


WIOA POLICY Calcasieu Parish Consortium Workforce Development Board LWDA #51 Allen, Beauregard, Calcasieu, Cameron, Jefferson Davis & Vernon Parishes		Workforce Innovation & Opportunity Act YOUTH ENROLMENT 	
POLICY: YP1		Youth	Approved: 08/29/2019
Revision: 01/23/2020; 6/25/2020; 05/25/2021		Expiration Date: Continuous, until further notice	
WDB Chairperson's Signature: Sarita Scheufens		WDB Director's Signature: Stephanie Seemion	

PURPOSE:

To provide LWDA51 guidance regarding youth enrollment for the Workforce Innovation and Opportunity Act (WIOA Youth Program). Youth services will prioritize serving out-of-school youth, high school dropout recovery, achievement of recognized post-secondary credentials, and successful employment outcomes. Career pathways and work-based learning will be promoted as learning approaches.

BACKGROUND:

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

DEFINITION(S):

Attending School — an individual to be "attending" school at the time of eligibility determination if s/he is:

- reporting to school on a routine basis, either physically or virtually, when school is in session;
- in between school sessions and is enrolled in continuing school at the start of the next session (e.g., the summer between secondary school grade levels); OR
- registered for post-secondary school, but classes have not yet started.

Note: Registration or attendance in post-secondary school must always involve credit-bearing classes. If the classes are non-credit-bearing, the individual is not considered "attending" school.

Basic Skills Deficient — is having a score of 8.9 or below on an NRS Assessment in Reading or Mathematics or, the youth is unable to compute or solve problems, or read, write or speak English, at a level necessary to function on the job, in the individual's family or society. This term is further defined as lacks a high school diploma or equivalency and is not enrolled in secondary education or enrolled in Title II (Adult Ed) or case manager makes observations. BSD for In-School Youth is an individual who is behind in credits to graduate on time with peer cohort, has a GPA of 2.5 or below, or has taken the End of Course Assessment (EOC Assessment) and did not pass.

Not Attending School — an individual as "not attending" school at the time of eligibility determination if s/he does not meet the "attending" definition and meets one of the following:

- has not reported to the school, either physically or virtually, for at least four full weeks and is not subject to the State's compulsory school attendance law (e.g., the individual is 20 years old and has not attended

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post-secondary training for the last four weeks); • is between school sessions and decides not to follow through with attending and is not subject to the State's compulsory school attendance law;

- is not currently reporting to school but is registered for post-secondary school and decides not to follow through with attending; • is enrolled in non-credit-bearing post-secondary classes; OR • is subject to the State's compulsory school attendance law but has not reported to the school, either physically or virtually, for the most recently completed quarter of the school district's school year or longer.

Public Assistance — LWDA51 further defines Public Assistance as the receipt of cash payment assistance from Federal, State, or Local government agencies. Some of those agencies are, but not limited to: Low-Income Home Energy Assistance Program (LiHEAP), Section 8 Housing, Supplemental Nutrition Assistance Program (SNAP), Louisiana Medicaid Program, Family Independence Temporary Assistance Program (FITAP), Temporary Assistance for Needy Families (TANF), Child Care Assistance Program (CCAP) or Supplemental Security Income (SSI). If a person is receiving a form of public assistance that is not commonly known, the WDB Director and/or Local Area Coordinator will provide the final approval if the stated assistance is acceptable for LWDA51.

POLICY GUIDANCE:

A WIOA program youth is not considered a "participant" and subsequently included in performance calculations until the youth has been determined eligible, received an objective assessment, developed an individual service and received 1 of the 14 youth program elements. These components should be completed in the order listed. The specifics of each component are described below. The ISS shall be developed in partnership (mutually agreed) with the participant. The ISS is the framework for justifying decisions concerning the customer's appropriate service mix and sequence.

A. ELIGIBILITY

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

Eligibility determination includes the following steps:

1. Determining income eligibility, if applicable
2. Determining barriers
3. Ensuring Selective Service Registration, if applicable
4. Determining School Status
5. Age Requirement

Out of School Youth:

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

Therefore, to be eligible as an Out of School youth:

The youth is not younger than age 16 or older than age 24 *AND* Not attending any school (as defined under State law) *AND* One or more of the following barrier(s):

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

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

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

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

In-School Youth:

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

To be eligible as In-School Youth:

Must be attending school (as defined under state law) **AND Not younger than age 14 or older than age 21 AND Low-income individual* AND One or more of the following barriers:**

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

Youth 5% Exception and Limitation

A Youth needing a 5% designation for eligibility will need the 5% exception or 5% limitation box checked on the eligibility screen of the WIOA application (on the last page). Only staff in the Management and MIS HiRE

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privilege group may check this box (this would include Local Area Coordinator and local MIS staff). Because this is an exception, a very small number of youths can put LWDA51 over the 5% threshold, this privilege is limited to the foregoing personnel.

WIOA requires a 5% limitation on using "Requires Additional Assistance " as a barrier for In-School youth.

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

Five Percent Rule:

The 5% window exception shall be calculated for each Service Provider within LWDA 51, based upon newly enrolled participants during a program year. Service Providers that choose to enroll under this category without the total number of enrollments required for compliance with this exception run the risk of disallowed costs as the youth would not technically be eligible for the WIOA youth program.

