

ALABAMA WORKFORCE INVESTMENT SYSTEM

Alabama Department of Economic and Community Affairs
Workforce Development Division
401 Adams Avenue
Post Office Box 5690
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June 19, 2013

GOVERNOR'S WORKFORCE DEVELOPMENT DIRECTIVE NO. PY 2012 – 14

SUBJECT: Training and Employment Guidance Letter (TEGL)

1. **Purpose.** This transmits the following TEGL:

<u>Number</u>	<u>Date</u>	<u>Subject</u>
33-12	06/11/13	Workforce Investment Act (WIA) Youth Program Guidance for Program Year (PY) 2013

2. **Discussion.** TEGL 33-12 provides program guidance for use of WIA Youth funded activities in PY 2013.

In the most recent program year (PY 2011), the WIA Youth program served 241,224 youth, a number higher than expected given the reduced funding level. This is compared to PY 2010 when the WIA Youth program served 267,454 with funding of almost \$100 million higher. At the PY 2011 funding level, ETA expected just over 239,000 youth to be served and exceeded that number by more than two thousand youth. In addition, the program served a higher percentage of out-of-school youth than ever before. Finally, the WIA Youth program exceeded annual goals for all three youth common performance measures, including all time highs in the degree/certificate attainment rate and the literacy/numeracy gains measure.

ETA recognizes that states, local areas, and youth service providers are striving to provide effective and comprehensive services that provide low-income youth with the educational and employment skills necessary to succeed in the workforce. In order to assist the public workforce system in providing high quality youth programs, ETA routinely monitors states and local areas to ensure compliance with WIA. ETA compared findings across 15 WIA Youth reports from monitoring visits conducted in 2011 and 2012 to identify common findings and areas of concern. In ETA's review, themes emerged around common findings at the state and local levels. The most common monitoring findings related to four, at times overlapping, categories: case management, service provision, performance management, and governance.

The intent of the attached TEGL 33-12 is to provide state and local area staff with a helpful tool to improve youth services and ensure legal compliance and successful future monitoring. Many of the tips and resources mentioned in TEGL 33-12 are from previously released TEGs. Please refer to the

GOVERNOR'S WORKFORCE DEVELOPMENT DIRECTIVE NO. PY 2012-14

"References" section on page 1 of the attached TEGL 33-12 for direct links to each of the TEGs mentioned throughout this guidance.

3. **Action.** Please share the attached TEGL 33-12 with LWIBs and youth service providers.
4. **Contact.** Questions regarding this TEGL should be directed to Sara Calhoun, Workforce Development Division at Sara.Calhoun@ADECA.Alabama.gov or 334.353-1632.



Steve Walkley, Division Chief
ADECA, Workforce Development Division

Attachment: TEGL 33-12

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION WIA/Youth
	CORRESPONDENCE SYMBOL OWI - DYS
	DATE June 11, 2013

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 33-12

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS

FROM: GERRI FIALA /s/
Acting Assistant Secretary

SUBJECT: Workforce Investment Act (WIA) Youth Program Guidance for Program Year (PY) 2013

1. **Purpose.** The purpose of this Training and Employment Guidance Letter (TEGL) is to provide program guidance for use of WIA Youth funded activities in PY 2013.

2. **References.**

- Workforce Investment Act of 1998 (WIA), as amended (29 U.S.C. 2801 et seq.)
<http://www.doleta.gov/usworkforce/wia/wialaw.pdf>
- WIA Regulations, 20 CFR Part 664
<http://www.doleta.gov/usworkforce/wia/finalrule.pdf>
- TEGL No. 09-00, *Workforce Investment Act of 1998, Section 129 - Competitive and Non-competitive Procedures for Providing Youth Activities Under Title I*
<http://wdr.doleta.gov/directives/attach/TEGL9-00.pdf>
- TEGL No. 3-03, Change 1, *Data Validation Policy for Employment and Training Programs* http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=1599
- TEGL No. 17-05, *Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues* http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2195
- TEGL No. 13-09, *Contracting Strategies That Facilitate Serving the Youth Most in Need*
http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2854
- TEGL No. 27-09, *Workforce Investment Act (WIA) Youth Program Guidance for Program Year (PY) 2010* http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2900
- TEGL No. 30-10, *Workforce Investment Act (WIA) Youth Program Guidance for Program Year (PY) 2011* http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3034
- Training and Employment Notice (TEN) No. 23-11, *New Research Reports on Summer and Post-Summer Youth Employment Initiatives under the American Recovery and Reinvestment Act of 2009 (Recovery Act)*
http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7559

