work Experience is a structured learning experience in a workplace and provides opportunities for career exploration and skill development
- Occupational Skills Training is an organized program of study that provides specific skills and leads to proficiency in an occupational field
- Education Offered Concurrently with Workforce Preparation is an integrated education and training model combining workforce preparation, basic academic skills, and occupational skills

- Leadership Development Opportunities encourage responsibility, confidence, employability, self-determination, and other positive social behaviors
- Supportive Services enable an individual to participate in WIOA activities
- Adult Mentoring is a formal relationship between a youth and an adult mentor with structured activities where the mentor offers guidance, support, and encouragement
- Follow-up Services are provided following program exit to help ensure youth succeed in employment or education
- Comprehensive Guidance and Counseling provides individualized counseling to participants, including drug/alcohol and mental health counseling
- Financial Literacy Education provides youth with the knowledge and skills they need to achieve long-term financial stability
- Entrepreneurial Skills Training provides the basics of starting and operating a small business and develops entrepreneurial skills
- Services that Provide Labor Market Information offer employment and labor market information about in-demand industry sectors or occupations
- Postsecondary Preparation and Transition Activities help youth prepare for and transition to postsecondary education and training

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

This element includes "tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.

Secondary school dropout prevention strategies include services and activities that keep a young person in-school and engaged in a formal learning and/or training setting. This program focus is on in-school services relating to attainment of a high school diploma.

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

This element includes alternative secondary school services such as basic education skills training, individualized academic instruction, and English as a Second Language training, or those services 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. While the activities within both types of services may overlap, each are provided with the goal of helping youth to re-engage and persist in education that leads to the completion of a recognized high school diploma equivalency.

Program Element 3: Paid and Unpaid Work Experience

This element is a critical component in the youth program. WIOA requires that a minimum of 20% of local area youth funds are to be expended on WEX. Bear in mind that:

- Local area administrative funds are not subject to the 20% requirement; and
- Leveraged resources cannot be counted toward the 20%.

WIOA identifies four categories of work experience:

- Summer employment opportunities and other employment opportunities throughout the year
- Pre-apprenticeship programs;
- Internships and job shadowing; and
- On-The-Job training opportunities.

Work Experiences must include academic and occupational education:

- The educational component may occur concurrently or sequentially with the work experience;
- The academic and occupational education component may occur inside or outside the work site;
- The work experience employer can provide the academic and occupational component or such components may be provided separately in the classroom or through other means;
- Local areas have the flexibility to decide who provides the education component;
- The academic and occupational education component refers to contextual learning that accompanies a work experience, it includes the information necessary to understand and work in specific industries and /or occupations.
- Local programs have the flexibility to determine the appropriate type of academic and occupational education necessary for a specific work experience.

For specific programmatic guidance on WEX or OJT, please view the COWIB Work Experience WEX Policy, or the COWIB OJT Policy.

Program Element 4: Occupational Skills Training

Element 4 is an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels. Local areas must select training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the local area.

Such training must:

- Be outcome-oriented and focused on an occupational goal specified in the individual service strategy;
- Be of sufficient duration to teach the skills needed to meet the occupational goal; and
- Lead to the attainment of a recognized postsecondary credential.

The Department of Labor and the State of Oklahoma allow WIOA Individual Training Accounts (ITA)s for

OSY, ages 16 to 24, using WIOA youth funds, when appropriate. ITAs allow participants the opportunity to choose the training provider that best meets their needs. To receive funds from an ITA, the training provider must be on the Eligible Training Provider List. However, the Department of Labor prohibits the use of youth program-funded ITAs for ISY. In-School Youth between the ages of 18 and 21 may co-enroll in the WIOA Adult program if the young adult's individual needs, knowledge, skills, and interests align with the WIOA adult program and may receive training services through an ITA funded by the adult program.

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

This element reflects an integrated education and training model (IET) and 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. Refers to the concurrent delivery of:

- Program Element 2: Alternative Secondary School Services or Dropout Recovery Services;
- Program Element 3: Work Experience; and
- Program Element 4: Occupational Skills Training/

The 3 components above all fit under different WIOA youth program elements and are only counted here under Element 5 if they occur concurrently as part of an IET model.

Program Element 6: Leadership Development Opportunities

Element 6 includes opportunities that encourage responsibility, confidence, employability, self-determination, and other positive social behaviors such as:

- Exposure to postsecondary educational possibilities
- Community and service learning projects
- Peer-centered activities, including peer mentoring and tutoring
- Organizational and team work training, including team leadership training
- Training in decision-making, including determining priorities and problem solving
- Citizenship training, including life skills training such as parenting and work behavior training
- Civic engagement activities which promote the quality of life in a community
- Activities that place youth in a leadership role such as serving on a WDB's Standing Youth Committee

Program Element 7: Supportive Services

Element 7 includes services that enable an individual to participate in WIOA activities. These services include but are not limited to:

- Linkages to community services;
- Assistance with child care and dependent care;

- Assistance with educational testing;
- Referrals to health care;
- Assistance with uniforms or other appropriate work attire and work-related tools including such items as eye glasses and protective eye gear;
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes
- Payments and fees for employment and training-related applications, tests, and certifications

Program Element 8: Adult Mentoring

Element 8 defines the timeframe for adult mentoring as lasting at least 12 months. Adult mentoring may take place both during the program and following exit from the program. It may 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.

