



Employment Security Department
WASHINGTON STATE

PY25 Comprehensive Monitoring Guide

WIOA In School &
Out of School
Youth Programs

PY25 WIOA IN SCHOOL / OUT OF SCHOOL YOUTH PROGRAM COMPREHENSIVE MONITORING GUIDE

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WIOA Title I Youth Program

Youth Program Requirements: Youth program requirements are distinguished by In-School youth and Out-of-School youth, which have different eligibility requirements.

WIOA In School Youth (ISY) Eligibility

- Between the ages 14-21,
- **Attending** school as defined by state law,
- U.S. citizen or Legally entitled to work in the U.S.;
- Registered for Selective Service, (see [WorkSource System Policy 1019, Revision 12](#) Section 5.2 for guidance on Selective Service registration). if applicable;
- Low income, and
- Meet one or more of the following:
 - Category 1: Basic skills deficient;
 - Category 2: English language learner;
 - Category 3: Offender/ex-offender
 - Category 4: Homeless, runaway;
 - Category 5: Currently in or aged out of the foster care system
 - Category 6: Pregnant or parenting;
 - Category 7: Disabled; or
 - Category 8: Requires additional assistance to complete an educational program or to secure or hold employment

WIOA Out of School Youth Eligibility

- Between the ages 16-24,
- **Not attending** any school, (includes students enrolled in a dropout reengagement program under RCW 28A.175.100; 28A.175.105; aka: Open Doors/1418);
- U.S citizen or legally entitled to work in the U.S.;
- Registered for Selective Service, (see [WorkSource System Policy 1019, Revision 12](#) Section 5.2 for guidance on Selective Service registration) if applicable; and
- Meet one or more of the following:
 - Category 1: A school dropout;
 - Category 2: Within the age of compulsory school attendance (**for WIOA purposes, youth ages 16-17**), but has not attended school for at least the most recent complete school year calendar quarter. In cases where schools do not use quarters, local programs must use calendar year quarters;
 - Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on WorkforceGPS October 24, 2017: Evan explained that this category refers

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to youth who have not attended school during the most recent school quarter and have not been officially identified as “dropped out” by the school (still on the rolls).

Category 3: Secondary school diploma recipient who is low-income and basic skills deficient or an English language learner

Category 4: Offender/ex-offender

Category 5: Homeless or a runaway;

Category 6: Currently in or aged out of the foster care system;

Category 7: Pregnant or parenting;

Category 8: Disabled;

Category 9: Low-income and requires additional assistance to enter or complete an educational program or to secure or hold employment.

Age 22+ and Attending Postsecondary Education:

TEGL 21-16 Change 1: A youth attending postsecondary education who is age 22 at time of eligibility determination would not be eligible for the WIOA youth program because they are in school and over the age of 21. That individual could be served through the WIOA Adult program.

Age / Date of Birth

OSY Ages - Between the ages 16-24

ISY Ages - Between the ages 14-21

Self-Attestation - WorkSource System Policy 1003, Revision 6, Attachment C:

Under WorkSource System Policy 1023, Revision 1, local areas formally implementing Integrated Service Delivery with co-enrollment can utilize self-attestation to document that participants are 18 years of age or older, are legally entitled to work in the U.S., and have registered for Selective Service (as applicable) for the purposes of eligibility determinations for the WIOA Title I adult and dislocated worker programs so long as those individuals are provided basic career services only. If those participants subsequently pursue individualized career services or training services, full eligibility documentation is required.

TEGL 09-22

Self-attestation is an acceptable source of documenting almost all program elements related to WIOA Youth eligibility. As stated in TEGL 23-19, Change 2, the following youth eligibility data elements allow self-attestation as an acceptable source of documentation: school status at program entry, date of birth, individual with a disability, pregnant or parenting, youth who needs additional assistance, foster youth, homeless youth, offender, low income, and English Language Learner. The only data element related to WIOA Youth eligibility that does not permit the use of self-attestation for documentation is “basic skills deficient.” Self-attestation means a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. ETA broadly interprets what is an electronic/digital signature. Electronic signatures or a submission from the participant such as an email, text, or unique online survey response is considered an electronic signature or verification; it must be participant generated and traceable to the participant. Grantees must retain documentation of the self-attestation.

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As stated in TEGL 23-19, Change 2, ETA encourages grant recipients to consider the impacts on equity and accessibility when developing their source documentation policies and procedures. For example, grantees considering restrictions on the use of self-attestation should consider that while other documentation sources are preferred when practical, self-attestation is an important option for populations with barriers to obtaining eligibility and reporting documents (such as disconnected youth, American Indian and Alaska Native populations, individuals experiencing homelessness, justice involved individuals, refugees, disaster impacted individuals, and others) and help ensure such populations are able to equitably access services. As a best practice, once enrolled, programs should assist the participant in obtaining the required documents through the use of supportive service funds as these documents are likely needed for employment and training related activities.

Selective Service Registration

Selective Service System Website: <https://www.sss.gov/>

Selective Service Registration Requirements - TEGL 11-11, Change 2

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

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

For U.S. citizens, Selective Service registration is **not** required if the man falls within one of the following categories:

- Men who are serving in the military on full-time active duty;
- Men attending the service academies;
- Disabled men who are continually confined to a residence, hospital or institution; and/or
- Men who are hospitalized, institutionalized, or incarcerated are not required to register during their confinement; however, they must register within 30 days after being released if they have not yet reached their 26th birthday.

For non-U.S. citizens, Selective Service registration is not required if the man falls within one of the following categories:

- Non-U.S. male who came into this country for the first time after his 26th birthday.
Acceptable forms of supporting documentation include:
 1. Date of entry stamp in his passport;
 2. I-94 with date of entry stamp on it; or
 3. Letter from the U.S. Citizenship and Immigration Services (USCIS) indicating the date the man entered the United States presented in conjunction with documentation establishing the individual's age.
- Non-U.S. male who entered the U.S. illegally after his 26th birthday. He must provide proof that he was not living in the U.S. from age 18 through 25.

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- Non-U.S. male on a valid non-immigrant visa.

Transgender / Non-Binary Person

Selective Service bases the registration requirement on gender assigned at birth and not on gender identity or on gender reassignment. Individuals who are born male and changed their gender to female *are still required to register*. Individuals who are born female and changed their gender to male are not required to register.

Requirement to Register - **WorkSource System Policy 1019, Revision 12:**

To be eligible to receive WIOA Title I-funded services, all males born on or after January 1, 1960 must present documentation showing compliance with the Selective Service registration.

Males 25 Years and Under:

- Before being enrolled in WIOA Title I services, all males who have not yet reached their 26th birthday must register with the Selective Service or provide documentation indicating they are covered by an exception.
- **Males turning 18** while participating in WIOA Title I services must complete their Selective Service registration no later than 30 days after turning 18 to continue to receive WIOA Title I services.
- Males between 18 and 25 years of age who refuse to register with the Selective Service must be suspended from WIOA Title I services until registered.
- If a youth fails to provide verification of Selective Service registration within 30 days of his 18th birthday, services must be suspended (i.e. on the 31st day after his 18th birthday).
- LWDBs must stop providing services to participants who have not met Selective Service registration requirements until the requirements are met.
- These requirements apply to transgender females. Selective Service registration requirements are based on the gender assigned at birth and not on gender identity or gender reassignment. Individuals who are born male and change their gender identity or assignment to female are required to register. Individuals who are born female and change their gender identity or assignment to male are not required to register.

For more information on who must register, <https://www.sss.gov/wp-content/uploads/2020/11/WhoMustRegisterChart.pdf>

Self-Attestation - WorkSource System Policy 1003, Revision 6, Attachment C:

Under WorkSource System Policy 1023, Revision 1, local areas formally implementing Integrated Service Delivery with co-enrollment can utilize self-attestation to document that participants are 18 years of age or older, are legally entitled to work in the U.S., and have registered for Selective Service (as applicable) for the purposes of eligibility determinations for the WIOA Title I adult and dislocated worker programs so long as those individuals are provided basic career services only. If those participants subsequently pursue individualized career services or training services, full eligibility documentation is required.

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Legally Entitled to Work in THE U.S.

20 CFR 683.285(5): Participation in programs and activities receiving funds under Title I of WIOA must be available to citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, Asylees, and parolees, and other immigrants authorized by the Attorney General to work in the United States.

Social Security Number (SSN) not required for eligibility.

TEGL 26-16: Eligibility to participate in any of the programs under WIOA is not contingent upon the individual providing a Social Security Number.

Requesting SSN and Providing Services - WorkSource System Policy 1036:

- Organizations that provide services to individuals under Title I and III of WIOA must request SSNs from those individuals because matching SSNs against quarterly UI wage records remains the most timely, effective and accurate way to ensure that performance data is available to the one-stop system and WIOA statutes direct states to use UI wage records for this purpose.
- Those same organizations, however, cannot require individuals to provide SSNs as a condition of program participation or receipt of services. Eligible individuals who do not provide SSNs must be provided all categories and types of services for which they qualify, subject to priority of service and resource availability considerations that otherwise apply to all eligible individuals.
- *Exception:* DOL has stated that U.S. IRS rules take precedence over WIOA rules. Therefore, per this WIN, individuals who do not want to provide their SSN must decide whether or not to continue to withhold that information when the service would require reporting income and wages to IRS. If those individuals choose to continue to withhold their SSN, LWDBs and their service providers may subsequently withhold those specific services.
- Services and case notes connected to individuals who do not provide SSNs must be recorded and tracked in WIT. Procedures are outlined in the WIT SSN Procedure Guide. Service provider staff must explain to participants who receive services without providing SSN that they and possibly their future employers will be contacted in the future and asked about their employment and earnings outcomes.
- To that end staff must ensure that full and extensive contact information is collected from such participants (primary and secondary phone numbers, e-mail addresses mailing addresses, including the same for alternative and secondary contacts) and instruct such participants to provide updated contact information if anything changes. In following up with participants, staff should contact them as close as possible to the end of the second and fourth quarters after exit.

WorkSource System Policy 1019, Revision 12: Handbook:

- LWDBs are required to verify U.S. citizenship or legal right to work for all WIOA Title I programs.
- Self-attestation is the minimum documentation requirement, but LWDBs may choose to require commonly used I-9 documentation such as driver's license or ID cards along with Social Security cards.
- Other documentation *may only* be used to *supplement* self-attestation or accepted I-9 documentation.
- List of Acceptable Documents as listed on Form I-9

List of I-9 Acceptable Documents

Homeland Security at <http://www.uscis.gov/i-9-central/acceptable-documents/list-documents>

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List A	<u>OR</u>	List B	<u>AND</u>	List C
Documents that Establish <u>Both Identity and Employment Authorization</u>		Documents that Establish <u>Identity</u>		Documents that Establish <u>Employment Authorization</u>
<ol style="list-style-type: none"> 1. U.S. Passport or U.S. Passport Card 2. Permanent Resident Card or Alien Registration Receipt Card (Form I-551). Signatures not required. 3. Foreign passport that contains a temporary I-551 stamp or temporary I-551 printed notation on a machine-readable immigrant visa 4. Employment Authorization Document that contains a photograph (Form I-766) 5. Foreign passport with Form I-94 or Form I-94A, Arrival/Departure Report bearing the same name as the passport and containing an endorsement of the alien's nonimmigrant status that authorizes such alien to work for a specific employer. 6. Passport from the Federated States of Micronesia (FSM) or the Republic of the Marshall Islands (RMI) with Form I-94 or Form I-94A indicating nonimmigrant admission under the Compact of Free Association Between the United States and the FSM or RMI. 		<ol style="list-style-type: none"> 1. Driver's license or ID card 2. School ID card with Photograph 3. Voter's registration card 4. U.S. Military card or draft record 5. Military dependent's card 6. U.S. Coast Guard Merchant Mariner Card 7. Native American tribal document 8. Driver's license issued by Canadian government authority <p>For persons under age 18 who are unable to present a document listed above:</p> <ol style="list-style-type: none"> 9. School record or report card 10. Clinic, doctor or hospital record 11. Day-care or nursery school record 		<ol style="list-style-type: none"> 1. *Social Security Card. A card that includes any of the following restrictive wording <u>IS NOT ACCEPTABLE</u> for List C documents: <ul style="list-style-type: none"> • NOT VALID FOR EMPLOYMENT; • VALID FOR WORK ONLY WITH INS AUTHORIZATION; or • VALID FOR WORK ONLY WITH DHS AUTHORIZATION • <u>NOTE:</u> According to the U.S. Citizenship and Immigration Services, <u>you may accept a Social Security card that has not been signed.</u> 2. Certification of Birth Abroad issued by the Department of State (Form FS-545) 3. Original or certified copy of birth certificate issued by a state, county, municipal authority or outlying possession of the United States bearing an official seal. 4. Native American tribal documents 5. U.S. Citizen ID Card (Form I-197) 6. Identification Card for Use of Resident Citizen in the United States (Form I-179) 7. Employment authorization document issued by DHS.

School Status at Program Entry

School Status

- **ISY:** In-school, HS or less
- **ISY:** In-school, Alternative School
- **ISY:** In-School, Post-HS
- **OSY:** Not attending school or HS Dropout
- **OSY:** Not attending school; H.S. Graduate

In-School Youth (ISY)

TEGL 21-16 Change 1: If a youth is enrolled in the WIOA youth program during the summer and is in between school years, the youth is considered an **ISY** if they are enrolled to continue school in the fall. If a youth is enrolled in the WIOA youth program between high school graduation and postsecondary education, the youth is considered an ISY if they are registered for postsecondary education, even if they have not yet begun postsecondary classes at the time of WIOA youth program enrollment. If the youth participant is enrolled in any credit-bearing postsecondary education classes, including credit-bearing community college classes and credit-bearing continuing education classes, then they are considered attending postsecondary education, and, therefore, in **ISY**.

WorkSource System Policy 1020, Revision 2: Homeschooled youth who meet the WA State requirements at [RCW 28A.200](#) and [28A.225.010\(4\)](#) are considered **ISY**.

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WorkSource System Policy 1019, Revision 12 The state's dropout reengagement program authorized under RCW 28A.175.100 provides educational opportunities and access to services to older youth ages 16 to 21 who have dropped out of high school or are not accumulating sufficient credits to reasonably complete a high school diploma in a public school before the age of 21 and are unlikely to re-engage in education by re-enrolling in a traditional or even alternative high school. RCW 28A.175.110 states that youth in this program are regularly enrolled students of the school district in which they are enrolled.

Section 4 of TEGl 21-16 on high school equivalency programs and dropout reengagement programs states that "Youth attending high school equivalency (HSE) programs, including those considered to be dropout re-engagement programs, funded by the public K-12 school system that are classified by the school system as still enrolled in school are considered ISY." Because Washington's Open Doors program, which is cited in state RCW and WAC, recognizes a range of models or approaches with varying degrees of school or school district participation in the delivery of dropout re-engagement services, DOL acknowledges that, from a WIOA standpoint, Washington's In-School Youth (ISY) and Out-of-School Youth (OSY) determination is situational and dependent on what entity or entities operate dropout re-engagement programs and how direct services are provided.

To support OSY designations, local areas must document that their dropout reengagement programs are (1) operated with partners beyond school districts as reflected on the Office of the Superintendent of Public Instruction (OSPI) Open Doors Programs – Regional Locations site and (2) described in an OSPI partnership-based Scope of Work document (i.e., District in Partnership with an Organization, District in Partnership with a College, Partnership with a Juvenile Justice Institution, Educational Service District-led Consortium) or (3) memoranda of understanding or statements of work that affirm operational partners beyond schools and school districts.

Local areas must also thoroughly document in participant files that OSY participants that are engaged in dropout re-engagement programs meet the aforementioned requirements as they are otherwise classified by the school system as enrolled in school.

ETA 9172: In-school, secondary school or less: At program entry has not yet received a secondary diploma or its recognized equivalent and is attending any primary or secondary school (including elementary, intermediate, junior high school, whether full or part-time), or is between school terms and intends to return to school. In-school, post-secondary school: At program entry, has received a secondary school diploma or its recognized equivalent and is attending a post-secondary school or program (whether full or part-time), or is between school terms and is enrolled to return to school.

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Out of School Youth (OSY)

WIOA Section 129(a) (B)

A youth who is within the age of compulsory school attendance but has not attended school for at least the most recent school calendar quarter. **WIOA Final Rules, p. 56161 “Measuring Attendance by School Year”:** The school quarter is based on how a local school district defines its school quarters.

20 CFR 681.230: WIOA youth programs may consider a youth to be **OSY** for purposes of WIOA youth program eligibility if he or she attend adult education provided under Title II of WIOA, YouthBuild, Job Corps, high school equivalency programs, or dropout re-engagement programs regardless of the funding sources of those programs.

WorkSource System Policy 1019, Revision 12: Washington’s Open Doors program, which is cited in Revised Code of Washington (RCW) and Washington Administrative Code (WAC), recognizes a range of models or approaches with varying degrees of school or school district engagement. DOL acknowledges that Washington’s ISY and OSY determination is situational and depends on the degree to which schools and school districts are service providers and funders in dropout re-engagement programs. If schools or school districts, despite having enrolled the youth into school, largely cede service provision to other entities, such as WIOA Title I-B youth providers, community-based organizations, or other non-profits, have minimal financial investment, and require little district-based accountability of participants, youth in those programs can be designated OSY. Page 20 of 31 Conversely, if schools or school districts are substantially directive, invested, and accountable (e.g., WIOA Title I-B Youth program only provides supportive services to participants), those youth should be designated ISY. This also applies to dropout re-engagement programs not connected to Open Doors. Based on the guidelines cited above, local areas must thoroughly document the case for OSY designation when youth participants in dropout re-engagement programs are enrolled in school.

TEGL 21-16 Change 1: If a youth graduates high school and registers for postsecondary education but does not ultimately follow through with attending postsecondary education, then such a youth would be considered an **OSY** *if the eligibility determination is made after the point that the youth decided not to attend postsecondary education*. If the youth participant is only enrolled in **non-credit-bearing postsecondary** classes, they would not be considered attending postsecondary school and, therefore, an **OSY**.

WorkSource System Policy 1020, Revision 2: Homeschooled youth who do not meet the WA State requirements at [RCW 28A.200](#) and [28A.225.010\(4\)](#) are not considered **ISY** and need to meet the **OSY** eligibility criteria.

ETA 9172: *Not attending school or is a Secondary School Dropout:* At program entry, is not within the age of compulsory school attendance and is no longer attending any school and has not received a secondary school diploma or its recognized equivalent. *Not attending school, secondary school graduate or has a recognized equivalent:* At program entry, is not attending any school and has either graduate from secondary school or has attained a secondary school equivalency. *Not attending school, within the age of compulsory school attendance:* At program entry, is within the age of compulsory school attendance, but has not attended school

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for at least the most recent complete school year calendar quarter and has not received a secondary school diploma or its recognized equivalent.

Not Considered “Schools”

20 CFR 681.230: For the purposes of WIOA, the Department does not consider the following to be schools:

- Providers of adult education under Title II of WIOA,
- Youth Build programs,
- Job Corps program,
- High school equivalency programs, or
- Dropout re-engagement programs (Open Doors/1418).

When and How to Determine School Status

TEGL 21-16 Change 1: As discussed in 20 CFR 681.240, school status is determined at the time of program enrollment. Because the process of program enrollment can occur over time, school status must be based at the time of eligibility determination. Once the school status of a youth is determined that school status remains the same throughout the youth’s participation in the WIOA youth program. This distinction is drawn for the purposes of reporting against the OSY expenditure requirement.

Definition

WIOA Sec. 3(54); WorkSource System Policy 1019, Revision 12: The term “school dropout” means an individual who is no longer attending any school and who has not received a secondary diploma or its recognized equivalent.

TEGL 21-16 Change 1: As discussed TEGL 08-15, an individual who has dropped out of postsecondary education is not a “school dropout” for purposes of youth program eligibility.

A dropout only includes an individual who is currently a secondary school dropout and does not include a youth who previously dropped out of secondary school but subsequently returned.

ETA 9172: Not attending school or is a Secondary School Dropout: At program entry, is not within the age of compulsory school attendance and is no longer attending any school and has not received a secondary school diploma or its recognized equivalent.

ISY / OSY Determinations

20 CFR 681.230: WIOA youth programs may consider a youth to be **OSY** for purposes of WIOA youth program eligibility if he or she attend adult education provided under Title II of WIOA, Youth Build, Job Corps, high school equivalency programs, or dropout re-engagement programs regardless of the funding sources of those programs.

Youth attending high school equivalency programs funded by the public K-12 school system who are classified by the school system as still enrolled in school are an exception; they are considered **ISY**.

Determining School Drop Out Status and 75% Expenditure Requirement

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20 CFR 681.240: Local WIOA youth programs must verify a youth's dropout status at the time of WIOA youth program enrollment.

An individual who is out of school at the time of enrollment, and subsequently placed in any school, is an OSY for the purposes of the 75% expenditure requirement for OSY throughout his/her participation in the program.

Low Income

Applies To

- All in-school youth and
- Out-of-school youth in the following 2 categories ONLY:
 - A recipient of a secondary school diploma or its recognized equivalent who is basic skills deficient or an English language learner; or
 - Who requires additional assistance to enter or complete an educational program or to secure or hold employment.

