

50. Iowa Title I Youth Services

Workforce Innovation and Opportunity Act (WIOA)

50.1. PURPOSE

This guidance is being issued pursuant to the federal Workforce Innovation and Opportunity Act of 2014 (WIOA) and its implementing regulations. The U.S. Department of Labor (DOL), in coordination with the U.S. Department of Education (ED) and the U.S. Department of Health and Human Services (HHS), developed a WIOA Resource Page and other information and resources for States, local areas, non-profits and other grantees, and other stakeholders to assist with implementation of the Act. This page can be found on the U. S. Department of Labor Employment and Training Administration's website at the following address: https://www.doleta.gov/wioa/Final_Rules_Resources.cfm.

This guide is not intended to serve as an official statement or interpretation of WIOA. Instead, this guidance should assist local areas in developing robust local policies to support excellent service to all eligible program participants under Iowa's Title I Youth Program, hereinafter referred to as "youth program."

Local areas are encouraged to apply these guidelines in the development of new or revised policies, creation of innovative programming, and the advancement of practices which help to remove barriers to employment for the state's youth population.

These guidelines are subject to revision as additional guidance is issued by the U. S. Department of Labor (DOL) or other applicable entity, or if a change in workforce trends or other factors necessitates.

Staff providing services under this program should adhere to all policies included in this manual and any local policies outlined in an area's local service plan.

Under WIOA, youth program staff should deliver services in a customer-centered, high-quality manner which seeks to advance the following for its youth participants:

- Enhanced skillsets,
- Increased likelihood of entry into meaningful employment,
- Enhance chances of retaining employment leading to self-sufficiency, and
- Removal and reduction in barriers to employment.

WIOA outlines a broad youth vision that supports an integrated service delivery system and provides a framework through which states and local areas can leverage other federal, state, local, and philanthropic resources to support eligible youth participants.

Iowa shares the commitment to providing high-quality services for all youth and young adults through the following activities:

- Career exploration and guidance,
- Continued support for educational attainment,
- Opportunities for skills training for in-demand industries and occupations, such as pre-apprenticeships or internships, and
- Job placement assistance in a field that supports a career pathway, enrollment in postsecondary education, or a Registered Apprenticeship.

Iowa's youth program connects eligible youth to a continuum of services and activities, aimed at teaching the youth to navigate the appropriate educational and workforce systems based on an established career pathway.

Services based on the unique needs of each individual participant are applied program-wide. Staff should encourage and actively engage youth participants in the design and implementation of their own program and development of realistic timeframes and future lifestyle implications.

WIOA Title I Youth has an increased focus on serving out-of-school youth, with an emphasis on reducing barriers to serve the most "at-need" young adults.

Under WIOA Title I Youth programs, there are 14 required program elements. The youth program strives to establish young adults as skilled and future-ready workers who demonstrate the value of Iowa's youth to employers. Employers are vital partners in this process and can provide participants with indispensable experiential learning opportunities such as applying learned skills in real-world employment settings.

50.2. YOUTH PROGRAM 14 ELEMENTS

In order to support youth and young adults who face significant barriers in transitioning to self-sufficient adulthood, the following services must be made available to youth participants in each local area. Career planners, together with the participant, may determine which elements to provide based on the participant's objective assessment and individual service strategy. Local career planners are encouraged to offer as many viable options as possible to a participant.

In order to support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for participants, the Iowa Title I Youth program shall provide services consistent with the 14 required program elements under WIOA:

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential (RBS) (SEC).
2. Alternative secondary school services, or dropout recovery services, as appropriate (SEC).
3. Experiential Learning consisting of paid and unpaid work experiences that have, as a component, academic and occupational education, which may include:
 - Summer employment opportunities and other employment opportunities available throughout the school year (WEP);
 - Pre-apprenticeship programs (PRE);
 - Internships and job shadowing (INT), (SHW); and
 - On-the-job training opportunities (OJT);
4. Occupational skills training, which shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in demand industry sectors or occupations in the local area involved, if determined by the local board (OJT), (IST), (CUS), (APP), (ENT);

5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster (PRE), (APP), (IST);
6. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate (LDS);
7. Supportive services;
8. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months (MEN);
9. Follow-up services for not less than 12 months after the completion of participation, as appropriate.
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate (G&C);
11. Financial literacy education (FIN);
12. Entrepreneurial skills training (ENT);
13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services (JSP); and
14. Activities that help youth prepare for and transition to postsecondary education and Training (WEP), (MEN), etc.; (SEC-when leads to credential).

50.3. YOUTH PROGRAM ELIGIBILITY

Youth eligibility must comply with selective service registration requirements and Veterans Priority of Service policy for employment and training programs, as applicable to youth age 18 and older.

To be eligible to receive WIOA Title I Youth services, at the time of eligibility determination an individual must meet all of the following criteria:

- Be a citizen or noncitizen authorized to work in the United States;
- Meet Military Selective Service registration requirements (males 18 years and older only);
 - if an individual who is required to register at age 18 turns 18 during his period of WIOA enrollment, he must register in order to remain enrolled in the program. Failure to register must result in immediate termination from WIOA program; **and**
- Be an out-of-school youth (OSY) or an in-school youth (ISY).

50.3.1. Eligibility: Out-Of-School Youth

An eligible Out of School Youth (OSY) is defined as an individual who is not attending any school as defined under State law, and who is not younger than age 16 or older than age 24, and meets at least one of the following criteria:

- School dropout;
- Within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter;

- A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is also either Basic Skills Deficient or an English Language Learner;
- Offender;
- Homeless individual (see homeless individual in Definitions section for complete definition), a homeless child or youth aged 16 to 24 (see homeless child or youth in Definitions section for complete definition), or a runaway;
- Individual 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 child who is likely to remain in foster care until 18 years of age, or in an out-of-home placement;
- Pregnant or parenting;
- Individual with a disability;
- Low-income individual or person living in a high-poverty area, requiring “additional assistance” to enter or complete an educational program, or to secure or hold employment.

Youth, who require additional assistance to complete an educational program or to secure and hold employment, additional assistance may be defined to include:

- Migrant Youth;
- Incarcerated Parent;
- Behavior Problems at School;
- Family Literacy Problems;
- Domestic Violence;
- Substance Abuse;
- Chronic Health Conditions;
- One or more grade levels below appropriate for age;
- Cultural barriers that may be a hindrance to employment;
- American Indian, Alaska Native or Native Hawaiian;
- Refugee; or
- Defined locally as needing “additional assistance.”

50.3.2. Eligibility: In-School Youth

An eligible In-School Youth (ISY) is defined as an individual who is attending school as defined under State law and who is not younger than age 14 or older than age 21 (unless an individual with a disability who is attending school under state law). All ISY must be low-income or living in a high poverty area and meet at least one of the following criteria:

- Meets the criteria as basic skills deficient;
- English language learner;
- Offender;
- Homeless individual as defined, is a homeless child or youth aged 14-21 as defined, or a runaway;
- An individual 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 child who is likely to remain in foster care until 18 years of age, or in an out-of-home placement;
- Pregnant or parenting;

- Individual with a disability; or
- An individual who requires “additional assistance” to complete an educational program or to secure or hold employment.

