



Category	WIOA
Effective Date	TBD
Last Revised	-
Policy No.	TBD

**WIOA Title I Youth Program Policy**

1 **Background:** The United States Department of Labor (USDOL) is committed to providing high quality services for  
 2 youth and young adults beginning with career exploration and guidance, continued support for educational  
 3 attainment, opportunities for skill training in in-demand industries and occupations, and culminating with a good  
 4 job along a career pathway or enrollment in post-secondary education.

5 The Workforce Innovation and Opportunity Act (WIOA) of 2014 enacted a comprehensive youth employment  
 6 program for serving eligible youth, ages 14-24, who face barriers to education, training, and employment. The  
 7 WIOA Youth program focuses primarily on out-of-school youth (OSY), requiring the state to expend a minimum of  
 8 75% of WIOA Youth funds on OSY. The program includes 14 program elements that are required to be made  
 9 available to youth participants. The youth program prioritizes work experience through a 20% minimum  
 10 expenditure rate for the work experience program element. Youth services are provided in partnership with the  
 11 WIOA One-Stop System and under the direction of the State Workforce Innovation Board.

12 **Scope:** This policy applies to all service providers operating WIOA Title I Youth, WIOA Title I Youth program  
 13 manager(s), WIOA fiscal officers and the WIOA monitoring team. This policy is effective (*insert date upon SWIB*  
 14 *approval.*)

15 **Policy:**

16 **Framework of Services to Youth Must Include:**

- 17 • Determination of eligibility;
- 18 • An objective assessment that includes a review of the academic and occupational skill levels, as well as the  
 19 service needs and strengths to identify appropriate services and career pathways;
- 20 • The ISS must identify career pathways that include education and employment goals, considers career  
 21 planning and results of the assessment, and prescribe achievement objectives and services; and
- 22 • Case management must be provided for youth participants, including follow-up services.

23 **Youth Eligibility:**

- 24 • In-School Youth is defined as:
  - 25 ○ Attending any school at program entry, including youth attending secondary school, post-secondary  
 26 school, an alternative school or registered home school;
    - 27 ■ WIOA does not consider providers of Adult Education under WIOA Title II, Youth Build  
 28 programs and Job Corps programs to be schools.
  - 29 ○ Not younger than age 14 or (unless an individual with a disability who is attending school under  
 30 State law) older than age 21 at the time of enrollment. Because age eligibility is based on age at  
 31 enrollment, participants may continue to receive services beyond the age of 21 once they are  
 32 enrolled in the program;
  - 33 ○ A low income individual; and
  - 34 ○ One or more of the following:
    - 35 ■ Basic skills deficient;
    - 36 ■ An English language learner;
    - 37 ■ An offender;

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- A homeless individual aged 14 to 21 which may include a runaway youth;
  - Youth in foster care or has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption;
  - A youth who is pregnant or parenting;
  - An individual with a disability; or
  - A youth (14-21) who requires additional assistance to:
    - Complete an educational program: a youth who is at risk of dropping out of high school as documented by his/her school; or had previously dropped out of an educational program but has returned to school (including an alternative school); has below average grades; or a youth with poor attendance patterns in an educational program during the last 12 calendar months; or has been suspended or expelled from school within the last 12 calendar months; or has previously been placed in out-of-home care (foster care, group home, or kinship care) for more than 6 months.
    - OR
    - Secure or hold employment: an in-school youth who has not held a job for more than three consecutive months; or has a poor work history to include no work history; or has been fired from a job in the last 6 calendar months; or lacks work readiness skill necessary to obtain and/or retain employment.
  - An Out-of-School Youth (OSY) is defined as:
    - Youth who is not attending any school, including youth in home schools that are not registered with the county superintendent;
    - Not younger than 16 nor older than 24 at the time of enrollment. Because age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 24 once they are enrolled in the program; and
    - One or more of the following:
      - A school dropout;
      - 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. School year calendar quarter is based on how a local school district defines its school year quarters.
      - 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;
      - An individual who is subject to the juvenile or adult justice system;
      - A homeless individual aged 16 to 24 which may include a runaway youth;
      - Youth in foster care or has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption;
      - A youth who is pregnant or parenting;
      - An individual with a disability; or
      - A low-income youth (16-24) who requires additional assistance to:
        - Enter or complete an educational program: a youth who is in need of a high school diploma; or has dropped out of a post-secondary educational program during the last 12 calendar months; or has a diploma but requires additional education in order to obtain or retain employment.
        - OR
        - Secure and hold employment: a youth (including a youth with a diploma or equivalent) not currently attending any school and who has not held a full-time job for more than three consecutive months; has a poor work history, to include no

1 work history; has been fired from a job in the last six calendar months; or lacks  
2 work readiness skills necessary to obtain and/or retain employment.