Low Income Individual

WIOA Sec. 3(36)(A): In general, the term “low-income individual” means an individual who-

- i. Receives, or in the past six (6) months has received, or is a member of a family that is receiving or in *the past six (6) months has received*, assistance through:
 - Food stamps; [or](#)
 - TANF; [or](#)
 - SSI; [or](#)
 - State or local income-based public assistance (e.g., Washington State Medicaid or Special Supplemental Nutritional Programs for Women, Infants, and Children (WIC)); [or](#)
- ii. Is in a family with total family income that does not exceed the higher of-
 - The poverty line, [or](#)
 - 70 percent of the Lower Living Standard Income Level (LLSIL), located at <https://www.doleta.gov/lisil/> ; [or](#)
- iii. Is a **homeless individual, or a homeless child or youth** (TEGL 21-16 Change 1: Homeless youth do not need to meet any additional low-income criteria); [or](#)
- iv. **Receives or is eligible to receive a free or reduced-price lunch** under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.) (TEGL 21-16 Change 1: When a school does not use individual eligibility criteria to determine who is eligible for free or reduced-price lunch, whole school receipt of free or reduced-price lunch cannot be used to determine WIOA low-income status for ISY. WIOA programs must base low-income status on an individual student's eligibility to receive free or reduced-price lunch or on meeting one of the other low-income categories under WIOA. Local programs can check with their local school districts for determining whether individual students are eligible to receive free or reduced-price lunch. While the free/reduced lunch low-income category primarily applies to ISY, there is one exception where it could apply to an OSY. If an OSY is a parent living in the same household as a child who receives or is eligible to receive free or reduced-price lunch based on their income level, then such an OSY would meet the low-income criteria based on his/her child's qualification.); [or](#)

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- v. Is a **foster child** on behalf of whom State or local government payments are made (TEGL 21-16 Change 1: foster youth do not need to meet any additional low-income criteria); or
- vi. Is an **individual with a disability** whose own income meets the income requirement of clause (ii) (*i.e., the poverty line; or 70% of the Lower Living Standard Income Level (LLSIL)*) but who is a member of a family whose income does not meet this requirement.

20 CFR 681.260: A youth who lives in a **high poverty area** is automatically considered to be a low-income individual. A high poverty area is a Census tract, a set of continuous Census tracts, an American Indian Reservation...or other tribal land as defined by the Secretary in guidance or county that has a poverty rate of at least 25% as set every 5 years using American Community Survey 5-Year data . SEE TEGL 21-16 Change 1. To determine the poverty rate for your county, the document at: [High Poverty Youth Areas](#) provides revised directions for using Census data to determine high-poverty areas for the WIOA Youth Formula Program. **ESD Policy recommends printing the webpage to use as documentation.*

WorkSource System Policy 1019, Revision 12: Unemployed individuals do not automatically meet local parameters regarding low-income. The intent is to prioritize services to individuals based on family income (low-income). To determine whether an individual is low-income under the definition at WIOA Section 3(36), it is also necessary to consider family size and family income.

Determining Family Size

20 CFR 675.300 & WorkSource System Policy 1019, Revision 12:

For these purposes, “family” under WIOA 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 married couple and dependent children,
- A parent or guardian and dependent children; or
- A married couple

TEGL 21-16 Change 1: If an individual is not living in a single residence with other family members, that individual is not a member of a family for the purposes of WIOA income calculations.

Individual with a Disability

WorkSource System Policy 1019, Revision 12: Based on 20 CFR 681.280, even if the family of a disabled individual does not meet the income eligibility criteria, the disabled individual may be considered a low-income individual if their income meets the income criteria of WIOA Section 3(36)(A) or 3(36)(B). Disabled individuals would be considered a family of one and only their income considered in determining low-income.

WIOA sec. 3(25): An individual with a disability as defined in [section 3 of the Americans with Disabilities Act of 1990](#) (42. U.S.C. 12102) means, with respect to an individual:

- A physical or mental impairment that substantially limits one or more major life activities of such individual;

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- A record of such an impairment; or
- Being regarded as having such impairment.

Dependent

20 CFR 681.250 Department's response, page 56167: When determining when a youth is a dependent, use the [IRS definition of dependent](#)

WorkSource System Policy 1019, Revision 12: WIOA does not define dependent. To avoid uncertainty in making eligibility decisions regarding family size and income, the State has identified three circumstances where youth must be considered dependents of parents or legal guardians for the purpose of determining family size for WIOA Title I youth and adult program eligibility:

1. Youth not yet 18, who are not emancipated youth nor runaway youth, living "at home" with their parents or legal guardians, including individuals in the temporary care of another individual or household (but not claimed as a dependent by that household)
2. Youth age 18-19 who are full-time students in a secondary school or equivalent and are living "at home" with their parents or legal guardians.
3. Youth age 18-24 who are not full-time students and are living "at home" with their parents or legal guardians and who are primarily supported by their parents.

LWDBs must also address in local policy and procedures how youth who do not fit circumstances 1-3 will be categorized as dependents or non-dependents for the purpose of determining family size.

A legal guardian is a blood relative (e.g., grandparent, aunt, or uncle) or other legally recognized relative (e.g., by decree of the court) who claims the youth as a dependent.

The key factors are:

- Relationship by blood or decree of court;
- Living in a single residence; and
- The youth is claimed as a dependent.

If LWDBs choose to identify youth in circumstances 1 and 3 of Section as independent, the definition must be made explicit in local procedures to eliminate any confusion for the purpose of determining family size when making eligibility determinations for the WIOA Title I youth and adult programs.

Note: LWDBs have the authority to develop additional criteria consistent with state and federal guidance to help staff determine family size and income for the purpose of determining WIOA Title I youth and adult program eligibility.

Basic Skills Deficient and Low Income

BSD Score

WorkSource System Policy 1011, Revision 6: Basic Skills Deficiency is denoted by a CASAS score of 238 or below in reading or 235 or below in math.

Applies To:

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ISY

OSY who have a diploma or equivalent

Individuals who are English Language Learners (ELL)

Definition

WIOA Sec. 3(5): A youth who has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or a youth or adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

Accommodation Requirement

20 CFR 681.290 (c): In assessing basic skills, 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.

CASAS Required Assessment Tool

ESD WIOA Policy 1011, Revision 6: ESD has approved CASAS tests as the only standard tools to determine BSD used for program enrollment. The Appraisal test must be given first (prior to the pre-test) to determine the appropriate level and form of the pre-test to be used. The CASAS appraisal test cannot be used in lieu of the CASAS pre-test to determine BSD. If using the Locator (e-test), the appraisal and pre-test are combined. When using the e-test format (called Locator), administration of CASAS to determine BSD is completed in one-step. Pre-tests determine BSD and EFL

Documentation Requirements

WorkSource System Policy 1003, Revision 6 Self-attestation is not acceptable for validating BSD.

WorkSource System Policy 1011, Revision 6: BSD must be documented in the State MIS WIOA Eligibility Application:

1. On the "Barriers" tab of the WIOA Eligibility Application, click the "yes" radio button for Basic Literacy Skills Deficiency.
2. On the dropdown list for BSD Verification, choose "Standardized Assessment Test"
3. Go to the "Notes" tab of the WIOA Eligibility Application and document the date of the test, score(s), name of the person or entity administering the test and any other supporting details.

Note: Staff must not upload into the case management system or retain in hard files any CASAS document(s) that contain test questions or other sensitive testing information.

English Language Learner and Low Income

Applies To:

ISY

OSY who have a diploma or equivalent

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Definition

WIOA Sec. 3(21, WIOA Title II Sec. 203(7); DOL ETA PIRL: An eligible individual who has limited ability in reading, writing, speaking, or comprehending the English language, **and** whose native language is a language other than English; **or** who lives in a family or community environment where a language other than English is the dominant language.

Offender, Ex-Offender

Applies To:

ISY
OSY

Definition

WIOA Sec. 3(38): An adult or juvenile who- Is or has been subject to any stage of the criminal justice process, and for whom services under this Act may be beneficial; **or** requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

ETA 9172 (PIRL): If the participant, at program entry who either: Has been subject to any stage of the criminal justice process for committing a status offense or delinquent act **or** requires assistance in overcoming barriers to employment resulting from a record of arrest or conviction.

WorkSource System Policy 1019, Revision 12:

An individual who has been charged with an offense, but subsequently directed to a community-based diversion program rather than the formal court system meets the definition of having been “subject to any stage of the criminal justice process” due to **having been charged with an offense**, even though they have not been remanded to the court system.

Reporting/ Management Information System (MIS) Requirement

WorkSource System Policy 1019, Revision 12:

When “offender” is solely relied on for eligibility purposes (ISY Category 3 or OSY Category 4), DOL has stated that the **offender status must be captured and reported** (in MIS) so DOL and Congress can know whether or not states and local areas are adequately serving individuals with, as in this case, employment barriers related to ex-offender status.

Homeless, Runaway

Applies To

ISY
OSY

Definition

20 CFR 681.210(5)-OSY and 20 CFR 681.220(4)-ISY: A homeless individual aged 16-24(OSY) or 14-21(ISY) who meets the criteria defined in sec. 41403(6) of the Violence Against Women Act of 1994; a homeless child or

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youth aged 16-24 (OSY) or 14-21 (ISY) who meets the criteria defined in sec. 725(2) of the McKinney-Vento Homeless Assistance Act; or a runaway.

Violence Against Women Act of 1994 [34 U.S.C. 12473-1(6)]: **Definition of Homeless:** an individual who lacks a fixed, regular, and adequate nighttime residence; and includes –

- an individual who-
 - is sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;
 - is living in a motel, hotel, trailer park, or campground due to the lack of alternative adequate accommodations;
 - is living in an emergency or transitional shelter;
 - is abandoned in a hospital; or
 - is awaiting foster care placement;
- an individual who has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings; or
- migratory children (as defined in [section 6399 of title 20](#)) who qualify as homeless under this section because the children are living in circumstances described in this paragraph;

McKinney-Vento Homeless Assistance Act [42.U.S.C. 11434a(2)], section 725(2) **Definition of Homeless:** The term homeless children and youth means individuals who lack a fixed, regular, and adequate nighttime residence and includes –

- Children and youth who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement;
- Children and youth who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
- Children and youth who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
- Migratory children who qualify as homeless for the purposes of this subtitle.

Low Income

WIOA Sec. 3(36)(A): In general, the term “*low-income individual*” means an individual who is a *homeless* individual, or a homeless child or youth

TEGL 21-16 Change 1: Homeless youth do not need to meet any additional low-income criteria

Foster Care Youth (In Foster Care or Aged Out of System)

Applies To

ISY

OSY

Definition

20 CFR 681.210(6) and .220(5): An individual in foster care or who: 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, [or](#) 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.

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ETA 9172: At program entry, is a person aged 24 or under who is currently in foster care or has aged out of the foster care system.

Pregnant or Parenting Youth

Applies To

ISY
OSY

Definition

TEGL 21-16 Change 1: An individual who is parenting can be a mother or father, custodial or non-custodial. As long as the youth is within the WIOA youth age eligibility, the age when the youth became a parent does not factor into the definition of parenting. A pregnant individual can only be the expectant mother.

WorkSource System Policy 1019, Revision 12: One important distinction is that the father does not attain to parenting status under WIOA until the child is born; that status does not convey to the father during pregnancy. To be clear, only the expectant mother can be a pregnant individual.

Single Parent

ETA 9172 (PIRL):

If the participant, at program entry, is single, separated, divorced or a widowed individual who has primary responsibility for one or more dependent children under age 18 (including single pregnant women).

Individual with a Disability

Applies To

ISY
OSY (low income is not required for OSY)

Definition

WIOA Sec. 3(25); DOL ETA PIRL: An individual with a disability as defined in [section 3 of the Americans with Disabilities Act of 1990](#) (42. U.S.C. 12102) means, with respect to an individual –

- A physical or mental impairment that substantially limits one or more *major life activities of such individual;
- A record of such an impairment; or
- **Being regarded as having such an impairment.

**Major life activities* include but are limited to caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.

Major life activities also include the operation of a major bodily function, including but not limited to functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions.

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***Being regarded as having such an impairment* means the individual establishes that he or she has been subjected to an action prohibited under this chapter because of an actual or perceived physical or mental impairment whether or not the impairment limits or is perceived to limit a major life activity.

Youth Who Needs Additional Assistance and Low Income

Applies To

ISY

OSY; OSY must also be low-income

5% Enrollment Limitation (ISY Only)

WIOA Section 129(a)(3)(B) and 681.310: Limitation on in-school youth requiring additional assistance. In any single program year, **no more than 5% of a local area's total in-school youth** participants can be those who require additional assistance to complete an educational program or to secure or hold employment.

Policy Requirement

WorkSource System Policy 1019, Revision 12: LWDBs that (use this criterion for eligibility), must establish a local policy that defines “requires additional assistance to complete an educational program or to secure or hold employment” criterion and documentation requirements. LWDBs must develop local parameters and policy for definition of “Requires Additional Assistance.”

TEGL 21-16 Change 1: The policies established at the State or local level should be reasonable, quantifiable, and based on evidence that the specific characteristic of the youth identified in the policy objectively requires additional assistance.

TEGL 09-22: There is one exception to the reporting of all youth eligibility barriers -- in-school youth who require additional assistance to complete an education program or secure or hold employment. For this particular barrier, it is important that local programs report it only when it is a participant's sole eligibility barrier. WIOA includes a limitation where in each local area only five percent of in-school youth in a given program year can be determined eligible using the “youth who require additional assistance to complete an education program or secure or hold employment” barrier. Based on the most recent data, 24.3 percent of in-school youth nationally are reported as having the “youth who require additional assistance” barrier. In order to more accurately track this five percent limitation, WIOA Youth programs should only report youth as having this barrier if it is their only barrier, and therefore, the barrier used for eligibility determination.

Exception to Low Income Eligibility Requirement

Applies To (**WorkSource System Policy 1019, Revision 12**):

All In-school youth, and

Out-of-school youth who meet the following eligibility criteria:

- A recipient of a secondary school diploma or its recognized equivalent who is either basic skills deficient or an English language learner; or

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- Requires additional assistance to enter or complete an educational program or to secure or hold employment.

5% Enrollment Limitation & Calculation requirement *(All Youth who must meet the low-income criteria)*

20 CFR 681.250(c):

WIOA allows a low-income exception where 5% of WIOA youth may be participants who ordinarily would be required to be low-income for eligibility purposes and meet all other 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 year who would ordinarily be required to meet the low-income criteria.

TEGL 21-16 Change 1: This percent is calculated at the end of a program year based on new enrollees in that program year.

Reporting/ Management Information System (MIS) Requirement:

Evan Rosenberg, Division of Youth Services, DOL ETA, "WIOA Youth Eligibility Live Q&A Session" on WorkforceGPS October 24, 2017:

- MIS will only capture those youth in which this is the only eligibility criteria recorded in the system.
- If the participant has other barriers, ensure the other eligibility barriers are recorded in MIS and case notes to ensure the participant is not captured in the 5% limit.

Objective Assessment

Requirements

WIOA Sec. 129(c)(1)(A): The **objective assessment shall include a review of the following** for the purpose of identifying appropriate services and career pathways for participants:

- Basic skills,
- Occupational skills,
- Prior work experience,
- Employability,
- Interests,
- Aptitudes (including interests and aptitudes for nontraditional jobs),
- Supportive service needs,
- Developmental needs.

TEGL 21-16 Change 1: For purposes of the basic skills assessment portion of the objective assessment, 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-i.e., CASAS), although use of these tools is permitted. Rather, local programs, may use other formalized testing instruments designed to measure skills-related gains. Alternatively, skills related gains may also be determined through less formal alternative assessment

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techniques such as observation, folder reviews, or interviews. The latter may be particularly appropriate for youth with disabilities given accessibility issues related to formalized instruments. Local programs may use previous basic skills assessment results if such previous assessments have been conducted within the past six (6) months. In contrast to the initial assessment described above if measuring EFL gains after program enrollment under the measurable skill gains indicator, local programs must use an NRS-approved assessment (i.e., CASAS) for both the EFL pre- and post-test to determine an individual's educational functioning level (EFL).

All youth, including youth with disabilities, can benefit from participation in career assessment activities, including, but not limited to, assessments of prior work experience, employability, interests, and aptitudes. Multiple assessment tools may be necessary since there is no standard approach that will work for all youth, including youth with disabilities. Career assessments help youth, including those with disabilities, understand how a variety of their personal attributes (e.g., interests, values, preferences, motivations, aptitudes, and skills) affect their potential success and satisfaction with different career options and work environments. Youth also need access to reliable information about career opportunities (based on labor market information) that provide a living wage, including information about education, entry requirements and income potential. These assessments may be provided directly through WIOA youth programs staff, and/or through referrals to national and community-based partners and resources. Supportive service needs; and Developmental needs

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

20 CFR 681.420(a)(1): Provide for an objective assessment of each youth participant that meets the requirements of WIOA Sec. 129(c)(1)(A) and includes a review of the academic and occupational skill levels, as well as the **service needs and strengths** of each youth for the purpose of identifying appropriate services and career pathways for participants and **informing the individual service strategy**.

Objective Assessment & Program Enrollment

WIOA Final Rule, narrative page 56170: The Department has added 681.320(b)(2) to clarify that the point of program participation *does not begin* until **after** the youth is determined eligible, the youth receives an objective assessment **and** the youth participates in 1 of the 14 program elements.

20 CFR 681.320(b)(2): In order to be a participant in the WIOA youth program, the participant must have received an objective assessment.

Participation

TEGL 19-16: An objective assessment carried out under WIOA sec. 129(c)(1)(A) does not trigger participation in the Youth program.

Reporting/ Management Information System (MIS) Requirements

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Per guidance received by the ESD Monitoring Unit from ESD Policy and Performance units on 8-30-18, Objective Assessments do not equate to a service, are not reported to DOL, and therefore do not need to be recorded in the State MIS.

Individual Service Strategy (ISS)

Requirements

WIOA Sec. 129(c)(1)(B): ISS's must be directly linked to 1 or more of the performance indicators described in WIOA section 116(b)(2)(A)(ii) and identify career pathways that include:

- education and employment goals (including, in appropriate circumstances, nontraditional employment),
- appropriate achievement objectives, and
- appropriate services for the participant taking into account the results of the objective assessment.

WIOA Final Rule, narrative page 56177: The Department does require the program elements provided to a youth to align with the goals the youth set forth in the ISS. Case managers must update the ISS on an on-going basis and document, among other items, the services provided and participant's progress, activities completed, benchmarks reached, and any other accomplishments. Case managers must document this information regardless of who provides the element.

20 CFR 681.420(a)(2): The design framework of local youth programs must develop, and update as needed, an individual service strategy based on the needs of each youth participant that:

- is directly linked to one or more indicators of performance described in WIOA sec. 116(b)(2)(A)(ii),
- identifies career pathways that include education and employment goals,
- considers career planning and the results of the objective assessment and
- prescribes achievement objectives and services for the participant.

Reporting/ Management Information System (MIS) Requirement

Per guidance received by the ESD Monitoring Unit from ESD Policy and Performance units on 8-30-18, ISS's do not equate to a service, are not reported to DOL, and therefore do not need to be recorded in the State MIS.

14 Program Elements

Requirements

ISS ALIGNMENT

WIOA Final Rule, Department's response page 56177: While the Department does not require a local youth service provider to pay for all program elements, the Department *does require* the program elements provided to a youth to align with the goals the youth set forth in the ISS.

Be Made Available

20 CFR 681.460: Local programs must make each of the following 14 services available to youth participants:

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- (1) 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;
- (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:
 - (i) Summer employment opportunities and other employment opportunities available throughout the school year;
 - (ii) Pre-apprenticeship programs;
 - (iii) Internships and job shadowing; and
 - (iv) On-the-job training 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 local area involved, if the Local WDB determines that the programs meet the quality criteria described in WIOA sec. 123;
 - *Do NOT Record "Training Paid by Other", **WorkSource System Policy 1019, Revision 12:**
 - For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source.
 - As such, there is no federal reporting requirement to enter the service as "Paid by Other"
- (5) EDUCATION OFFERED CONCURRENTLY with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- (6) LEADERSHIP DEVELOPMENT opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors;
- (7) SUPPORTIVE SERVICES, including the services listed in § 681.570;
- (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 less than 12 months after the completion of participation, as provided in § 681.580;
- (10) COMPREHENSIVE GUIDANCE AND COUNSELING, which may include drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth;
- (11) FINANCIAL LITERACY EDUCATION;
- (12) ENTREPRENEURIAL SKILLS TRAINING;
- (13) SERVICES THAT PROVIDE LABOR MARKET AND EMPLOYMENT information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
- (14) Activities that help youth prepare for **and transition to postsecondary education and training.**

Participation

TEGL 10-16, Change 3, Attachment 7, Table B: All youth program elements trigger participation following eligibility determination, objective assessment, and completion of the ISS.

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LWDB Partner Agreement Requirements

20 CFR 681.470: The local area must ensure that if a program element is not funded with WIOA youth funds, the local program has an agreement in place with a partner organization to ensure that the program element will be offered. The Local Board must ensure that the program element is closely connected and coordinated with the WIOA youth program.

WIOA Final Rule, narrative page 56177: “By closely connected and coordinated, the Department means that case managers must contact and monitor the provider of the non-WIOA-funded activity to ensure the activity is of high quality and beneficial to the youth participant.” The case manager must check on the provider of the non-WIOA-funded activity and make sure the youth participant gets quality services that match the program elements.

14 Program Elements & Program Enrollment

WIOA Final Rule, narrative page 56170: Point of program participation does not begin until *after* the youth is determined eligible, the youth receives an objective assessment and the youth participates in 1 of the 14 program elements.

20 CFR 681.320(b)(3): In order to be a participant in the WIOA youth program, the youth must participate in any of the 14 WIOA youth program elements. Case managers providing case management should not be reported as one of the 14 youth program elements in the PIRL.

WorkSource System Policy 1019, Revision 12: The state directs Title I youth case managers to ensure the Title I youth receive at least one WIOA youth program element and that the service(s) are recorded in the system to ensure those youth become participants.

Determining and Providing services

20 CFR 681.460(b): Local programs have the discretion to determine what specific program services a youth participant receives, based on each participant’s objective assessment and individual service strategy. Local programs are not required to provide every program service to each participant.

Reporting

TEGL 10-16, Change 3, Attachment 7, Table B: All youth program elements are considered “Career Services” with the exception of occupational skills training which is categorized as “training”. Note that the categorization of career and training services for youth differs from the Adult and DW programs.

TEGL 21-16 Change 1: 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. All 14 WIOA youth program elements are contained in the PIRL and local youth programs should ensure that services received are reported in the applicable program element in the PIRL. Case management is the act of connecting youth to appropriate services and is not a program element.

Reporting/Management Information System (MIS) Data Entry Requirements

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WorkSource System Policy 1020, Revision 2 Services must be entered at the point in time they are delivered, if services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered *within 14 calendar days* of service delivery and the *service date entered must always reflect the date the service was delivered*.