Not more than 5% of total in-school youth enrolled in the youth program can be enrolled under the “individual who requires additional assistance” component. Calculation is based on all in-school youth served within the given program year.

For youth who require additional assistance to complete an educational program, or to secure and hold employment, “additional assistance” may be defined to include:

- Migrant Youth;
- Incarcerated Parent;
- Behavior Problems at School;
- Family Literacy Problems;
- Domestic Violence;
- Substance Abuse;
- Chronic Health Conditions;
- One or more grade levels below appropriate for age;
- Cultural barriers that may be a hindrance to employment;
- American Indian, Alaska Native or Native Hawaiian;
- Refugee; or
- Locally defined “needing additional assistance.”

All in-school youth participants must be low-income, except those who fall under the low income exception.

Within this exception, 5% of youth per region may be exempted from the low income requirement based on the number of youth enrolled in a given program year who would ordinarily be required to meet the low income criteria. Individuals who may go into this exception include:

- All in-school youth (ISY), and
- Out-of-school youth (OSY) who only meet the criteria of:
 - Basic skills deficient
 - English Language Learner, or
 - Require “additional assistance” to complete an educational program or to secure or hold employment.

For example, a local area enrolled 200 youth in a program year. 100 of those youth were OSY who were not required to meet the low-income criteria, 50 were OSY who were required to meet the low-income criteria, and 50 were ISY. In this example, the 50 OSY required to be low income and the 50 ISY are the only youth factored into the 5% low-income exception calculation. $[(50 + 50) \times .05 = 5]$ Five of the 100 youth may be exempted from meeting low income eligibility.

Documentation for this exception must be maintained by the Title I Youth Service Provider.

50.3.3. Out of School Youth Funds 75% Requirement

At a minimum, 75% of the WIOA Title I Youth funds available to a region for youth programs must be used to provide services to out-of-school youth. This requirement will be considered met if at least 75% of the Youth Program services expenditures are for out-of-school youth.

50.4. APPLICANT & PARTICIPANT PROCESS

The framework of youth program services includes intake, objective assessment, career planning and the development of an individual service strategy, designation and referral to supportive services, and follow-up services.

50.4.1. Outreach & Recruitment

Outreach is the active effort or process by which potential participants are located, made aware of programs, and encouraged to utilize the service opportunities provided through Iowa's One-Stop Center System. The outreach process must ensure that substantial segments of the population, as well as targeted populations, are aware of all available services and that those methods are available in accessible formats in order to reach the broadest possible audience.

Recruitment includes the official involvement of the youth in the process. Local areas are encouraged to think creatively when developing local youth programming and policies. Seek out partnerships with local community-based youth programs and established area agencies serving area youth. Connect with high school guidance counselors, career planners or other counselors outside of the one-stop center. Consider innovative methods to recruit using a variety of techniques such as recruiting in peer groups, launching a robust social media campaign, and targeting special populations such as disconnected youth.

Engaging disconnected and out-of-school youth is a priority under WIOA. To reach this population several methods can be approached, however, connecting with young adults where they are has proven to be effective. Being visible in the community and proactively seeking opportunities to connect with youth outside of traditional service delivery locations, can aid in recruitment efforts.

Providing direct outreach in recreation centers, shopping malls, community centers, health clinics, etc., can prove valuable to recruiting efforts. Holding informational sessions at area high schools, community-based and faith-based organizations, emergency food programs and homeless shelters should be standard practice in your local recruiting strategy. Current and past participants can also serve as peer recruiters and quality referral sources.

Other proven methods include print and media campaigns, partnerships with local schools to access youth who are currently not attending school or who have dropped out, information sharing between schools, and partnering to host expos and re-engagement fairs. It is important to remember that outreach and recruiting tools and materials should be accessible and reach a multitude of audiences, including those with differing abilities and varied communication methods, and individuals with limited English proficiency. Given the out-of-school age increase to age 24, many Temporary Assistance for Needy Families (TANF) heads-of-household participants may be eligible for the youth program. Local areas are encouraged to partner with their local PROMISE JOBS staff which is typically located in one-stop centers, to reach the TANF population.

Additional efforts to target Veterans and youth with disabilities should be reinforced and supported through the use of multiple methods to ensure as many OSY as possible are reached, including disconnected youth.

In addition, outreach techniques must include dissemination of information regarding non-traditional career options for all participants. The outreach process needs to be flexible to allow adjustments that will ensure equitable service to substantial segments of the population. For purposes of this requirement, substantial segments of the eligible populations have been identified in terms of the demographic characteristics of age, race, gender and disability.

50.4.2. Preliminary Pre-Assessment

The pre-assessment process precedes an official enrollment for WIOA Title I funded Youth services. Topics discussed during such preliminary information gathering sessions include:

- Eligibility requirements for program services,
- What will happen with young adults who are ineligible,
- Identification of expectations,
- An overview of the purpose of the program,
- Available services,
- Expected results and associated outcomes,
- Description of each person's roles and responsibilities in achieving the goals of the plan.

Initial meetings should consist of building rapport with the youth and establishing the tone and quality of an ongoing relationship with the youth. This "getting to know you" period should be treated as such and used to critically listen to the participant in an attempt to understand their unique needs and circumstances. While the gathering of information and documentation in accordance with established procedures is necessary, the focus should be on the youth, rather than utilizing meetings only to gather eligibility documentation.

50.4.3. Application for Services

An application for WIOA Title I Youth services is required. All questions asked in the application must cover all questions required in the data management system.

50.4.4. Eligibility Determination

Determination of eligibility for WIOA Title I programs must be based on information gathered at the time of enrollment. Such information must be gathered at, or prior to, enrollment in Iowa's Title I Youth Program. All youth must be determined eligible before they can participate in any Title I activities.

The WIOA Title I Service Provider(s) for youth services is responsible for all eligibility determinations within each region for the youth program. The service provider may delegate this responsibility to a sub-recipient if this arrangement is stated in the Local Service Plan. The service provider may permit a WIOA Title I sub-recipient to make such determinations if the service provider ensures reasonable safeguards, including provisions for reimbursement of costs incurred because of erroneous determinations made by the sub-recipient.

Eligibility determinations may be based upon self-certification of information provided by applicants if no other verification method can be obtained, and only when applicable. The applicant must certify, in writing or by other appropriate means, that information provided is true and correct to the best of the applicant's knowledge. If the information provided is inconsistent, or if there is reason to suspect the applicant is either mistaken or dishonest, an obligation exists to verify the accuracy of the information.

For minors, a parent or guardian must certify that information provided is correct to the best of the parent or guardian's knowledge. Parent or guardian signatures are not required for emancipated minors.

See youth program eligibility for additional details.

50.4.5. Selection for Enrollment into Title I Youth Services

In making enrollment decisions, priority must be given to residents of the region, extended out to the local school district boundaries. It is the responsibility of the Title I Youth Service Provider(s), or their designees, to follow the regional selection procedure as described in the Local Service Plan. The criteria in the written procedure must provide a fair and equitable method for selection among the eligible applicants, as well as a process by which to document fair and equitable determination.

50.4.6. Enrollment

In order to be a participant in the WIOA Title I Youth program, all of the following must occur:

- An eligibility determination,
- The provision of an objective assessment,
- Development of an individual service strategy and
- Participation in any of the 14 youth program elements.