RESCISSIONS None	EXPIRATION DATE Continuing
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- TEGL No. 28-11, *Program Year 2011/Fiscal Year 2012 Performance Reporting and Data Validation Timelines*
http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=9545
- TEN No. 46-11, *Announcement of the Workforce Investment Act (WIA) Youth Program Reference Tool*
http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7673
- TEGL No. 05-12, *Workforce Investment Act (WIA) Youth Program Guidance for Program Year (PY) 2012*
http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=6048

3. Background. In the most recent program year (PY 2011), the WIA Youth program served 241,224 youth, a number higher than expected given the reduced funding level. This is compared to PY 2010 when the WIA Youth program served 267,454 with funding of almost \$100 million higher. At the PY 2011 funding level, ETA expected just over 239,000 youth to be served and exceeded that number by more than two thousand youth. In addition, the program served a higher percentage of out-of-school youth than ever before. Finally, the WIA Youth program exceeded annual goals for all three youth common performance measures, including all time highs in the degree/certificate attainment rate and the literacy/numeracy gains measure.

ETA recognizes that states, local areas, and youth service providers are striving to provide effective and comprehensive services that provide low-income youth with the educational and employment skills necessary to succeed in the workforce. In order to assist the public workforce system in providing high quality youth programs, ETA routinely monitors states and local areas to ensure compliance with WIA. ETA compared findings across 15 WIA Youth reports from monitoring visits conducted in 2011 and 2012 to identify common findings and areas of concern. In ETA's review, themes emerged around common findings at the state and local levels. The most common monitoring findings related to four, at times overlapping, categories: case management, service provision, performance management, and governance.

The intent of the TEGL is to provide state and local area staff with a helpful tool to improve youth services and ensure legal compliance and successful future monitoring. Many of the tips and resources mentioned in this TEGL are from previously released TEGs. Please refer to the "References" section above for direct links to each of the TEGs mentioned throughout this guidance.

4. Common Findings and Tips.

A. Case Management

Effective case management practices include the development of Individual Service Strategies (ISS), follow-up services, and case note and file maintenance. A successful case management approach includes assessing and interpreting needs; developing strategies to help reach educational, training and employment goals; providing tools and resources to help overcome personal barriers; documenting youth participation, referral outcomes, service decisions, summaries of one-to-one meetings, and achievements; and providing

follow-up services. Case management provides an opportunity for staff to build a working relationship with the participant and with key organizations in order to assist youth in meeting their objectives.

Development of an ISS. Findings demonstrated that many ISSs lacked documentation of objective assessment results and failed to incorporate assessment results into the ISS. In addition, a number of ISSs did not include employment goals, services received, detailed strategies needed to help youth achieve their goals, and case manager and participant signatures documenting an agreed upon strategy. Other ISSs were not updated on an ongoing basis, and therefore did not document the services provided, or any potential life changes that affect goal attainment.

Having a well-developed ISS and related documentation is a vital part of case management and is required by DOL regulations. Monitoring visits found that WIA Youth providers often lack a fully-developed ISS for participants. The WIA Youth program requires every youth participant to have an ISS in their case file (20 CFR 664.405 (a)(2)). As outlined in WIA Section 129 (c)(1)(B), the ISS represents an individual plan for each young person and includes: 1) an employment goal; 2) appropriate achievement objectives, including educational goals; and 3) appropriate services that take into account what is learned from the objective assessment. The ISS is a detailed, unique, individual strategy for each participant that is the basis for the overall case management strategy. The ISS should be a living document, reviewed and updated on an ongoing basis. The case manager should use the ISS to update strategies and activities as they occur and/or as life changes require, and to document referral and contact information for services obtained from partner organizations. When reviewing the ISS, case managers should document a participant's progress, activities completed, benchmarks reached, and any other accomplishments. Additionally, the ISS should be developed and modified in partnership with the participant, and should document achievements in measurable and attainable short-term and long-term goals that both reflect the young person's interests and incorporate career pathway planning.