- 3 • The school status remains the same throughout the youth’s participation in the Youth program for  
4 purposes of reporting. If the youth is determined out-of-school at the time of enrollment and subsequently  
5 enrolls or enters any type of school qualified under the Youth program, that youth is still considered OSY  
6 throughout their participation in the program.
- 7 • Low-income eligibility requirement:
  - 8 ○ In addition to the criteria found at [WIOA sec 3 \(36\)](#) in the definition of “low-income individual”, a  
9 youth is low-income if he or she receives or is eligible to receive a free or reduced price lunch or if  
10 he or she lives in a high poverty area.
  - 11 ○ For OSY, only those youth who are the recipient of a secondary school diploma or its recognized  
12 equivalent and are either basic skill deficient or an English language learner, and youth who require  
13 additional assistance to enter or complete an education program or to secure or hold employment,  
14 must be low-income. All other OSY meeting OSY eligibility listed above are not required to be low-  
15 income.
  - 16 ○ All in-school youth must be low-income to meet the in-school youth eligibility criteria, except those  
17 that fall under the low-income exception.
  - 18 ○ A low-income exception is allowed where 5 percent of WIOA youth maybe participants who  
19 ordinarily would be required to be low-income for eligibility purposes and meet all other eligibility  
20 criteria for WIOA youth except the low-income criteria. A program must calculate the 5 percent  
21 based on the percent of newly enrolled youth by the service provider in a given program year who  
22 would ordinarily be required to meet the low-income criteria. The [Verification Worksheet 5% Low  
23 Income Exception \(WIOA.14\)](#) form must be completed and maintained in participant file.
  - 24 ○ Individuals who are recipients of public assistance (TANF, SNAP/Food Stamps, Supplemental  
25 Security Income (SSI), Refugee Cash Assistance (RCA), and General Assistance (GA)) may meet  
26 Categorical Income Eligibility and considered automatically income eligible and no further income  
27 verification is required if the individual has provided acceptable documentation.
    - 28 ▪ TANF and SNAP (Food Stamp) documentation must be current and verify that the individual  
29 receives or is a member of a household that is receiving TANF or SNAP benefits. Examples  
30 of documentation include the Letter of Award if the individual is the recipient, or  
31 documentation that lists the individual is a member of the household receiving TANF or  
32 SNAP, and documentation such as a TANF or SNAP benefit summary showing the dates to  
33 verify that benefits were received within the six-month period prior to application to a  
34 WIOA program. Refer to the [In-School Youth \(WIOA.12\) Verification Worksheet](#) or [Out-of-  
35 School Youth \(WIOA.13\) Verification Worksheet](#) for complete list of acceptable  
36 documentation.
    - 37 ▪ SSI, RCA and GA are payments made to a single recipient. The individual applying to WIOA  
38 must be the recipient and is currently receiving SSI, RCA or GA in order to be considered as  
39 receiving public assistance and would be considered as a family of one. Examples of  
40 acceptable documentation include the Award Letter or other authorization notice to  
41 receive cash public assistance. Refer to the [In-School Youth \(WIOA.12\) Verification  
42 Worksheet](#) or [Out-of-School Youth \(WIOA.13\) Verification Worksheet](#) for complete list of  
43 acceptable documentation.
- 44 • Veterans shall receive priority of service in applying for and receiving youth services.

45 **Objective Assessment:**

- 1 • Youth participants must receive an objective assessment of the academic levels, skills levels, and services  
2 needed. The objective assessment shall include a review of all the following:
  - 3 ○ Basic skills;
  - 4 ○ Occupational skills;
  - 5 ○ Prior work experience;
  - 6 ○ Employability;
  - 7 ○ Interests;
  - 8 ○ Aptitudes (including interests and aptitudes for nontraditional jobs);
  - 9 ○ Supportive service needs; and
  - 10 ○ Developmental needs.
- 11 • No objective assessment is required if the provider determines it is appropriate to use a recent assessment  
12 (within the last 6 months) of the participant conducted by another education or training program. This may  
13 include evaluations completed by a secondary school, Vocational Rehabilitation, Adult Basic and Literacy  
14 Education (ABLE) or other education or training provider.
- 15 • Academic skills assessments help program staff determine participants' academic skill levels and uncover  
16 any subject areas requiring improvement. Case managers shall use assessment results to guide the  
17 academic support services they provide the youth to help them gain aptitudes and increase literacy.  
18 Support may include case managers engaging dedicated tutors to assist participants improve their math  
19 scores or reading comprehension.
- 20 • Out-of-School Youth (OSY) must be assessed for basic skill deficiencies. All OSY must sign the basic skills  
21 assessment, Test for Adult Basic Education (TABE); agreement form and case managers must clearly explain  
22 the consequences that could result from the youth's failure to test (regardless of it's to pre-test or post-  
23 test) within the required timelines.
  - 24 ○ Pre-testing: OSY participants must be pre-tested using the TABE to determine whether they are  
25 basic skills deficient. All pre-tests must be administered within 10 working days of enrollment. In  
26 extenuating circumstances, a waiver may be requested from the program manager to extend the  
27 date of the pre-test. Providers who fail to administer the pre-test within the prescribed timelines  
28 will be subject to corrective action. The pre-test may not be administered by the provider prior to  
29 participant enrollment; however the provider may utilize a pre-test administered by ABLE up to six  
30 months prior to the first date of youth service delivered. A copy of the TABE scoring sheet  
31 indicating grade level skills must be maintained in the participant file. The results of reading and  
32 math must be quantifiable through grade equivalency scores or raw scores from criterion-  
33 referenced assessment tools and entered in MWorks within 7 working days. Plans to address grade  
34 level skills below the ninth grade must be documented on the ISS.
  - 35 ○ Post-testing: OSY who receive services and tested below 9.0 on their pre-test must be post-tested  
36 using the same TABE standardized test that was part of their initial assessment. The post-test will  
37 show gains or losses in educational grade equivalency and be an indication of correct or incorrect  
38 program activities. Post-testing of OSY is required to report measurable skills gains for performance  
39 purposes.
- 40 • No participant payments will be made to OSY participants until the pre-tests has been administered or a  
41 waiver has been obtained. The post-test must be administered to participants testing below 9.0 during the  
42 first year following the participant's date of first youth program service. Providers who fail to administer  
43 either the pre-test or post-test within the prescribed timelines will be subject to corrective action which  
44 may include repayment of any funds expended on OSY for the period of time the youth should have been  
45 tested.
- 46 • In-school youth do not need to be assessed for basic skills; however, the provider must track youth who are  
47 basic skills deficient. Documentation of basic skills deficiencies may include school records, a current IEP or