In some instances, LWDA51 Board Director may grant permission to enroll a youth under this exception, based upon the total number of enrollments throughout the consortium. This permission must be obtained in writing/email prior to the enrollment of the youth and placed in the participant file with other eligibility documentation. (Ref TEGL, 21-16)

LWDA51 Workforce Development Board defines In School Youth who "require additional assistance to complete an educational program, or to secure and hold employment" and Out of School Youth who "requires additional assistance to enter or complete an educational program or secure or hold employment" as youth who fall within at least one of the following categories:

- Failed any part of the LEAP Test
- Emancipated youth
- Youth who is underemployed
- Is or was a ward of the State
- Has been referred to or treated by an agency for substance abuse/ psychological problems
- A victim of domestic abuse or violence ● Has a currently incarcerated parent(s)
- Has neither the work experience nor the credential required for an occupation in demand for which training is necessary and will be provided
- Has been fired from a job within the six (6) months (or longer if the last job) before application

Definition of Underemployed Youth:

Any out of school youth between the ages of 16-24, who is currently employed, and:

1. Not earning at least, the poverty level, or
2. Is earning at least the poverty level, but not employed full-time, or
3. Is in a position that does not provide any reasonable prospects for career advancement, or
4. Has skill sets which do not match or align with the skills needed for high demand/growing occupations in the local labor market. or
5. Has appropriate skillsets for high demand/growing occupations, but lacks work experience or longevity in the labor market to obtain such jobs, or

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6. Has appropriate skill sets, but jobs requiring those skills are limited or do not exist in the local labor market. (Ref WDB Minutes 01/28/2016)

Low Income Individual means an individual who:

- 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, income-based public support (TANF, SNAP or other income-based public assistance);
- is in a family with total family income that does not exceed the higher of the poverty line or 70 % of the lower living standard income level;
- Homeless individual;
- Is an individual with a disability whose own income meets the income requirement of the clause but who is a member of a family whose income does not meet this requirement.
- Foster child
- Receives or is eligible to receive "free and reduced" lunch; or
- A youth living in a high poverty area

Family Definition:

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

- (A) A married couple and dependent children.
- (B) A parent or guardian and dependent children.
- (C) A married couple.

***When calculating a potential youth participant's income, LWDA51 staff will follow the IRS definition and test for qualifying child dependent as defined in Publication 501: Dependents, Standard Deduction, and Filing information. These five (5) tests will help decide if the parent/guardian's income needs to be included in the participant's income calculation. (See Attachment A for the Qualifying Child/Dependent Test.)**

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

Family of One Definition:

The following may be considered a family of one for determining program eligibility:

- An adult or youth with a physical, mental, learning, or emotional/behavioral disability. (This includes substance abuse. The disability must be documented if pertinent to eligibility.)
- An individual 14 years of age or older not living with his/her family and receiving less than 50 percent of his/her maintenance from the family in the six-month period previous to program application.
- An individual 18 years of age or older living with his/her family who received less than 50 percent of his/her maintenance from the family in the six-month period previous to program application and is not the principal earner nor the spouse of the principal earner.
- For purposes of determining eligibility, an at-risk youth may be classified as a family

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of one and deemed economically disadvantaged and children of dislocated workers who meet age requirements may be classified as a family of one.

Additional Eligibility Requirement and Data Validation:

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

Ineligible Youth Candidates:

In the scenario that a youth applies for WIOA services and does not meet the WIOA enrollment requirements, the youth should be referred to the appropriate agencies that could best assist and/or serve them. Staff must case note the outcome of the eligibility process and retain a file with all eligibility documentation. Job vacancies and labor market information can be provided to the youth to help them obtain employment.

Objective Assessment Summary:

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

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

The objective assessment in Louisiana Works - HiRE will be the approved objective assessment tool that youth staff will use in LWDA51.

(Ref TEGL, 21-16)

Individual Services Strategy (ISS)

An ISS is a specific plan developed for each youth based on the objective assessment. It identifies an employment goal (including, in appropriate circumstances, nontraditional employment), an educational goal, appropriate achievement objectives, and appropriate services for the youth. LWDA51 's most current approved ISS will be documented on blue paper. The ISS in HiRE will be the approved goals and objectives documented process for LWDA51.

(Ref TEGL, 21-16)

Youth 14 Program Elements

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

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

Staff must ensure the 14 WIOA youth program elements are made available to all youth participants. LWDA51 has embedded the 14 elements in the Youth ISS and developed a WIOA Program Brochure that lists the 14 elements provided to each youth. Local programs must make all these program elements available to youth participants.

The 14 youth program elements are:

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

However, this does not mean that every youth participant must receive services from all program elements. The appropriate components are made available to explain what and how they can assist the youth in removing barriers and obtaining short- and long-term goals. Specific program services will be provided to a youth participant, based on each participant's objective assessment and individual service strategy.

HiRE Data Entry: A case note must be recorded stating the 14 youth elements have been made available and discussed with the participant. An ISS will be developed with the youth determining the best way to implement the needed youth elements. The required elements must also be documented on the youth's ISS. As with all case notes, this must be individualized. A case note should accompany every activity entered.

REFERENCE(S):

WIOA Section 3(27), 3(46), 129(2)

20 CFR 681.200 through 681.310

WIOA section 129(A)

WIOA 129 (c) (2)

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20 CFR 681.460

20 CFR Part 664

20 CFR 681.250(b)(c)(d)

TEGL 21-16

WDB Minutes 01/28/2016

ATTACHMENT(S):

Publication 501 : Dependents, Standard Deductions, and Filing Information