States and/or local workforce investment boards must establish policies and procedures to ensure all ISSs are complete per requirements and guidance. ETA encourages case managers and other youth providers to review the following resources in order to create or enhance ISS development and implementation strategies. The Department of Labor (the Department) developed the *Toolkit for Frontline Services for Youth*, t: http://www.doleta.gov/youth_services/Toolkit-improve.cfm, to assist programs with improving case management, including development of an ISS. TEGL No. 05-12 also provides information on developing an ISS, as well as links to samples and examples of states with effective ISS development. Another resource detailing how to develop an ISS is from Focused Futures Youth Development System Builder and can be found at: <http://cle.osu.edu/lwc-publications/focused-futures/downloads/Developing-as-ISS.pdf>. For sample ISS documents, see ETA's Youth Connections Community of Practice on Workforce 3One at: <https://youth.workforce3one.org/page/resources/1001200332592308266>.

Follow-up Services. Relating to quality case management, monitoring visits found that programs were offering inadequate or insufficient follow-up services, providing follow-up services inconsistently, *i.e.*, “only upon request,” and providing follow-up services for less than a duration of 12 months. WIA regulations at 20 CFR 664.450 state that all youth must receive some form of follow-up services for not less than 12 months after the completion of participation. The types and duration of services must be based on the needs of the individual.

As described in TEGL No. 05-12, a follow-up service provides support and guidance after placement to facilitate: 1) sustained employment and educational achievement; 2) advancement along a job and/or educational ladder; and 3) personal development. 20 CFR 664.450 also provides examples of follow-up services for youth. One of the examples in the regulation is “tracking the progress of youth in employment after training.” While a follow-up service should include more than just a contact attempted or made for securing documentation for the case file in order to report a performance outcome, regular contact with the participant to ensure youth successfully continue in their placement of employment or post-secondary education may be a sufficient follow-up service as long as the case manager has assessed whether the participant needs anything beyond the regular contact and determined they do not need additional services. If a case manager learns from communication with the youth that he/she is, at that time, not in need of additional services or assistance, case managers must fully document the details of that conversation in the case file. This would include documenting the questions that led the case manager to assess the youth is not in need of services or assistance, such as those pertaining to whether or not a youth is in need of transportation, child care, appropriate work attire, support or mentoring to retain employment or remain in education, health and/or mental health services, or any other services or assistance that can help a youth achieve goals outlined in his/her ISS.

One additional clarification relates to the types of allowable follow-up services. As discussed in 20 CFR 664.450, the type of follow-up services provided is based on the needs of the participant. Any allowable WIA Youth service is allowable as a follow-up service if it is determined an individual needs such a service. As long as the participant is still in his/her follow-up services period, there is no need to re-enroll a participant in the WIA Youth program following exit in order to receive further services. Such services are considered part of follow-up services. For example, a participant is placed in employment and after 90 days of no service is exited from the program. Four months later, during their 12 month follow-up period, the participant loses their job and is determined to be in need of additional services such as further education or work experience. Under WIA, such a service may be provided as part of follow-up services.

Local areas should develop policies and training for case managers to deliver effective follow-up services to youth. ETA also recommends local areas review case files to ensure follow-up services occur for a minimum of 12 months following exit. To assist in developing such policies and practices, the *Toolkit for Frontline Services for Youth* and TEGL No. 05-12, both referenced above, provide additional information on follow-up services and strategies to conduct follow-up. In addition, TEGL No. 30-10 provides

examples of follow-up service strategies to help local practitioners ensure participant success.

Case File Maintenance and Case Notes. Monitoring reviews reported several types of issues with case file documentation and practices. These included incomplete case notes, poor case file maintenance where required documentation was missing, case files not updated and/or not matching information entered into the Management Information System (MIS); and extended gaps in time for documenting updates, including updating the ISS. In accordance with TEGl No. 3-03, Change 1, grantees must collect and store specific source documentation to enable the validation of data elements related to eligibility, services received, and outcome information that are used to calculate and support the validity of performance outcomes reported to ETA. Required documentation must be kept in case files, particularly for eligibility documentation, such as verification of date of birth; assessment for basic skills; scores for pre- and post-tests; income verification; signatures from the youth and/or parent/guardian of minor participants; and contact information.

Each WIA Youth participant should have a case file with detailed information on basic and occupational skills; work experience; interests; supportive service needs; assessment results; eligibility documentation; case notes documenting active case management and follow-up, including how service decisions are made; and other information that will help create a strategy for success. Thorough case file maintenance and documentation by case notes are essential to the effective provision of case management, as they assist with managing and supporting participants' progress.