1 a report card. Basic skills deficiencies shall be documented on the ISS and in case notes with supporting  
2 documentation maintained in the participant's file.

### 3 **Individual Service Strategy (ISS):**

- 4 • The Individual Service Strategy (ISS) with youth must directly link to one or more of the following primary  
5 indicators of performance:
  - 6 ○ **Employment Rate:**
    - 7 ▪ The percentage of program participants who are in education or training activities, or in  
8 unsubsidized employment during the second quarter after exit from the program;
    - 9 ▪ The percentage of program participants who are in education or training activities, or in  
10 unsubsidized employment, during the fourth quarter after exit from the program; and
  - 11 ○ **Median Earnings:**
    - 12 ▪ The median earning of program participants who are in unsubsidized employment during  
13 the second quarter after exit from the program;
  - 14 ○ **Credential Attainment:**
    - 15 ▪ The percentage of program participants who obtain a recognized postsecondary credential,  
16 or a secondary school diploma or its recognized equivalent during participation or within  
17 one year after exit from the program. A participant who has attained a secondary school  
18 diploma or its recognized equivalent is included in the percentage of participants who have  
19 attained a secondary school diploma or its recognized equivalent only if the participant also  
20 is employed or is enrolled in an education or training program leading to a recognized  
21 postsecondary credential within one year after exit from the program.
  - 22 ○ **Measurable Skills Gain:**
    - 23 ▪ The percentage of program participants who, during a program year, are in an education or  
24 training program that leads to a recognized postsecondary credential or employment and  
25 who are achieving measurable skill gains toward such a credential or employment; and
    - 26 ▪ All In School Youth are included in this measure and some Out of School Youth who are in  
27 occupational skills training, secondary or postsecondary while in the program are included.
  - 28 ○ **Effectiveness in Serving Employers:**
    - 29 ▪ The indicator of effectiveness in serving employers. The services provided to employers  
30 while administering the youth program include but are not limited to:
      - 31 • Employer Information and Support Services: providing information on state and  
32 federal tax credits or workforce investment incentives (WOTC) to employers;  
33 customized workforce information on labor market conditions, industries,  
34 occupations, and the characteristics of the workforce; and proactive linkage and  
35 referral of establishment to community resources that support their workforce  
36 needs.
      - 37 • Workforce Recruitment Assistance: supporting employer's search for qualified  
38 candidates; conducting special recruitment efforts; conducting pre-employment  
39 testing and background checks; and securing information on job requirements and  
40 providing employers with one-stop staff support for candidate screening and pre-  
41 employment interviews.
      - 42 • Strategic Planning/Economic Development Activities: participating in community  
43 based strategic planning; sponsoring employer forums; securing information on  
44 industry trends; providing information for the purpose of corporate economic  
45 development planning; and collaborating to identify workforce challenges and  
46 developing strategies to address those challenges.

- Accessing Untapped Labor Pools: outreach to youth, veterans, individuals with disabilities, older workers, ex-offenders, and other targeted demographic groups; industry awareness campaigns; joint partnerships with high schools, community colleges, or other education programs to improve skill levels; and programs to address limited English proficiency and vocational training.
  - Training Services: funding for training assistance, including customized training, on-the-job training, and incumbent worker training.
  - Incumbent Worker Training Services: employers who have received publicly funded incumbent worker training assistance for enrolled youth participant.
  - Rapid Response/Business Downsizing Assistance: an employer that received an initial on-site visit or contact to either discuss the range of rapid response services and other assistance available to workers and employers affected by layoff, plant closures or natural disaster, or plan a layoff response following notification of a current or projected permanent closure or mass layoff, including natural or other disasters.
- An ISS is required for all WIOA Title I Youth in-school and out-of-school participants. Services provided by the youth program are based on the individual needs of the participant; therefore, the participant must be involved in the design and implementation of services to ensure their needs are being met.
- The ISS identifies where the participant is, where the participant wants to be, and the appropriate mix and sequence of services and support needed to reach realistic goals. The ISS once completed shall be continually updated.
- The ISS form shall be the basic instrument used to:
  - Document the results of the objective assessment that included the review of the academic and occupational skill levels, as well as the service needs, of each youth for the purpose of identifying the appropriate services and career pathways for participants;
  - Identify the appropriate career pathways that include education and employment goals;
  - Consider career planning and the results of the objective assessment;
  - Prescribe achievement objectives and services for the participant including program/employment/career goals, timeline for attainment, expected wage at placement;
  - Determine the mix and sequence of services, including supportive services, and other resources needed to achieve program/employment/ career goals; components of the section include:
    - Short and long-term objectives;
    - Which WIOA program element(s) to provide based on the participants objective assessment that will assist the youth in achieving short and long-term objectives;
    - Timeline for attainment and date attained;
  - Document how the program element is being provided, i.e., in-house or through a referral with a specific agency or service listed;
  - As appropriate determine effective connections to in-demand industry sectors and occupations, including small employers; and
  - Discuss the provision of follow-up services that will track the progress of youth after exit from the program based on the youth's needs, providing assistance to help the youth secure better jobs, career development and further education.
- The ISS shall be reviewed at least quarterly and updated as needed.
- Service providers shall use the ISS ([ISS \(WIOA.17\)](#)) form.
- The ISS must be fully completed and signed. A signed copy of the participant agreement must be provided to the participant and the original attached to the ISS and maintained in the participant's file.