WorkSource System Policy 1023, Revision 1 – Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.

WorkSource System Policy 1023, Revision 1 For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source. If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as “Paid by Other”. In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

Program Enrollment

Date of Program Entry, Participation

Participation

20 CFR 681.320(b): In order to be a participant in the WIOA youth program, all the following *must* occur:

- The collection of information to support an eligibility determination;
- The provision of an objective assessment;
- Development of an individual service strategy, and
- Participation in any of the 14 WIOA youth program elements.

WorkSource System Policy 1020, Revision 2 Handbook: For youth, the date of participation is when all applicable program requirements for the provision of services, including eligibility determination, objective assessment, development of an individual service strategy, and receipt of one or more of the 14 WIOA Youth program elements occur.

TEGL 10-16, Change 3: A reportable individual is considered a participant when he/she has satisfied all the applicable program requirements for the provision of services, including:

- Eligibility determination,
- An objective assessment,
- Development of an individual service strategy, [and](#)

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- Received one of the 14 WIOA Youth program elements.

WorkSource System Policy 1023 Revision 1 – Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: The job seeker is counted in the service pool when a qualifying service is recorded [and](#) linked to an Active Program Enrollment. All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1023, Revision 1: DOL has implemented a new edit check for the PIRL that rejects any Title I youth record that shows an enrollment into the program but no affiliated record of at least one recognized WIOA youth program element. The State directs Title I youth case managers to ensure the Title I youth receive at least one WIOA youth program element and that the service(s) are recorded in the system to ensure those youth become participants.

Services that Trigger Participation

TEGL 10-16, Change. 3:

- Tutoring, study skills training, dropout prevention
- Alternative secondary school services
- Paid and unpaid work experience
- Occupational skills training
- Education offered concurrently with workforce preparation
- Leadership development
- Supportive services
- Adult mentoring
- Comprehensive guidance and counseling
- Financial literacy education
- Entrepreneurial skills training
- Services that provide labor market information
- Postsecondary preparation and transition activities

Program Enrollment

WIOA Joint Rule, Departments' response pages 55845: The Departments emphasize that programs must not delay enrollment or prohibit participants from entering a program late in the program year. All participant outcomes, regardless if achieved at the end of the reporting period in which they enrolled or in the next reporting period, count as positive outcomes for the program.

Evan Rosenberg, Division of Youth Services, DOL ETA, "WIOA Youth Eligibility Live Q&A Session" on WorkforceGPS October 24, 2017: *Do not enroll an individual into the WIOA Youth program until:*

- Eligibility has been determined,
- an Objective Assessment has been facilitation,
- an ISS has been developed [and](#)
- one (1) if the 14 Elements has been provided.

Allowable and Unallowable Expenses Prior to Eligibility Determination

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TEGL 21-16 Change 1: Youth funds can be expended on outreach and recruitment or assessment for eligibility determination prior to eligibility determination, but they cannot be spent on youth program services, such as the 14 program elements prior to eligibility determination.

Reporting/ Management Information System (MIS) Data Entry Requirements:

WorkSource System Policy 1020, Revision 2 Services must be entered at the point in time they are delivered; If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered within 14 calendar days of service delivery and the service date entered must always reflect the date the service was delivered.

WorkSource System Policy 1023, Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.

WorkSource System Policy 1003, Revision 6: Record the date on which an individual became a participant satisfying applicable programmatic requirements for the provision of services.

Concurrent Program Enrollment (e.g., Youth/Adult; Youth/DW)

WIOA Adult/WIOA Youth Co-enrollment

TEGL 19-16: WIOA creates an opportunity for the Adult program to work closely with the Youth program to ensure young adults receive the services they need to succeed in education and the workforce. *Individuals aged 18-24 may be eligible for both the WIOA Youth and Adult programs and can be co-enrolled in the two programs.* ETA encourages the WIOA Adult and Dislocated Worker programs, along with the ES program, to coordinate closely with the WIOA Youth program to maximize flexibility and service delivery to eligible populations.

- Some examples where enhanced coordination could take place are as follows: (Note: This is not an exhaustive list of ways to coordinate activities and service delivery but is meant to illustrate some of WIOA's flexibilities and services to improve educational and employment opportunities for participants.)
- Referring 18-24-year-old individuals to the Title I Youth program if they need more intensive support around specific program elements described under WIOA sec. 129(c)(2).
- Utilizing WIOA Adult formula program funded ITAs as part of a career pathway strategy for Youth program participants co-enrolled as adults or dislocated workers;
- Utilizing work-based training opportunities for Youth program participants co-enrolled as adults or dislocated workers, as identified in their Individual Service Strategy (ISS) as part of a career pathway; and

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- Career pathway planning.

Determining Appropriate Services

TEGL 19-16: Local program operators may determine, for these individuals, the appropriate level and balance of services under the Youth and Adult programs.

- Such determinations regarding the appropriate program for the participant must be based on the service needs of the participant and if the participant is career-ready based on an assessment of his/her occupational skills, prior work experience, employability, and the participant's needs.
- An important difference to note here is that while receiving an assessment from the Adult, Dislocated Worker, or ES programs does trigger participation and inclusion in the performance accountability calculations for those programs, an objective assessment carried out under WIOA sec. 129(c)(1)(A) does not trigger participation in the Youth program.

Tracking of Funds

TEGL 19-16 Local program operators must **identify and track the funding streams** which pay the costs of services provided to individuals who are participating in Youth and Adult programs concurrently, and ensure no duplication of services.

Veteran Status at Participation (Youth Aged 18 or older, Data Validation Purposes Only)

Definitions

WIOA Sec. 3(63): The term “veteran” has the meaning given the term in section 101 of title 38, United States Code. The term “**recently separated veteran**” means any veteran who applies for participation under this Act within 48 months after the discharge or release from active military, naval, or air services. **38 U.S.C. 101:** The term “**veteran**” means a person who served in the active military, naval, or air service, and who was discharged or released therefrom under conditions other than dishonorable.

PRIORITY OF SERVICE

20 CFR 680.650: Veterans under WIOA receive priority of service in all DOL funded training programs.

Income Not Required

20 CFR 680.650: For income-based eligibility determinations, **amounts paid while on active duty or paid by the Department of Veterans Affairs (VA) for vocational rehabilitation, disability payments, or related VA-funded programs are not to be considered as income** in accordance with 38 U.S.C. 4213 and 20 CFR 683.230. See also **TEGL 3-15** (page 7).

20 CFR 683.230: When past income is an eligibility determinant for Federal employment or training programs, any amounts received as military pay or allowances by any person who served on active duty, and certain other specified benefits must be disregarded for the veteran and for other individuals for whom those

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amounts would normally be applied in making an eligibility determination. This applies when determining if a person is a “low-income individual” for eligibility purposes (for example, WIOA youth).

Documentation Required

WorkSource System Policy 1003, Revision 6: DD-214 **or** a letter from the Veteran’s Administration

Note: The documentation must include the dates of service and indicate the veteran was discharged or released from such duty with other than a dishonorable discharge

Employment Status at Participation

Employment Status Definitions - Federal Register Vol. 80, No. 140; ETA 9172-WIOA PIRL:

- **Employed:** At program entry,
 - Is currently performing any work at all as a paid employee;
 - Is currently performing any work at all in his or her own business, profession, or farm;
 - Is currently performing any work as an unpaid worker in an enterprise operated by a member of the family, or
 - Is one who is no working, but currently has a job or business from which he or she is temporarily absent because of illness, bad weather, vacation, labor-management dispute, or personal reason, whether or not paid by the employer for time-off, and whether or not seeking another job.
- **Employed, but Received Notice of Termination of Employment or Military Separation:** At program entry, is a person who, although employed, either
 - Has received a notice of termination of employment or the employer has issued a Worker Adjustment and Retraining Notification (WARN) or other notice that the facility or enterprise will close, or
 - Is a transitioning service member (i.e., within 12 months of separation or 24 months of retirement).
- **Not in the Labor Force:** At program entry, is not in the labor force (i.e., those who are not employed and are not actively looking for work, including those who are incarcerated).
- **Actively Seeking Employment:** At program entry is not employed but is seeking employment, makes specific effort to find a job, and is available for work.

Reporting - WIOA Joint Rule, Departments’ response, page 55849: Employment status at enrollment does not impact performance indicators for employment during the 2nd and 4th quarters after exit.

Services – Program Elements

PE# 1 Tutoring, Study Skills Training, Instruction, and Dropout Prevention

MIS:

WIN 0077, Change 16; WorkSource Service Catalog: Tutoring, Study Skills Training, Instruction, and Dropout Prevention (Youth Only):

- Tutoring, study skills training, and instruction provided in addition to regular in-school instruction that lead to a high school diploma are services that focus on providing academic support, helping a youth identify areas of academic concern, assisting with overcoming learning obstacles, and providing tools and resources to develop learning strategies.
- These services can be provided one-on-one, in a group setting, through resources and workshops.
- Secondary school dropout prevention strategies intended to lead to a high school diploma are also included in this youth element and include services and activities that keep a young person in-school and engaged in a formal learning and/or training setting.
- Strategies include but are not limited to tutoring, literacy development, active learning experiences, after-school opportunities, and individualized instruction.

Definition

TEGL 21-16 Change 1: In 20 CFR 681.460(a)(1), this is the first program element listed and 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.”

Tutoring, study skills training, and instruction that lead to a high school diploma: Such services focus on:

- providing academic support,
- helping a youth identify areas of academic concern,
- assisting with overcoming learning obstacles, and
- providing tools and resources to develop learning strategies.
- tutoring, study skills training, and instruction can be provided one-on-one, in a group setting, through resources and workshops.

Secondary school dropout prevention strategies intended to lead to a high school diploma: 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. Strategies include, but are not limited to:

- tutoring,
- literacy development,
- active learning experiences,
- after-school opportunities, and
- individualized instruction.

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Reporting/ Management Information System (MIS) Data Entry Requirements

WorkSource System Policy 1020, Revision 2 Services must be entered at the point in time they are delivered; If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered **within 14 calendar days** of service delivery and the **service date entered must always reflect the date the service was delivered.**

WorkSource System Policy 1023, Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook:

All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. **Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.**

WorkSource System Policy 1023, Revision 1: For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source. If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as “Paid by Other”. In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

PE# 2 Alternative Secondary School Services or Dropout Recovery Services

MIS:

WIN 0077, Change 16; WorkSource Service Catalog: Alternative Secondary School Services or Dropout Recovery Services (Youth Only):

- Alternative secondary school services, such as basic education skills training, individualized academic instruction, and English as a Second Language training, are those that assist youth who have struggled in traditional secondary education.
- Dropout recovery services, such as credit recovery, counseling, and educational plan development, are those that assist youth who have dropped out of school.
- While such activities 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 equivalent.

Definition

TEGL 21-16 Change 1: Under 20 CFR 681.460(a)(2), **alternative secondary school services**, such as **basic education skills training, individualized academic instruction, and English as a Second Language training**, are those that assist **youth who have struggled in traditional secondary education.**

- Dropout recovery services, such as credit recovery, counseling, and educational plan development, are those that assist youth who have dropped out of school.

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- 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 equivalent.

WorkSource System Policy 1003, Revision 6 and ETA 9172 (PIRL): A Secondary Education Program includes both secondary school and enrollment in a program of study with instruction designed to lead to a high school equivalent credential.

- Examples may include adult high school credit programs and programs designed to prepare participants to pass recognized high school equivalency exams such as GED.
- Programs of study designed to teach English proficiency skills or literacy skills below the 9th grade equivalent are not considered Secondary Education Programs.

Reporting/ Management Information System (MIS) Data Entry Requirements

TEGL 21-16 Change 1: For documentation purposes, services aimed at getting a youth who has dropped out of secondary education back into a secondary school or alternative secondary school/high school equivalency program and preparing them for high school equivalency attainment, should be counted under program element 2-Alternative Secondary School Services or Dropout Recovery Services. While the statutory and regulatory language for both program elements 1 and 4 include language discussing services leading to recognized postsecondary credentials, training services that lead to recognized postsecondary credentials should be reported under program element 4, Occupational Skills Training to avoid duplicated reporting of services.

WorkSource System Policy 1020, Revision 2 Services must be entered at the point in time they are delivered; If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered *within 14 calendar days* of service delivery and the **service date entered must always reflect the date the service was delivered.**

WorkSource System Policy 1023, Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. **Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.**

WorkSource System Policy 1023, Revision 1: For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source. If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as “Paid by Other”. In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

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WorkSource System Policy 1003, Revision 6 and ETA 9172 (PIRL): Secondary Education: Record if the participant was enrolled in a Secondary Education Program at or above the 9th Grade level. A Secondary Education program includes both secondary school and enrollment in a program of study with instruction designed to lead to a high school equivalent credential. Examples may include adult high school credit programs and programs designed to prepare participants to pass recognized high school equivalency exams such as the GED, HISET, or TASC. Programs of study designed to teach English proficiency skills or literacy skills below the 9th grade equivalent are not considered Secondary Education Programs. States may use this coding value if the participant was either already enrolled in education or training at the time of application to the program OR became enrolled in an education or training program at or above the 9th Grade level at any point while participating in the program.

Date Enrolled: Record the date the participant was enrolled during program participation in an education or training program that leads to a recognized post-secondary credential, **including a secondary education program**, or training program that leads to employment as defined by the core program in which the participant participates whether **at program enrollment or at any point while participating in the program**.

- This includes but is not limited to participation in Job Corps or YouthBuild or Adult Education or secondary education programs.
- Note: This data element applies to the Measurable Skill Gains Indicator and specifically will be utilized to calculate the denominator.

ETA 9172 (PIRL): Record the date on which the participant's first training service began.

PE# 3 Work Experience (WEX) Paid and Unpaid

MIS:

WIN 0077, CHANGE 16; WorkSource Service Catalog: Paid and Unpaid Work Experience with Academic/Education Component-Employment Opportunities (Youth Only): Paid and unpaid work experiences that have an academic and occupational education component that consists of employment opportunities available throughout the year.

- Paid and Unpaid Work Experience with Academic/Education Component-Internships or Employment (Youth Only):
- Unpaid Work Experience with Academic/Education Component – Job Shadowing.
- Paid and Unpaid Work Experience with Academic/Education Component-On-the-Job Training Opportunities (Youth Only)
- Paid and Unpaid Work Experience with Academic/Education Component-Pre-Apprenticeship Programs (Youth Only):

Definition

WIOA Sec. 129(c)(2)(C): Paid and unpaid work experiences that have as a component academic and occupational education, which may include-

- Summer/year-round employment opportunities
- Pre-Apprenticeship programs

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- Internships and Job Shadowing
- On-the-Job Training (OJT)

20 CFR 681.600(a) Work experiences are a planned, structured learning experience that takes place in a workplace for a limited period.

Academic & Occupational Education Requirement

20 CFR 681.600(b): Work experiences must include academic and occupational education. The educational component may occur concurrently or sequentially with the work experience. Further academic and occupational education may occur inside or outside the work site.

TEGL 21-16 Change 1: 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.

- Example: if a youth is in a work experience in a hospital, the occupational education could be learning about the duties of different types of hospital occupations such as a phlebotomist, radiology tech, or physical therapist.
- Whereas, the academic education could be learning some of the information individuals in those occupations need to know such as why blood type matters, the name of a specific bone in the body, or the function of a specific ligament.
- Local programs have the flexibility to determine the appropriate type of academic and occupational education necessary for a specific work experience.
- The academic and occupational educational component may:
- Occur concurrently or sequentially with the work experience;
- Occur inside or outside the worksite;
- Be provided by the work experience employer or be provided separately in the classroom or through other means.
- States and local areas have the flexibility to decide who provides the educational component.

Types of Work Experiences

Job Shadow

TEGL 21-16 Change 1, Job Shadowing: Is a work experience option where youth learn about a job by walking through the workday as a shadow to competent worker. The job shadowing work experience is a temporary, unpaid exposure to the workplace in an occupational area of interest to the participant. Youth witness firsthand the work environment, employability and occupational skills in practice, the value of professional training, and potential career options. A job-shadowing experience can be anywhere from a few hours, to a day, to a week or more. Job shadowing is designed to increase career awareness, help model youth behavior through examples, and reinforce in the youth and young adult the link between academic classroom learning and occupational work requirements.

Pre-Apprenticeship Program:

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CFR 681.480 & TEGL 21-16 Change 1: A **pre-apprenticeship is a program** designed to prepare individuals to enter and succeed in an apprenticeship program and includes the following elements:

- Training and curriculum that aligns with the skill needs of employers in the economy of the state or region involved;
- Access to educational and career counseling and other supportive services, directly or indirectly;
- Hands-on, meaningful learning activities that are connected to education and training activities, such as exploring career options, and understanding how the skills acquired through coursework can be applied toward a future career;
- Opportunities to attain at least one industry-recognized credential; and
- A partnership with one or more registered apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship program in a registered apprenticeship program.

TEGL 13-16 Change 1: Pre-apprenticeship programs provide instruction and/or training to increase math, literacy, and other vocational and pre-vocational skills needed to gain entry into a Registered Apprenticeship program. A pre-apprenticeship program funded with WIOA must have at least one Registered Apprenticeship partner; such pre-apprenticeship programs must possess or develop a strong record of enrolling their pre-apprenticeship graduates into a Registered Apprenticeship program. Once the participant is enrolled in the Registered Apprenticeship program, and if his/her funding has not been exhausted, a portion and/or the balance of funding may be used to cover the costs of the Registered Apprenticeship program's classroom training/related instruction.

- Pre-apprenticeship programs do not have the same automatic ETP status under WIOA as do Registered Apprenticeship programs according to DOL-only Regulations 20 CFR 680.470(f). The USDOL does not register or regulate pre-apprenticeship programs.
- Organizations offering pre-apprenticeship training programs that are seeking ETP status are required to go through the same vetting process and performance reporting requirements as all other training providers in the State.
- If the pre-apprenticeship training program is on the ETP list, WIOA funds may be used to fund that program for eligible individuals.
- ITAs also can finance pre-apprenticeship training in preparation for formal RA if they are on the State ETP list.

TEGL 09-22: If the pre-apprenticeship program includes an occupational skills training component, separate from the work experience, WIOA Youth programs may report pre-apprenticeship under both the work experience program element and the occupational skills training program element.

On-the-Job Training (OJT):

OJT Definition & Design

WIOA Sec. 3(44): The term "on-the-job training" means training by an employer that is provided to a paid participant while engaged in productive work in a job that

- Provides knowledge or skills essential to the full and adequate performance of the job;

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- Is made available through a program that provides reimbursement to the employer of up to 50% of the wage rate of the participant, except as provided in section 134(c)(3)(H), for the extraordinary costs of providing the training and additional supervision related to the training; and
- Is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant.

WIOA Final Rules, page 56149: OJT is primarily designed to first hire the participant and provide them with the knowledge and skills necessary for the full performance of the job.

WIOA Final Rules, page 56150: The Department is not requiring specific OJT duration limitations.

OJT Displacement and Union Concurrence

WIOA Sec. 181(b)(2): A participant in a program or activity authorized under this title shall not displace (including a partial displacement, such as a reduction in hours, wages or benefits) any currently employed employee (as of the date of the participation).

- A specified activity shall not impair an existing contract for services or collective bargaining agreement, and no such activity that would be inconsistent with the terms of a collective bargaining agreement shall be undertaken without the written concurrence of the labor organization and employer concerned.
- A participant shall not be employed in a job if:
- Any other individual is on layoff from the same or any substantially equivalent job;
- The employer has terminated the employment of any regular employee or otherwise reduced the workforce of the employer with the intention of filling the vacancy so created with the participant; or
- The job is created in a promotional line that will infringe in any way upon the promotional opportunities of currently employed individuals (as of the date of the participation).

OJT Wages & Benefits

20 CFR 683.275: Individual in OJT must be compensated at the same rates, including periodic increase, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills. Such rates must be in accordance with applicable law but may not be less than the higher of the rate specified in sec. 6(a)(1) of the Fair Labor Standards Act of 1938 or the applicable State or local minimum wage law. Individuals in OJT must be provided benefits and working conditions at the same level and to the same extent as other trainees or employees working a similar length of time and doing the same type of work. Allowances, earnings, and payments to individuals participating in programs under WIOA are not considered as income for purposes of determining eligibility for aid furnished under any Federal or Federally assisted program based on need, other than as provided under the Social Security Act.

TEGL 13-15: A wage cap is an upper limit on the hourly wage rate that is eligible for reimbursement. A reimbursement rate, or reimbursement level, refers to the percentage of the OJT participant's hourly wage or

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wage cap that can be reimbursed to an employer. The wage cap is set at the average hourly wage rate for each state. The training reimbursement percentage is applied against the participant's wage rate unless the wage rate exceeds the state's average hourly rate. When the latter occurs, the training reimbursement percentage must be applied against the state's average hourly rate. Based upon Attachment II of TEGL 13-15, the Average Hourly Wage Rate for WA State is \$25.26.

OJT Employer Eligibility/Relocation

WIOA Sec. 181(d)(2): No funds provided under this title for an employment or training activity shall be used for customized or skill training, OJT, incumbent worker training, transitional employment or company-specific assessments of job applicants or employees, for any business or part of a business that has relocated, until the date that is 120 days after the date on which such business commences operations at the new location, if the relocation of such business or part of a business results in a loss of employment for any employee of such business at the original location and such original location is within the United States.

OJT Contracts

20 CFR 680.700: OJT is provided under a contract with an employer or registered apprenticeship program sponsor in the public, private not-profit, or private sector.

20 CFR 680.710: OJT contracts may be written for eligible employed workers when:

- The employee is not earning a self-sufficient wage or wages comparable to or higher than wages from previous employment;
- The requirements of sec. 680.700 are met; and
- The OJT relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes identified by the Local WDB.

WIOA Final Rules, page 56149: OJT contracts must be continually monitored so that WIOA funds provided through OJT contracts are providing participants the training to retain employment successfully.