Proper case file maintenance includes organizing case files, using a case file template to ensure consistency across files, and regular and routine updating. Complete and detailed case notes help plan, implement, and evaluate services. This includes dates on each document at the time of occurrence and copies of credentials, awards, hiring letters, and schedules. Case files should be maintained to verify and document eligibility, services, and outcomes. Of particular importance is documenting facts and records that directly relate to eligibility determination. Contact information, such as a current phone number, physical address, e-mail address, and emergency contact information, is also important, especially as it relates to the ability of case managers to provide follow-up services.

Local areas should develop policies and procedures regarding case file maintenance. ETA encourages regular in-house monitoring, regular random selection file review, and team/peer review to ensure high quality case files. Programs are encouraged to adopt a common file format, whether the case notes are being generated electronically or hand-written, to ensure consistency across files. Information on effective case file maintenance and case notes can be found in the *Toolkit for Frontline Services for Youth and Training* and the Youth Connections Community of Practice on Workforce3One at: <https://youth.workforce3one.org/page/resources/1001200332592308266>. In addition, Workforce3One has a dedicated page, called Effective Case Management, providing tools and resources to ensure high-quality case management in workforce programs at: <https://effectivecasemanagement.workforce3one.org/index.aspx>.

Related to documenting eligibility determination, ETA recommends local programs' intake process include provisions to advise applicants in advance which documents are essential for enrollment. Many local areas have avoided disallowed cost issues by implementing record keeping systems that use a preliminary application, including an eligibility check list, to ensure that intake workers have verified and recorded documents to meet the appropriate eligibility requirements. Data quality and validation also are important; states should work with local areas to include data validation as part of their monitoring and service provider certification process. ETA has source documentation requirements regarding the types of documentation that are acceptable to validate certain components of eligibility, services, and outcomes as part of Department's data validation initiative. They can be found in TEGL No. 28-11, Attachment A at: http://wdr.doleta.gov/directives/attach/TEGL/TEGL_28-11-Atta1.pdf.

B. Service Provision

Determining services based on assessment and ISS. Monitoring found that some states did not provide services that matched participant assessments and ISS. One local area, for example, automatically placed all youth in work experiences without regard to the needs, goals, and interests identified in the assessment and ISS. As outlined in WIA section 129(c)(1)(A) and detailed in the WIA regulations at 20 CFR 664.405(a)(1) - (2), the program design framework must include an objective assessment and ISS plan. These integral components of the WIA Youth program help determine the program elements that are to be provided to youth participants. A comprehensive assessment is the basis for good planning and positive employment experiences for youth and employers. As stated in WIA Section 129(c)(1), local areas must provide an objective assessment of the academic levels, skill levels, and service needs of each participant. The assessment shall include a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes (including interests and aptitudes for nontraditional jobs), supportive service needs, and developmental needs of participants.

The assessment process involves gathering information from multiple sources, including observations and personal interviews, youth-completed forms, and any activities or tools designed to determine a young person's career interests. It also includes more formal assessments, which generally involve the use of standardized tests to assess specific abilities, such as literacy and numeracy skills for out-of-school, basic skills-deficient youth. Assessments should help to identify the strengths of individuals, and should not be used for purposes of excluding youth from programs. Rather than using an identical battery of assessments for all participants, the ideal approach is to have several tools that can be used with different youth based on needs. Just as the career planning process should be customized depending on the young person's individual needs, so too should the assessment process. In addition, assessment should be an ongoing process, continually reviewing participant interests, abilities, etc., that allows the case manager an opportunity to evaluate how effective services are in meeting particular needs, and ensuring flexibility in adapting service delivery strategies to a youth's needs and employment goals.

It is critical that all services provided to participants match participant needs, as identified in the assessment and plans articulated in the ISS. It is important to note that the ISS should be

reviewed with the youth at each meeting with the case manager to reinforce the youth's familiarity with the goals and for periodic updates. Youth should receive a copy of the jointly-developed and completed ISS. Additionally, services should be documented in the participant's case file. For specific requirements and tips on developing the ISS, see section 4.A in this TEGL. For assistance in selecting assessment instruments, ETA developed a useful reference guide: *Tests and Other Assessments: Helping You Make Better Career Decisions*, found at: http://www.onetcenter.org/dl_files/testAsse.pdf. Additional information on assessment can be found in the *Toolkit for Frontline Services for Youth*, found at: http://www.doleta.gov/youth_services/Toolkit-improve.cfm.