- 1 • The TABE agreement is attached to the ISS. The agreement must also be signed and dated by all OSY. A  
2 signed copy of this agreement must also be provided to the participant and the original attached to the ISS  
3 and maintained the participant's file.
- 4 • The ISS service must be opened in MWorks on the Employment Plan and services identified through ISS  
5 goals opened and closed as appropriate. MWorks Employment Plan must only be signed when major  
6 changes are made to goals.
- 7 • Measurable skills gains are not performance measures for the in-school youth however poor math and/or  
8 reading skills could be a factor in the participant's education and employment goals. Deficiencies shall be  
9 discussed with the participant to provide them the opportunity to determine how they want to address the  
10 deficiencies and explore options for improvement.

#### 11 **Youth Services and Activities:**

- 12 • The following 14 elements must be available to youth participants. Service providers have the discretion of  
13 what specific services are provided to a youth based on the individual's objective assessment and ISS.  
14 [Glossary of definitions and terms for 14 required elements](#)
  - 15 1. Tutoring, study skills training and instruction leading to secondary school completion, including  
16 dropout prevention strategies;
  - 17 2. Alternative secondary school offerings;
  - 18 3. Paid and unpaid Work Experiences (WEX) that have academic and occupational education as a  
19 component of the work experience which may include:
    - 20 ▪ Summer employment opportunities and other employment opportunities available  
21 throughout the school year;
    - 22 ▪ Pre-apprenticeship programs;
    - 23 ▪ Internships and job shadowing; and
    - 24 ▪ On-the-job training opportunities;
  - 25 4. Occupational skill training with priority consideration for training programs that lead to recognized  
26 post-secondary credential that align with in-demand industry sectors or occupations;
  - 27 5. Education offered concurrently with and in the same context as workforce preparation activities  
28 and training for a specific occupation or occupational cluster;
  - 29 6. Leadership development opportunities, including community service and peer-centered activities  
30 encouraging responsibility and other positive social and civic behaviors;
  - 31 7. Supportive Services *(insert link to Supportive Services policy once approved by SWIB)*;
  - 32 8. Adult mentoring for the duration of at least 12 months that may occur both during and after  
33 program participation;
  - 34 9. Follow-up services for not less than 12 months after the completion of participation;
  - 35 10. Comprehensive guidance and counseling which may include drug and alcohol abuse counseling, as  
36 well as referrals to counseling, as appropriate to the needs of the individual youth;
  - 37 11. Financial literacy education;
  - 38 12. Entrepreneurial skills training;
  - 39 13. Services that provide labor market and employment information about in-demand industry sectors  
40 or occupations available in the local area, such as career awareness, career counseling, and career  
41 exploration services; and
  - 42 14. Activities that help youth prepare for and transition to post-secondary education and training.
- 43 • Youth goals and services are provided in conjunction with skill goals that may include any of the following  
44 services:
  - 45 ○ Basic skills goal;
  - 46 ○ Occupational skills goal;

- 1           ○ Work readiness skills goal;
- 2           ○ On-the-Job Training (OJT);
- 3           ○ Customized training;
- 4           ○ Work experience; or
- 5           ○ High School equivalency certificate prep (applies to youth 16 years and older).