The information required for enrollment may be collected using electronic data transfer, personal interview, or an individual application. During enrollment, all information necessary to make a determination of eligibility for the services to be provided must be gathered and documented. A complete enrollment must be obtained for each individual receiving WIOA Title I services. See Record Keeping and Maintenance for the minimum requirements for documenting enrollment eligibility.

Co-Enrollment

Co-Enrollment is a service strategy that may benefit the overall success of the participant by partnering with other subject matter experts within the workforce system. This may take place without a re-determination of eligibility if each of the applicable programs' basic eligibility requirements are met. Participants must have an active role in the development of their Individual Service Strategy (ISS). A new ISS is not required if the participant recently developed an ISS under another education or training program.

Intrastate Transfer

Intrastate Transfer is an option when a participant relocates from one service delivery area to another, whereby there is an expectation that comparable services continue based upon available resources. If services can continue with the original region, there is no requirement they be transferred to the region in which they relocated. If it is determined to be appropriate to transfer, a new application is not required.

However, the service delivery area to which the participant is being transferred to should obtain and maintain the following items in the participant file.

- A copy of the original enrollment; and
- Documentation of participation in the Title I program with the originating service delivery area.

The service delivery area that originally enrolled the individual is encouraged to maintain the enrollment in the data management system in partnership with the service delivery area that the participant was transferred to, as exiting the participant at the point of transfer may result in premature exit and not meeting performance outcomes.

Performance for the participant remains with the service delivery area that initially enrolled the participant.

Re-enrollment

Re-enrollment is allowed for individuals interested in re-enrolling; however a redetermination of eligibility must be completed prior to re-enrollment. Justification for re-enrollment of former participants must be documented in the Individual Service Strategy (ISS).

50.4.7. Objective Assessment (OBA)

All youth participants must receive an Objective Assessment (OBA). The objective assessment process collects information upon which a participant's Individual Service Strategy (ISS) will be based. OBA is a mutual exchange of ideas and opinions, discussion and deliberation. This process assists a participant in obtaining a focus to develop his or her talents and competencies for the world of work. The results of the objective assessment must be shared verbally with the participant and must be used to develop the ISS in partnership with the youth.

Objective assessment may be completed using a combination of structured interviews, paper and pencil tests, performance tests, work samples, behavioral observations, interest and/or attitude inventories, career guidance instruments, and basic skills measurements. OBA is a process that requires more than one appointment between the participant and the career planner to conduct all of the necessary portions of the assessment.

Portions of assessments conducted by other one-stop center partners, such as PROMISE JOBS or other programs, such as, but not limited to Vocational Rehabilitation, Job Corps, AmeriCorps, YouthBuild or iJAG may be used to collect information for the objective assessment as described in this section. Such assessments must have been completed within one year prior to WIOA Title I Youth enrollment. Any tests of reading, writing, and computation skills must have been completed within six months prior to the Title I Youth enrollment. Reading and math skills for out-of-school youth should be measured by allowable assessments as determined by the National Reporting System (NRS) as part of the objective assessment. For in-school youth, standardized assessments administered by the youth's school may be accepted.

The objective assessment is short-term activity that may be revisited as needed to determine further service strategies. The OBA should not be used as a stand-alone activity unless the participant's employment goals change. The OBA must be clearly documented in the data management system including the type of assessment used and the results of that assessment. Documentation of a mutual conversation between the career planner and participant of the results is also required. Local areas shall identify which assessment

tools will be utilized during the OBA process and ensure that the OBA process is made accessible to all eligible youth.

The OBA process is intended to provide information necessary for the youth to develop an Individual Service Strategy (ISS) with realistic goals. The results of OBA instruments and how results are used to develop the ISS must be documented in the data management system with copies of test results in the participant case file.

If goals are set for youth in basic skills, tests for determining grade level must be given within 30 days of the goal being established. Individuals with disabilities that preclude testing who are obviously at or below the eighth grade level may be reported that way. Individuals who have a college degree or a two-year associate degree do not need to be tested. They may be reported as having a 12th grade reading and math level.

Objective assessment must be a participant-centered, objective evaluation of the academic levels, skill levels and service needs of each participant. The objective assessment may include a review of basic skills, occupational skills, work readiness skills, prior work experience, employability, interests, aptitudes (including interests and aptitudes for nontraditional jobs), support service needs and developmental needs of participants for the purpose of identifying appropriate services and career pathway development.

The assessment process must utilize generally accepted methodologies and instruments to collect information on each of the following factors for each participant:

- Family situation,
- Work history,
- Education,
- Basic literacy skills,
- Occupational skills,
- Work readiness skills,
- Interests and aptitudes,
- Attitude and motivation,
- Financial resources,
- Basic needs, and
- Review of strengths.

The participant should be re-assessed as necessary to determine further service strategies. As additional relevant information about a participant becomes available, the objective assessment should be reviewed and re-evaluated, and may be re-opened if the participant's goals change.

Consumer choice is a process where the career planner and participant engage in mutual conversation regarding selecting the appropriate training program and training provider. Although consumer choice is not required for the Title I Youth program, it is strongly encouraged that the career planner facilitates a discussion with the participant during the OBA process, and includes the following:

- The training program selected should be directly linked to employment opportunities in the local region, or in another area in which the individual is willing to relocate, that are:
 - In high demand; or

- Have a high potential for sustained demand; or
 - Anticipating growth in the local area.
- Career planners should provide guidance to ensure that the training provider and program selection is appropriate for the participant, which was identified through the Objective Assessment (OBA) process.
 - Career planners should document conversations of maximized consumer choice within the data management system as a component of the OBA process.
 - Consumer choice must be documented in the OBA when a participant is co-enrolled with Title I Adult or Dislocated Worker programs and training is funded by either program.

50.4.8. Career Pathway

Under WIOA, the term “career pathway” means a combination of rigorous and high quality education, training, and other services that—

- Aligns with the skill needs of industries in the economy of the State or regional economy involved;
- Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including Registered Apprenticeships;
- Includes counseling to support an individual in achieving the individual’s education and career goals;
- Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
- Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
- Helps an individual enter or advance within a specific occupation or occupational cluster.

Career planners and participants should work together to identify appropriate career pathways by utilizing the objective assessment results.

Career pathway goals, timelines, and other considerations must be established and entered in the data management system on the ISS or associated employment/career plan. Inclusion of the O*NET code on the ISS as the first step is recommended, and the pathway must be described in the data management system.

50.4.9. Individual Service Strategy (ISS)

An Individual Service Strategy (ISS) must be prepared for each WIOA Title I Youth participant who will receive services, and be reviewed and updated on an ongoing basis. The ISS is a comprehensive service plan, based on the results of the objective assessment that describes the following participant considerations:

- Employability,
- Academic level,
- Skills training (if applicable) and

- Support service needs of the participant and the service strategy developed to meet participant needs in order to achieve employment goals.

The activities and services designed to meet these needs and achieve the career pathway goals, whether the career pathway goals are established through another agency or developed with the participant and career planner, it must still be accurately describe and documented.