Availability of all 10 program elements. A common finding across a number of states and local areas was that not all 10 WIA Youth program elements were made available to all WIA Youth participants. In some instances, summer employment was the primary service provided with few other services available, while in other locations summer employment opportunities were not available at all. In some cases, older youth were not offered the full array of services available, and similarly there were cases where services were not offered to a portion (ages 14-16) of the younger youth cohort. In other instances, supportive services were not made available and mentoring beyond a relationship with the case manager was not available.

WIA Section 129(c)(2) and 20 CFR 664.410 state that local programs must make each of the 10 program elements available to youth participants. It also states that local areas have the discretion to determine what specific program services will be provided to a youth participant, based on each participant's objective assessment and ISS. This means that the services offered and provided to youth are determined by the needs and strategies identified through the assessment and ISS process. In addition, WIA section 129(c)(3)(A)(i) provides that local boards ensure each eligible youth be provided information on the full array of applicable or appropriate services that are available through the local board or other eligible providers. It is important that each local area make WIA youth service program elements available to all eligible youth participants, throughout the entire age range of 14-21.

ETA recognizes that with declining resources it can be difficult to fund all WIA Youth program elements. However, the intent of WIA is not necessarily to use WIA Youth funds for every youth element; rather, the WIA Youth program is intended to act as an intermediary, partnering with various publicly and privately funded organizations to ensure that all 10 youth program elements are available to all youth participants. As discussed in TEGL Nos. 09-00 and 05-12, local grant recipients do not need to use WIA funds to provide all 10 program elements and can rely on partner programs to provide some of the program elements if such services are available for all eligible youth in the local area. If an activity is not funded with WIA Title I funds, the local area must ensure that those activities are closely connected and coordinated with the WIA system. Ongoing relationships should be established with providers of non-WIA funded activities either through coordinated case management strategies, memorandums of understanding, or some other vehicle.

It is critical that the WIA Youth program ensure that participants have access to the services they need that will lead them to success in entering post-secondary education and

employment. Programs should not provide services based on what is most readily available or a one-size-fits-all approach. Rather, services should be individually tailored to a participant's needs balanced by evidence of what will lead to success. For example, work experiences should match a participant's interest and aptitude, balanced by the type of employment opportunities that are available and predicted to grow in a given local area. In addition, as discussed in TEGL No. 5-12, the provision of case management is not sufficient to be considered a mentoring service. Mentoring should be a structured activity provided by someone other than a case manager and should be available to all participants. Finally, if certain participants require supportive services to participate in the program, it is important to ensure they receive such services.

Ensuring appropriate services for older, out-of-school youth (OSY). Monitoring found that in some states and local areas, older youth were not being offered the full array of services authorized by WIA. As discussed earlier, all youth must be offered the full array of program elements and services based on the individual's assessment and ISS. Older youth and OSY will likely have different needs than younger, in-school youth. TEN No. 23-11 released the Recovery Act post-summer employment study examining the WIA Youth Recovery Act programming that focused on older youth and OSY. The study found that paid work experience is an effective way to engage older OSY; that there is a need to provide work experiences for such youth throughout the year and not just in the summer months; and that such work experiences should be of a larger, targeted career pathway, combining the work experience with the necessary education, training, and transition planning beyond the work experience.

One strategy to combine work experience with the necessary education and occupational skills training is to co-enroll youth ages 18-21 in the WIA Adult program, in order to fund occupational skills training with Individual Training Accounts. In the most recent program year, only 7.8 percent of 18-21 year old WIA Youth were co-enrolled in the WIA Adult program. Programs should consider increasing the number of older youth enrolled in the WIA Adult program when appropriate and as resources permit. TEGL Nos. 27-09 and 30-10 provide additional strategies for serving older youth and OSY.

Identifying Eligible Youth Service Providers. Monitoring reviews further revealed that some states did not have adequate service provider contracts because they did not have measurable contract goals and therefore had no means of evaluating service providers' performance within the contract. In addition, one local area in a state exited youth from the program because the program year ended and there was a change in a service provider contract, which is not an acceptable practice.