6   **Work Experience (WEX):**

- 7           • Work Experiences (WEX) may serve as a stepping-stone to unsubsidized employment and is an important  
8           step in the process of developing a career pathway for youth. WEX is designed to enable youth to gain  
9           exposure to the working world and its requirements; help youth acquire the personal attributes,  
10           knowledge, and skills needed to obtain a job and advance in employment. WEX can be paid or unpaid and  
11           may take place in private for profit, non-profit or public sector.
- 12          • Local youth programs must expend not less than 20 percent of funds allocated to them to provide in-school  
13           and out-of-school youth with paid and unpaid work experience. This includes wages and staff costs for the  
14           development and management of the WEX.
- 15          • WEX must include academic and occupational education. The education component may occur  
16           concurrently or sequentially to the WEX.
- 17          • WEX requires integrated education and training to occur concurrently and contextually with workforce  
18           preparation activities and workforce training for a specific occupation or occupational cluster for the  
19           purpose of educational and career advancement. Youth participants are not required to master basic  
20           academic skills before moving on to learning career specific technical skills.
- 21          • WEX placements must:
  - 22           ○ Comply with the Fair Labor Standards Act in regards to wages paid, hours worked and child labor  
23           regulation;
  - 24           ○ Complete an I-9 in accordance with the Immigration Reform and Control Act;
  - 25           ○ Provide Workers' Compensation coverage; and
  - 26           ○ Withhold Social Security, Federal Income and Montana State Income taxes.
- 27          • Youth that have been in a paid WEX may not claim unemployment insurance. Montana state law excludes  
28           work-training programs such as WIOA WEX from the definition of employment for purposes of  
29           unemployment insurance (UI) compensation. Therefore, WEX wages are not subject to payment of UI taxes  
30           by the employer and WEX participants do not earn wage credits during their participation.
- 31          • WEX participants shall be paid an hourly wage for hours worked which may be in ¼-hour increments.  
32           Wages are a work-training or educational allowance. Each participant will receive a wage based on:
  - 33           ○ Applicable federal and state minimum wage; or
  - 34           ○ At the same rates as trainees or employees who are in similar occupations, and who have similar  
35           training, experience and skills within that worksite, whichever is higher.
  - 36           ○ Providers are not restricted to paying minimum wage for a youth WEX and may pay the youth a  
37           higher wage based on wages in the community and are commiserate with other employees at the  
38           worksite doing the same job but not more than the other employees doing the same job.
- 39          • Participants must complete a W-4 and the employer must issue a W-2. Transportation and/or supportive  
40           services, if paid are over and above wages and are not subject to tax deduction.
- 41          • Providers are to ensure that each WEX participant is covered by Workers' Compensation Insurance or  
42           adequate injury insurance.
- 43          • WEX participants must be provided with the same level of benefits and working conditions as the other  
44           employees working the similar type of work and length of time. Participants may work part-time or full-  
45           time in a WEX depending on the service provider funding. Full-time participation is defined as working 32-

1 40 hours per week, not to exceed 40 hours per week. Neither overtime work nor overtime pay is allowable.  
2 Child labor laws must be observed when scheduling work hours for youth under 18 years of age.

- 3 • The length of the WEX assignment is to be based on the needs of the participant and purpose of placing  
4 that participant in a WEX.
- 5 • A Memorandum of Agreement (MOA) [MOA \(WIOA.22\)](#) and Training Summary [WIOA. 22.c](#) must be  
6 completed prior to the placement of participants at a worksite.
- 7 • WEX agreements shall be set up annually to coincide with the program year start and end (e.g. July 1, 2017  
8 to June 30, 2018). There only needs to be one agreement per worksite to cover all participants placed  
9 there. There may be multiple summaries tied to a worksite based on job titles.
- 10 • Following an informal consultation with the appropriate labor organization, the Union Concurrence Form  
11 ([WIOA.22b](#)) must be completed for each agreement where a collective bargaining agreement covers the  
12 occupation the participant(s) are to be placed in. A signed copy of the Union Concurrence Form must be  
13 kept with each MOA whether or not a collective bargaining agreement exists. A note on the Union  
14 Concurrence form such as N/A is sufficient when there is no collective bargaining agreement.
- 15 • Training Summary [WIOA. 22.c](#) must be fully completed for each job that will be performed at a worksite.
- 16 • All participants on a WEX must fully complete a timesheet at the end of the scheduled work period. Each  
17 agency may use their own timesheet if it has all of the required criteria on them or use this timesheet  
18 ([WIOA 22.d](#)). The job duties and tasks that the participant performed must be completed on the WIOA  
19 WEX timesheet for each day worked and must tie to the work elements, duties and tasks listed on the  
20 WIOA Training Summary.
  - 21 ○ Timesheets must be completed with pay period dates, dates and hours worked, and duties  
22 documented;
  - 23 ○ Timesheets must be signed and dated by both the participant and the supervisor;
  - 24 ○ The supervisor must complete the evaluation section of the timesheet; and
  - 25 ○ The individual signing as the supervisor must be listed on the Training Summary as authorized to  
26 sign time sheets.
- 27 • MWorks must contain the following:
  - 28 ○ Case note WEX details including: how the worksite was determined, worksite information, youth's  
29 supervisor and expected duration of the WEX;
  - 30 ○ Enter the name of the worksite in the WEX Service task feature; and
  - 31 ○ Set up individual payment authorizations for each pay period. Payment authorizations must be able  
32 to tie back to the timesheets in the participant's file. The pay period dates or end date and hours  
33 worked for that pay period must be documented on all payment authorizations. The only time  
34 multiple pay periods may be combined on a single payment authorization is when timesheets are  
35 not submitted timely and the individual will not receive payment for the timesheet until the end of  
36 the next pay period. Document this clearly on the payment authorization.