- 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;
- Career Navigators are allowed to serve as mentors in areas where adult mentors are scarce.

Program Element 9: Follow-up Services

Element 9 is a required Youth program element and must be provided to all participants enrolled in the Youth program for a minimum of 12 months after completion of participation, (program exit). Follow- up services are critical following a Youth exit from the program to help ensure successful employment and/or post-secondary education and training and may include the following program elements:

- Supportive services
- Adult mentoring
- Financial literacy education
- Services that provide labor market and employment information about in-demand industry and career exploration services
- Activities that help youth prepare for and transition to post-secondary education and training

Career Navigators are responsible for ensuring Youth are offered an opportunity to receive follow-up services that align with their individual service strategies at least one time every thirty (30) days. If a Career Navigator is not able to make follow-up contact with a client utilizing the primary contact number and the two alternative contact methods, (i.e. email, Facebook, friend or family, etc.,) for 3 consecutive months, the Career Navigator needs to document in a case note what methods of contact were used on what dates, and that the client is being removed from follow-up services due to "refusal of follow-up services".

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For further information regarding this program element, please reference the COWIB Follow-Up Policy.

Program Element 10: Comprehensive Guidance and Counseling

Element 10 includes comprehensive guidance and counseling that is appropriate to the needs of the individual youth and may include career counseling and guidance, drug and alcohol abuse counseling, mental health counseling, and/or referral to partner programs, as appropriate.

Comprehensive employment and education counseling will be provided in-house, whereas comprehensive personal counseling must be provided by appropriately trained staff through referrals to other entities within the community. When referring participants to necessary counseling, the Service Provider must coordinate with the organization it is referring to in order to ensure continuity of services. The participant's comprehensive counseling and guidance service must be documented within OKJobMatch in the service and training field.

Program Element 11: Financial Literacy Education

Element 11 is financial literacy education. These activities be age appropriate, timely, and provide opportunities to put lessons into practice. In the case of ESL youth, multilingual financial literacy and education materials should be made available. Additionally, financial literacy and education materials should be accessible so that youth with disabilities may take advantage of them. Program element 11 may include activities to:

- Support the ability of participants to create budgets, initiate checking and savings accounts at banks, and make informed financial decisions
- Support participants in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards
- Learn 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 a credit report, how to correct inaccuracies, and how to improve or maintain good credit
- Understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions
- Understand identity theft, ways to protect themselves, as well as ways to identify theft and resolve cases
- Help participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability.

Program Element 12: Entrepreneurial Skills Training

Element 12 includes entrepreneurial skills training, which provides the basics of starting and operating a small business. Such training must develop the skills associated with entrepreneurship. Such skills may include, but are not limited to the ability to:

- Take initiative
- Creatively seek out and identify business opportunities

- Develop budgets and forecast resource needs

- Understand various options for acquiring capital and the trade-offs associated with each option

- Communicate effectively and market oneself and one's ideas.

Approaches to teaching youth entrepreneurial skills may include, but are not limited to:
- Entrepreneurship education that provides an introduction to the values and basics of starting and running a business. Entrepreneurship education programs often guide youth through the development of a business plan and also may include simulations of business start-up and operation

- Enterprise development which provides supports and services that incubate and help youth develop their own businesses. Enterprise development programs go beyond entrepreneurship education by helping youth access small loans or grants that are needed to begin business operation and by providing more individualized attention to the development of viable business ideas

- Experiential programs that provide youth with experience in the day-to-day operation of a business. These programs may involve the development of a youth-run business that young people participating in the program work in and manage. Or, they may facilitate placement in apprentice or internship positions with adult entrepreneurs in the community.

Program Element 13: Services that Provide Labor Market Information

Element 13 includes 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.

Program Element 14: Postsecondary Preparation and Transition Activities

Element 14 prepares ISY and OSY for advancement to post-secondary education after attaining a high school diploma or its recognized equivalent. These services include exploring post-secondary education options including technical training schools, community colleges, 4-year colleges and universities, and Registered Apprenticeship. Additional services include, but are not limited to:

- Assisting youth with preparation for SAT/ACT testing

- Assisting with college admission applications

- Searching and applying for scholarships and/or grants

- Filling out the proper financial aid applications and adhering to changing guidelines

- Connecting youth to postsecondary education programs such as OKCollegeStart.org

Documentation and Case Notes

Documenting receipt of program elements is critical to ensure that youth who are actively participating in programs do not get unintentionally exited due to 90 days of no service. Career Navigators should ensure that services received are reported accordingly.

