



Subject: Youth Services for Formula WIOA Programs

Purpose: To transmit Coastal Counties Workforce Board’s policy on Youth Services

Statutory Authority: 29 USC §3102(18)(24)(27)(36)(46)(71); §3161-3164; 20 CFR §681.200 - §681.220; §681.250; §681.270; §681.280; §681.300 - §681.310; §681.410; §681.460 – §681.470; §681.490 - §681.560 -§681.570; §681.580 - §681.600; §681.650; Maine Department of Labor Policy PY16-05

Action: WIOA Service providers are required to adhere to all policies and guidelines set forth in the policy below.

Effective Date: 9/14/17

Revision Date(s): 12/14/23

Expiration Date: Indefinite

The goal of the Coastal Counties Local Board is to provide comprehensive wrap-around services for all WIOA youth activities within the region including outreach, intake and eligibility, assessment, plan development, job placement and follow-up services through the local CareerCenters and Workforce Solutions Centers consistent with both WIOA, WIOA regulations and regional needs in addition to direction disseminated through TEGL’s and MDOL policies.

I. Youth Barriers:

In addition to school status, age, and wage eligibility criteria, all youth receiving services must meet the definition of either “in-school” or “out-of-school” youth as outlined in WIOA, 29 USC 3164(a)(1)(A)(B) and (C) and its regulations, 20 CFR §681.210, §681.220, and §681.250. For purposes of this policy, the terms of each are outlined below:

- A. **In-School Youth (ISY):** An ISY is an individual who is attending school (as defined by State law); not younger than age 14 or older than age 21 (unless the individual has a disability and is attending school under State law); a low-income individual; and one or more of the following apply:

- 1) Basic skills deficient;

- 2) An English language learner;
- 3) An offender;
- 4) A homeless individual aged 14 to 21 who meets the criteria defined in sec. 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), a homeless child or youth aged 14 to 21 who meets the criteria defined in sec. 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), or a runaway;
- 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, 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;
- 6) An individual who is pregnant or parenting;
- 7) An individual with a disability; or
- 8) An individual who requires additional assistance to complete an educational program or to secure or hold employment.

Note: In addition to meeting the basic criteria i.e., low income test, an in-School Youth must meet one of the above 8 criteria unless they require additional assistance (see section C below).

WIOA defines a low-income individual to include an individual who receives (or is eligible to receive) a free or reduced-price lunch under the Richard B. Russell National School Lunch Act.

B. Out-of-School Youth (OSY): An OSY is an individual who is not attending any school (as defined by State law); not younger than age 16 or older than age 24; and one or more of the following:

- 1) A school dropout;
- 2) A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter (as defined by the local school district);
- 3) An offender;
- 4) A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English language learner;
- 5) A homeless individual aged 16 to 24 who meets the criteria defined in sec. 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), a homeless child or youth aged 16 to 24 who meets the criteria defined in sec. 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)) or a runaway;
- 6) 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, 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;
- 7) An individual who is pregnant or parenting; or
- 8) A youth who is an individual with a disability;
- 9) A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

Unless specified, youth meeting one of the above 7 criteria do not have to meet the low income test. However, the low income test applies to Out-of-School Youth who are either:

- 1) A recipient of a secondary school diploma or its recognized equivalent and

- 2) Is basic skills deficient or an English language learner or
- 3) Who requires additional assistance (as defined below) to enter or complete an educational program or to secure or hold employment

NOTE: Minimally, the WIOA Youth service provider shall spend at least 75% of youth funds on out-of-school youth.

C. Requires Additional Assistance: Coastal Counties Workforce Board’s definition of “*requires additional assistance*” is as follows: youth with an immediate family member who is incarcerated; youth dealing with substance abuse issues or parents who have had a history or currently have issues with substance abuse; youth who live in rural areas with lack of resources, including transportation. In the case of In-School Youth, not more than five percent of the newly enrolled in a given program year may be eligible solely based on the “*requires additional assistance*” barrier (without meeting the low-income criteria) to “complete an educational program or to secure or hold employment” criterion.

D. Documentation: in order to substantiate the above barriers, the Board requires the WIOA Youth service provider to keep record, both in paper and electronic case files, by using the chart below:

Barrier	Documentation
1. Youth with immediate family member who is incarcerated	Public court records; Self-attestation
2. Youth dealing with substance abuse or immediate family members who have had a history or currently have issues with substance abuse	Documentation from mental health or rehabilitation facility; Self-attestation
3. Youth who have a lack of resources, both community based and individual For purposes of this section, “lack of resources” means less than sufficient amount of financial and community resources to aid the individual in finding and/or keeping employment.	Record of address; Self-attestation

II. Outreach:

Youth Employment Counselors primary duties include providing direct support to both internal and external youth program activities. Youth enrollments will reflect youth being served throughout the entire geographic area of the region. Efforts will be made by Service Provider(s) throughout their service delivery area to ensure youth are made aware of services and to recruit youth participants. Outreach is conducted through presentations to community partners that include but are not limited to secondary schools, alternative schools, business community, Adult Education, juvenile justice facilities/staff, social service agencies serving youth with barriers (i.e. homeless shelters, housing authorities, YouthBuild, etc.) Additionally, youth are recruited from the Information Centers found in CareerCenters and Workforce Solutions Centers.