The ISS is the basic instrument to document the appropriateness of enrollment and training decisions and contains supporting documentation for activities and services. Career planners are encouraged to document appropriateness for training services on the appropriateness tab in the data management system when applicable. The ISS must be developed in accordance with the following process and must include basic elements as well as additional requirements for certain activities or participants.

For participants still in school, credential attainment must be the goal and the career planner must continue providing services until the participant has attained their credential.

Developing the ISS

Certain elements are required in the Individual Service Strategy of each participant while the necessity of other elements may be based on the participant's age or individual needs. It is essential that career planners proactively seek out opportunities to partner with the participant in identifying and resolving barriers which hinder the participant's fullest participation in the workforce system.

The Six Basic Elements of the ISS are identified below:

1. Identification of appropriate career pathways that include education, career goals, and timeframes;
2. Clear linkages to the goals of the WIOA Title I Youth program;
3. Career Plans, including career pathways;
4. Results of the OBA;
5. Achievement Objectives, including short-term goals and benchmarks that will lead to achievement of the career pathway goal; and
6. Service Recommendations and Referrals, outlining appropriate training and support services, including a schedule of activities, a timeframe for completion and a process for following up on referrals.

The ISS must be developed in partnership with the participant and appropriate partner agencies, and must incorporate the six basic elements outlined above.

The WIOA Title I Youth Service Provider must ensure that decisions are participant-centered and intended to enhance the employability of the participant. The combination of services to the participant described in the ISS must be supported by the results of the objective assessment process.

If the participant's basic skills, work readiness skills, occupational skills, leadership skills and support service needs cannot be provided entirely and exclusively through Title I youth services, every reasonable effort must be made to arrange for these needs through other partner and community resources.

When determining the appropriate mix of activities and services for a participant, career planners must keep in mind that training may only be conducted for occupations that lead to self-sufficiency and for which there is a demand or anticipated future in the local area.

Participants must be informed of the broad range of coordinated services available to eligible youth. These include, but are not limited to the following:

- Opportunities for assistance in both academic and occupational learning,
- Development of leadership skills,
- Preparation for further education, and
- Additional training and eventual employment.

Additional considerations when developing the ISS:

- Strategies must be designed to insure equal opportunity. A participant may not be excluded from training or career options based on race, color, religion, national origin, sexual orientation, sex, or disability status
- All participants must be provided information regarding non-traditional employment opportunities in an encouraging and supportive manner

The ISS is an ongoing process and must be reviewed and updated, at minimum, annually. The ISS may need to be updated more frequently based on the changing needs and situation of the participant. The ISS review must include the following:

- An evaluation of the participant's progress in meeting the goals and objectives of the ISS
- Assessment of attainment of the following:
 - Basic skills,
 - Occupational skills,
 - Work readiness skills,
 - Leadership skills,
 - Occupational skills training, and
 - A review of the adequacy of the support services provided to-date.

The ISS should be developed in partnership with the participant, and include:

- Documentation of achievements in measurable and attainable short-term and long-term goals that appropriately reflect:
 - Participant's interests,
 - Aptitudes, and
 - Career pathway planning.

Both the participant and the career planner must sign the initial ISS. In the case of a participant under age 18, a parent or guardian signature is not required on the ISS. Copies of the initial ISS and subsequent

revisions should be given to the participant each time a revision is made. Copies of the initial ISS and subsequent revisions should be maintained in the participant case file.

Youth Goals

Goal-setting begins with a thorough assessment during the OBA process. All participants must have an identified career pathway and outlined goals based on the participant's OBA and ISS development. Youth participants who have not attained a High School diploma or equivalent may have a career pathway goal identified and entered into the career plan in the data management system dependent upon the needs and situation of the participant. Of those youth who may be in the early stages of career development, a generalized career pathway goal may be established such as "complete HS/equivalent" and "career exploration" rather than a specific job title.

Benchmark Goals

In addition, benchmark goals are used to demonstrate participant progress along their career pathway. Benchmark goals allow for the measurement of performance over time, uncover areas for improvement, and support the achievement of larger or longer-term goals.

- At least one short-term benchmark goal which is attainable within a 12-month period shall be established.
- Larger goals should be examined to determine if they should be broken down into smaller, more manageable benchmark goals.
- Achievement of benchmark goals can build confidence in youth participants and provide opportunities to celebrate a participant's progress toward their future goals.
- It is important to actively engage the youth participant in the goal-setting process and the development of their career pathway.
- If a benchmark goal is achieved in less than a year, another goal must be set that advances the participant's career pathway goal.

A Career Pathway and supporting goals must be established and documented in the participant's ISS.

SMART Goal Setting

A useful tool for assisting youth participants in setting goals is the SMART model, which states that goals should be:

- Specific - well defined, easy to understand.
- Measurable - defines the point in time when the goal has been achieved.
- Agreed Upon - staff and the participant must agree on working towards the goal together.
- Reasonable - the goal must be realistic and attainable - with appropriate accommodation.
- Time-bound - there should be a reasonable completion date established from the beginning.

The following is an example of a SMART Goal and a supporting benchmark goal:

Goal: "I would like to obtain my HiSED, by summer 2018.

Benchmark Goal: Attend two HiSED classes each week to prepare for HiSET.

Career planners should make use of the many tools available to assist participants in establishing career plans. Educating participants on how to use Labor Market Information (LMI) to inform career goals and long-term decisions is essential. Exploring online resources dedicated to career planning with the participant can provide an opportunity to build rapport and to evaluate participant computer and basic skills.

Career planners should continually seek out new and innovative approaches to career planning including, but not limited to the following:

- Discussing future lifestyle and personal aspirations can be useful in getting participants to think critically about the importance and long-term implications of proper career planning efforts.
- Asking participants about what they think life would look like in 30 years, 20 years, 10 years, etc. can encourage participants to consider different career options.
- The career planner should strive to effectively demonstrate the connection between lifestyle and career to increase enthusiasm for the process.

The ISS must demonstrate activities and services provided to meet identified goals. It is suggested that each benchmark goal have action steps to achieve the goal, which include reasonable timeframes and outcomes.

Team Approach

The career planner and the participant should regularly assess and evaluate participant goals together. Below are some suggested steps and questions to consider while working together to set goals.

- Set the goal
 - Goals should be very specific.
 - How will you know that you have achieved the goal?
- Develop action steps
 - Action steps may need to be broken down into smaller, more manageable pieces.
 - What should be done first, second, third, etc.?
 - What resources or agency partners could assist in this process?
 - What challenges are present or can be anticipated?
- Establish timeframes
 - Set a reasonable date to achieve the goal.
 - Apply deadlines or “milestone dates” to each action step.
- Collaborate, coordinate, and refer
 - Each participant has a unique set of talents, needs and available resources. Career planners should be well acquainted with local and other resources and can assist participants in making good use of a wealth of resources.
 - What center resources are available to help the participant complete their goal on time?
 - Which local agencies can help reduce this participant’s unique barriers?
 - Which steps are the responsibilities of the participant?