Contact with a participant for case management purposes is not considered a program service and will not prevent a program exit from occurring. For clarification, Case Management is the act of connecting youth to appropriate services and not a program element.

Participants who have exited must have eligibility re-determined and a new enrollment approved to receive additional program services. However, if a participant has completed the last service in the ISS, such as work experience and enters follow-up, but later determines that they need additional services beyond the 5 elements allowed in follow-up and the youth has not exited, the career navigator could revise the ISS in agreement with the youth and provide elements as needed beyond the follow-up elements.

Each element may be tied to multiple services. All services, including those not funded with Title I youth funds, must be documented by entry into the youth's service and training plan. The provider of the service should be the entity, employer or training provider actually providing the service and not the contracted service provider. All services entered must have a correlating program note entry. A program service must be given every 90 days at a minimum. Participants that go over 90 days without a staff assisted program service will exit from the program.

Performance Indicators

Section 116(b)(2)(A) of WIOA identifies six primary indicators by which all core programs will be measured in order to assess effectiveness in achieving positive outcomes for individuals served by programs:

Employment Rate 2nd Quarter After Exit;

For Title I Youth, this is the percentage of participants who are in education or training activities, or in unsubsidized employment during the second quarter after exit, as established through direct UI wage record match, Federal or military employment records, or supplemental wage information.

    i.   Denominator Criteria: Title I Youth Participants that have exited the program

    ii.   Numerator Criteria: Title I Youth Participants in an education or training activity, or in unsubsidized employment during the 2nd quarter after exit.

Employment Rate 4th Quarter After Exit;

For Title I Youth, this is the percentage of participants who are in education or training activities, or in unsubsidized employment during the fourth quarter after exit, as established through direct UI wage record match, Federal or military employment records, or supplemental wage information.

    i.   Denominator Criteria: Title I Youth Participants that have exited the program

    ii.   Numerator Criteria: Title I Youth Participants in an education or training activity, or in unsubsidized employment during the 4nd quarter after exit.

Median Earnings 2nd Quarter After Exit;

The median earnings of Title I and III Participants who are in unsubsidized employment during the second quarter after exit from the program, as established through direct UI wage record match, Federal or military employment records, or supplemental wage information.

    i.   <u>Denominator Criteria:</u> Title I Youth Participants employed in the 2nd quarter after exit.

    ii.   <u>Numerator Criteria:</u> Total Quarterly earnings are collected and listed in order, from the lowest to the highest value. The values in the middle of this list is the median earnings values.

Credential Attainment;

The percentage of Title I In-School Youth who attain a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program.

Participants who attained a secondary school diploma or its recognized equivalent are included only if the participants are also employed within one year (quarter based) after exit or are enrolled in an education or training program leading to a recognized postsecondary credential during program participation or within one year after exit from the program.

The percentage of Title I Out-Of-School Youth Participants enrolled in occupational skills training, secondary education, postsecondary education, Title II-Funded adult education, YouthBuild, and Job Corps are included in the credential attainment indicator.

<u>Credential:</u> A credential must recognize technical or industry/occupational skills for a specific industry/occupation rather than general skills related to safety, hygiene, etc., even if general skills certificates are broadly required to qualify for entry-level employment or advancement in employment. The technical or industry/occupational skills certified must be based on standards developed or endorsed by employers or industry associations. The credential must be awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within a specific industry/occupation. Certificates awarded by workforce development boards and work readiness certificates are not included in this definition because neither type of certificate is recognized industry-wide, nor do these types of certificates document the measurable technical or industry/occupational skills needed to gain employment or to advance within the occupation.

    i.   <u>Denominator Criteria:</u> Title I Participants who were enrolled in postsecondary or secondary education or training programs (excluding OJT & Customized Training) and have exited during the reporting period.

    ii.   <u>Numerator Criteria:</u> Title I Participants who attain a postsecondary credential OR attain a secondary credential and enroll in an education or training program leading to a recognized postsecondary credential or are employed, during participation or within 1 year after exit from the program.

Credential attainment must be documented by uploading a copy of the credential to OKJobMatch.

Measurable Skill Gains

The percentage of Title I Program Participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving

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measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress, towards such a credential or employment. Depending on the type of education or training, documented progress is defined as one of the following five types of measurable skill gains:

- Educational Functioning Level (EFL)
- Secondary School Diploma/Recognized Equivalent
- Secondary or Postsecondary Transcript/Report Card
- Training Milestone
- Successful Passage of an Exam

i. Denominator Criteria: Title I Participants who, during any point in the program year, are in an education or training program that leads to a recognized postsecondary credential or employment. This includes participants who continue to receive services as well as those who have participated during the reporting period and have exited the program.

ii. Numerator Criteria: The number of Title I Program Participants included in the denominator criteria that achieved at least one type of gain based on benchmarks above.