### 37 **Occupational Skills Training:**

- 38 • Occupation Skills Training, one of the 14 elements that are offered to youth participants, allows Individual  
39 Training Accounts (ITA) for OSY ages 18 to 24 using WIOA funds when appropriate. Priority consideration  
40 must be given to training programs that lead to recognized post-secondary credentials that align with in-  
41 demand industry sectors or occupations in the local area. Such training must:
  - 42 ○ Be outcome-oriented and focused on an occupational goal specified in the ISS;
  - 43 ○ Be of sufficient duration to impart the skills needed to meet the occupational goal; and
  - 44 ○ Result in attainment of a recognized post-secondary credential.
- 45 • To receive Occupational Skills Training services the youth must receive, at a minimum:
  - 46 ○ A completed ISS as described above; and

- 1           ○ A comprehensive and specialized assessment of skill levels and service needs; or
- 2           ○ Group and/or individual employment counseling; or
- 3           ○ Case management and career planning.
- 4       • Training services are any WIOA funded and non-WIOA funded training services. Individuals shall be afforded
- 5       opportunities for participation in training activities designed to improve participation in the workforce and
- 6       lead to higher earning for individuals who successfully complete them. Training activities for persons in
- 7       these groups will be provided in the context of the state’s vision to provide universal access for all
- 8       customers. Training services may be provided to ages 18 - 24.
- 9       • A participant may enroll in WIOA-funded training while his/her application for a Pell Grant is pending as
- 10       long as the WIOA provider has made arrangements with the training provider and the participant regarding
- 11       allocation of the Pell Grant, if it is subsequently awarded. In that case, the training provider must reimburse
- 12       the WIOA provider the WIOA funds used to underwrite the training for the amount the Pell Grant covers,
- 13       including any education fees the training provider charges to attend training. Reimbursement is not
- 14       required from the portion of the Pell Grant assistance disbursed the participation for education related
- 15       expenses, such as fees, books and supplies.
- 16       • Training services shall be provided through providers listed on the Montana ETPL unless noted otherwise in
- 17       the following list of training services. Out-of-state and on-line training provider programs must be on their
- 18       state’s ETPL; and, if not on that state’s list, the service provider must determine why not. If the provider is
- 19       not eligible by another state, then they cannot be added to Montanan’s ETPL, and cannot be used as a
- 20       training provider. If there is another reason, they are not on their state’s list (i.e. an overly cumbersome
- 21       application process, etc.) then, they can be added to Montana’s ETPL through the normal application
- 22       process, [ETPL Policy](#). ETPL printout shall be documented in the participant’s file.
- 23       • Training services may include:
  - 24           ○ Occupational skills training, including training for nontraditional employment and for training
  - 25           programs operated by the private sector; (requires ETP)
  - 26           ○ OJT; (does not require ETP)
  - 27           ○ Programs that combine workplace training with related instruction, which may include cooperative
  - 28           education programs; (requires ETP)
  - 29           ○ Training programs operated by the private sector; (requires ETP)
  - 30           ○ Skill upgrading and retraining; (requires ETP)
  - 31           ○ Entrepreneurial training; (requires ETP)
  - 32           ○ Short-term job readiness training; (does not require ETP)
  - 33           ○ Adult education and literacy activities conducted at ABLE provided in combination with services for
  - 34           the Incumbent Worker Training program; (does not require ETP)
  - 35           ○ Customized training conducted with a commitment by an employer or group of employers to
  - 36           employ an individual upon successful completion of the training; (does not require ETP) or
  - 37           ○ Short-term pre-vocational training that that is generally one week (40 hours) or less which does not
  - 38           provide certification or a credential upon completion. (does not require ETP)
- 39       • Training Payments: Service providers must verify and pay tuition and other training costs in accordance
- 40       with the training provider’s documented payment policy or terms. WIOA funding may be used for any
- 41       expenses considered to be part of the tuition, fees, room and board, books, supplies and tools required by
- 42       the course that cannot be met from the Pell Grant or other grant assistance. When a participant is co-
- 43       enrolled in WIOA or non-WIOA programs, the case manager will coordinate with the training provider and
- 44       other program(s) to ensure the participant’s training needs are met and there is no duplication of service.
- 45       WIOA funding shall always be supplement to other grant assistance.

46       **Case Management:**

- 1 • Case management is conducted throughout the entirety of the youth’s participation, from pre-application  
2 through follow-up. Case management is essential to the success of WIOA youth service deliver. Case  
3 management activities include:
  - 4 ○ Direct service delivery – orientation, pre-application, eligibility determination, objective  
5 assessment, ISS development, career planning, coordination of supportive services, referrals, job  
6 and work experience placement, outreach and follow-up.
  - 7 ○ Monitoring and documenting eligibility, services and outcomes: Accurate and timely data entry  
8 into MWorks; ensuring eligibility and documentation requirements are met; and determining the  
9 appropriate time to exit youth from program and monitor program exits and performance  
10 outcomes.
- 11 • A significant failure to meet these case management responsibilities based on program monitoring may  
12 result in formal corrective action if there is no improvement from one year to the next.
- 13 • The case manager must inform the participant of their responsibilities listed on [ISS \(WIOA.17\)](#) and ensure  
14 the participants signs the acknowledgement of the responsibilities.