- Which steps are the responsibilities of the career planner?
- What program resources can be coordinated or put in place for the participant?
- What can the participant do to advocate for self?
- Evaluate Progress
 - Progression towards a goal should regularly be reviewed and evaluated in relation to the established timeframes set for each goal.
 - What are contributing, or limiting factors to the goal being completed successfully?
 - What is one thing that is working well?
 - What is one thing we should consider doing differently?
 - Are there creative or innovative ways we can approach reducing and removing barriers?
 - Review progress on benchmark goals and advancement along the career pathway.

All participants shall have at least one benchmark goal set during each year. At least one goal must be set on the enrollment date and must be reported as set on the enrollment date.

- Benchmark goals must be attainable within one year of the date established.
- The current progress-to-date of each goal must be reported by the anniversary date of the goal.
- Benchmark goals may be set for less than one year as this may be an appropriate strategy in providing services to youth and to demonstrate observable progress.
- Examples of benchmark goals might include:
 - Increase in participant reading basic skills by one grade level.
 - Completion an Internship (INT).
 - Attainment of unsubsidized employment with a sustainable wage.
 - Complete a leadership development curriculum.
 - Complete CNA training.
 - Complete the NCRC.
 - Attainment of HiSED.
 - Open a bank account.
 - Complete a financial literacy course.

Any participant identified as “basic skills deficient” must have a basic skills benchmark goal to address the deficiency which demonstrates the following characteristics:

- Identified as related to either employment or academic/credential attainment;
- Set, and reported as set, on the participant enrollment date;
- May be tested and achieved after 90 days from the date the goal was established, but must be reported within 364 days of the date established;
- Demonstrates substantial improvement for basic skills, defined as an improvement of at least one grade level in one or more of the following areas:
 - Reading comprehension
 - Math computation

- Writing
 - Speaking
 - Listening
 - Problem-solving or reasoning.
- Achievement of the goal must be based on an individual assessment using standardized assessments;
 - Individuals who have a college degree or a two-year associate degree do not need to be tested. They may be reported as having a 12th grade reading and math level;
 - For individuals with a learning disability, the substantial improvement will be established based upon the individual's baseline capabilities. The substantial improvement goal must be established after consultation with, and agreement of, appropriate staff of the local Area Education Agency (AEA) or district personnel. This consultation should include a review of the participant's Individual Education Plan (AEA-IEP). The goals set in the ISS must coincide with the goals of the AEA-IEP. All WIOA Title I Youth and partner services and activities should support the AEA-IEP goals as well as those in the ISS.

Cancelling Goals

Once a goal is established, it can only be cancelled due to external events which prevent the goal from being attained. Examples of external events include pregnancy, illness, institutionalization or other events that prevent the individual from participating in planned services for at least 90 days.

Goal Attainment

Each goal and the attainment of the goal must be fully documented, including the date the goal was set, the date the goal was attained, as well as the outcome. Goal attainment may be based on an individual assessment using recognized standardized assessments.

Administering assessments to determine progress in benchmark goal attainment should be completed periodically, as appropriate, throughout the time period set for goal achievement. If a benchmark goal is achieved in less than a year, another goal must be set that advances the participant's career pathway goal. By assessing progress towards benchmark goal achievement periodically, the participant can achieve multiple benchmark goals while they advance along their career pathway.

Substantial progress for a benchmark goal that is employment related is defined as learning and being able to demonstrate proficiency in employment skills for a specific occupation. Examples include demonstrating proficiency to perform actual tasks and technical functions required for a specific occupational field at entry, intermediate, or advanced levels.

Additionally, employment skill attainment may entail familiarity with and use of set-up procedures, safety measures, work-related terminology, record keeping and paperwork formats, tools, equipment and materials, and breakdown and clean-up routines. When skills are gained through an employer, journeyman, instructor or supervisor, the achievement of proficiency must be verified by the participant's supervisor.

Measurable Skill Gains

Measurable Skill Gains will be developed further upon release of additional guidance. A Measurable Skill Gain under WIOA is represented by attainment of an industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the State or the Federal government, an associate or baccalaureate degree, or a secondary school diploma or its equivalent.

The attainment of any goal must be directly related to Title I Youth services or partner services provided and documented in the ISS. In order to properly credit any of the basic skills goals for the measurable skill gains measure, the goal must be established and documented in the ISS at the start of the goal, and the participant must have had services provided for a minimum of one academic year. Local areas determine attainment for the goal once they have secured documentation for the prior academic year (a full academic year or 24 credit hours for post-secondary enrollees) that indicates a participant is demonstrating measurable progress toward the Iowa Department of Education's policy for academic standards. For the measurable skill gains performance measure, securing a student transcript or report card is required.

For in-school youth, when determining measurable skill gains and no other substantiated method may be used to determine the gain, the goal must not be recorded as attained until satisfactory documentation reflecting one academic year (24 credit hours equivalent) is provided. Additional goals attained prior to one academic year may be recorded as attained at the time of achievement, and a new goal must be set.

For example, measurable skill gains may be achieved by:

- Advancing one educational functioning level (EFL);
- Attainment of high school diploma or equivalent;
- Transcript or report card, secondary or post-secondary achieving policy for academic standards - to determine measurable skills gain (for ISY), the goal must not be recorded as attained until documentation reflecting one academic year (24 credit hours equivalent) is provided;
- Satisfactory progress towards established milestones from employer or training provider (Experiential Learning Activities: OJT, APP, WEP, INT, etc.); or
- Completion of an exam required for an occupation, progress towards attaining educational or occupational skills evidenced by trade related benchmarks such as knowledge based exams.

50.4.10. Coordination of Services

Coordinating efforts among program staff improves efficiency and effectiveness in service delivery, resulting in an increase in the likelihood of participant success across all programs.

The benefits of coordination are many, and can include, but are not limited to the following:

- Barriers can be identified and resolved more quickly and conscientiously;
- Improved customer service and streamlined service delivery across multiple programs;
- Reduction or elimination in duplication of services and staff efforts;
- Increased connection to training and income support resources for the participant;
- Structured communication and consistent messaging assist the participant in navigating systems;
- Efficient use of staff and financial resources;
- Increased access to a wide array of customized services;
- Shared performance outcomes; and

- Better employment services connected to employer needs for all job seekers.

Co-enrollment

Co-enrollment occurs when a participant is enrolled in additional programs for which they are eligible and that provide added value to the participant's success. Co-enrollment benefits the participant by streamlining processes across two or more programs while improving efficiency and service delivery.

There is potential for coordination of services among numerous programs/services to include, but not limited to:

- Adult/Dislocated Worker
- Youth
- PROMISE JOBS
- Jobs for Veterans State Grant (JVSG)
- Trade Adjustment Assistance (TAA)
- Migrant and Seasonal Farm Worker (MSFW)
- Ticket to Work
- Grants (National Dislocated Worker Grants, Disability Employment Initiatives, etc.)
- Registered Apprenticeships

In order for co-enrollment to be effective, it is imperative that all staff working with the participant work in a fully integrated, congenial, and supportive manner and in accordance with Iowa's integrated service delivery model. Staff collaborating to serve the participant should work together to ensure that the current needs and progress of the participant are being accurately communicated and that identified needs are being met in a coordinated manner. Career planners should conduct integrated service delivery meetings with the participant to expedite meaningful communication that benefits the participant and increases their chances for success.