OJT 75% Reimbursement

20 CFR 680.730(b) and TEGL 19-16: LWDBs must document the factors used when deciding to increase the wage reimbursement levels above 50% up to 75%.

TEGL 19-16: Local WDBs have the flexibility under WIOA to increase the reimbursement level to up to 75% of the total wage taking into account the following factors: The characteristics of the participants taking into consideration whether they are "individuals with barriers to employment" as defined in WIOA sec. 3(24); The size of the employer, with an emphasis on small businesses; The quality of employer-provided training and advancement opportunities, for example if the OJT contract is for an in-demand occupation and will lead to an industry-recognized credential; and Other factors the Governor or Local WDB may determine appropriate (e.g. the number of employees participating in the training, wage and benefit levels of the employees (both pre and post participation earnings), and relation of the training to the competitiveness of the participant).

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Labor Standards

20 CFR 681.600(a): Work experience may be paid or unpaid, as appropriate. A work experience may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists.

WEX Expenditures

20 CFR 681.590: Local youth programs must expend not less than 20% of the funds allocated to them to provide ISY and OSY with paid and unpaid work experiences. Local WIOA youth programs must track program funds spent on paid and unpaid work experiences, including wages and staff costs for the development and management of work experiences, and report such expenditures as part of the local WIOA youth financial reporting. The percentage of funds spent on work experience is calculated based on the local area youth funds expended for work experience rather than calculated separately for ISY and OSY. Local area administrative costs are not subject to the 20% minimum expenditure requirement. Leveraged resources cannot count toward the expenditure requirement (*WIOA Final Rule, narrative, page. 56184 and TEGL 21-16 Change 1*).

TEGL 8-15 and TEGL 21-16 Change 1 provide further discussion of allowable expenditures that may be counted toward the work experience expenditure requirement and articulates that program expenditures on the work experience program element can be more than just wages paid to youth in work experience.

Allowable work experience expenditures include:

- Wages/stipends paid for participation in a work experience;
- Staff time working to identify and develop a work experience opportunity, including staff time spent working with employers to identify and develop the work experience;
- Staff time working with employers to ensure a successful work experience, including staff time spent managing the work experience;
- Staff time spent evaluating the work experience
- Participant work experience orientation sessions;
- Employer work experience orientation sessions;
- Classroom training or the required academic education component directly related to the work experience;
- Incentive payments directly tied to the completion of work experience; and
- Employability skills/job readiness training to prepare youth for a work experience.

TEGL 21-16 Change 1: Supportive services are a separate program element and cannot be counted toward the work experience expenditure requirement even if supportive services assist the youth in participating in the work experience.

Credential Attainment Performance Measure Exclusion

TEGL 19-16: OJT is excluded from the credential attainment performance indicator because, although OJT's often provide employment benefits to recipients of these services, they rarely result in a credential.

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WorkSource System Policy 1023 Revision 1 – Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.

WorkSource System Policy 1023, Revision 1: For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source. If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as “Paid by Other”. In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

PE# 4 Occupational Skills Training

MIS:

WIN 0077, CHANGE 16; WorkSource Service Catalog: Occupational Skills Training (Youth Only): An organized program of study for youth (ages 16-24) 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.

Definition

20 CFR 681.540(a) & TEGL 21-16 Change 1: The Department *defines occupational skills training* as an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels. Local areas must give priority consideration to 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 enough duration to impart the skills needed to meet the occupational goal; and
- Lead to the attainment of a recognized postsecondary credential.

Not Counted as Occupational Skills Training

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Guidance from ESD Policy to ESD Monitoring on 2-16-18: Microsoft Digital Literacy (*it should be recorded as Workforce Preparation*)

WorkSource System Policy 1020, Revision 2 Handbook: First aid cards (*record as Workforce Preparation per ESP Policy guidance to ESD Monitoring on 2-23-19*), Food handler's card

Requirements

20 CFR 681.540(b) The chosen occupational skills training must meet the quality standards in WIOA sec. 123.

Satisfactory in Progress Training

ESD WS Policy 5601, Revision 2: LWDBs may want to require that participants demonstrate satisfactory progress in training, except for good cause (see Section 4 - Definitions), to access payments through their ITAs. If they do so, "satisfactory progress" should be defined by LWDB policy. Washington's Unemployment Insurance Training Benefits program has specific criteria for determining satisfactory progress for claimants (WAC 192-270-065) that may serve as a helpful example.

Evan Rosenberg, Division of Youth Services, DOL ETA, "WIOA Youth Eligibility Live Q&A Session" on WorkforceGPS October 24, 2017: Job Corps can only count as occupational skills training if Job Corps is not counted as a program outcome.

Documentation Requirements

20 CFR 680.220(b): The case file must contain a determination of need for training as determined through the interview, evaluation or assessment, AND career planning informed by local labor market information and training provider performance information, or through any other career service received.

Reporting/ Management Information System (MIS) Data Entry Requirements:

WorkSource System Policy 1020, Revision 2: Services must be entered at the point in time they are delivered. If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered within 14 calendar days of service delivery and the service date entered must always reflect the date the service was delivered.

WorkSource System Policy 1019, Revision 12: Youth program staff must record in MIS any services provided to WIOA youth program participants even if the services were provided by non-WIOA providers and paid for with non-WIOA funds. As reported by ESD Performance to ESD Monitoring on 3-5-18, if training is paid for with non-WIOA funds, the service recorded in MIS would still be Occupational Skills Training. *Do not* record it as Training Paid by other. This is for the Youth Program only. In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

WorkSource System Policy 1020, Revision 2 Data Integrity and Performance Policy and Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. *Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.*

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Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on WorkforceGPS October 24, 2017: All trainings must be recorded in the state’s MIS. DOL wants the counts for all training participants receive, not just those that are WIOA funded.

WorkSource System Policy 1023, Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1003, Revision 6: Post-secondary Education: Record if the participant was in a post-secondary program that leads to a credential or degree from an accredited post-secondary education institution at program enrollment or at any point during program participation.

Date Enrolled: Record the date the participant was enrolled during program participation in an education or training program that leads to a recognized post-secondary credential, including a secondary education program, or training program that leads to employment as defined by the core program in which the participant participates *whether at program enrollment or at any point while participating in the program*. If the participant was enrolled in post-secondary education at program entry, the date in this field should be the date of Program Entry. This includes but is not limited to participation in Job Corps or YouthBuild or Adult Education or secondary education programs.

Note: This data element applies to the **Measurable Skill Gains Indicator** and specifically will be utilized to calculate the denominator.

ETA 9172 (PIRL): Record the date on which the participant’s first *training service actually began*. Record the date the participant *completed during program participation an education or training program* that leads to a recognized postsecondary credential, including a secondary education program, or training program that leads to employment as defined by the core program in which the participant participates. States may use this coding value if the participant was either already enrolled in education or training at the time of program entry or became enrolled in education or training at any point while participating in the program. If the participant was enrolled in postsecondary education at program entry, the date in this field should be after the date of Program Entry. This includes, but is not limited to participation in Job Corps, YouthBuild, a Registered Apprenticeship program, Adult Education or secondary education programs.

Note: This data element applies to the **Measurable Skill Gains Indicator**, and specifically will be utilized to calculate the denominator. It encompasses all education and training program enrollment.

Consumer Choice (OSY WIOA Funded Postsecondary Training Only)

Requirements 20 CFR 680.340:

(a) Training services, whether under ITAs or under contract, **must** be provided in a manner that maximizes informed consumer choice in selecting an eligible provider.

(b) Each Local WDB, through the one-stop center, **must** make available to customers the State list of eligible training providers required in WIOA sec. 122(d).

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(c) An individual who has been determined eligible for training services under § 680.210 may select a provider described in paragraph (b) of this section after consultation with a career planner. Unless the program has exhausted training funds for the program year, the one-stop center **must** refer the individual to the selected provider and establish an ITA for the individual to pay for training. For purposes of this paragraph, a referral may be carried out by providing a voucher or certificate to the individual to obtain the training.

(f) Consistent with paragraph (a) of this section, priority consideration must be given to programs that lead to recognized postsecondary credentials (defined at WIOA sec. 3(52)) that are aligned with in-demand industry sectors or occupations in the local area.

Financial Aid; Other Program / Grant Assistance

Applies To

Only applicable to OSY receiving an ITA for post-secondary training

Requirements

20 CFR 680.230: WIOA funding for training is limited to **participants who:** Are **unable to obtain grant assistance from other sources** to pay the cost of their training; **or** require assistance beyond that available under grant assistance from other sources to pay the costs of such training.

- In making the determination, one-stop centers may consider the full cost of participating in training services, including the cost of supportive services and other appropriate costs.
- One-stop centers must consider the availability of other sources of grants to pay for training costs such as TANF, State-funded training funds (e.g., Worker Retraining, WorkFirst, BFET), and Federal Pell Grants, so that WIOA funds supplement other sources of training grants.
- A WIOA participant may enroll in WIOA funded training while his/her application for a Pell Grant is pending as long as the one-stop center has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell Grant, if it is subsequently awarded.

WIOA Title I Policy 5601, Revision 2: Local areas must consider the availability of other sources of grants, excluding loans, to pay for training costs so that WIOA funds are used to supplement but not supplant other sources. WIOA funds are intended to provide training services in instances when there is no grant assistance (or insufficient assistance) from other sources (i.e., TANF, BFET, Title IV Programs and State-funded grants) to pay for those costs. The use of WIOA funds to pay down a loan of an otherwise eligible participant is prohibited; however, *the mere existence of a federal loan must not impact eligibility determinations.*

Excluded

WIOA Final Rules, Department Response, page 56121 and TEGL 19-16: The Department notes that the Department of Veterans Affairs benefits for education and training services are not included in the category of “other sources of training grants” listed in sec. 680.230(b). Therefore, veterans and spouses are not required to first use any available benefit entitlements associated with their military service before being considered eligible for WIOA funded training, and one-stop centers are not required to consider the availability of those funds.

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Individual Training Account (ITA) (OSY ages 16-24 only)

OSY Eligible for ITA's:

20 CFR 681.550: The Dept. allows WIOA ITAs for OSY, ages 16-24 using WIOA youth funds when appropriate

Use of ITA Funds:

WIOA Title I Policy 5601, Revision 2: If an ITA has been established and the training is managed between the WIOA Title I case manager and the participant, those funds may be used to pay for allowable training-related expenses as well as tuition expenses.

If the training provider was selected by the WIOA Title I participant and the case manager, but the source of *payment* for training is Pell, other financial aid, or private scholarships, a WIOA-funded ITA **may be used** to pay allowable training costs not covered by those fund sources. A WIOA-funded ITA is **not** appropriate **if** the WIOA Title I case manager and program played no role in training provider selection and the participant's training is selected, funded, and directed by a program other than Title I, such as Vocational Rehabilitation (VR), Trade Adjustment Assistance (TAA), or community and technical colleges (Worker Retraining (WRT)). However, if such funding ends after training has started, a WIOA Title I-funded ITA may be initiated if that program is on the Eligible Training Provider (ETP) list.

In-demand Occupations - WIOA Title I Policy 5601, Revision 2: ITA funds must be directly linked to an in-demand industry sector or occupation in the local area, or in another area to which the individual is willing to relocate. Local boards may also approve training services for occupations determined by the local board to be in economic sectors that have high potential for sustained demand or growth in the local area.

DOL guidance is that registered apprenticeship programs are in-demand even if the labor market information may not list as "in-demand" the occupation for which the individual is apprenticed because registered apprenticeship programs, being tied to specific employers, only enroll individuals when there is employer demand, which makes it possible to carry out the on-the-job aspect of the instruction.

Training Providers Eligible for ITA

20 CFR 680.300: Training services for eligible individuals are typically provided by training providers who receive payment for their services through an ITA.

TEGL 13-16 Change1: Registered Apprenticeship sponsors are able to use ITA funds to support the educational portion (i.e., related instruction component) of the registered apprenticeship for eligible apprentices.

Definition

20 CFR 680.300: The ITA is a payment agreement established on behalf of a participant with a training provider. WIOA Title I adult and dislocated workers purchase training services from State eligible training providers they select in consultation with the career planner, which includes discussion of program quality and performance information on the available eligible training providers.

Out of Area or Out of State training

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20 CFR 680.520: An individual may choose training providers and programs outside of the local area provided the training program is on the State list, in accordance with local policies and procedures. An individual may choose eligible training providers and programs outside of the State consistent with State (WIOA Title I Policy 5611, Revision 3; WTECB's document) and local policies and procedures.

Contract for Training (OSY Only)

Requirements - WIOA 134(C.3.G), 20 CFR 681.550

- (a) Contracts for services may be used instead of ITAs only when one or more of the following five exceptions apply, and the local area has fulfilled the consumer choice requirements of 680.340:
- 1) For OJTs, customized training, incumbent worker training or transitional jobs;
 - 2) When the LWDB determines that there are an insufficient number of eligible training providers in the local area to accomplish the purpose of a system of ITAs. The determination process must include a public comment period for interested providers of at least 30 days, and be described in the Local Plan;
 - 3) When the Local WDB determines that there is a training services program of demonstrated effectiveness offered in the area by a community-based organization or another private organization to serve *individuals with barriers to employment, as described in paragraph (b) of this section. The Local WDB must develop criteria to be used in determining demonstrated effectiveness, particularly as it applies to the individuals with barriers to employment to be served.
 - 4) When the Local WDB determines that it would be most appropriate to contract with an institution of higher education (see WIOA sec. 3(28)) or other provider of training services in order to facilitate the training of multiple individuals in in-demand industry sectors or occupations, provided that the contract does not limit consumer choice.
 - 5) When the Local WDB is considering entering into a Pay-for-Performance contract, and the Local WDB ensures that the contract is consistent with § [683.510](#) of this chapter.
- (b) Under paragraph (a)(3) of this section, individuals with barriers to employment include those individuals in one or more of the following categories, as prescribed by WIOA sec. 3(24):

(1) Displaced homemakers	(8) Youth who are in or have aged out of the foster care system
(2) Low-income individuals	(9) Individuals who are English language learners, individuals who have low levels of *literacy, and individuals facing substantial **cultural barriers
(3) Indians, Alaska Natives, and Native Hawaiians	(10) Eligible migrant and seasonal farmworkers, defined in WIOA sec. 167(i)
(4) Individuals with disabilities	(11) Individuals within 2 years of exhausting lifetime eligibility under TANF
(5) Older individuals, i.e., those aged 55 or over	(12) Single parents (including single pregnant women)
(6) Ex-offenders	(13) ***Long-term unemployed individuals

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(7) Homeless individuals

(14) Other groups determined by the Governor to have barriers to employment****

(c) The Local Plan must describe the process to be used in selecting the providers under a contract for services.

*Literacy: WIOA Sec. 202(13): The term “literacy” means an individual’s ability to read, write, and speak English, compute, and solve problems, at levels of proficiency necessary to function on the job, in the family of the individual and in society.

** Cultural Barrier: DOL ETA 9172 WIOA Record Layout (PIRL): The participant, at program entry, perceives him or herself as possessing attitudes, beliefs, customs or practices that influence a way of thinking, acting or working that may serve as a hindrance to employment.

***Definition, WIOA Final Rule, page 56122; DOL ETA 9172, WIOA PIRL: The Dept. generally defers to the Bureau of Labor Statistics definition which is “unemployment 27 weeks or more”.

****ESD WorkSource System Policy 1030: Exercising the authority granted under WIOA Section 3(24)(N), effective December 1, 2021, the Governor additionally designated **Black, Asian, Native Hawaiian, Compact of Free Association (COFA) nations, and Pacific Islander communities; Latinos; LGBTQ communities; expectant persons; and veterans** as populations with barriers to employment for the purpose of targeted outreach for WIOA one-stop system services in Washington.

PE# 5 Education Offered Concurrently with Workforce Preparation and Training for a Specific Occupation

MIS:

WIN 0077, CHANGE 16; WorkSource Service Catalog:

Education Offered with Workforce Preparation Activities and Occupational Training-Youth Only: Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.

Definition

TEGL 21-16 Change 1: 20 CFR 681.630 states that this program element reflects an integrated education and training model and describes how *workforce preparation activities, basic academic skills, and hands-on occupational skills training are to be taught within the same timeframe and connected to training in a specific occupation, occupational cluster, or career pathway*. While programs developing basic academic skills, which are included as part of alternative secondary school services and dropout recovery services (program element 2), workforce preparation activities that occur as part of a work experience (program element 3), and occupational skills training (program element 4) can all occur separately and at different times (and thus are counted under separate program elements), this program element refers to the concurrent delivery of these services which make up an integrated education and training model.

Reporting/ Management Information System (MIS) Data Entry Requirements

WorkSource System Policy 1020, Revision 2: Services must be entered at the point in time they are delivered; If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered

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within 14 calendar days of service delivery and the service date entered must always reflect the date the service was delivered.

WorkSource System Policy 1023 Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. **Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.**

WorkSource System Policy 1020, Revision 2 For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source. If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as “Paid by Other”. In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

PE# 6 Leadership Development Opportunities

MIS:

WIN 0077, CHANGE 16; WorkSource Service Catalog: Youth Leadership Development Opportunities 2.0 (Youth Only): Leadership Development Opportunities include but are not limited to activities that encourage responsibility, employability, and other positive social behaviors such as:

- exposure to post-secondary educational opportunities;
- community and service-learning projects;
- peer-centered activities including peer mentoring and tutoring;
- organizational and teamwork training, including team leadership training;
- training in decision making, including determining priorities; and
- citizenship training, including life skills training such as parenting, work behavior training, and budgeting of resources.

Definition

20 CFR 681.520: Leadership development opportunities are 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 teamwork 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;

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- Civic engagement activities which promote the quality of life in a community; and
- Other leadership activities that place youth in a leadership role such as serving on youth leadership committees, such as a Standing Youth Committee.

***Positive Social & Civic Behaviors:**

20 CFR 681.530: Positive social and civic behaviors are outcomes of leadership opportunities, which are incorporated by local programs as part of their menu of services. Positive social and civic behaviors focus on areas that may include the following:

- Positive attitudinal development;
- Self-esteem building;
- Openness to work with individuals from diverse backgrounds;
- Maintaining healthy lifestyles, including being alcohol- and drug-free;
- Maintaining positive social relationships with responsible adults and peers, and contributing to the well-being of one's community, including voting;
- Maintaining a commitment to learning and academic success;
- Avoiding delinquency; and
- Positive job attitudes and work skills.

Reporting/ Management Information System (MIS) Data Entry Requirements

WorkSource System Policy 1020, Revision 2 : Services must be entered at the point in time they are delivered; If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered *within 14 calendar days* of service delivery and the *service date entered must always reflect the date the service was delivered*.

WorkSource System Policy 1023 Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. **Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.**

WorkSource System Policy 1023 Revision 1: For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source. If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as "Paid by Other". *In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.*

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PE# 7 Supportive Services

MIS:

WIN 0077, CHANGE 16; WorkSource Service Catalog: Support Services-fees, supplies, tests, transportation, etc. (Youth Only): Support services to be provided to youth to enable them to participate in youth program activities. These services may include: linkages to community services; assistance with transportation, child and dependent care, housing, educational testing, uniforms or other appropriate work attire and work-related tools, such as eyeglasses, protective eye gear, books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; payments and fees for employment and training-related applications, tests, and certifications; reasonable accommodations for youth with disabilities; legal aid services, and referrals to health care.

Types of Supportive Services

20 CFR 681.570: Supportive services for youth, as defined in WIOA Sec. 3(59), are services that enable an individual to participate in WIOA activities. These services include, but are not limited to:

- Linkages to community services;
- Assistance with transportation;
- Assistance with childcare and dependent care;
- Assistance with housing;
- Needs-related payments (youth ages 18-24 only);
- Assistance with educational testing;
- Reasonable accommodations for youth with disabilities;
- Legal aid services;
- Referrals to health care;
- Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear;
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; and
- Payments and fees for employment and training-related applications, tests, and certifications.

Supportive Services Allowed in Follow-up - 20 CFR 681.580(b): Follow-up services for youth may include supportive services.

Supportive Services Disallowed***:

ESD WIOA Policy 5602, Revision 5: FOOD/GROCERIES:

DOL commented on page 56182 of the WIOA Final Rules that “groceries and on-site meals for program participants are beyond the scope of WIOA.” Further, neither TEGL 19-16 nor TEGL 21-16 Change 1 include groceries, including food, on their respective listings of allowable supportive services. Though both guidance’s state that the lists are not exhaustive, DOL has opined that its Final Rule commentary represents an explicit prohibition, so groceries are therefore not an allowable supportive service for WIOA Title I adults, dislocated workers, or youth.

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In 2020, DOL clarified that food may be purchased with Title I-B fund for eligible youth on a limited and reasonable basis if necessary to assist or enable them to participate in allowable youth program activities and reach their employment and training goals.

Local Workforce Development Boards (LWDBs) must coordinate the purchase of food for WIOA Title I-B youth with other community, state, or federal services that provide food to low-income individuals and document the coordination efforts undertaken.

To prepare to provide food as a supportive service for WIOA Title I Youth participants, LWDBs are encouraged to review local policy guidance regarding internal controls and documentation requirements, as well as assess or establish partnerships with other entities that will be necessary to provide food to WIOA Title I-B youth.

If Title I-B funds are ultimately used to purchase food, DOL expects case files to amply document:

- (1) unsuccessful efforts to first secure food for the youth through federal, state, and community food assistance programs and services; and
- (2) the immediate need for Title I-B funds to be used to purchase food for the youth to enable effective participation in youth program activities.

Incentives

MIS Incentives: Per ESD Policy Unit, there is no service to record incentives in MIS

Incentives Allowed

20 CFR 681.640 & TEGL 21-16 Change 1: Incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. The local program must have written policies and procedures in place governing the award of incentives and must ensure that such incentive payments are:

- Tied to the goals of the specific program;
- Outlined in writing before the commencement of the program that may provide incentive payments;
- Align with the local program's organizational policies; and
- Accord with the requirements in 2 CFR 200.