Additional Information on Performance Measures

For further information on performance indicators, collection of information, or reporting, please reference the Oklahoma Office of Workforce Development's guidance in WSD 21-2024, Core Performance Measures, or its current replacement.

Equal Opportunity and Nondiscrimination Statement

All Recipients, and Sub-recipients / Sub-grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

Addenda / Revisions

The COWIB Chief Executive Officer is authorized to issue additional instructions, guidance, approvals, and/or forms to further implement the requirements of policy, without making substantive change to the policy, except in situations when a new or updated state and federal guidance is issued.

SCALE SCORE RANGES FOR NRS EDUCATIONAL FUNCTIONING LEVELS
TABE 9 and 10 Scale Score Ranges for NRS Educational Functioning Levels

EFL	Reading	Total Math	Language
ABE Beginning Literacy	367 and below	313 and below	389 and below
ABE Beginning	368-460	314-441	390-490
ABE Low Intermediate	461-517	442-505	491-523
ABE High Intermediate	518-566	506-565	524-559
ABE Low Adult Secondary	567-595	566-594	560-585
ABE High Adult Secondary	596 and above	595 and above	586 and above

TABE 11 and 12 Scale Score Ranges for NRS Educational Functioning Levels

EFL	Reading	Total Math	Language
ABE Beginning Literacy	300-441	300-448	300-457
ABE Beginning	442-500	449-495	458-510
ABE Low Intermediate	501-535	496-536	511-546
ABE High Intermediate	536-575	537-595	547-583
ABE Low Adult Secondary	576616	596-656	584-630
ABE High Adult Secondary	617-800	657-800	631-800

CASAS Assessment Chart for Educational Functioning Level in Adult Basic Education (for NRS approved Reading Goals assessments through February 2025)

National Reporting System Levels	Reading GOALS Score Ranges
1 Beginning ABE Literacy	203 and below
2 Beginning Basic Education	204-216
3 Low Intermediate Basic Education	217-227
4 High Intermediate Basic Education	228-238
5 Low Adult Secondary Education	239-248
6 High Adult Secondary Education	249 and above

CASAS Assessment Chart for Educational Functioning Level in Adult Basic Education (for NRS approved Math Goals assessments through March 2022)

National Reporting System Levels	Reading GOALS Score Ranges
1 Beginning ABE Literacy	193 and below
2 Beginning Basic Education	194-203
3 Low Intermediate Basic Education	204-214
4 High Intermediate Basic Education	215-225
5 Low Adult Secondary Education	226-235
6 High Adult Secondary Education	236 and above

BEST Plus 2.0 and BEST Literacy Scale Score Ranges for NRS Educational Functioning Levels

National Reporting System Levels	BEST Plus 2.0	BEST Literacy 2008 Effective July 1, 2008
1 ESL Beginning Literacy	88-361	0-20
2 ESL Low Beginning	362-427	21-52
3 ESL High Beginning	428-452	53-63
4 ESL Low Intermediate	453-484	64-67
5 ESL High Intermediate	485-524	68-75
6 ESL Advanced	525-564	76-78

TABE CLAS-E Scale Score Ranges for NRS Educational Functioning Levels

National Reporting System Levels	Reading	Writing	Total Reading & Writing	Listening	Speaking	Total Listening & Speaking	SPL
1 ESL Beginning Literacy	250-392	200-396	225-394	230-389	231-425	230-407	0-1
2 ESL Low Beginning	393-436	397-445	395-441	390-437	426-460	408-449	2
3 ESL High Beginning	437-476	446-488	442-482	438-468	461-501	450-485	3
4 ESL Low Intermediate	477-508	489-520	483-514	469-514	502-536	486-525	4
5 ESL High Intermediate	509-557	521-555	515-556	515-549	537-567	526-558	5
6 ESL Advanced	558-588	556-612	557-600	550-607	568-594	559-600	6

CASAS Assessment Chart for Educational Functioning Level in English as a Second Language

Educational Functioning Level	CASAS Level	Reading and Listening Score Ranges
1 Beginning ESL Literacy	A	Reading: 180 and below Listening: 162-180
2 Low Beginning ESL	A	Reading: 181-190 Listening: 181-189
3 High Beginning ESL	A	Reading: 191-200 Listening: 190-199
4 Low Intermediate ESL	B	Reading: 201-210 Listening: 200-209
5 High Intermediate ESL	B	Reading: 211-220 Listening: 210-218
6 Advanced ESL	C	Reading: Placement: 221-234 Completion: 235 and above Listening: Placement: 219-226 Completion: 227 and above