Coordination with Trade Adjustment Act (TAA)

Co-enrollment with Trade Adjustment Act (TAA) is important to the effective delivery of eligible services to ensure the participant receives all necessary services to address as broad a range as possible of a participant's identified needs.

Staff should consider the following when co-enrolling eligible participants in TAA services:

- TAA participants should be served in a similar manner to a dislocated worker;
- Most TAA participants would meet the definition of dislocated worker for WIOA Title I and should be served under both programs;
- Co-enrollment could also occur with National Dislocated Worker Grants, Vocational Rehabilitation, and other partner program/grant if a need is identified;
- When a TAA participant is being served under more than one program, TAA funds should always be utilized first. Partner program funds should only be utilized when it is not possible to use TAA funds as duplication of services is not allowed;
- TAA participants should not be subject to duplicative assessment. Under TAA/WIOA Title I, only one set of assessments should be completed;

- TAA is not required to use the ETPL for selection of training providers/programs. If a dislocated worker identifies their job was lost due to foreign competition the State Trade Office should be contacted to file a petition for TAA benefits;
- Co-enrollment may also assist in making additional funds available for OJT;
- WIOA Title I programming allows up to 75% reimbursement to employers for OJT, while the TAA program allows reimbursement up to 50%. For OJT training for a co-enrolled TAA participant, the TAA Program may reimburse employers up to 50%, and WIOA Title I may reimburse employers up to an additional 25%, bringing the total reimbursement to employers up to 75% to align TAA program benefits with WIOA Title I program benefits.

Coordination with PROMISE JOBS

PROMISE JOBS (PJ) provides services to targeted populations of low-income individuals who are also participating in the state's TANF program. When considering priority of service for co-enrolled PROMISE JOBS participants, when priority is given to low-income individuals, PJ participants automatically meet low-income eligibility when applicable.

Coordination with VETS

Disabled Veteran Outreach Program specialists (DVOP) provide intensive services to eligible veterans and spouses. Those veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority of services provided with WIOA adult formula funds.

Veterans and eligible spouses receive priority of service for all DOL-funded job training programs.

All Title I staff are required to be knowledgeable of Iowa's Priority of Service for Veterans policy.

50.4.11. Participant Progress

Participant progress must be evaluated in relation to the goals and achievement objectives that were determined during the objective assessment process and documented in the ISS.

The evaluation of participant progress includes, but is not limited to the following:

- Meaningful direct contact should be made with participant regarding progress toward goals and achievement objectives.
 - Direct contact may be either in person, by telephone, by e-mail or regular mail or electronic means provided there is a meaningful conversation or interaction between staff and the participant.
 - Direct contact should be documented in the case file.
- Discussions should include, but not be limited to the following examples:
 - Acknowledgement of small steps and accomplishments participant has made towards goal;
 - Current or changing circumstances that may be hindering progress; and
 - Steps taken to assist the participant in overcoming current barriers.

- Referrals and follow-ups should be made to outside service providers and clearly documented.
- A performance evaluation from the training instructor or supervisor can be helpful tool.

When evaluating participant progress, career planners should review, assess or update the following:

- A summary of the participant progress review and outcomes must be documented in the ISS and case noted in the data management system.
- For enrolled youth, the evaluation of participant progress must be conducted for each participant and outcomes must be documented on the ISS within the first 30 days of participation, at least monthly thereafter.
- Progress must be documented in addition to the “Time and Attendance” documentation requirement.
- Participant progress reports and performance evaluations must be completed in accordance with the Records Keeping and Maintenance policy.
- Test scores obtained or ordered as a part of this process must be documented and maintained in the participant file.

50.4.12. Exit

Exit from program services occurs on the last date a participant received WIOA Title I or partner services, excluding follow-up services. Participants are automatically exited in the data management system upon the 90th day after the last WIOA Title I or partner service is received if no further WIOA Title I or partner services are scheduled and the exit date becomes the last date of a countable service.

All activities must be closed for the exit to occur.

Future services may only be used to extend the 90 day exit if the gap in service is due to a delay before the beginning of training, or if a health/medical condition or institutionalization prevents an individual from participating in services. In this situation, career planners are required to document any gaps in services and to document the reason for the gap in service. Additional assistance on this topic is available in the Performance Reporting and Outcomes policy.

The following outlines circumstances for which it may be appropriate for an exit to occur prior than intended upon participant enrollment.

- The career planner can enter the appropriate exit code only in the following participant circumstances:
 - Institutionalized;
 - Health/Medical or family care (for conditions expected to last beyond 90 days and documented by a physician);
 - Deceased;
 - Reserve Forces Called to Active Duty – the participant is a member of the National Guard or a military Reserve unit and is called to active duty for at least 90 days;
 - Relocated to a mandated residential care program (for youth only); or

- Invalid or missing Social Security Number. Will be addressed automatically by the system in the event the SSN cannot be matched to wages.
- In the following participant circumstances, the career planner must close all activities and the participant will be exited automatically in 90 days unless the participant is receiving partner services:
 - Upon final determination of ineligibility;
 - Upon determination of fraud committed by the participant. For information concerning determination of fraud see policies regarding fraud in the Iowa Title I Fiscal Administration section;
 - Upon failure to furnish verification documentation within a reasonable amount of time; or
 - For failure to comply with Selective Service requirements, i.e., submitting and registering for the draft as required.
- A participant's activities may also be ended for other reasons as established by the WIOA Title I Youth Service Provider including the following:
 - Upon recommendation of instructor, supervisor or WIOA Title I representative for disciplinary reasons or unsatisfactory progress;
 - For health, family or transportation problems which prevent the continuation of scheduled activity;
 - If working for an employer, for any and all reasons that other regular (non-WIOA Title I) employees of the employer may be dismissed. In such cases, ending WIOA Title I activities is not mandatory or automatic. It is the responsibility of the WIOA Title I Service Provider to determine whether the participant's activities should be ended or continue to be served in another WIOA Title I activity; or
 - After a minimum of 4 unsuccessful attempts to contact the youth over the course of 90 days. Staff will use at least 2 different contact methods: phone, text, email, US mail, or private messaging via social media when a participant has provided permission for contact through social media. Clearly document all attempted contacts in the data management system.

Ineligibility

If a participant is determined to be ineligible at any time, the individual must be informed of the determination and given a reasonable time to respond. Upon final determination of ineligibility for a program, the participant's activities must be closed. This must occur the same day that the final determination of ineligibility is made. The reason for the ineligibility, the date of final determination of ineligibility and the date of discontinuation of services must be documented in the participant record.

Fraud

If at any time it is found that a participant has committed fraud to receive WIOA Title I assistance or has attempted to defraud the WIOA Title I program, the participant's activities must be immediately closed. All circumstances related to the fraudulent act or attempt to defraud, along with the last date of services, must

be documented and maintained in the participant record. Please see the Fraud and Investigations policy to ensure proper procedures are used for reporting and responding to fraudulent acts.

50.4.13. Follow-up Services

Follow-up services are critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-up services may include regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise.

Follow-up services for youth may include the following program elements:

- Supportive services;
- Adult mentoring;
- Financial literacy education;
- Services that provide labor market and employment information about in demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
- Activities that help youth prepare for and transition to postsecondary education and training.