WIA Section 117(h)(4)(B)(i)-(ii) and 20 CFR 661.340(c)-(d) require that youth councils are responsible for recommending eligible providers of youth activities and conducting oversight of eligible youth providers, should Local Workforce Boards (LWIBs) delegate this responsibility to its youth councils. Additionally, WIA Section 123 states that LWIBs must identify eligible providers of youth activities by awarding grants or contracts competitively based on the recommendations of the youth council. To learn more about the selection of service providers, see section 4 of the *WIA Youth Program Reference Tool*, found at:

http://wdr.doleta.gov/directives/attach/TEN/ten_46_11.pdf. Further information on the youth council's role and responsibilities regarding service providers is available in section 4.D of this TEGL. In addition, WIA section 112(b)(18)(B) (29 U.S.C. 2822) requires that the State Plan include information identifying the criteria to be used by the LWIBs in awarding grants for youth activities, including the criteria that the Governor and the LWIBs will use to identify effective and ineffective youth activities and providers of those activities. Therefore, it is critical that local areas have mechanisms in place, such as measurable contract goals, to assess the effectiveness of youth services providers.

TEGL No. 13-09 suggests a number of real-time indicators or interim progress benchmarks to assess provider performance within service provider contracts. States are encouraged to review this guidance and share its contents with LWIBs to help to assure that adequate service provider contracts are in place with measurable youth service provider contract terms to evaluate service providers. In addition, changes in youth service providers should have no adverse impact on WIA Youth participants. As mentioned previously, services to participants should be based on assessment and the ISS and not timed to the beginning or end of a service provider contract. If a contract ends, youth must be transitioned to the new service provider to ensure there is no disruption in services.

An additional resource to assist local boards and youth councils in developing effective Requests for Proposals for youth services is the *WIA Youth Program RFP Guide*, developed in January 2001, at: http://www.doleta.gov/youth_services/pdf/rfpguide.pdf.

C. Performance Management

Improperly exiting youth was the most frequent finding identified across the monitoring reports. Many states did not exit youth following 90 days of no service, as required in guidance. As defined in TEGL No. 17-05, the term "program exit" means a participant does not receive a service funded by the program or a partner program for 90 consecutive calendar days and is not scheduled for future services. See WIA Section 121(b)(1) for the definition of partner program. The phrase "and is not scheduled for future services" does not apply to a participant who voluntarily withdraws or drops out of the program. Once a participant has not received any services funded by the WIA Youth program or partner program for 90 consecutive calendar days, the exit is applied retroactively to the last day on which the individual received a service funded by the program or a partner program. This means that, at a minimum, local areas must attempt to track participant services across the required DOL-funded American Jobs Center network programs until the individual exits all services. Some methods of tracking a participant across programs include specifying services financially assisted or accomplished by partner programs in the individual's service plans, coordinating service tracking through integrated data systems or other technologies, and providing coordinated follow-up services to individuals.

All currently enrolled participants should be actively engaged in appropriate services. See section 6.B.2. of TEGL No. 17-05 for exceptions to the program exit definition. In accordance with subsection 101(34) of WIA, follow-up services do not count as a service that would extend participation. For a list of such follow-up services that do not extend the period of participation, see TEGL No. 17-05, section 6.B.1.

Failure to exit participants after 90 days of no service impacts all three WIA Youth common measures. If the date of exit is not accurately recorded, post-exit data that the Department uses to determine performance outcomes will be incorrect and consequently, performance outcomes will not be accurate. Both the “Placement in Employment or Education” and the “Attainment of a Degree or Certificate” are reported following exit; the Literacy and Numeracy Gains measure, while not fully exit-based, is impacted by the exit date if an OSY exits prior to the completion of their first full year in the program.

ETA requires state and local boards to develop and implement exit policies consistent with TEGL No. 17-05. ETA encourages case managers or other relevant program staff to build mechanisms into case management processes and/or MIS that trigger action by staff to properly exit youth, such as automatic alerts when a service has not been provided in 90 days or an MIS feature that automatically exits participants based on their last service date after a period of 90 days of no service. In addition, incorporating a proactive trigger into the MIS warning of no service at intervals such as 30, 60, and 75 days also is helpful to ensure necessary services are provided before youth are exited.

D. Governance

State Youth Policy and Oversight. Monitoring reviews found that several states did not provide adequate policy guidance to local areas. This lack of adequate policy guidance contributed to the Department finding states non-compliant in certain areas, such as youth council operations, service provision, performance management, and case management. In addition, findings revealed that some states did not have monitoring policies and procedures or failed to monitor local areas altogether. States should have monitoring policies and procedures in place and should regularly monitor local areas. These policies and procedures should be periodically reviewed to ensure their effectiveness.