III. Partnership Agreements:

The Workforce Solutions Centers will continue to build working partnerships with community-based youth serving programs. The Youth Services Team will meet regularly and reach out to the entire region to include partners and providers who serve, refer, and employ youth and young adults. Collaboration Agreements with a variety of youth serving programs such as the Greater Portland Workforce Initiative, Portland Jobs Alliance, Southern Maine Youth Transition Network (SMYTN), Long Creek Youth Development Center, CASH Coalition of Greater Portland, and others will continue as the mechanism to reflect these partnerships. Youth services follow statewide agreements that are developed through MDOL and other state departments in addition to more localized letters of support/agreements.

By developing "systemic" agreements with other major programs, the Board will create a sustainable capacity in the region to deliver coordinated services to a larger segment of the eligible youth population without duplication.

IV. Designated Staff Approach:

Designated staff members work with eligible youth populations to provide services that are comprehensive and fully integrated. Youth have access to all services found at the CareerCenters/Workforce Solutions Centers and work directly with youth designated staff for intensive case management and goal setting.

V. Out-of-School Youth Focus:

In accordance with WIOA 29 USC §3164(a)(4), Coastal Counties focuses on providing services to out-of-school youth. This Area follows and adopts the ETA vision that, “[f]or any program year, not less than 75 percent of the funds allotted under section 127(b)(1)(C) ...shall be used to provide youth workforce investment activities for out-of-school youth.”

This Area’s Workforce Board believes that out-of-school youth are at a higher risk than in-school youth and as such, greater focus on this out-of school population is critical. WIOA youth programming can be the resource to re-engage the disengaged youth in our region. Although on a limited basis, in-school youth are, however, eligible for services and are also enrolled with an emphasis on serving youth attending alternative secondary schools.

VI. Work Readiness:

To make services comprehensive in nature, youth also have the opportunity to develop work readiness skills that are crucial for success in the workforce. Youth will participate in work readiness training provided by the youth staff in groups or individually dependent on the youth’s needs and timing for entering the system.

Work readiness training combined with paid and unpaid work experiences, On-the-Job Training, Apprenticeship, Occupational Skills Training and/or Post-Secondary Training will prepare youth to achieve long term economic self-sufficiency through work. Youth will have access to state recognized Work Readiness Credentials as appropriate.

VII. Comprehensive Services:

Youth plans are comprehensive and include basic skills assessments, work readiness skills, and training needs. These goals will be achieved through one or more of the activities listed above. Youth also have access to mentoring, tutoring, support services, alternative education, leadership development, summer employment opportunities directly linked to academic and occupational learning, follow-up services, alternative secondary school services, and comprehensive guidance and counseling, which may include

drug and alcohol abuse counseling and referrals as appropriate. These activities are available on site or through community partnerships throughout the area. For activities not directly provided by the WIA Service Provider, Youth are referred to appropriate services available through other entities.

VIII. Youth Program Elements:

In accordance with WIOA and "...to support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for participant," the Coastal Counties WIOA service provider(s) shall offer or provide elements of programming consistent with the following:

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, 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 as a component academic and occupational education;
4. Occupational skill training, which shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area;
5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
6. Leadership development opportunities;
7. Supportive services;
8. Adult mentoring;
9. Follow-up services;
10. Comprehensive guidance and counseling;
11. Financial literacy education;
12. Entrepreneurial skills training;
13. Services that provide labor market and employment information about in-demand industry sectors or occupational available in the local area;
14. Activities that help youth prepare for and transition to postsecondary education and training

IX. Follow-up Services:

Once a youth participant has formally "exited" from the youth program, follow-up services shall be provided for at least "...12 months unless the participant declines to receive follow-up services or the participant cannot be located or contacted." Follow-up services must include more than one contact attempt and all outcomes thoroughly documented in the case file and Maine Job Link. Follow-up services may include: 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; activities that help youth prepare for and transition to postsecondary education and training; other services that align with their individual service strategy.

X. Work Experience Priority:

Minimally, at least 20% of funds allocated to Youth programming will be spent on paid and unpaid work experiences. The definition of work experience is as follows: "...planned, structured learning experience[s] that take place in a workplace for a limited period of time. Work experiences may be paid or unpaid, as appropriate...work experiences must include academic and occupational education." (20 CFR §681.600).

XI. Information and Referrals:

The Coastal Counties Workforce Board requires that the WIOA service provider(s) advise each participant on the full array of services available through the local board and other one-stop partners. This includes co-enrollment opportunities and referral to appropriate training and educational programs that have the capacity to serve the participant either on a sequential or concurrent basis. Moreover, for those individuals who are deemed ineligible to receive WIOA services, service provider(s) shall refer the individual for further assessment, as necessary, to appropriate programs to meet the basic skills and training needs of the applicant.

XII. Involvement of Parents/Guardians and Members of the Community:

Parents/guardians are highly encouraged to actively participate in the youth's service strategy and program delivery as deemed appropriate by the youth's career counselor.

For individuals seeking to be involved in the design and implementation of local youth programming, the Coastal Counties Workforce Board actively seeks membership to the Youth Standing Committee. For those interested, please contact Coastal Counties Workforce, Inc. for more information regarding becoming an active member. Furthermore, community members are encouraged to act as mentors, tutors and to provide input on program design during open Board meetings.

LWIB Approved: 12/14/2023