15 **Youth Incentives:**

	<u>Text of Policy</u>	<u>Info Regarding Option</u>
Option 1	Youth Incentive payments are not authorized and may not be paid to participants by the provider using WIOA Title I funds.	Incentive participant payments are allowable but not required. Should the SWIB not authorize Incentive Payments this portion of the policy would read as seen here.
Option 2	<ul style="list-style-type: none"> <li>• Providers are encouraged but not required to provide incentives. Providers may determine whether or not to provide an incentive award however if they choose to provide incentive awards they will base the award amount on their fund availability. Incentives, both cash and non-cash must be in an amount that is consistent to each youth receiving an incentive for their achievement. If a provider determines that the amount awarded for the attainment of one goal is \$10, than all youth achieving that goal and receiving an incentive award will receive \$10.</li> <li>• Incentives may also be awarded to youth who have successfully completed the WIOA program and obtained full-time unsubsidized employment.</li> <li>• Incentives may be given to youth if the provision of an incentive is included in the participant’s ISS. The ISS shall describe the plans for preparing the youth for post-secondary education and/or employment, finding effective connections to the job market and employers, and understanding the links between academic and occupational learning, and setting and achieving goals, and for providing incentives as appropriate to youth who achieve goals. Providers must also document the plans for providing</li> </ul>	<p>MT has authorized participant payments in the past and has left the determination of whether to provide an incentive award up to the provider and their individual budgets.</p> <p>The SWIB has the authority to choose to accept all or some of the incentive categories listed as well as accept or modify the incentive amounts listed.</p>

	<p>incentives based upon the youth attaining one or more of the goals described below in the case notes. The youth must be an active participant in the WIOA Youth program in order to receive an incentive.</p> <ul style="list-style-type: none"> <li>• Youth incentives may not include entertainment costs such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment.</li> <li>• Non-cash incentive examples include but are not limited to: <ul style="list-style-type: none"> <li>○ Gift certificates (restaurant, retail and school book stores);</li> <li>○ Plaques;</li> <li>○ Cap and gown;</li> <li>○ Class picture; or</li> <li>○ Class ring.</li> </ul> </li> <li>• Cash incentives awards for a participant are limited to <b>\$500</b> for the entire program year.</li> <li>• The cash or non-cash dollar amounts listed in the incentive plan are suggested award amounts. Youth service providers have discretion in determining the actual award amount and whether it will be in the form of cash or non-cash.</li> <li>• Attainment of a skill goal (basic work readiness or occupational skill goals). A copy of the completed goals screen is required for reimbursement of accomplished skill goal. Participants may be awarded up to the following amounts per goal: <ul style="list-style-type: none"> <li>○ Attainment of one goal: <b>\$10</b></li> <li>○ Attainment of two goals: <b>\$15</b></li> <li>○ Attainment of three goals: <b>\$25</b></li> </ul> </li> <li>• Attainment of Literacy or Numeracy gain applies to OSY who are basic skills deficient; actively participating in program services; and who have achieved an increase of at least one educational functioning level. A copy of the measurable skills screen and documentation showing results of pre and post-test are required documentation for reimbursement. Participants may be awarded up to the following amounts: <ul style="list-style-type: none"> <li>○ <b>\$25</b> cash or gift certificate for increase of .5 to 1.0 grade level.</li> <li>○ <b>\$50</b> cash or gift certificate for increase of 1.1 to 1.9 grade level or more.</li> <li>○ <b>\$75</b> cash or gift certificate for testing 9.0 or above in both reading and math on the TABE if increase is more than three grade levels after second year of program participation.</li> </ul> </li> <li>• Attainment of a secondary school diploma or equivalent applies to participants, whether in school or out-of-school, who at the time of enrollment have</li> </ul>	<p>Within this section the SWIB may alter the limit that has been utilized in the past of \$500 per program year per participant. Other dollar limit suggestions are welcome.</p> <p>The SWIB may alter the amounts being utilized for attaining skill goals. Other dollar limit suggestions are welcome.</p> <p>The SWIB may alter the amounts being utilized for attaining measurable skills gains. Other dollar limit suggestions are welcome.</p>
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not attained a high school diploma or equivalent and are awarded such during program participation. For purposes of this policy, attainment of a secondary school diploma or equivalent includes:

- High school diploma;
- General Equivalency Diploma (GED); or
- HiSet.

Participants may be awarded a cash incentive up to \$250 for obtaining their High School Diploma, GED or HiSet. A copy of the diploma, GED or HiSet certification is required documentation for reimbursement. Participants may not be awarded cash incentives for attending GED/State sponsored high school equivalency classes.

- Returning to school for OSY who are both out-of-school and basic skills deficient at enrollment may receive up to the following incentives for returning to school and successful completion. A copy of the diploma, post-secondary degree or documentation of completion of first term from school official is required documentation for reimbursement.
  - The first term: \$50 limit
  - Attainment of a Diploma or Degree: \$250 limit.
- Attainment of occupational skills credential applies to those participants who are enrolled in training, have not received an occupational skills credential and attain an occupational skills credential during participation. An occupational skills credential is defined as a nationally recognized degree or certificate. Credentials include, but are not limited to, post-secondary degrees, recognized skill standards, and licensure of industry-recognized credentials. A copy of the occupational skills credential or degree from two year or community college is required documentation for reimbursement.
  - Up to \$250 may be awarded for attainment of an occupational skills credential.
- Attendance in high school applies to those participants enrolled in secondary education that achieve a GPA of 2.0 or higher. School records showing GPA is required documents for reimbursement.
- Incentives are based on:
  - The grade point average for 4 quarters;
  - School attendance (the number of days absent or tardy per semester); and
  - Grade related/core classes.