WIOA Title I Policy 5621, Revision 5: Per 20 CFR 681.640 and TEGL 21-16 Change 1, allows for incentive payments are not services but, rather, financial transactions. (*There is no service to record an incentive in the State MIS*)

Prior state approval is **not** required for incentive payments to WIOA Title I youth participants so long as the criteria in 3(a)(i-v) Per Section 5 of TEGL 21-16, incentive payments to WIOA Title I youth participants paid for with WIOA funds are permitted for recognition and achievement of milestones tied to work experience, education, or training. To that end, the allowable WIOA Title I youth program elements to which incentives

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may be tied can be found in Attachment A. This includes youth engaged in youth program elements through activities funded by Title I statewide activities (Governor's reserve) funds.

All Local Workforce Development Boards (LWDBs) **must** have policies and procedures that govern the award of incentive payments to Title I youth participants and **must** ensure that WIOA-funded incentive payments are:

- Tied to the goals of WIOA Title I.
- Outlined in a written local policy prior to the start date of programs that might provide incentive payments.
- Aligned with the LWDB's organizational policies.
- In accordance with the requirements and cost principles in 2 CFR Part 200.
- Tied to youth program elements (which may include attainment of unsubsidized employment and/or employment retention resulting from participation in one or more program elements for which incentive payments are allowed (see Attachment A). The total amount of incentive payments to WIOA Title I youth participants in any single program year (July 1 to June 30) may not exceed the limits, if any, cited in local policy as they relate to WIOA Title I youth program formula grants for that program year. The allowance for and limits on incentive payments to WIOA Title I youth participants in projects funded by WIOA Title I statewide activities discretionary funds will be outlined by the State in the contracts' special terms and conditions.

Attachment A: Youth Program Elements for which incentive payments are or are not allowed.

No.	Program Element Allowable	Allowable
1	Tutoring, study skills training, instruction, and dropout prevention	Yes
2	Alternative secondary school services or dropout recovery services	Yes
3	Paid and unpaid work experience	Yes
4	Occupational skills training	Yes
5	Education offered concurrently with workforce preparation and training for a specific occupation	Yes
6	Leadership development opportunities	No
7	Supportive services	No
8	Adult mentoring	No
9	Follow-up services	No
	Supportive services in follow-up	No
	Adult mentoring in follow-up	No
	Financial literacy education in follow-up	Yes
	Services that provide labor market information in follow-up	No
	Post-secondary preparation and transition activities in follow-up	Yes
10	Comprehensive guidance and counseling	No
11	Financial literacy education	Yes
12	Entrepreneurial skills training	Yes

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13	Services that provide labor market information	No
14	Post-secondary preparation and transition activities	Yes

Incentives Disallowed

WIOA Final Rule, Department's Response, page 56185 & TEGL 21-16 Change 1: While incentive payments are allowable, Federal funds may not be spent on entertainment costs. Therefore, **incentives may not include entertainment**, such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment.

Incentive Documentation Requirements

WIOA Title I Policy 5621, Revision 5: Youth service providers must document incentive payments to youth by recording in case notes and participant files the youth program element and milestone, including attainment and retention of unsubsidized employment, achieved along with the incentive amount paid for the achievement.

Stipends

MIS: Per ESD Policy Unit, there is no service to record stipends in MIS.

Stipends may be used as an allowable payment for participation in WIOA Title I-B youth program element activities such as occupational skills training or classroom activities, including high school equivalency preparation, work readiness, or employability skills training. Stipends cannot be used when an employer-employee relationship exists because that relationship warrants wages rather than stipends.

States and local areas have flexibility in determining when and how to pay stipends. However, they must have policies aligned with Federal regulations to guide the payment of those stipends. Staff need to understand when and how they might offer stipends to help youth achieve their goals.

Stipends for participants in the Youth Program are different from payments made as supportive services. Supportive service payments may only be made when they are necessary to enable an individual to participate in program activities. Stipends also differ from incentive payments made to incentivize participant attainment or achievement of program activity milestones. Stipends, rather, are used to recognize the time and effort spent participating in program activities.

Local Policy:

LWDBs are not required to provide youth stipends. However, LWDBs that choose to provide stipends using WIOA Title I-B youth formula grant funds must develop local policies that establish the guidelines, minimum requirements, procedures, and internal controls that service providers must follow. Local board policies must address the following:

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- i. **Qualifying Activities:** The youth program elements for which stipends will be provided in the local area. Note: Attachment A identifies the activities for which stipends are allowed. LWDBs can elect to provide stipends for all qualifying activities or a more select number of those activities.
- ii. **Eligibility:** The factors or criteria that service providers must use when providing stipends to youth participants, including any criteria that must be met by participants to continue to receiving stipends.
- iii. **Amounts:** The parameters or limitations on stipend payment amounts provided to youth participants for either each individual qualifying youth program element or all qualifying youth program elements uniformly and, as applicable, the maximum amount of stipends youth participants can receive during participation episodes and any proration, where applicable, for incomplete activities, consistent with reasonable cost principles under 2 CFR 200.404 and 2 CFR 200.403(a).
- iv. **Time-Based Payments:** The maximum number of hours for which stipends will be paid and the hourly amount of the stipend, including hourly amounts if stipends vary by Page 3 of 4 activity, if a per hour methodology is used to determine the amount of stipend payments.
- v. **Documentation:** The documentation requirements for subsections d.i through d.iv for service providers that are paying the stipends.

Allowable Activities for Which Stipends May be Applied

The allowable activities for which stipends may be provided to eligible and enrolled WIOA Title I-B youth program participants are identified in **Attachment A**, which denotes the Youth Program Elements to which stipends can and cannot be applied.

Attachment A:

No.	Program Element Allowable	Allowable
1	Tutoring, study skills training, instruction, and dropout prevention	Yes
2	Alternative secondary school services or dropout recovery services	Yes
3	Paid and unpaid work experience	
	Paid work experience	No
	Unpaid work experience*	Yes
4	Occupational skills training	Yes
5	Education offered concurrently with workforce preparation and training for a specific occupation	Yes
6	Leadership development opportunities	Yes
7	Supportive services	No
8	Adult mentoring	Yes
9	Follow-up services	
	Supportive services in follow-up	No
	Adult mentoring in follow-up	Yes
	Financial literacy education in follow-up	Yes
	Services that provide labor market information in follow-up	Yes

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	Post-secondary preparation and transition activities in follow-up	Yes
10	Comprehensive guidance and counseling	Yes
11	Financial literacy education	Yes
12	Entrepreneurial skills training	Yes
13	Services that provide labor market information	No
14	Post-secondary preparation and transition activities	Yes

* Stipends paid to youth in unpaid WEX count toward the 20% WEX expenditure requirement. Source: Section 5 of TEGL 21-16

Federal Tax Reporting:

WIOA Title I-B youth program participants who receive stipends totaling \$600.00 or more in a calendar year must be provided with an Internal Revenue Service (IRS) Form 1099-MISC by January 31 for the prior calendar year in which stipends (taxable miscellaneous income) were provided. Participants should be informed that they need to track and report stipends as income for the purpose of federal income tax reporting even if they do not receive a 1099-MISC. Stipends used by participants for educational purposes (i.e., tuition, books, fees, and campus-based room and board) are exempt from reporting. Stipends should be processed as accounts payable rather than as payroll. The latter causes stipends to be treated as wages, in which case payroll taxes and deductions apply.

Needs Related Payments

MIS:

WIN 0077, CHANGE 16; WorkSource Service Catalog: Needs-Related Payments (Youth Only): Financial assistance (income support) to eligible youth (ages 18-24) in training to enable them to participate in that training.

Definition & Design

20 CFR 680.930: Needs-related payments provide financial assistance to participants for them to participate in training and are a supportive service.

NRP Eligibility

WIOA Title I Policy 5602, Revision 5: OSY ages 18-24 must: Be unemployed; not qualify for (or have ceased to qualify for) UI; and be enrolled in a program of training services under WIOA Section 129(c)(2) for OSY ages 18-24.

NRP Payments

20 CFR 680.960: Payments may be provided if the participant has been accepted in a training program that will begin within 30 calendar days.

20 CFR 680.970: The payment level must be established by the LWDB. WIOA does not specify a minimum level of payment. The weekly payment level must be adjusted to reflect changes in total family income as determined by LWDB policies.

Reporting/ Management Information System (MIS) Data Entry Requirements

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Participation

WIN 0077, Change 16: Support services triggers and extends participation but is not a durational service.

WorkSource System Policy 1019, Revision 12: Supportive services extend participation prior to follow-up; supportive services provided in follow-up do not extend participation.

WorkSource System Policy 1020, Revision 2: Services must be entered at the point in time they are delivered; If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered *within 14 calendar days* of service delivery and the service date entered must always reflect the date the service was delivered.

WorkSource System Policy 1023 Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. **Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.**

WorkSource System Policy 1020, Revision 2: For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source. If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as “Paid by Other”. In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

PE# 8 Adult Mentoring

MIS:

WIN 0077, CHANGE 16; WorkSource Service Catalog: Mentoring (Youth): A formal relationship between youth and an adult mentor that includes structured activities, guidance, support, and encouragement to develop competence and character of the mentee. May include workplace mentoring where a youth is matched with an employer or employee of a company. WIOA case managers are discouraged from serving as mentors unless adult mentors are sparse in the local area, in which case, WIOA case managers *can* serve in that role. Mentoring must be provided for at least 12 months.

Requirements

20 CFR 681.490 & TEGL 21-16 Change 1: Adult mentoring for youth must:

- Last at least 12 months and may take place both during the program and following exit from the program;

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- 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; and
- While group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the local youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis.
- Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company.

Case Managers as Mentors

TEGL 21-16 Change 1 and WIN 0077, Change 16: While DOL strongly prefers that case managers not serve as mentors, the final rule allows case managers to serve as mentors in areas where adult mentors are sparse.

Reporting/ Management Information System (MIS) Data Entry Requirements

PARTICIPATION

WIN 0077, Change 16: “Mentoring Youth” triggers and extends participation and is a durational service.

Reporting/ Management Information System (MIS) Data Entry Requirements

WorkSource System Policy 1020, Revision 2 Services must be entered at the point in time they are delivered; If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered *within 14 calendar days* of service delivery and the *service date entered must always reflect the date the service was delivered*.

WorkSource System Policy 1023 Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. *Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.*

WorkSource System Policy 1020, Revision 2: For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source. If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as “Paid by Other”. In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

PE# 9 Follow-up Services is located on page 78.

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PE# 10 Comprehensive Guidance and Counseling

MIS:

WIN 0077, CHANGE 16; WorkSource Service Catalog: Youth Guidance and Counseling: Additional support for youth includes activities such as comprehensive guidance and counseling as aids to barrier removal, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth.

Definition

20 CFR 681.510 & TEGL 21-16 Change 1: Comprehensive guidance and counseling provide individualized counseling to participants. This includes drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate. When referring participants to necessary counseling that cannot be provided by the local youth program or its service providers, the local youth program must coordinate with the organization it refers to in order to ensure continuity of service.

TEGL 21-16 Change 1: When resources exist within the local program or its service providers, it is allowable to provide counseling services directly to participants rather than refer youth to partner programs.

Reporting/ Management Information System (MIS) Data Entry Requirements

WorkSource System Policy 1020, Revision 2: Services must be entered at the point in time they are delivered; If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered *within 14 calendar days* of service delivery and the *service date entered must always reflect the date the service was delivered*.

WorkSource System Policy 1023 Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. *Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.*

WorkSource System Policy 1023 Revision 1: For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source. If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as "Paid by Other". In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

TEGL 09-22: In reviewing reporting data, ETA observed that many states may not be accurately reporting the comprehensive guidance and counseling program element. For example, in the most recent data reported,

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five states report 100 percent of participants receive this program element, two additional states report over 90 percent of participants receive this program element, and three more report over 70 percent as receiving comprehensive guidance and counseling. It appears some states report certain program services as comprehensive guidance and counseling that should be categorized in other program elements, or they are reporting general case management as comprehensive guidance and counseling. As stated in TEGL 21-16, case management is the act of connecting youth to appropriate services and is not considered a program element.

Another program element that often is misreported as comprehensive guidance and counseling is the program element entitled “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.” As discussed in TEGL 21-16, career counseling services may include providing information about resume preparation, interview skills, potential opportunities for job shadowing, and the long-term benefits of postsecondary education and training. This type of career counseling, often provided by a case manager, should be reported as the “services that provide labor market information” program element and should not be reported as the comprehensive guidance and counseling program element.

PE# 11 Financial Literacy Education

MIS:

WIN 0077, Change 16; WorkSource Service Catalog: Financial Literacy (Youth Only): Supporting the ability of youth participants to create household budgets; initiate savings plans; understand financial services and products; make informed financial decisions; understand rights and protections related to identity theft and financial data and pursue financially related activities and education that are age-appropriate and timely.

Definition

20 CFR 681.500 & TEGL 21-16 Change 1: The financial literacy education program element may include activities which:

- 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;
- Teach participants about the significance of credit reports and credit scores; what their rights are regarding their credit and financial information; how to determine the accuracy of a credit report and how to correct inaccuracies; and how to improve or maintain good credit;
- Support a participant’s ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions;

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- Educate participants about identity theft, ways to protect themselves from identify theft, and how to resolve cases of identity theft and in other ways understand their rights and protections related to personal identity and financial data;
- Support activities that address the particular financial literacy needs of non-English speakers, including providing the support through the development and distribution of multilingual financial literacy and education materials;
- Support activities that address the particular financial literacy needs of youth with disabilities, including connecting them to benefits planning and work incentives counseling;
- Provide financial education that is age appropriate, timely, and provides opportunities to put lessons into practice, such as by access to safe and affordable financial products that enable money management and savings; and
- Implement other approaches to help participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high quality, age-appropriate, and relevant strategies and channels, including, where possible, timely and customized information, guidance, tools, and instruction.

Reporting/ Management Information System (MIS) Data Entry Requirements Participation

WIN 0077, Change 16: “Financial Literacy” service triggers and extends participation but is not a durational service.

Management Information System (MIS) Data Entry Requirements

WorkSource System Policy 1020, Revision 2: Services must be entered at the point in time they are delivered; If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered *within 14 calendar days* of service delivery and the *service date entered must always reflect the date the service was delivered*.

WorkSource System Policy 1023 Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. *Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.*

WorkSource System Policy 1023 Revision 1: For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source. If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as “Paid by Other”

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In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

PE# 12 Entrepreneurial Skills Training

MIS:

WIN 0077, CHANGE 16; WorkSource Service Catalog: Entrepreneurial Skills Training (Youth Only): Training to provide youth with the basics of starting and operating a small business. Training may include, but not be limited to, taking initiative, identifying business opportunities; developing budgets and forecasting resource needs; understanding options for acquiring capital; and effectively communicating and marketing ideas.

Definition

20 CFR 681.560 & TEGL 21-16 Change 1: Entrepreneurial skills training 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; and Communicate effectively and market oneself and one's ideas.

Approaches to teaching youth entrepreneurial skills include, but are not limited to, the following:

- 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.

Reporting/ Management Information System (MIS) Data Entry Requirements

WorkSource System Policy 1020, Revision 2: Services must be entered at the point in time they are delivered; If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered *within 14 calendar days* of service delivery and the *service date entered must always reflect the date the service was delivered*.

WorkSource System Policy 1023 Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook:

All services must be linked to an Active Program Enrollment.

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WorkSource System Policy 1020, Revision 2 Data Integrity and Performance Policy and Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. *Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.*

WorkSource System Policy 1023 Revision 1: For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source. If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as “Paid by Other”. In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

PE# 13 Services that Provide Labor Market Information

MIS:

WIN 0077, Change 16; WorkSource Service Catalog: Labor Market Information Services (Youth Only): 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.

WorkSource System Policy 1019, Revision 12: It is the State’s expectation that Title I Youth case manager take only *Labor Market Information Services (Youth Only)* to represent either job search or labor market-related activities.

Definitions

TEGL 21-16 CHANGE 1: Under 20 CFR 681.460(a)(13), this element includes services such as *career awareness*, *career counseling* and *career exploration* that provide labor market and employment information about in-demand industry sectors or occupations available in the local area.

- *Career awareness* begins the process of developing knowledge of the variety of careers and occupations available, their skill requirements, working conditions and training prerequisites, and job opportunities across a wide range of industry sectors.
- *Career counseling* or guidance provides advice and support in making decisions about what career paths to take. Career counseling services may include providing information about resume preparation, interview skills, potential opportunities for job shadowing, and the long-term benefits of postsecondary education and training (e.g., increased earning power and career mobility).
- The process in which youth choose an educational path and training or a job which fits their interests, skills and abilities can be described as career exploration.
- Wagner-Peyser regulation at 20 CFR 651.10 defines workforce and labor market information as “the body of knowledge that describes the relationship between labor demand and supply.”

Reporting/ Management Information System (MIS) Data Entry Requirements Participation

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WIN 0077, Change 16: “Services that Provide Labor Market Information” triggers and extends participation but is not a durational service.

Management Information System (MIS) Data Entry Requirements

WorkSource System Policy 1020, Revision 2: Services must be entered at the point in time they are delivered; If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered *within 14 calendar days* of service delivery and the *service date entered must always reflect the date the service was delivered*.

WorkSource System Policy 1023 Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.

WorkSource System Policy 1023 Revision 1: *For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source.* If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as “Paid by Other”. In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

PE# 14 Postsecondary Preparation and Transition Activities

MIS:

WIN 0077, CHANGE 16; WorkSource Service Catalog: Post-Secondary Preparation and Transition Activities (Youth Only): Such activities prepare ISY and OSY for advancement to postsecondary education after attaining a high school diploma or its recognized equivalent. These services include exploring postsecondary education options including technical training schools, community colleges, four-year colleges and universities, and registered apprenticeship. Additional services include, but are not limited to, assisting youth to prepare for SAT/ACT testing; assisting with college admission applications; searching and applying for scholarships and grants; filling out the proper Financial Aid applications and adhering to changing guidelines; and connecting youth to postsecondary education programs.

Definition

TEGL 21-16 Change 1: Postsecondary preparation and transition activities and services prepare ISY and OSY for advancement to postsecondary education after attaining a high school diploma or its recognized equivalent.

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These services include **but are not limited to**:

- exploring postsecondary education options;
- assisting youth to prepare for SAT/ACT testing;
- assisting with college admission applications;
- searching and applying for scholarships and grants;
- filling out the proper Financial Aid applications and adhering to changing guidelines; and
- connecting youth to postsecondary education programs.

Reporting/ Management Information System (MIS) Data Entry Requirements Participation

WIN 0077, CHANGE 16: Postsecondary Preparation and Transition Activities” triggers and extends participation but is not a durational service.

WorkSource System Policy 1020, Revision 2: Effective 2-15-17, the minimal WIT data entry requirements are as follows: Services must be entered at the point in time they are delivered; If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered *within 14 calendar days* of service delivery and the *service date entered must always reflect the date the service was delivered.*

WorkSource System Policy 1023 Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. *Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.*

WorkSource System Policy 1020, Revision 2: For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source. If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as “Paid by Other”. In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

Outcomes

In-Program Measurable Skill Gains (During Program Participation)

See more details under “Youth Performance Indicators”

Definitions

20 CFR 677.155(c)(5):

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- Measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress towards such as credential or employment.
- Documented progress is defined as one of the following:
 - Documented achievement of at least one educational functioning level of a participant who is receiving instruction below the postsecondary education level;
 - Documented attainment of a secondary school diploma or its recognized equivalent;
 - Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is achieving the State unit's academic standards;

WorkSource System Policy 1020, Revision 2 Handbook – Documentation of MSG:

TEGL 10-16 Change 3 directs that progress toward MSG can be documented by, among other methods, “secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the State unit’s academic standards. This corresponds with the “Report Card or Transcript” tab in the Test and Results Touch Point in the state MIS. **To that end, the State has established the academic standard as a grade of “C” or higher as having met the academic standard for report cards.**

Although there is not an indicator within the state MIS that identifies when someone is counted in the MSG measure, the system includes all participants who are enrolled during program participation in a training or education program that leads to a recognized postsecondary credential, including a secondary education program in which individuals participate in a program year. To be counted in the numerator, an individual must obtain one of the positive progress benchmarks indicated by DOL in TEGL 10-16 Change 3, such as meeting a training milestone or other forms of progress towards credential or employment. The Tests and Results Touch Point will allow staff to indicate which type of MSG progress a participant has made.

For documenting achievement of at least one educational functioning level (EFL), TEGL 10-16, Change 3, added at Section 4(b)(E)(1)(d), “educational functioning level gain for participants who pass a **subtest** on a State-recognized high school equivalency examination.” This means countable EFL gains can be documented for any one of the four subject tests as opposed to only the overall composite EFL.

Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on WorkforceGPS October 24, 2017: DOL does not require any specific information be documented on report cards. As long as there is sufficient information to convey the participant is making satisfactory progress, LWDBs can decide what, if anything specific, must be on the report card.

- (iv) Satisfactory or better progress report, towards established milestones, such as completion of OJT or completion of 1 year of an apprenticeship program or similar milestones, from an employer or training provider who is providing training.

Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on WorkforceGPS October 24, 2017: “Progress” is determined at the local level.

- (v) Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams.

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TEGL 10-16, Change 3: The Measurable Skill Gains indicator is the percentage of 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 documented academic, technical, occupational, or other forms of progress, towards such a credential or employment. The measurable skill gains indicator is used to measure interim progress of participants who are enrolled in education or training services for a specified reporting period. It is not an exit-based measure.

Performance Indicators

TEGL 10-16, Change 3: A participant may have achieved more than one type of gain in a reporting period; however, only one gain per participant in a reporting period may be used to calculate success on this measure. States should report all measurable skill gains achieved by participants in a program year, although only one gain is required per participation period per program year to meet performance outcomes.

Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on WorkforceGPS October 24, 2017: This measure only counts the number of measurable skills gains reported. It does not count as a negative towards a program’s performance if a participant does not earn a measurable skill gain. Only one (1) measurable skill gain will be reported even if more than one (1) measurable skill gain is recorded in MIS.

Counted in this Measure

TEGL 10-16, Change 3; WorkSource System Policy 1019, Revision 12: All ISY are included in the measurable skill gains indicator since they are attending secondary or postsecondary school.