All youth participants must be offered an opportunity to receive follow-up services that align with their individual service strategies according to the following guidelines:

- Follow-up services must be provided to all participants for a minimum of 12 months unless the participant declines to receive follow-up services or the participant cannot be located or contacted. However, it is encouraged that attempts continue to be made upon exit in order to offer services in the instance a participant may decide to reengage. Follow-up services may be provided beyond 12 months, at the discretion of the local workforce development board.
- The types of services provided and the duration of services must be determined based on the needs of the individual and therefore, the type and intensity of follow-up services may differ for each participant.
- The ISS must indicate that those services would be appropriate with any additional justification provided in case notes in the data management system.
- The development of follow-up services requires active participation of the participant and should be developed and entered on the ISS prior to exit. Follow-up services help ensure continued success for the participant.
- Follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome.
- The first follow-up service is required to be provided within the first 30 days of exit from the program and should be in the form of a personal contact (in person, via telephone or electronic means) with the participant.
- A second follow-up service must occur within 90 days after exit, and at least quarterly thereafter for the next three quarters.
- The provision of follow-up services must be documented in case notes in the data management system.

50.4.14. Post-Exit Documentation

The Post-Exit process includes the collection of information on a participant's status after an individual has been exited from WIOA Title I services, Refer to the Record Keeping and Maintenance policy for additional information on Post-Exit technical procedures.

- The Post-Exit process is tracked from the exit date and begins the first and second quarter after the exit quarter.
- Wage and employment information is primarily obtained automatically from UI Wage Records and administrative records and may need to be collected through personal contact with the youth participant. Supplemental sources may be used if individuals are not found in UI Wage Records, provided that the information is documented and verified, and wages earned are in compliance with state or federal law. IWD will verify the accuracy of a sample of supplemental information through the monitoring process.
- Several reporting items cannot be obtained through UI Wage Records and will need to be obtained through follow-up contacts and include the following:
 - Employment Information, including occupation, training-related employment and non-traditional employment;
 - Attainment of a recognized educational/occupational certificate/credential/diploma or equivalent, or degree and the date of attainment;
 - School status at exit;
 - Entry into postsecondary education , advanced training, military service, qualified apprenticeship, or un-subsidized employment and the date of entry in the second quarter after exit as well as whether or not the individual is still in one of these four qualifying activities in the fourth quarter after exit.

50.5. PROGRAM SERVICES AND ACTIVITIES

Documentation for all activities listed in this section must be detailed in the data management system and all services from beginning to end must be documented. Many of the activities and services listed below contain policies relating to the maximum length or duration of the activities. These limitations are intended to be default policies. The Regional Workforce Development Board may increase or decrease the maximum length of an activity by specifying the regional policy in the Local Service Plan (LSP).

50.5.1. Objective Assessment (OBA)

An Objective Assessment (OBA) is required for all WIOA Title I Youth. The specific requirements for the OBA activity are defined in Applicant & Participant Process.

50.5.2. Financial Literacy (FIN)

Financial Literacy (FIN) provides a participant with the information needed to make informed judgments and effective decisions about the use and management of their money.

The FIN activity includes activities that provide age appropriate and relevant financial education. Offering access to safe and affordable financial products that enhance money management skills and complement other approaches is one way to support participants. Career planners can also help participants gain the

knowledge, skills, and confidence needed to make informed, sustainable financial decisions. Timely and customized information, guidance, tools, and instruction should be accessible and readily available to participants. Programs are encouraged to engage participants through providing opportunities to put lessons into practice. Quality FIN activities should achieve the following:

- Support the ability of participants to create budgets, initiate checking and savings accounts at banks, and make informed financial decisions.
- Support participants in learning, credit, debt, including student loans, consumer credit, and credit cards.
- Teach participants about the significance of credit reports and credit scores, what their rights are regarding their credit and financial information, how to determine the accuracy of a credit report and how to correct inaccuracies, and how to improve or maintain good credit.
- Support a participant's ability to understand, evaluate, and compare financial products, services, and opportunities to make informed financial decisions.
- Educate participants about identity theft, ways to protect themselves from identity theft, and how to resolve cases of identity theft, and in other ways understand their rights and protections related to personal identity and financial data.
- Support activities that address the particular financial literacy needs of non-English speakers, including providing the support through the development and distribution of multilingual financial literacy and education materials.

50.5.3. Guidance and Counseling (G&C)

Guidance and Counseling (G&C) provides group or individualized counseling on a variety of topics such as, but not limited to: crisis intervention, domestic abuse counseling, drug and alcohol abuse counseling and mental health counseling.

Career planners should refer to the following guidelines when considering G&C services for youth participants:

- During initial or subsequent interventions, referrals to partner programs are necessary to ensure appropriate services are offered by qualified professionals. When referring participants to necessary counseling that cannot be provided by the local youth program or its service providers, the local youth program must coordinate with the organization it refers to in order to ensure continuity of service.
- Guidance and counseling may include information or referrals related to parenting skills, behaviors in school, academic progress, juvenile delinquency, pregnancy, conflict management within your support network, etc.
- G&C must be offered in combination with other WIOA Title I or partner services. G&C is not to be used as an ongoing activity. G&C may be revisited if the participant experiences a major change in his or her personal life or wishes to change his or her ISS.
- Case notes must identify the specific purpose of Guidance and Counseling. They must also document progress in achieving the specific planned outcome. Support services may be utilized as appropriate.

50.5.4. Job Search and Placement (JSP)

Job Search and Placement (JSP) occur when the participant is provided one-on-one assistance with the development of their job search activities and career counseling. Participants shall be provided information on in-demand industry sectors and occupations, including information regarding nontraditional and emerging employment opportunities.

Examples of JSP activities may include, but are not limited to:

- Mock Interviewing
- Video Interviewing
- Informational Interviewing
- Career Fairs
- Employment Proposals
- Employer Contacts
- Job Referrals with Follow-up

Documentation of a job search plan, resume assistance or employer contact is required and must be noted in the data management system.

Sending participants job referrals without further engagement is not appropriate under this activity.

50.5.5. Leadership Development (LDS)

The purpose of Leadership Development (LDS) is to enhance the personal life skills, social skills and leadership skills of youth participants and to remove barriers to educational and employment-related success.

Leadership development opportunities encourage responsibility, confidence, employability, self-determination and other positive social behaviors such as:

- Exposure to postsecondary educational opportunities
- Community and service learning projects
- Peer-centered activities, including peer mentoring and tutoring when in a group setting
- Organizational and team work training, including team leadership training
- Training in decision-making, including determining priorities and problem-solving
- Citizenship training, including life skills training such as parenting, work behavior training and budgeting of resources
- Civic engagement activities which promote the quality of life in a community, including, but not limited to:
 - Positive attitudinal development
 - Self-esteem building
 - Openness to work with individuals from diverse backgrounds
 - Maintaining healthy lifestyles, including being alcohol and drug-free
 - Maintaining a commitment to learning and academic success

- Maintaining positive relationships with responsible adults and peers, and contributing to the well-being of one's community, including voting
 - Avoiding delinquency
 - Postponed parenting and responsible parenting, including child support education
 - Positive job attitudes and work skills
 - Keeping informed in community affairs and current events
- Other activities that place youth in a leadership role such as serving on youth leadership committees, such as a Youth Standing Committee.

