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Policy Letter #18

TO: All Cumberland County Workforce Development Service Providers
FROM: Tracy Jackson- Interim Director
SUBJECT: Youth Services Policy

PURPOSE

This policy provides guidance regarding the operation of the Cumberland County Workforce Development Board's (WDB) Workforce Innovation and Opportunity Act (WIOA) Youth program. The 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. Youth Program Service Providers are responsible for administering a youth program model 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.

Supportive services for youth, as defined in the Workforce Innovation and Opportunity Act (WIOA) Section 134(d)(2), states that services such as transportation, child care, dependent care, housing and needs-related payments that are necessary to enable an individual to

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

participate in WIOA are permissible services. Supportive Services may include but are not limited to, the following: linkage to community services, assistance with transportation, assistance with child care, assistance with housing, referral to medical services, and assistance with uniforms or other appropriate work attire and work-related tools.

WIOA Youth Eligibility

To be eligible to receive WIOA youth services, an individual must:

- Be a citizen or noncitizen authorized to work in the United States;
- Meet military Selective Service registration requirements (males only); and
- Be an In-School Youth (ISY) or an Out-of-School Youth (OSY).

In School Youth

An In School Youth is an individual who is:

- Not younger than 14 and not older than 21 years of age;
- Attending school;
- Low-income, or lives 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).

Not more than 5% of the In-School Youth enrolled each program year may be enrolled based on “youth who requires additional assistance to enter or complete an education program or to secure or hold employment” criterion.

High Poverty Area

A Youth living in a high poverty area automatically meets the low-income criterion. A poverty area is defined as a Census tract, a set of contiguous Census tracts, Indian Reservation, tribal land, or Native Alaskan Village of a county that has a poverty rate of at least 30 percent. The WDB has obtained information from the Labor & Economic Analysis Division (LEAD) to determine which areas within the region are considered to be high poverty areas.

Out-of-School Youth

An Out-of-School Youth is an individual who is:

- Not younger than 16 and not older than 24 years of age;
- Not attending school; **and**
- One of more of the following:
 - A school dropout (a youth attending an alternative school at the time of enrollment is not considered to be a dropout);
 - 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;
 - 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;
 - A low-income individual who requires additional assistance to enter or complete an educational program or to obtain or retain employment (refer to the guidelines below).

Youth that falls between the ages of 18-24 may be served as youth or adults. The determination will be made by staff to serve the individual as a youth, adult, or both, based on funding availability.

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 Policy Statement 10-2018 dated September 25, 2018.

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.

Approval from the Workforce Development Director is required 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.

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 that 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;
3. Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, which may include the following types of work experiences:
 - a. Summer employment opportunities and other employment opportunities available throughout the year;
 - b. Pre-apprenticeship programs- a program or set of strategies designed to prepare individuals to enter and succeed in a registered apprenticeship program and has a documented partnership with at least one, if not more, registered apprenticeship programs;
 - c. Internships and job shadowing;
 - d. On-the-Job (OJT) opportunities
4. Occupational skills training, which includes priority consideration for training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the workforce area involved;
5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster - training that integrates adult and literacy activities (programs, activities, and services such as English language services to achieve competence in reading, writing, speaking, and comprehension) with workforce preparation activities and workforce training. This

program element allows workforce preparation activities, basic academic skills, and hands-on occupational skills to be taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway;

6. Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate;
7. Support services, as defined in WIOA, which enable an individual to participate in WIOA activities;
8. Adult mentoring for a duration of at least 12 months that may occur both during and after program participation;
9. Follow-up services for not fewer than 12 months after the completion of participation. Follow-up is required and should be documented in NCWorks Online by entering data in the quarterly follow-up boxes and case notes. If services are provided during the follow-up quarter, an “F” service/activity should be entered in NCWorks Online;
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, and referrals to counseling, as appropriate to the needs of the individual youth;
11. Financial literacy education - Activities that assist with improving financial literacy and/or personal budgeting skills;
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 #14 WIOA Work Experience Opportunities

Individual Training Accounts and Procedures

Reference Policy #12 Individual Training Accounts and Procedures

Supportive Services

Reference Policy #17 Supportive Services and Needs-Related Payments

Needs-Related Payment / Supportive Services / 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:

\$10.00 per day	travel	\$50.00 per week
+ \$7.00 per day	meals/snacks	\$35.00 per week
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\$17.00 per day	x 5 days x 4 weeks	= \$340 monthly (340 / 2 = \$170.00 Biweekly)

Needs-Related Payment / Support Service forms 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 time sheet 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 Career Center 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.

Cumberland County Youth Program Incentive Policy:

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.

Examples of documented progress include:

1. A credential received from a recognized educational institution which provides the certification:
 - Attainment of a diploma or equivalent
 - Attainment of a recognized Occupational Certificate

2. Achievement in academic standards:
 - GPA of 3.0 or better at the end of a semester (full-time student)
 - A or A/B Honor Roll recognition
 - Increase in measurable skills gains within one year prior to the last test (not to exceed two years)
 - Attainment of a Career Readiness Credential

3. Satisfactory completion of established goals:
 - Completion of Employability Skills Training/Activities
 - Obtainment of unsubsidized employment
 - Satisfactory evaluation upon completion of the work experience

All incentive approvals will be based on the criteria listed above. Service Provider shall maintain required documentation; NCWorks and case notes must also clearly document the service, goal, incentive, and related cost for each incentive award.

CHART OF INCENTIVE AWARDS:

Activity 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 equivalency.</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 leadership, career/employment workshops, the passage of occupational/employer exam, 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>
<ul style="list-style-type: none"> • Completion of Work Training Experience (which may include, but is not limited to, On-the-Job Training, Pre-Apprenticeship, Summer Work Training Experience, etc.). • 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>1st Scenario: \$100</p> <p>(separated the two scenarios with bullets, in reading the text it seems as only 1 scenario.</p> <p>2nd Scenario: \$200</p>

Exceptions to the above incentive guidelines may be approved by the Director for special circumstances (e.g., recognition).

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.

Follow-Up Services

All youth participants must receive some form of follow-up services for a **minimum** duration of twelve (12) months after exiting from the program.

Follow-up services may include:

- Leadership development and supportive service activities;
- Regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise;
- Assistance in securing better paying jobs, career development, and further education;
- Work-related peer support groups;
- Adult mentoring;
- Services necessary to ensure the success of youth in employment and/or postsecondary education.

Creation Date

November 2011

Revised Date

July 2020