Only OSY who are in one of the following are included in the indicator:

- Occupational skills training
- Secondary education at or above the 9th grade level during participation in the Youth program
- Postsecondary education during participation in the Youth program
- Title II-funded adult education at or above the 9th grade level during participation in the Youth program
- YouthBuild program during participation in the Youth program
- Job Corps during participation in the Youth program

WIOA Joint Rule, Departments’ response, page 55842: It should be noted that in instances where participants are enrolled in an education or training program that is not intended to result in a credential, the measurable skill gains indicator can capture progress made by participants.

Excluded from this Measure

TEGL 10-16, Change 3 & WorkSource System Policy 1019 Revision 10:

- Exits the program because of incarceration in correctional institution or has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center during the course of receiving services as a participant.

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- Exits the program due to medical treatment lasting longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program
- Deceased (the only exclusion that can be linked to non-participants)
- Exits the program due to called to active duty for at least 90 days
- The youth is in foster care and exits the program because the participant has moved from the local workforce area as part of such program or system.

Enrollment Requirement

TEGL 10-16, Change 3: Programs should not delay enrollment or services to participants until a new program year even if programs believe there is insufficient time for the participant to make any type of measurable skill gain by the end of that program year.

ISS Requirement

TEGL 10-16, Change 3: The type of skill gain should be based on the youth's individual service strategy.

Reporting/ Management Information System (MIS) Data Entry Requirements:

Recording MSG in the State MIS instructions provided via email from Carri Callaghan on 8-11-23:

If the job seeker is in the denominator, the following must be completed.

A Measurable Skill Gains must be entered in the appropriate TouchPoint (TP), with a test or report date within the relevant reporting period of the PIRL.

The following Measurable Skill Gains are accepted, by DOL, on the PIRL:

- Create a new Tests and Results TouchPoint (TP), if the job seeker has a pre-test Tests and Results (TP).
 - On the Record Type Tab:
 - Select "Tests and Results" from the Record Type drop down.
 - On the Tests and Results Tab:
 - Select the appropriate program from the Associated Program Enrollment drop down.
 - Select the "Post Test" radio button.
 - Select the appropriate category from the Assessment Category drop down.
 - Select a date from the Test Date field.
 - For the post-test to count as an MSG it must take place on or after the pre-test, in the same participation episode. It also must take place during the reporting period.
 - Select an appropriate functional area from the Functional Area drop down.
 - For the post-test to count as an MSG, it must have the same functional area as the pre-test.
 - Select an appropriate level from the Educational Functioning Level drop down.
 - For the post-test to count as an MSG, it must have a higher level than the pre-test.

-OR-

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- For Credential Attainments for Secondary School Diploma/or equivalency to be counted for Measurable Skill Gains it does not need to be entered into the system outside of the normal process, see DOL Credential Attainment Performance Measure (PM) Statewide Data Analysis document for more information.

-OR-

- Create a Transcript/Report Card on the Test and Results TouchPoint (TP)
 - On Record Type Tab:
 - Select “Report Card or Transcript” from the Record Type drop down.
 - On Report or Transcript Tab:
 - Select the appropriate program enrollment from the Associated Program Enrollment drop down.
 - Enter an appropriate date in the Date of Report Card or Transcript field.
 - Select the appropriate school type from Secondary or Postsecondary drop down.
 - If the school type is “Postsecondary School” enter the appropriate response in the How many credits/units did the participant complete? field.
 - Select the appropriate Radio Button on the Does the transcript or report card meet the state unit’s academic standards?

-OR-

- Create a Training Milestone on the Test and Results TouchPoint (TP)
 - On Record Type Tab:
 - Select “Progress Report” from the Record Type drop down.
 - Select the appropriate program enrollment from the Associated Program Enrollment drop down.
 - Select the appropriate progress report type, either “Apprenticeship” or “OJT” from the Progress Report Type drop down.
 - Enter an appropriate date in the Date of Progress Report field.
 - Select the appropriate response for the Is the progress satisfactory? radio button.

-OR-

- Create a Skills Progression on the Test and Results TouchPoint (TP)
 - On Record Type Tab:
 - Select “Progress Report” from the Record Type drop down.
 - On Progress Report Tab:
 - Select the appropriate program enrollment from the Associated Program Enrollment drop down.
 - Select “Skills Progression” from Progress Report Type drop down.
 - Enter an appropriate date in the Date of Progress Report field.
 - Select the appropriate response for the Did the participant successfully pass an exam that is required for a particular occupation, or progress in attaining technical or

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occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams? radio button.

- Select the appropriate response for the “Is the progress satisfactory?” radio button.

Skill gains should be counted using the *date on which they occur*, not the date on which they are recorded, or documentation is received.

WorkSource System Policy 1019, Revision 12: MSG is documenting an individual’s progress while receiving training or education services, so the **14-day calendar day requirement for real-time data** entry per WorkSource System Policy 1020, Revision 2 and WorkSource System Policy 1020, Revision 2 on Real-Time Data Entry **does not apply.**

WorkSource System Policy 1003, Revision 6 & ETA 9172 (PIRL): EFL: Record the most recent date the participant who received instruction below the post-secondary education level achieved at least one EFL. **EFL gain may be documented in one of four ways:**

- By comparing EFL as measured by a participant’s post-test, or
- For State’s that offer secondary school programs that lead to a secondary school diploma or its recognized equivalent an, EFL gain may be measured through the awarding of credits or Carnegie units; or
- States may report an EFL gain for participants who exit the program and enroll in post-secondary education or training during the program year.
- Passage of a subtest on a State-recognized high school equivalency examination

Secondary Transcript/Report Card: Record the most recent date of the participant’s transcript or report card for secondary education for one semester showing that the participant is meeting the State unit’s academic standards.

Post-secondary Transcript/Report Card: Record the most recent date the participant’s transcript or report card for post-secondary education who complete a minimum of 12 hours per semester, or for part time students, a total of at least 12 credit hours over the course of two completed consecutive semesters during the program year, that shows a participant is meeting the State unit’s academic standards.

Training Milestone/Progress Reports: Record the most recent date that the participant had a satisfactory or better progress report towards established milestones from an employer training provider who is providing training (e.g., completion of OJT, completion of one year of a registered apprenticeship program, etc.).

- Progress reports must document substantive skill development that the participant has achieved.
- Progress reports may include training reports on milestones completed as the individual masters the required job skills, or steps to complete an OJT or apprenticeship program.
- Increases in pay resulting from newly acquired skills or increased performance can also be used to document progress.

Industry Exam, Skills Progression: Record the most recent date the participant successfully passed an exam that is required for a particular occupation, or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams.

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WorkSource System Policy 1020, Revision 2 – Differentiating between MSG and Credential Attainment

Completion of a course and passing an exam that is required to receive a license, degree, or occupational certificate would count as MSG, but the awarding of the license, degree, or occupational certificate itself would count as a Credential. The one exception to this guidance is a secondary school diploma or its equivalent, which counts as both a credential and an MSG, per TEGL 10-16, Change 3. While a participant is attending training there should be documentable progress of skills gained, or coursework completed, that would count as Measurable Skill Gains. The attainment of a license, degree or occupational certificate is seen as the end goal of training and those documents are considered credentials (TEGL 10-16, Change 3).

Date Attained and Type of Recognized Credential (In-Program and Exit-Based Performance Indicator)

See more details under *“Youth Performance Indicators”*

Definition

TEGL 10-16, Change 3:

Attainment of 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.

A recognized postsecondary credential is awarded in recognition of an individual’s attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. These technical or industry/occupational skills generally are based on standards developed or endorsed by employers or industry associations.

Types of Acceptable Credentials:

TEGL 10-16, Change 3; WorkSource System Policy 1003, Revision 6: The following are acceptable types of credentials that count toward the credential attainment indicator:

- Secondary school diploma or recognized equivalent
- Associate degree
- Bachelor’s degree
- Occupational licensure
- Occupational certificate, including Registered Apprenticeship and Career and Technical Education educational certificates
- Occupational certification
- Other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment.

Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on WorkforceGPS October 24, 2017: DOL does not define what specifically counts toward a credential. DOL

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intentionally defined credential in a fashion to allow states and LWDBs to make that determination as long as the state and LWDB determinations are based on DOL's definition.

Although Evan did state the following are considered credentials:

- CNA
- ACE Certificate

WorkSource System Policy 1020, Revision 2 Handbook - Recognized Postsecondary Credentials Counted Toward Federal Performance Measures:

Postsecondary credentials reportable to DOL are described in TEGL 10-16, Change 3 and will be recorded in the State MIS, or its successor, and in case files used for validation of federal reports.

The dates on which credentials, certificates or licenses are awarded need to be recorded in the State MIS.

Dates are needed to determine the applicable timeframe for reporting. The following are acceptable types of credentials that count toward the credential attainment indicator:

Secondary School diploma or recognized equivalent

- Associate degree
- Bachelor's degree
- Occupational licensure
- Occupational certificate, including Registered Apprenticeship and Career and Technical Education educational certificates
- Occupational certification
- Other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment.

Note: WIOA Section 3(52) defines a recognized postsecondary credential as a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree. Graduate degrees are not included in the definition of a recognized postsecondary credential. Therefore, graduate degrees do not count towards credential attainment.

A variety of different public and private entities issue recognized postsecondary credentials. Below is a list of the types of organizations and institutions that award recognized postsecondary credentials (not all credentials by these entities meet the definition of recognized postsecondary credential).

A state educational agency or a state agency responsible for administering vocational and technical education within a state;

- An institution of higher education described in Section 102 of the Higher Education Act of 1965 (20 USC sec. 1002) that is qualified to participate in the student financial assistance programs authorized by title IV of that Act. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in Federal Student Financial Aid (FAFSA) programs;
- An institution of higher education that is formally controlled, or has been formally sanctioned or chartered, by the governing body of an Indian tribe or tribes.

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- A professional, industry, or employer organization (e.g., National Institute for Automotive Service Excellence certification, National Institute for Metalworking Skills, Inc., Machining Level I credential) or product manufacturer or developer (e.g., recognized Microsoft Information Technology certificates, such as Microsoft Certified IT Professional (MCITP), Certified Novell Engineer, a Sun Certified Java Programmer, etc.) using a valid and reliable assessment of an individual's knowledge, skills and abilities;
- ETA's Office of Apprenticeship or a recognized State Apprenticeship Agency;
- A public regulatory agency, which awards a credential upon an individual's fulfillment of educational, work experience, or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g., Federal Aviation Administration aviation mechanic license, or a State-licensed asbestos inspector);
- A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons; or
- Job Corps, which issues certificates for completing career training programs that are based on industry skills standards and certification requirements.

Certificates awarded by local workforce development boards (LWDBs) and work readiness certificates are not included because neither type of certificate is recognized industry-wide, nor documents the measurable technical or industry/occupational skills necessary to gain employment or advancement within an occupation. Likewise, such certificates must recognize technical or industry/occupational skills for the specific industry/occupation rather than general skills related to safety, hygiene, etc., even if such general skills certificates are broadly required to qualify for entry-level employment or advancement in employment.

Note: Occupational skills licenses are granted by state licensing or regulatory bodies and are required as a condition of practicing a specific occupation. These must be industry-recognized, and include, but are not limited to:

- Commercial driver's licenses
- Nursing licenses
- Cosmetology licenses
- Massage licenses

For a list of occupations licensed by the Washington Department of Licensing, refer to <https://www.dol.wa.gov/professional-licenses>.

For a list of occupations licensed by the Washington Department of Health, refer to <https://doh.wa.gov/licenses-permits-and-certificates/professions-new-renew-or-update>

Other sources of acceptable occupational skills certificates are:

- Clearinghouses of industry skill certificates being developed for use in skill assessments in vocational education, such as Career and Technical Education Consortium of States (CTECS).

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- State or regional employer skill panels that have developed skill standards, methods of testing to determine that job seekers meet those standards, and issue certificates to those meeting standards.
- Occupational Safety and Health Administration (OSHA) or Washington Industrial Safety and Health Act (WISHA) testing of operator skills for the operation of equipment.
- Certificates of training completion required by OSHA or WISHA to flaggers, forklift operators, or other workers as a condition of performing work in an occupation.

Certificates/Credentials Not Included

TEGL 10-16, Change 3:

Certificates awarded by workforce development boards (WDBs) and work readiness certificates are not included in this definition because neither type of certificate is recognized industry-wide, nor documents the measurable technical or industry/occupational skills necessary to gain employment or advancement within an occupation. Likewise, such certificates must recognize technical or industry/occupational skills for the specific industry/occupation rather than general skills related to safety, hygiene, etc., even if such general skills certificates are broadly required to qualify for entry-level employment or advancement in employment. Although these types of certificates may not count towards the credential attainment indicator, these types of certifications may lead to positive outcomes in other performance indicators, so it may be valuable to provide services that lead to such certificates, depending on the requirements and eligibility for individual programs. Services that lead to these types of certificates often do not meet the definition of training or education; therefore, in such cases those participants are also excluded from the denominator of this measure.

WorkSource System Policy 1020, Revision 2 Handbook: To be counted, certificates and credentials should be necessary to complete training and sufficient to perform a job, not just necessary. For example, some jobs require that the holder have a non-commercial driver's license or a first-aid card. However, such supplementary credentials do not normally indicate that one is qualified to perform the job. Credentials that do not count toward federal Primary Indicators of Performance include but are not limited to:

- First Aid Cards
- Food Handler's Cards
- Completion of WEXs
- Proof of employment held subsequent to training
- Certificates of completion for short-term prevocational services
- Completion of programs provided by institutions and training organizations not licensed by WTECB or an equivalent state regulatory agency or trade association in cases where the institution or training provider is not eligible to provide recognized postsecondary credentials as described above.

Though these types of certificates do not count toward credential attainment, they may lead to positive outcomes in other performance indicators, so it may be valuable to provide services that lead to such certificates, depending on their contribution to the goals and outcomes articulated by participants or outlined in Individual Employment Plans (IEPs).

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Guidance from ESD Policy to ESD Monitoring on 2-1-18:

- WEX
- Locally Authorized Credential Earned

Guidance from ESD Policy to ESD Monitoring on 2-16-18:

- Microsoft Digital Literacy (*it does not meet the definition of industry recognized credential*)

Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on WorkforceGPS October 24, 2017: Even though DOL will not define what counts as a credential, Evan did state the following common trainings do not count as a credential or occupational skills training:

- CPR
- OSHA 10
- Work readiness
- Completion of assistive technology training program (screen reading software)
- Certificates related to hygiene and safety that are broadly required for entry level employment

Documentation Requirement

Federal Register Vol. 80, No. 140; WorkSource System Policy 1003, Revision 6: Diplomas, degree, or certificate must be attained either during participation or within one year of exit.

Reporting/ MIS Recording

WorkSource System Policy 1020, Revision 2 - Post-secondary Credentials Data Collection: Staff must follow the process outlined in the Procedures to Support Postsecondary Credential Data Collection located on the Technology tab of the WPC site to support PIRL element updates for postsecondary education training. The process pertains to the following PIRL elements:

- Element 1332 - Participated in Postsecondary Education During Program Participation
- Element 1406 - Date Enrolled in Post Exit Education or Training Program Leading to a Recognized Postsecondary Credential

TEGL 10-16, Change 3: Participants Who Count in the Measure

- Participants who exit and are in a postsecondary education or training program, or who are in a secondary education program (at or above the 9th grade level) without a secondary school diploma or equivalent (excluding those in OJT and customized training) who are employed or enrolled in an education or training program leading to a recognized postsecondary credential within 1 year following exit.
- Such employment or enrollment in an education or training program only needs to be for some period during the 4 quarters after exit, not for the entire 1-year period after exit. (WIOA Joint Rule, Departments’ responses: Page 55841)

Special Rule Relating to Secondary School Diplomas and Recognized Equivalents:

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- All in-school Youth (ISY) are included in the credential attainment indicator since they are attending secondary or postsecondary school at program entry.
- Only out-of-school Youth (OSY) who participate in one of the following are included in the credential attainment indicator:
 - the program element occupational skills training
 - the program element education offered concurrently with workforce preparation
 - secondary education at or above the 9th grade level during participation in the
 - title I Youth program
 - postsecondary education during participation in the title I Youth program
 - Title II-funded adult education at or above the 9th grade level during
 - participation in the title I Youth program
 - YouthBuild during participation in the title I Youth program
 - Job Corps during participation in the title I Youth program

Excluded from the Measure:

Participants who exited a program and one of these conditions apply:

- Who were enrolled in OJT only
- Who were enrolled in Customized Training only
- Incarcerated
- Medical treatment lasting longer than 90 days
- Deceased
- Called to active duty for at least 90 days
- Foster care and moved away from the local workforce area

Reporting Outcomes:

- Reporting on this indicator requires a full year of follow-up to determine if a credential was attained within one year after exit and to determine employment or entry into postsecondary education or training for those who attain a secondary school diploma or recognized equivalent.
- States report periods of participation and outcomes, if achieved, for both periods when there is more than one period of participation in the same program year.

WorkSource System Policy 1003, Revision 6:

Secondary Education: Record if the participant was enrolled in a Secondary Education Program at or above the 9th Grade level. A Secondary Education Program includes both secondary school and enrollment in a program of study with instruction designed to lead to a high school equivalent credential. Examples may include adult high school credit programs and programs designed to prepare participants to pass recognized high school equivalency exams such as GED. Programs of study designed to teach English proficiency skills or literacy skills below the 9th grade equivalent are not considered Secondary Education Programs.

Post-secondary Education: Record if the participant was in a post-secondary program that leads to a credential or degree from an accredited post-secondary education institution *at program enrollment or at any point during program participation.*

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Date Enrolled: Record the date the participant was enrolled during program participation in an education or training program that leads to a recognized post-secondary credential, including a secondary education program, or training program that leads to employment as defined by the core program in which the participant participates *whether at program enrollment or at any point while participating in the program*. If the participant was enrolled in post-secondary education at program entry, the date in this field should be the date of Program Entry. This includes but is not limited to participation in Job Corps or YouthBuild or Adult Education or secondary education programs. **Note:** This data element applies to the **Measurable Skill Gains Indicator** and specifically will be utilized to calculate the denominator.

DOL ETA PIRL 9172: Record the date on which the participant attained a recognized credential. Use the appropriate code to record the type of recognized diploma, degree, or a credential consisting of an industry-recognized certificate or certification, a certificate of completion of a Registered Apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree attained by the participant who received education or training services.

Note: Diplomas, degrees, licenses or certificates must be attained either during participation or within one year of exit. This data element applies to both the Credential Rate indicator and the Measurable Skills Gain indicator for all programs.

Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on WorkforceGPS October 24, 2017: Only one (1) credential will be reported even if more than one credential is recorded in MIS. *All credentials earned must be recorded in MIS.*

“Training Paid by Other”, Guidance Received via email from ESD System Performance to ESD Monitoring on 3-6-18:

- If a WIOA participant is in non-WIOA funded training and recorded in MIS as “Training Paid by Other”, Measurable Skill Gains and Credential Earned performance indicators are not captured.
- In order for these two performance indicators to be captured, a WIOA funded training service must be recorded in MIS.

If the participant is *co-enrolled* in more than one WIOA funded program, and one of the WIOA program funds training, there is no need for the other program to record “Training Paid by Other”; the participant is entered into the Measurable Skills Gains and Credential performance measures for all programs that were active during the participation episode.

Program Exit

Date and Reason for Program Exit

System Exit:

WorkSource System Policy 1020, Revision 2 Handbook:

- “Exit” refers to a participant who has not received a qualifying service funded by any qualifying program in the WorkSource system for 90 consecutive calendar days and is not scheduled to receive future participation-level services. This definition supports the integrated service philosophy and acknowledges that a system exit is a common exit from all qualifying WorkSource system programs.

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- Note: “Program completion” should not be confused with system exit since completion of one program does not necessarily mean the participant has reached a true exit.
- “Exit Date” is an auto-exit that is a system-derived date determined after participants have not received any participation-level service for 90 consecutive calendar days and are not scheduled to receive future services.
- In accordance with the requirements of TEGL 14-18, the exit date is applied retroactively, after a 90-consecutive day period without participation-level services, back to the last day on which individuals received participation-level services provided by any program included in this policy.
- Individuals who are participating in more than one program will have a single common exit date based on the last completed participation-level service. This ensures that the exit date is the same as the last date of service for all programs in the participation period.

20 CFR 677.150(c)(1):

- Exit is the last day of service.
- The last day of service cannot be determined until at least 90 days have elapsed since the participant last received services; services do not include self-service, information-only services, activities, or follow-up services.
- This also requires that there are no plans to provide the participant with future services.

Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on WorkforceGPS October 24, 2017: The Common Measures definition of exit is that of no services provided or planned. If service is planned (and recorded as planned in the MIS) the system will not exit after 90 days because a planned service is recorded in the system.

ETA 9172 (PIRL):

- The last date the participant received services that are not self-service, information-only, or follow-up services.
- And only if there are no future services that are not self-service, information-only or follow-up services, planned from the program.

Exclusions from Performance Measures / Other Reasons for Exit

WorkSource System Policy 1020, Revision 2 Handbook:

Exclusions from performance measures may only be used for participants who present one of the following reasons for exclusion from all performance measures:

- Institutionalized or Incarcerated;
- Health/Medical expected to last longer than 90 days;
- Deceased (the only exclusion that can be linked to non-participants)
- Reserve Forces Called to Active Duty for at least 90 days;

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- Foster Care (Youth only);

The “Deceased” category is the only category that can be counted through the fourth quarter after exit.

WorkSource System Policy 1003, Revision 6:

- Incarcerated in a correctional institution or has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center during the course of receiving services as a participant.
- Medical treatment expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
- Deceased
- Member of National Guard or other reserve military unit of the armed forces and is called to active duty for at least 90 days.

Program Completion:

WorkSource System Policy 1020, Revision 2 Handbook: *The date of program completion is the date of the final program-funded participation-level service.* This date is entered into the State MIS by staff. In this sense, it is unlike the exit date, which is common across all programs rather than specific to a particular program. *The program completion date may or may not be the same as the exit date. The program completion date will be equal to or less than the exit date.*

Note: Individuals who have completed program participation enter a follow-up period to support their continued success (see Section 2.3.5 for youth). However, if at any time they return in the 90-day period, they must be provided participation-level services as needed.