GPA Range	1 Quarter	2 Quarter	3 Quarter	4 Quarter
2.0-2.99	\$20	\$20	\$20	\$20

The SWIB may alter the limit that has been utilized in the past of \$250 for. Other dollar limit suggestions are welcome.

The SWIB may alter the amounts being utilized for returning to school. Other dollar limit suggestions are welcome.

The SWIB may alter the limit that has been utilized in the past of \$250 for receiving credentials. Other dollar limit suggestions are welcome.

The SWIB may alter the amounts being utilized for

3.0-3.49	\$30	\$30	\$30	\$30
3.5-4.0	\$50	\$50	\$50	\$50

- Participants may receive the following incentives for attendance. Youth may receive only one attendance incentive per semester. School records showing attendance is required documents for reimbursement.
  - \$50 cash or gift certificate for perfect attendance.
  - \$25 cash or gift certificate for missing less than two days of school and being tardy less than two times.
- Participants may receive the following incentives for core class grade related improvements. School records showing grade or pass/fail record is required documents for reimbursement.
  - \$10 cash or gift certificate for going from failing to passing.
  - \$20 cash or gift certificate for passing all classes with a C or higher (apply this incentive to the GPA or Grade Related incentive, not both).
  - \$30 cash or gift certificate for increasing one full grade.
  - \$40 cash or gift certificate for passing all classes for the school year.
- School completion incentive applies to youth who are out-of-school and employed full-time and are enrolled in an educational program leading to the attainment of a GED/state approved high school equivalency diploma, professional license or certificate. The incentive is limited to those participants who are in good standing and actively progressing toward accomplishment of a GED/state approved high school equivalency diploma or professional license or certificate as described in the ISS. A copy of the GED/state approved high school equivalency diploma or professional license or certificate is required for reimbursement.
  - \$50 for receiving a GED/state approved high school equivalency diploma.
  - \$75 for receiving a professional license/certificate.
- Job retention incentive applies to youth who have successfully completed the WIOA program and are employed full time. Verification of employment and a quarterly progress report by the case manager are required for reimbursement.
  - \$25 for getting a job.
  - \$100 for retaining the same job for 3 months.

GPA. Other dollar limit suggestions are welcome.

The SWIB may alter the amounts being utilized for attendance. Other dollar limit suggestions are welcome.

The SWIB may alter the amounts being utilized for core class grade related improvement. Other dollar limit suggestions are welcome.

The SWIB may alter the amounts being utilized for school completion. Other dollar limit suggestions are welcome.

The SWIB may alter the amounts being utilized for

	<ul style="list-style-type: none"> <li>○ \$150 for retaining the same job for 6 months.</li> <li>○ \$200 for retaining the same job for 9 months.</li> <li>● Providers must document the plans for providing incentives based upon the youth attaining one or more goals in the youth’s case notes in MWorks. Youth incentives are included in Youth Services objective. Service providers shall track incentive awards, whether cash or non-cash, through the Objectives and Services section of the MWorks Employment Plan following the same funding process of obligating, authorizing and making payments as with any service that has funding attached.</li> </ul>	<p>job retention. Other dollar limit suggestions are welcome.</p>
<p>Staff Recommendation</p>	<p>Option #2. The practice of providing incentive payments to youth has proven to increase participation and outcomes.</p>	

1 **Administrative Requirements:**

- 2 ● The WIOA Title I Youth program manager(s) shall provide technical assistance to case managers.

3 **Funding:**

- 4 ● The WIOA youth program is funded through WIOA Title IB. CFDA# 17.259
- 5 ● Program Year 2016 received initial funding in the amount of \$2,139,306 for youth services to be provided in
- 6 the state of Montana.

7 **Monitoring and Evaluation:**

- 8 ● A formal monitoring will be conducted on an annual basis by the entity designated by SWIB.

9 **References:**

- 10 ● [20 CFR 681 Youth Activities](#)
- 11 ● [WIOA Section 129](#)
- 12 ● [ISS Form \(WIOA.17\)](#)
- 13 ● [ETPL Policy](#)
- 14 ● [MCA 39-51-204 1m](#)
- 15 ● [MOA \(WIOA.22\)](#)
- 16 ● [Training Summary \(WIOA.22.c\)](#)
- 17 ● [Union Concurrence Form \(WIOA.22b\)](#)
- 18 ● [Timesheet \(WIOA.22.d\)](#)
- 19 ● [2 CFR 200 Uniform Administrative Requirements](#)
- 20 ● [TEGL 08-15](#)
- 21 ● [WIOA Section 3 \(36\) - Low income definition](#)
- 22 ● [Verification Worksheet 5% Low Income Exception \(WIOA.14\)](#)
- 23 ● [In-School Youth Verification Worksheet \(WIOA.12\)](#)
- 24 ● [Out-of-School Youth Verification Worksheet \(WIOA.13\)](#)
- 25 ● [TEGL 10-16](#)
- 26 ● [TEGL 21-16](#)