State and local workforce boards design and manage the workforce system’s governance responsibilities under WIA. State boards are responsible for advising the Governor on ways to develop the statewide system, and for helping the Governor by monitoring statewide activities. Requirements in the WIA regulations at 20 CFR 661.120 require that state boards establish policies, interpretations, guidelines and definitions to implement the provisions of WIA title I. In addition, WIA regulations at 20 CFR 667.410 require states to conduct regular oversight and monitoring of their WIA activities and those of their sub-recipients and contractors. Each Governor is responsible for developing the state monitoring system, which must provide for annual on-site monitoring reviews of local areas’ compliance with DOL uniform administrative requirements, as required in Section 184(a)(4) of WIA and 20 CFR 667.410(b)(1).

It is critical that states have adequate policies in place, or that they ensure their local areas have adequate policies in place, that detail the requirements for the program areas cited in this TEGL as common findings. ETA encourages states and local areas to review WIA Youth policies, with particular attention to: 1) defining the sixth barrier for youth eligibility which, as specified in Section 101(13)(C)(vi) of WIA, is an individual who requires additional assistance to complete an educational program, or to secure and hold

employment; 2) identifying documentation requirements for case files; 3) articulating what should be included in an assessment and ISS, ensuring consistency with Section 129(c)(1)(A) and 129(c)(1)(B) of WIA; 4) defining what constitutes adequate follow-up services; 5) identifying what constitutes proper case notes and case file maintenance; 6) identifying necessary elements within service provider contracts such as quantifiable benchmarks; and 7) articulating what constitutes a service and requiring that youth must be exited following 90 days of no service.

State oversight is essential to ensuring that established policies both help to achieve program quality and successful outcomes for youth, and meet WIA objectives. Timely monitoring helps determine whether sub-recipients and contractors have demonstrated compliance with WIA requirements. ETA encourages states to provide both staff training on monitoring requirements, and the technical support necessary to ensure local areas have the tools needed to operate effective youth programs.

Operating Effective Youth Councils. Lastly, many local areas did not have adequate youth councils. Findings included youth councils missing required members, inactive youth councils that had not met in over a year, local areas failing to establish a youth council at all, and youth councils that did not develop portions of the local plan related to eligible youth. Overall, the findings confirm the need for more technical assistance and support to help build the capacity of youth councils to plan and manage youth programs in their local areas.

Section 117(h) of WIA and the regulations at 20 CFR 661.335 require state and local workforce areas to establish governance systems that include LWIBs and youth councils. Youth councils are required to guide youth policy and coordinate youth services in local areas. Specific duties identified in the regulations at 20 CFR 661.340 require youth councils to coordinate youth activities, develop portions of the local plan related to eligible youth, and recommend eligible youth providers in accordance with Section 123 of WIA. Also, youth councils must conduct oversight with respect to eligible providers of youth activities, subject to the approval of the local board. Further information on governance and youth councils can be found in Section 2 of the WIA Youth Program Reference Tool at http://wdr.doleta.gov/directives/attach/TEN/ten_46_11.pdf.

ETA encourages states to provide technical assistance to help local areas develop strategies to build youth councils' capacity to plan and manage youth programs. At the local level, LWIBs should ensure that youth councils are active. If they are inactive or failed to meet over an extended period, LWIBs should work to re-activate such youth councils. Further, LWIBs are encouraged to review membership requirements as provided at Section 117(h) of WIA to ensure all required members are actively participating, particularly parents, and ensure members carry out functions identified in the regulations at 20 CFR 661.340. Once active, youth councils should engage in strategic planning to bring together WIA-funded services and other partner services and programs to build a comprehensive, coordinated youth development system in their communities. States also should encourage LWIBs and youth councils to be creative in leveraging both WIA and other available funds. Community resource mapping is a useful tool to help identify existing services and gaps in services.

Tools to help youth councils in their roles and responsibilities, include: “Youth Council Toolkit: Tools to Help Youth Councils Build Effective Operational Youth Service Delivery,” available at: http://www.doleta.gov/youth_services/toolkit_2002.cfm, and *Recipes for Success: Youth Council Guide to Creating a Youth Development System Under WIA*, by John J. Heldrich, Center for Workforce Development at Rutgers University, available at: http://www.doleta.gov/youth_services/pdf/recipes-ycouncil.pdf.