Note: “Program completion” should not be confused with system exit since completion of one program does not necessarily mean the participant has reached a true exit.

Reporting/ Management Information System (MIS) Data Entry Requirements

WorkSource System Policy 1003, Revision 6: Record the last date the participant received services that are not self-service, information only, or follow-up services. Record the last date of receipt of services only if there are no future services that are not self-service, information-only, or follow-up services planned from the program. For Titles I, II and III, record the last date of funded service(s).

WorkSource System Policy 1020, Revision 2 Handbook: (In MIS), the fields “Completion Outcome” and “Program Completion Date” should reflect when and why program services have ended. However, on 9-25-18, ESD Policy clarified to the ESD Monitoring Unit that while WorkSource System Policy 1020, Revision 2 Handbook encourages the recording of the “Completion Outcome” and “Program Completion Date” in MIS, it is not a requirement for DOL reporting purposes.

School Status at Program Completion

MIS Documentation Requirements

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WorkSource System Policy 1019, Revision 12: Staff must enter data on youth school status at exit into the case management system in the following sequential order of precedence:

- School status at exit if known (the most accurate outcome);
- Last known documented school status, after participation has begun, if school status at exit is unknown;
- School status at start of participation, if school status at exit is unknown and there is otherwise no documentation as to school status other than that at start of participation.
- By following the aforementioned order of precedence, staff will be recording the last known school status of WIOA Title I youth participants. This will ensure that the case management system has the required data, so no records are rejected or excluded from our federal performance reports for lack of this data element.

School Status

- **ISY:** In-school, HS or less
- **OSY:** Not attending school or HS Dropout
- **ISY:** In-school, Alternative School
- **OSY:** Not attending school; H.S. Graduate
- **ISY:** In-School, Post-HS

IN-SCHOOL YOUTH:

WorkSource System Policy 1019, Revision 12: Washington's Open Doors program recognizes a range of models or approaches with varying degrees of school or school district engagement. DOL acknowledges that Washington's ISY and OSY determination is situational and depends on the degree to which schools and school districts are service providers and funders in Drop-out re-engagement programs. *If schools or school districts are substantially directive, invested, and accountable (e.g., WIOA program only provides supportive services to participants), those youth should be designated ISY.* This also applies to dropout re-engagement programs not connected to Open Doors.

TEGL 21-16 Change 1: If a youth is enrolled in the WIOA youth program during the summer and is in between school years, the youth is considered an **ISY** if they are enrolled to continue school in the fall. If a youth is enrolled in the WIOA youth program between high school graduation and postsecondary education, the youth is considered an **ISY** if they are registered for postsecondary education, even if they have not yet begun postsecondary classes at the time of WIOA youth program enrollment. If the youth participant is enrolled in *any credit-bearing postsecondary education classes, including credit-bearing community college classes and credit-bearing continuing education classes*, then they are considered attending postsecondary education, and, therefore, in **ISY**.

WorkSource System Policy 1019, Revision 12: Homeschooled youth who meet the WA State requirements at [RCW 28A.200](#) and [28A.225.010\(4\)](#) are considered **ISY**.

WorkSource System Policy 1019, Revision 12: Individuals whose home-schooling activity meets the requirements of at [RCW 28A.200](#) and [28A.225.010\(4\)](#) can seek eligibility as **ISY**; if not, they need to meet **OSY** eligibility criteria.

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OUT-OF-SCHOOL:

WorkSource System Policy 1019, Revision 12: Washington's Open Doors program recognizes a range of models or approaches with varying degrees of school or school district engagement. DOL acknowledges that Washington's ISY and OSY determination is situational and depends on the degree to which schools and school districts are service providers and funders in dropout re-engagement programs. **If schools or school districts, despite having enrolled the youth into school, largely cede service provision to other entities (e.g., WIOA Title I youth providers, community-based organizations, non-profits), have minimal financial investment, and require little or no district-based accountability of participants, youth in those programs can be designated OSY.**

WorkSource System Policy 1019, Revision 12, *Local areas must thoroughly document the case for OSY designation when youth participants in dropout re-engagement programs are enrolled in school.*

TEGL 21-16 Change 1: If a youth graduates high school and registers for postsecondary education, but does not ultimately follow through with attending postsecondary education, then such a youth would be considered an **OSY** *if the eligibility determination is made after the point that the youth decided not to attend postsecondary education.* If the youth participant is only enrolled in **non-credit-bearing postsecondary** classes, they would not be considered attending postsecondary school and, therefore, an **OSY**.

WorkSource System Policy 1019, Revision 12: Homeschooled youth who do not meet the WA State requirements at [RCW 28A.200](#) and [28A.225.010\(4\)](#) are not considered **ISY** and need to meet the **OSY** eligibility criteria.

WorkSource System Policy 1019, Revision 12 in reference to "Open Doors" and other re-engagement programs: DOL acknowledges that Washington's ISY and OSY determination is situational and largely dependent on the degree to which schools and school districts as service providers and funders in dropout re-engagement programs. If schools or school districts, despite having enrolled the youth into school, largely cede service provision to other entities (e.g., WIOA youth providers, CBOs, other non-profits), have minimal financial investment, and require little district-based accountability of participants, youth in these programs can be **designated OSY**. Conversely, if schools or school districts are substantially directive, invested, and accountable (e.g., WIOA program only provides supportive services to participants), those youth should be **designated ISY**. This test also applies to dropout re-engagement programs not connected to Open Doors.

Not Considered "SCHOOLS"

20 CFR 681.230: For the purposes of WIOA, the Department **does not consider the following to be schools:**

- Providers of adult education under Title II of WIOA,
- Youth Build programs,
- Job Corps program,
- High school equivalency programs, or
- Dropout re-engagement programs (Open Doors/1418).

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Date Enrolled in Post-Exit Education or Training Program Leading to a Recognized Post-Secondary Credential

See more details under “Youth Performance Indicators”

Applies To:

WIOA Sec. 116(b)(2)(A)(iii): This is only for participants who exited secondary education and obtained a high school credential or its recognized equivalent.

WorkSource System Policy 1003, Revision 6 & ETA 9172 (PIRL): This element only applies to participants who exited secondary education and obtained a secondary school diploma or its equivalency per sec 116(b)(2)(A)(iii). This data element applies to the Credential Rate numerator. This element is not to be confused with “Date Enrolled During Program Participation in an Education or Training Program Leading to a Recognized Post-secondary Credential or Employment” which encompasses all education and training program enrollment and captures those enrolled during program participation, not post-exit.

Documentation Requirement

Federal Register Vol. 80, No. 140- Information Collection for WIOA: Documentation supporting the **date the participant is enrolled** in an education or training program that leads to a recognized postsecondary credential **after program exit** (*completion*).

Reporting/ Management Information System (MIS) Data Entry Requirements

WorkSource System Policy 1003, Revision 6: Record the date the participant is enrolled in an education or training program that leads to a recognized post-secondary credential after program exit.

PE# 9 Follow-Up Services

MIS:

WIN 0077, CHANGE 16; WorkSource Service Catalog:

- Financial Literacy in Follow-up, effective budgeting and spending, etc. (Youth Only)
- Labor Market Information Services in Follow-up (Youth Only)
- Mentoring in Follow-up (Youth Only)
- Other Follow-up Assistance with Work-related Problems (Youth Only)
- Post-secondary Preparation and Transition Activities in Follow-up (Youth Only)
- Support Services in Follow-up (Youth Only)

When to provide follow-up Services

20 CFR 681.580(a): Follow-up services are critical services provided following a youth’s exit from the program to help ensure the youth is successful in employment and/or post-secondary education and training.

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TEGL 10-16, Change 3 and 21-16 Change 1: Because the date of exit is retroactive to the last date of service, *follow-up services may begin immediately following the last date of service if it is expected that the participant will not receive any future services other than follow-up services.*

Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on WorkforceGPS October 24, 2017:

- Follow-up starts 90 days after exit. Exit is retro to the last date of service. Therefore, you will not know the official last date of service/exit date until 90 days pass.
- If you absolutely know that a certain date is the actual exit date, DOL strongly encourages the provision of follow-up services on that date. Otherwise, wait 90 days to confirm actual last date of service/exit date.

WorkSource System Policy 1020, Revision 2 Handbook:

Note: Follow-up services are delivered when the participant still needs services to ensure continued success. However, a new program enrollment and participation period will preclude the delivery of follow-up services from a prior enrollment. Follow-up services delivered within consecutive 90 days of the last participation-level service can be used to establish that participants do not need to be reengaged with qualifying services (as listed in the Services Catalog) prior to exit.

Allowable Services

20 CFR 681.580(b): Follow-up services for youth also 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 sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
- Activities that help youth prepare for and transition to postsecondary education and training.

Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on WorkforceGPS October 24, 2017: States and LWDBs can restrict certain types of supportive services during follow-up.

Requirements

20 CFR 681.580(c) & TEGL 21-16 Change 1: All youth participants must be offered an opportunity to receive follow-up services that align with their individual service strategies. Follow-up services must be provided to all participants for a minimum of 12 months unless the participant declines to receive follow-up services or the participant cannot be located or contacted. Follow-up services may be provided beyond 12 months at the State or Local WDB’s discretion. The types of services provided, and the duration of services must be determined based on the needs of the individual and therefore, the type and intensity of follow-up services

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

TEGL 21-16 Change 1: At the time of enrollment, youth must be informed that follow-up services will be provided for 12 months following exit. If at any point in time during the program or during the 12 months following exit the youth requests to opt out of follow-up services, they may do so. In this case, the request to opt out or discontinue follow-up services made by the youth must be documented in the case file.

Reporting/ Management Information System (MIS) Data Entry Requirements

TEGL 10-16, Change 3 and 21-16 Change 1: Provision of follow-up services does not extend the date of exit. The 12-month follow-up requirement is completed upon one year from the date of exit.

TEGL 21-16 Change 1: Follow-up services should be documented in the case file that they were provided as follow-up services post exit.

WorkSource System Policy 1019, Revision 12: None of the five follow-up activities listed in 20 CFR 681.580(b) extend participation when delivered as part of post-exit follow-up services; Whereas all of the five activities listed in 20 CFR 681.580(b) do trigger and extend participation when delivered as program elements during participation.

WIN 0077, Change 16: Per TEGL 21-16 Change 1, case notes should be used to document services were provided as follow-up services post-exit.

Management Information System (MIS) Data Entry Requirements

WorkSource System Policy 1020, Revision 2: Effective 2-15-17, the minimal WIT data entry requirements are as follows: Services must be entered at the point in time they are delivered; If services cannot be entered at the time they are delivered, Basic Services and ITSS services must be entered *within 14 calendar days* of service delivery and the *service date entered must always reflect the date the service was delivered.*

WorkSource System Policy 1023 Revision 1 Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: All services must be linked to an Active Program Enrollment.

WorkSource System Policy 1020, Revision 2 Handbook: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. **Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.**

WorkSource System Policy 1020, Revision 2: For WIOA Youth programs only, DOL has said [service providers] should report a Youth program element as if it were funded by the WIOA program, regardless of the funding source. If a WIOA Youth participant receives program elements from another service provider, the WIOA Youth provider should record these in MIS in the same way as they would if the WIOA Youth program provided the component. As such, there is no federal reporting requirement to enter the service as "Paid by

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Other”. In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes.

Data Validation, Data Integrity

WorkSource System Policy 1003, Revision 6 - As recipients of WIOA Title I-B, Title III and TAA funds, ESD and Local Workforce Development Boards (LWDBs) are required to collect and report accurate information for these programs. DOL mandates annual DEV to maintain and demonstrate system integrity, assess the accuracy of submitted participant data, and identify and correct problems associated with data entry processes.

Definitions – WorkSource System Policy 1003, Revision 6

- **Data Validation** – A series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data.
- **Data Element Validation (DEV)** – The federally mandated process by which the state annually assesses the accuracy of prescribed data elements in randomly sampled participant files against source documents in program files for compliance with federal definitions (refer to TEGL 07-18).

Types of Source Documentation

WorkSource System Policy 1003, Revision 6 – Attachment B

For most data elements, the validation guidelines provide multiple forms of acceptable source documentation. If the grantee collects multiple sources for the same data element and the sources conflict, the most objective source should be used to determine if the data element is valid and accurate.

These source documentation types include:

1. **Case Notes:** Case notes refer to either paper or electronic statements by the case manager that identify, at a minimum, the following: (a) a participant's status for a specific data element, (b) the date on which the information was obtained, and (c) the case manager who obtained the information.
2. **Cross-Match:** A cross-match requires grantees to identify detailed evidence that confirms the data element in a secondary database. Grantees must also confirm supporting information such as dates of participation and services rendered. Grantees must have data sharing agreements in place as appropriate.
3. **Electronic Records** which may include:
 - **Participant Source Documents:** Participant source documents maintained in the grantee's management information system (MIS) or other official record keeping system.
 - **Grantee participant service record:** Grantee participant information generated and maintained by the grantee regarding the specific services received by a participant. The information may be generated and maintained through the grantee's MIS or other official record keeping system.
4. **Self-Attestation:** Self-attestation means a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. DOL broadly interprets what is considered an electronic/digital signature. Electronic signatures or a submission from the participant such as an email, text, or unique online survey response is considered an electronic signature or verification; it must be

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participant generated and traceable to the participant. Grantees must retain documentation of the self-attestation.

5. **File Documentation with Notes from Program Staff:** Supporting material that provides official information or evidence or that serves as a record in support of the data element, along with corresponding case notes from staff. Examples of file documentation include both standard state MIS forms such as ISS or assessment as well as information obtained from outside officials (i.e. emails, records, letters).

Note: Attachment B of WorkSource System Policy 1003, Revision 6 details the allowable source documentation for data element validation in Washington.

Self-Attestation

Definition:

WorkSource System Policy 1003, Revision 6 Self-attestation means a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. DOL broadly interprets what is considered an electronic/digital signature. Electronic signatures or a submission from the participant such as an email, text, or unique online survey response is considered an electronic signature or verification; it must be participant generated and traceable to the participant. Grantees must retain documentation of the self-attestation.

Note: Self-attestation can be in the form of a signed and dated WIOA eligibility application that is either in paper format or one of two forms of electronic documentation (a scanned and uploaded copy of the paper document or an application in the State's case management system with the participant's date-stamped electronic signature).

Documentation

WorkSource System Policy 1003, Revision 6: To ensure properly documented customer self-attestation, ESD strongly encourages LWDBs to use the self-attestation forms provided, or local versions that are substantially similar. DOL further recommends that staff document the reason for using self-attestation in case notes.

Improperly documented self-attestation or self-attestation on eligibility elements not permitted under federal law or guidance or this policy may result in disallowed costs. Properly documented self-attestation serves as documentary evidence of eligibility determination and does not, by itself, warrant disallowed cost findings. At the same time, properly documented self-attestation does not, by itself, preclude disallowed cost findings if it is determined during monitoring, reviews, or audits that the attestation was false.

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Management Information System (MIS)

Accurate Data Reporting

20 CFR WIOA Joint Rule Departments' response, page 55793: A critical part of the implementation of WIOA is the collection and reporting of accurate, timely information about individuals who receive services through the programs authorized under the law. **Such information is critical to inform public policy and support analysis of effective strategies.**

20 CFR 677.240: States must ensure that they submit complete annual performance reports that contain information that is valid and reliable, as required by WIOA sec. 116(d)(5). If a State fails to meet these standards, corrective actions may include the State providing training for its sub-recipients.

WorkSource System Policy 1020, Revision 2: The minimal WIT data entry requirements are as follows:

- Services must be entered at the point in time they are delivered.
- If services cannot be entered at the time they are delivered, services must be entered within 14 calendar days of service delivery and the service date entered must always reflect the date the service was delivered.
- These data limitations do NOT impact any other Touchpoints including follow-up or placement information in Touchpoints.
- When a service is provided, the appropriate qualifying service must be identified, even if case notes are entered.
- Qualifying services are identified in the WorkSource Service Catalog.
- Services should only be entered when delivered to a participant and only actual services should be entered.
- Case notes should support, not contradict service entries.
- Case notes should not be entered to represent service delivery without also entering a qualifying service from the WorkSource Service Catalog.
- Services should not be recorded if only a voice message was left, or an email delivered as they only represent the intent to provide service as opposed to the actual provision of services.

Reporting/Management Information System (MIS) Data Entry Requirements

WorkSource System Policy 1020, Revision 2: Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system. *Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.*

TEGL 10-16, Change 3, Attachment 7, Table B: All youth program elements are considered "Career Services" with the exception of occupational skills training which is categorized as "training".
Note that the categorization of career and training services for youth differs from the Adult and DW programs.

TEGL 21-16 Change 1: 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. All 14 WIOA

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youth program elements are contained in the PIRL and local **youth programs should ensure that services received are reported in the applicable program element in the PIRL.** Case management is the act of connecting youth to appropriate services and is not a program element.

WorkSource System Policy 1023 Revision 1– Co-enrolled Integrated Service Delivery Policy and Operations Manual Handbook: The job seeker is counted in the service pool when a qualifying service is recorded and linked to an Active Program Enrollment. All services must be linked to an Active Program Enrollment.

20 CFR 677.160: State **performance reports must provide**, at a minimum, information on the **actual performance levels achieved** with respect to the total number of participants served and the total **number of participants who exited** each of the core programs **including disaggregated counts of those who participated in and exited a core program, by:**

- Individuals with barriers to employment as defined in WIOA sec. 3(24) and
- Co-enrollment in any of the programs in WIOA sec. 116(b)(3)(A)(ii).
- Information on the performance levels achieved for the primary indicators of performance for all of the core programs including disaggregated levels for individuals with barriers to employment, age, sex; and race and ethnicity.
- The number of participants who received career serves and the total number of participants who exited from career services and training services;
- Information on the performance levels achieved for the primary indicators of performance for career and training services;
- Percentage of participants in a program who attained unsubsidized employment related to the training received;
- Amount of funds spent on career services and training services; and
- Average cost per participants for those who received career and training services, respectively

20 CFR 677.170(c)(2): State levels of performance for primary indicators consist of, among other things:

- Indicators of poor work history;
- Lack of work experience;
- Lack of educational or occupational skills attainment;
- Dislocation from high-wage and high-benefit employment;
- Low levels of literacy;
- Low levels of English proficiency;
- Disability status;
- Homelessness;
- Ex-offender status; and
- Welfare dependency

20 CFR 677.235: On a quarterly basis, each State must submit to the Secretary of Labor individual records that include **demographic information**, information on **services received**, and information on resulting **outcomes for each reportable individual**.

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Case Notes

DOL Definition

WorkSource System Policy 1003, Revision 6: Paper or electronic statements by the case manager that identifies, at a minimum, the following:

- A participant's status for a specific data element,
- The date on which the information was obtained and
- The case manager who obtained the information.

Reporting

WorkSource System Policy 1020, Revision 2 Handbook:

WIOA provides an opportunity for a greater emphasis on customer-focused and effective case management. Integral to this approach is the utilization of multiple techniques to address and provide solutions for a variety of barriers and assessed needs of participants.

Recording case notes is critical because it weaves each service element into a comprehensive service plan. Individualized case notes provide a complete, accurate, and concise explanation of frequency and type of contact with participants, including the types of services provided and the outcomes associated with those services.

Case notes are a tool to help service providers organize and analyze the information gathered on participants and to plan case management strategies. It is imperative that LWDBs, their Title I-B sub-contractors, one-stop system partners, and federal and state monitors and auditors be able to recognize and discern each service and expenditure provided to, and made on behalf of, a one-stop system customer.

Additional Considerations

- Information contained in case notes belongs to participants.
- Case notes are legal documents that may be subpoenaed by the courts or disclosed through public records requests.
- Case notes are also used to represent the local WIOA Title I-B and WP activities and their compliance with federal, state, and local policies.
- Case files and case notes are subject to monitoring and data validation reviews.

Confidential Information

WorkSource System Policy 1031

Medical and disability-related documents must be secured and maintained in a separate and confidential customer file. Medical and disability files should be stored as a medical record, and must be separate from all other confidential information (e.g. court documents). Each customer's medical file should be separate (ie; medical information for multiple customers should not be kept in the same file). Medical and disability-related information contained in case notes, assessment forms, or other documentation in the Management Information System (MIS) must be secured in a separate and confidential medical file. This is accomplished by

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copying the specific sheet of the case note file, assessment form or language in the MIS that contains medical or disability related information, placing it in a separate medical and disability file, then redacting the medical and disability-related information in the case notes, assessment form or language in the MIS and inserting 'See separate confidential file'.

Case notes should not be entered to represent service delivery without also entering a participation-level service from the WorkSource Services Catalog. In other words, case notes do not represent documentation of services and are not substitutes for proper entry of service Touchpoints in the state MIS.

ESD Monitoring Team Recommendations

Case notes should include detailed information about the participant's eligibility, the participant's service needs, services provided to the participant, outcomes of those services and general case management provided. Case notes should provide the whole story of the participant; do not just focus on one activity (e.g. GED, WEX).

Late Service Entry - WorkSource System Policy 1020, Revision 2 (Sept 30, 2020)

For any Activity Start Date of Basic and ITSS services errors identified after the 14-day calendar restriction, *staff must correct the errors and request Department Head review and approve the correction. Department Head approval must be documented with a case note. The case note must identify the service name, the reason for the correction, and the Department Head's review and approval of the correction.*

Miscellaneous Observations

This element covers all other observations not accounted for on this tool. Examples of "miscellaneous observations" may include, but are not limited to:

- Loose, unattached documents located in a hard file
- Medical references in the file
- Names of other program participants located in the file
- Other "miscellaneous observations"

Confidential information

WorkSource System Policy 1031

LWDBs must ensure that medical and disability-related information is collected and used by WorkSource partners and staff as outlined by federal law and this information notice. The following instructions serve as guidance for LWDBs to use in order to meet the requirements related to the management of medical and disability-related information:

1. Medical and disability-related documents must be secured and maintained in a unique client file. Medical and disability files should be stored as a medical record, and must be separate from all other confidential information (e.g. court documents). Each customer's medical file should be separate (i/e/ medical information for multiple customers should not be kept in the same file).
2. Medical and disability-related information contained in case notes, assessment forms, or other documentation in the Management Information System (MIS) must be secured in the client file. This is

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accomplished by copying the specific sheet of the case note file, assessment form or language in the MIS that contains medical or disability related information, placing it in the medical and disability file, then redacting the medical and disability-related information in the case notes, assessment form or language in the MIS and inserting 'See confidential file'.

3. Partner staff co-located at a center should place their medical and disability-related information with that of the center or send it to their main office for similar storing. If medical files are maintained in paper, they should be kept in a locked cabinet with limited access and separate from other file types maintained for the customer. Please note that medical and disability-related information should not be stored in staff desks. If medical files are maintained electronically, they should be secured in a password protected file or access to the electronic file location should be limited, and they should be stored separately from other file types.
4. To ensure confidentiality, there should be limited access to the medical and disability file. Individuals monitoring for compliance with 29 CFR Part 32 and 38 may have access for monitoring purposes.
5. The information that is of value to staff is most often the limitations caused by a customer's disability or medical condition and the effect on the customer's ability to advance through the program, as opposed to a disability or medical diagnosis. It is possible to record relevant information without documenting actual medical or disability related information.

Here are examples of information that is not considered medical or disability-related for the purpose of securing and maintaining: "The client cannot lift more than 20 pounds"; "cannot sit for more than an hour"; "must take frequent breaks or must take breaks at least every hour"; "must be located in a quiet room with few interruptions"; "cannot drive in mornings until 9 a.m."; "will be unavailable during the next six weeks"; etc.

Here are examples of information that is considered medical/disability information and must be secured: "The client has a herniated disk"; "stage 2 abdominal cancer"; "Crohn's disease"; "seasonal affective disorder"; "hypertension"; "diabetes"; "a fractured tibia"; "mild depression"; etc.

6. Medical and disability-related information can be acquired during the delivery of case management services but should then be stored securely. This information should be kept confidential and not be shared with employers or those providing labor exchange and/or job matching services. It may be appropriate to discuss a person's disability or medical condition in limited circumstances at the customer's request such as with program supervisors or trainers to explain reasonable accommodations, or with first aid and safety personnel if the customer asks us to because the condition may require emergency treatment.
7. Medical files, whether they exist in electronic form (including email) or hard copy, must be maintained for a period of not less than three years from the close of the applicable program year.

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Performance Indicators for youth

Excluded from Performance

TEGL 10-16, Change 3, [Attachment 2](#), Table B:

- Incarceration or Resident of Facility Providing 24-hour Support: The participant exits the program because he or she became incarcerated in a correctional institution or has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center during the course of receiving services as a participant.
- Medical Treatment: The participant exits the program because of medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
- Deceased: The participant is deceased.
- Called to Active Duty: The participant exits the program because the participant is a member of the National Guard or other reserve military unit of the armed forces and is called to active duty for at least 90 days.
- Foster Care & Moved from Local Workforce Area: The participant is in foster care system as defined in 45 CFR 1355.20(a), and exits the program because the participant has moved from the local workforce area as part of such a program or system.

Recording Exclusions in MIS

ESD WIN 0077, CHANGE 16

- Exit Exclusion-Incarceration or Institutional Care
- Exit Exclusion-Medical Treatment Expected to Last Longer than 90 Days
- Exit Exclusion-Reserve Military Called to Active Duty
- Exit Exclusion-Youth in Foster Care Moved Out of Area

Performance Definitions

Reportable Individual

TEGL 10-16, Change 3:

- An individual who has taken action that demonstrates an intent to use program services and who meets specific reporting criteria of the program, including:
 - individuals who provide identifying information;
 - individuals who only use the self-service system; or
 - individuals who only receive information-only services or activities or
 - For the purposes of the Title IV VR program only, a student with a disability who solely receives pre-employment transition services and who does apply for VR services, who is not determined eligible, and who does not have an approved IPE.
- The category of reportable individual allows the Departments to identify the individuals who engaged with the workforce development system on an initial level but who do not complete the requirements to become participants.

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- The Departments will use this category to track the number of individuals who may take part in self-services, receive information-only services or activities, or those who do not complete the program requirements for eligibility or for participation.
- The Departments require inclusion of certain information about reportable individuals in the State annual performance reports.
- Collecting such information allows the Departments to identify the individuals who engaged with the system on an initial level but who do not complete the requirements to become participants.

Participant

TEGL 10-16, Change 3:

- For the WIOA Title 1 Youth and Wagner-Peyser programs, a participant is an individual who:
 - Meets the definition of reportable individual;
 - Has received services other than the services described in 20 CFR 677.150(a)(3) (i.e., individuals who only use the self-service system); and
 - Has satisfied all applicable programmatic requirements for the provision of services.
- Only “participants” are included in the performance indicators.
- The Departments will negotiate levels of performance and calculate sanctions based on the outcomes of program participants because the performance indicators are based on the experience of participants upon exit from or, as applicable, during participation in a program.

Period of Participation

TEGL 10-16, Change 3:

- For all indicators, except Measurable Skill Gains, a period of participation refers to the period of time beginning when an individual becomes a participant and ending on the participant’s date of exit from the program.
- A new period of participation is counted each time a participant re-enters and exits the program—even if both exits occur during the same program year.

In-Program Measurable Skill Gains (During Program Participation)

Definition

Performance 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 measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress towards such a credential or employment.

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Methodology

Calculation includes all participants:

- The number of program participants during the reporting period who are in an education or training program that leads to a recognized postsecondary credential or employment **AND**
- are achieving measurable skill gains based on attainment of at least one type of gain
- **DIVIDED** by the number of program participants during the reporting period who are in an education or training program that leads to a recognized postsecondary credential or employment.

Included

TEGL 10-16, Change 3: All ISY since they are attending secondary or postsecondary school, **and OSY who participate any one of the following:**

- **Occupational skills training**
- **Secondary education** during participation in the WIOA Youth program
- **Title II-funded adult education** during participation in the WIOA Youth program
- **YouthBuild** program during participation in the WIOA Youth program
- **Job Corps** during participation in the WIOA Youth program.

Frequency and Timing of Measure

TEGL 10-16, Change 3:

- Participants are only included in the denominator, and likewise the numerator, *one time per reporting period* (i.e., program year), regardless of how many skills gains they achieve in a given program year unless the individual has more than one period of participation in a given program year.
- A participant who exits the program and re-enrolls in the program during the same program year and is in an education or training program will be in the indicator two times for that particular program year.
- The measurable skill gains indicator is different from the other indicators because it is not exit-based, meaning that a participant can achieve a measurable skill gain while still participating in a program.
- Programs should not delay enrollment or services to participants until a new program year even if programs believe there is insufficient time for the participant to make any type of measurable skill gain by the end of that program year.
- When in-school youth complete their secondary or postsecondary activities, they are removed from the MSG denominator in subsequent program years. If provided additional education and training services in subsequent program years, however, they are included in the MSG denominator for that program year.

Documentation Requirements

WorkSource System Policy 1003, Revision 6:

EFL:

- Record the most recent date the participant who received instruction below the post-secondary education level achieved at least one EFL.
- EFL gain may be documented in one of four ways:

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- By comparing EFL as measured by a participant's post-test or
- For State's that offer secondary school programs that lead to a secondary school diploma or its recognized equivalent an, EFL gain may be measured through the awarding of credits or Carnegie units; or
- States may report an EFL gain for participants who exit the program and enroll in post-secondary education or training during the program year.
- Passage of a subtest on a State-recognized high school equivalency examination (WorkSource System Policy 1020, Revision 2)
- **Source Documentation Requirements:**
 - Pre- and post-test results measuring EFL gain
 - Adult High School transcript showing EFL gain through the awarding of credits
 - Post-secondary education or training enrollment
 - Proof of passage of a subtest on a State-recognized high school equivalency examination (WorkSource System Policy 1020, Revision 2)

Post-secondary Transcript/Report Card:

- Record the most recent date the participant's transcript or report card for post-secondary education who complete a minimum of 12 hours per semester, or for part time students, a total of at least 12 credit hours over the course of two completed consecutive semesters during the program year, that shows a participant is meeting the State unit's academic standards.
- **Source Documentation Requirements:**
 - Transcripts showing the participant is achieving the State's policies for academic standards
 - Report card

Secondary Transcript/Report Card:

- Record the most recent date of the participant's transcript or report card for secondary education for one semester showing that the participant is meeting the State unit's academic standards.
- **Source Documentation Requirements:**
 - Transcripts showing the participant is achieving the State's policies for academic standards
 - Report card

Training Milestone:

- Record the most recent date that the participant had a satisfactory or better progress report towards established milestones from an employer training provider who is providing training (e.g., completion of OJT, completion of one year of a registered apprenticeship program, etc.).
- **Source Documentation Requirements:** Contract and/or evaluation from employer or training provider

Industry Exam, Skills Progression:

- Record the most recent date the participant successfully passed an exam that is required for a particular occupation, or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams.
- **Source Documentation Requirements:**
 - Results of knowledge-based exam or certification of completion
 - Documentation demonstrating progress in attaining technical or occupational skills
 - Documentation from training provider or employer

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- Copy of credential that is required for a particular occupation and only is earned after the passage of an exam.

Credential Rate (During Program Participation or Within 1 Year after Exit)

Definition

% participants enrolled in an education or training program (*excluding those in OJT and customized training*) who obtained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within 1 year after exit from the program.

This measure counts only if the participant is also employed or is enrolled in an education or training program leading to a recognized postsecondary credential within 1 year from program exit.

Methodology

Calculation includes all participants who exited from a program and were in either a postsecondary education or training program (other than OJT and customized training) OR in a secondary education program at or above the 9th grade level without a secondary school diploma or its equivalent:

- The number of participants who exited during the reporting period who obtained a recognized postsecondary credential during the program or within one year after exit OR
- those who were in a secondary education program and obtained a secondary school diploma or its recognized equivalent during the program or within one year after exit AND
- were also employed, or in an education or training program leading to a recognized postsecondary credential within one year after exit
- DIVIDED by the number of participants enrolled in an education or training program (excluding those in OJT and customized training) who exited during the reporting period.

Types of Credentials

TEGL 10-16, Change 3: This indicator measures attainment of two types of credentials:

- A recognized postsecondary credential, or
- A secondary school diploma or its recognized equivalent

WorkSource System Policy 1003, Revision 6:

Secondary School Diploma/or equivalency

- AA or AS Diploma/Degree
- BA or BS Diploma/Degree
- Occupational Licensure
- Occupational Certificate
- Occupational Certification
- Other Recognized Diploma, Degree, or Certificate

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Included

TEGL 10-16, Change 3:

- All ISY since they are attending secondary or postsecondary school, and
- OSY who participate in one of the following:
 - Occupational skills training
 - Secondary education during participation in the WIOA Youth program
 - Postsecondary education during participation in the WIOA Youth program
 - Title II funded adult education during participation in the WIOA Youth program
 - Youth Build during participation in the WIOA Youth program
 - Job Corps during participation in the WIOA Youth program

Excluded

TEGL 10-16, Change 3:

- OJT
- Customized Training
- Incarcerated
- Medical treatment
- Deceased
- Called to active duty
- Foster Care & Moved from local area

One-year of Follow-up Required

TEGL 10-16, Change 3: Reporting on this indicator requires a full year of follow-up to determine if a credential was attained within one year after exit and to determine employment or entry into postsecondary education or training for those who attain a secondary school diploma or recognized equivalent.

WIOA Joint Rule, Department's Response, page 55841: Such employment or enrollment in an education or training program only needs to be for some period during the 4 quarters after exit, not for the entire 1-year period after exit.

Documentation Requirements

WorkSource System Policy 1003, Revision 6:

- Diplomas, degrees, licenses, or certificates must be attained either during participation or within one year of exit:
 - Copy of credential
 - Copy of school record
 - Follow-up survey from program participants
 - Case notes documenting information obtained from education or training provider

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- This data element applies to both the Credential Rate Indicator and the Measurable Skills Gain indicator for all programs.

Median Earnings (Second Quarter after Exit)

Definition

Median earnings of participants who are in unsubsidized employment during the 2nd quarter after exit

Methodology

To calculate the median earnings for all participants employed in the second quarter after exit from any of the core programs:

- Total quarterly earnings, for all participants employed in the second quarter after exit, are collected by either direct wage record match or supplemental wage information.
- The collected quarterly wage information values are listed in order from the lowest to the highest value.
- The value in the middle of this list is the median earnings value, where there is the same quantity of numbers above the median number as there is below the median number.

Included

TEGL 10-16, Change 3: Youth in **AmeriCorps** or **Job Corps** count as a success in the training indicator. Participants who are in the military or in a Registered Apprenticeship program are also considered as employed, and their quarterly earnings are calculated for the purpose of these indicators.

Excluded

TEGL 10-16, Change 3:

Exited participants:

- Who are not employed in the 2nd quarter after exit;
- For whom earnings are not yet available;
- Who have \$0 income;
- Who are in subsidized employment; and
- Participants who have exited for any of the reasons listed in Attachment 2, Table B (incarcerated, medical treatment, deceased, called to active duty, foster care/moved)

Documentation Requirements

TEGL 26-16 and WorkSource System Policy 1036: Acceptable supplemental wage information may, but is not limited to:

- Copies of quarterly tax payment forms to IRS (Form 941);
- Copies of pay stubs (minimum of two copies) from the reference quarters;
- Signed letter or other information from employer on official letterhead attesting to an individual's employment status and earnings during the reference quarters;
- Follow-up survey (self-reported) of participants during the reference quarters;
- Income earned from sales commissions or similar positions during the reference quarters;

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- Detailed case notes verified by employers and entered by case managers during the reference quarters
- Administrative records from other partners' automated database systems for which data sharing agreements exist, including current records of eligibility for programs with income-based eligibility (e.g., TANF or SNAP) from the reference quarters; or
- Self-employment worksheets that reflect income after expenses during the reference quarters, signed and attested to by participants.

TEGL 10-16, Change 3:

- Status in unsubsidized employment and quarterly earnings may be determined by direct:
 - UI wage match
- Supplemental wage information may be collected in those circumstances where quarterly wage records are not available or may not apply (e.g. for participants who are self-employed, or for participants who decline to provide a SSN).

WorkSource System Policy 1003, Revision 6:

- Follow-up survey from program participants
- Paycheck stubs, tax records, W-2 form
- Quarterly tax payment forms such as an RS Form 941
- Document from employer on company letterhead attesting to an individual's employment status and earnings
- Self-employment worksheets signed and attested to by program participants
- Detailed case notes verified by the employer and signed by the case manager.

Reporting

TEGL 26-16 and WorkSource System Policy 1036:

- Where wage matches are not possible and local areas choose not to pursue supplemental wage information, participants are still included in the denominator for performance, which means they count as negatives (0 in the numerator) for the second and fourth quarter employment indicators and are excluded from median earnings calculations.
- Upon receiving supplemental wage information, staff *must* take the Program Outcome Touchpoint in MIS to record the employment and wage information.

WIOA Joint Rule, Departments' Response page 55839: WIOA requires the collection of data regarding the median earnings for all participants who exit the program and are employed during the second quarter after exit, regardless of whether the participants are simultaneously enrolled in an educational or training program.

Placement in Employment or Education (Second Quarter after Exit)

Definition

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% participants in education or training activities, or in unsubsidized employment, during the 2nd quarter after exit.

Methodology

Calculation includes all Adult and DW program participants (Youth reported separately):

- The number of Title I youth program participants who exited during the reporting period who are found to be employed, either through direct UI wage record match, Federal or military employment records, or supplemental wage information,
- **OR** found to be enrolled in secondary education, postsecondary education, or occupational skills training (including advanced training) in the second quarter after the exit quarter
- **DIVIDED** by the number of Title 1 Youth program participants who exited during the reporting period.

Included

TEGL 10-16, Change 3: Youth in **AmeriCorps** or **Job Corps** count as a success in the training indicator. Participants who are in the military or in a Registered Apprenticeship program are also considered as employed, and their quarterly earnings are calculated for the purpose of these indicators.

WIOA Joint Rule, Departments' Responses, Page 55849: Only unsubsidized employment will count as a positive outcome for employment. However, service programs, such as AmeriCorps, would count as a positive outcome because these service programs are considered training for the purposes of the youth indicators **Page 55849:** Both secondary and postsecondary education will count as successful outcomes for the two youth indicators related to employment or education or training.

Excluded

WIOA Joint Rule, Departments' Responses, Page 55835: *Incarcerated individuals* are excluded from this performance measure because they do not have the opportunity to obtain employment or participate in education or training programs in the same manner as other participants who are in the general population.

WIOA Joint Rule, Departments' Responses, Page 55849: Internships that are subsidized would not count as a positive outcome.

Reporting and Outcomes

WIOA Joint Rule, Departments' Responses. Page 55837:

- This employment indicator measures the employment rate in the 4th quarter after program exit regardless of whether those participants also were employed in the second quarter after exit from the program.
- A participant would be counted as a positive outcome for this indicator if he or she was employed in the 4th quarter after exit regardless of whether he or she was also employed in the 2nd quarter after exit

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Documentation Requirements

WorkSource System Policy 1003, Revision 6:

Placement in Education

- Copy of enrollment record
- File documentation with notes from program staff
- School records
- Transcript or report card
- Vendor/training provider training documentation

Placement in Employment

- UI wage data match
- Follow-up survey from program participants
- Pay check stubs, tax records, W2 form
- Wage record match

TEGL 26-16 and WorkSource System Policy 1036: Acceptable supplemental wage information may, but is not limited to:

- Copies of quarterly tax payment forms to IRS (Form 941);
- Copies of pay stubs (minimum of two copies) from the reference quarters;
- Signed letter or other information from employer on official letterhead attesting to an individual's employment status and earnings during the reference quarters;
- Follow-up survey (self-reported) of participants during the reference quarters
- Income earned from sales commissions or similar positions during the reference quarters;
- Detailed case notes verified by employers and entered by case managers during the reference quarters
- Administrative records from other partners' automated database systems for which data sharing agreements exist, including current records of eligibility for programs with income-based eligibility (e.g., TANF or SNAP) from the reference quarters; or
- Self-employment worksheets that reflect income after expenses during the reference quarters, signed and attested to by participants.

TEGL 10-16, Change 3: Status in unsubsidized employment and quarterly earnings may be determined by direct:

- UI wage match
- Federal employment records
- Military employment records
- Supplemental wage information

Supplemental wage information may be collected in those circumstances where quarterly wage records are not available or may not apply (e.g. for participants who are self-employed, or for participants who decline to provide an SSN).

Reporting

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TEGL 26-16 and WorkSource System Policy 1036: Where wage matches are not possible and local areas choose not to pursue supplemental wage information, participants are still included in the denominator for performance, which means they count as negatives (0 in the numerator) for the second and fourth quarter employment indicators and are excluded from median earnings calculations.

Upon receiving supplemental wage information, *staff must take the Program Outcome Touchpoint in MIS to record the employment and wage information.*

Placement in Employment or Education (Fourth Quarter after Exit)

Definition

% participants in education or training activities, or in unsubsidized employment, during the 4th quarter after exit.

Methodology

Calculation includes all Title 1 Youth program participants

- The number of Title I youth program participants who exited during the reporting period who are found to be employed, either through direct UI wage record match, Federal or military employment records, or supplemental wage information,
- **OR** found to be enrolled in secondary education, postsecondary education, or occupational skills training (including advanced training) in the second quarter after the exit quarter
- **DIVIDED** by the number of participants who exited during the reporting period.

Included

TEGL 10-16, Change 3: Youth in **AmeriCorps** or **Job Corps** count as a success in the training indicator. Participants who are in the military or in a Registered Apprenticeship program are also considered as employed, and their quarterly earnings are calculated for the purpose of these indicators.

WIOA Joint Rule, Departments' Responses, Page 55849: Only unsubsidized employment will count as a positive outcome for employment. However, service programs, such as AmeriCorps, would count as a positive outcome because these service programs are considered training for the purposes of the youth indicators

Page 55849: Both secondary and postsecondary education will count as successful outcomes for the two youth indicators related to employment or education or training.

Excluded

WIOA Joint Rule, Departments' Responses, Page 55835: **Incarcerated individuals** are excluded from this performance measure because they do not have the opportunity to obtain employment or participate in education or training programs in the same manner as other participants who are in the general population.

WIOA Joint Rule, Departments' Responses, Page 55849: Internships that are subsidized would not count as a positive outcome.

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Reporting and Outcomes

WIOA Joint Rule, Departments' Responses, Page 55837:

- This employment indicator measures the employment rate in the 4th quarter after program exit regardless of whether those participants also were employed in the second quarter after exit from the program.
- A participant would be counted as a positive outcome for this indicator if he or she was employed in the 4th quarter after exit regardless of whether he or she was also employed in the 2nd quarter after exit.

Documentation Requirements

WorkSource System Policy 1003, Revision 6:

Placement in Education

- Copy of enrollment record
- File documentation with notes from program staff
- School records
- Transcript or report card
- Vendor/training provider training documentation

Placement in Employment

- UI wage data match
- Follow-up survey from program participants
- Pay check stubs, tax records, W2 form
- Wage record match

TEGL 10-16, Change 3: Status in unsubsidized employment and quarterly earnings may be determined by direct:

- UI wage match
- Federal employment records
- Military employment records
- Supplemental wage information

Supplemental wage information may be collected in those circumstances where quarterly wage records are not available or may not apply (e.g. for participants who are self-employed, or for participants who decline to provide an SSN).

Reporting

TEGL 26-16 and WorkSource System Policy 1036:

- Where wage matches are not possible and local areas choose not to pursue supplemental wage information,
- participants are still included in the denominator for performance, which means they count as negatives (0 in

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- the numerator) for the second and fourth quarter employment indicators and are excluded from median earnings calculations.
- Upon receiving supplemental wage information, *staff must take the Program Outcome Touchpoint in MIS to record the employment and wage information.*

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