5. **Tools and Resources.** Below are resources related to the topics discussed in this TEG, which DOL provides to help programs better serve WIA Youth participants. Given that the Workforce Investment Act was passed in 1998, some of the resources below were written a number of years ago shortly after passage of WIA. While these older resources may contain a few outdated references, the majority of the information contained in them is still very relevant. In addition, ETA will host upcoming webinars and web chats to provide further technical assistance on many of the topics included in this TEG. Please see the Youth Connections Community of Practice at: <https://youth.workforce3one.org/> for future webinars and chats.

Effective Case Management, Workforce3One: This Workforce3One page is a technical assistance repository that identifies existing tools and resources about integrated intake processes and high quality case management. <https://effectivecasemanagement.workforce3one.org/index.aspx>.

Improving Demand-Driven Services and Performance: Toolkit for Effective Front-Line Services to Youth: The Department published this toolkit in 2007 to assist programs with improving case management, recruitment, intake, follow-up services, and developing Individual Service Strategies. http://www.doleta.gov/youth_services/Toolkit-improve.cfm.

My Next Move: This electronic tool gives individuals three main ways to explore careers, including an online O*NET interest assessment, and then provides an easy-to-read, one-page profile of each occupation highlighting important knowledge, skills, abilities, technologies used, simplified salary and outlook information, and links to find specific training and employment opportunities. www.MyNextMove.org

mySkills myFuture: This electronic tool enables job seekers and intermediaries to match a worker’s occupational skills and experiences with the skills needed in other occupations, in order to facilitate their career mobility and economic prospects. For any occupation, users can get a list of job listings in their local area (i.e. state or zip code) and click directly through to the hiring company’s website. www.mySkillsmyFuture.org

Recipes for Success: Youth Council Guide to Creating a Youth Development System Under WIA: The Department published this guide in 2000; it provides practical information for community leaders, LWIBs, and youth councils on developing and operating a youth council. http://www.doleta.gov/youth_services/pdf/recipes-ycouncil.pdf.

Soft Skills to Pay the Bills: Mastering Soft Skills for Workplace Success: The Department's Office of Disability Employment Policy published this curriculum in 2012; it focuses on teaching "soft" or workforce readiness skills to youth, including youth with disabilities. Created for youth development professionals as an introduction to workplace interpersonal and professional skills, the curriculum is targeted for youth ages 14 to 21 in both in-school and out-of-school environments.
<http://www.dol.gov/odep/topics/youth/softskills/>.

Tests and Other Assessments: Helping You Make Better Career Decisions: The Department published this guide in 2000; it addresses the job-seeker and assists with better understanding the different types of career assessments and how they may be used to make career decisions.
http://www.onetcenter.org/dl_files/testAsse.pdf.

What's My Next Move Guide: The Department developed this printable guide that includes seven steps to help students plan a career path after graduation. It was developed as a resource to connect young people to online career exploration resources available from the Department of Labor. The guide encourages students to think about and make decisions about their future and to engage with career counselors, workforce professionals, teachers, and parents/guardians.
<http://www.careeronestop.org/whats-my-next-move.aspx>.

WIA Youth Program RFP Guide: The Department developed this guide in January 2001; it provides LWIBs and youth councils with information and ideas on how to develop an effective request for proposal for youth services.
http://www.doleta.gov/youth_services/pdf/rfpguide.pdf.

Youth Connections Community of Practice (CoP), Sample Documents: Tools for Youth Providers: Various states, LWIBs, and youth providers across the country have developed these sample forms, policies, documents, and training tools for use in their WIA Youth programs. Visitors to the site are free to use these samples as models for developing tools, in accordance with state and local workforce board policies.
<https://youth.workforce3one.org/page/resources/1001200332592308266>.

Youth Council Toolkit: Tools to Help Youth Councils Build Effective Operational Youth Service Delivery: The Department published this toolkit in 2002; it contains six modules addressing the development and maintenance of a local youth council.
http://www.doleta.gov/youth_services/toolkit_2002.cfm.

6. **Action Requested.** Please share this TEGL with LWIBs and youth service providers.
7. **Inquiries.** If you have questions about this guidance, please contact the appropriate ETA regional office.