Leadership Development activities must include a schedule for the participant to follow, regular contact by a staff person, and a maximum length of time allowed in the activity and documentation that the participant and staff are making the required contacts and following the established schedule.

Participants enrolled in LDS must be covered by adequate, on-site medical and accident insurance.

50.5.6. Adult Mentoring (MEN)

Adult Mentoring (MEN) is a formal, long-term relationship between a youth and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee. In particular, where parents are either unavailable or unable to provide responsible guidance for their children, mentors play a critical role.

Mentoring generally serves the following broad purposes:

- Education/academic:
 - Helps mentored youth improve overall academic achievement
- Career:
 - Helps mentored youth develop the necessary skills to enter or continue on a career path or where they assist to match a youth participant with an employer or employee of a company
- Personal development:
 - Supports mentored youth during times of personal or social stress and provides guidance for decision-making

Group mentoring activities and mentoring through electronic means are allowable as part of this activity, however, the youth must be matched to an individual mentor to whom the youth interacts with on a face-to-face basis. It is encouraged that mentoring be provided by someone other than the career planner.

Mentoring is to be provided for no less than 12 months and may take place both during the program and following exit from the program. Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company.

50.5.7. Skill-Upgrading (SUG)

The purpose of Skill-Upgrading (SUG) is to provide short-term pre-vocational training to participants to upgrade their occupational skills and enhance their employability. Examples of allowable skill upgrading activities include: a typing refresher to increase speed and accuracy, keyboarding, basic computer literacy, English language literacy, or other non-industry specific training activities like customer service or manufacturing training.

Skill-Upgrading may be conducted in a classroom setting or on an individual basis. SUG must be short-term in nature and must not exceed 26 weeks in duration, with the exception of English language literacy, and does not lead to a credential. Documentation including justification of activity, length and progress and results must be noted in the data management system.

50.5.8. Staff-Assisted Job Development (SJD)

Staff-Assisted Job Development (SJD) is the act of contacting employers, who do not already have a job listed, to determine if the employer has an interest in interviewing and potentially hiring a specific participant who possesses skills required by that employer. Career planners are expected to act in the best interest of the participant while working with a specific employer to develop a position for the participant.

Employer communication documentation is required.

50.5.9. Pre-Employment Training (PET)

The purpose of Pre-Employment Training (PET) is to help participants to acquire skills necessary to obtain unsubsidized employment and to maintain employment.

PET activities may include, but are not limited to:

- Instruction on how to maintain employment, including employer's expectations relating to punctuality, job attendance, dependability, professional conduct and interaction with other employees;
- Assistance in personal growth and development which may include motivation, self-esteem building, communication skills, basic living, personal maintenance skills, social planning, citizenship and life survival skills;
- Instruction in how to obtain jobs, including completing applications and resumes and learning interviewing skills and
- Non-career specific skills enhancement as provided in a classroom setting.

Pre-Employment Training activities must include documentation of the following:

- A schedule for the participant to follow,
- Regular contact by a staff person, and
- A maximum length of time allowed in the activity and documentation that the participant and staff are making the required contacts and following the established schedule.

50.6. EXPERIENTIAL LEARNING ACTIVITIES

Experiential learning activities are the most important program elements within the WIOA Title I Youth Program, which include: Work Experience (WEP), Pre-Apprenticeship (PRE), Internships (INT), Job Shadowing (SHW) and On-the-Job Training (OJT). Of these experiential learning activities, OJT is considered a training activity. These activities are designed to enable youth to gain exposure to the world of work and its requirements by helping them acquire the personal attributes, knowledge, and skills needed to obtain a job and advance in employment. These experiences provide the youth participant with opportunities for career exploration and skill development and must include academic and occupational education.

The academic component may occur concurrently with the experiential learning activity. In addition, the academic and occupational education may occur inside or outside the worksite.

Experiential learning activities are a planned, structured learning experience that takes place in a workplace for a limited period of time, which may be paid or unpaid, as appropriate.

Staff should use the following guidelines when considering experiential learning activities for participants:

- Placements may be made in the private for-profit sector, the non-profit sector, or the public sector.
- Labor standards apply in any experiential learning activity where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists.
- Local areas must spend a minimum of 20% of local area funds on experiential learning activities, and to meet this requirement this may be an in-school or out-of-school youth, in aggregate. Support services are not included in the 20% experiential learning expenditure rate.
- Initial documentation must include location, wage, duration and goals of the Experiential Learning activity in the data management system.
- Progress must be case noted every 30 days and final results must be noted in the data management system.

50.6.1. Work Experience (WEP)

The Work Experience (WEP) activity must be used for individuals who have limited work experience or have been out of the labor force for an extended period of time including, but not limited to, students, school dropouts and individuals with disabilities.

Work Experience must be limited to persons who need assistance to become accustomed to basic work requirements, including basic work skills, in order to successfully compete in the labor market.

Work Experience may be used to provide:

- Instructions concerning work habits and employer and employee relationships in a work environment
- An improved work history and work references
- An opportunity to actively participate in a specific work field
- An opportunity to progressively master more complex tasks

Work experiences may be paid or unpaid; however it is strongly encouraged that organizations pay individuals for work performed.

Staff should use the following guidelines when considering work experiences for participants:

Wages, Insurance and Benefits

- If the WEP participant is paid wages, the wages must be no less than the higher of the federal or State Minimum Wage. (In most WEP situations, the WIOA Title I Service Provider is the employer of record.) WEP participants must always be paid for time worked and must not be paid for any scheduled hours they failed to attend without good cause.
- Each participant in WEP must be covered either by Workers' Compensation in accordance with State law or by adequate on-site medical and accident insurance.
- Participants in WEP are exempt from unemployment compensation insurance. Therefore, unemployment compensation costs are not allowable.
- Under certain conditions participants in a wage paying WEP may be paid for time spent attending other activities. Such payments may only be made if WEP participation is scheduled for more than 50% of the scheduled training time in all activities. Usually, the participant will be enrolled simultaneously in both the WEP activity and the other activity.
- If the work experience is paid, in addition to the guidelines listed here, other State and federal regulations governing employment situations apply to WEP as well.

Worksite Eligibility

- Work Experience may take place in the private sector, for-profit sector, non-profit sector, or public sector. A participant cannot be placed in a WEP with an employer where the participant is already employed in an unsubsidized position.
- Work Experience must not be used as a substitute for Public Service Employment (community service) activities as a result of court-adjudication.

WEP Length of Training

A WEP agreement at one worksite can be written for a maximum of 13 calendar weeks, unless the agreement is for a part-time WEP of less than 520 hours, then WEP activity period can be extended to a maximum of 26 weeks.

50.6.2. Pre-Apprenticeship (PRE)

Pre-apprenticeship programs are workforce development programs that prepare people, particularly low-income individuals and non-traditional construction workers such as women and minorities, to enter the construction trades.

A Pre-Apprenticeship program must incorporate the following elements outlined below:

Approved Training and Curriculum

Training and curriculum is based on industry standards and approved by the documented Registered Apprenticeship partner(s) that will prepare individuals with the skills and competencies needed to enter one or more Registered Apprenticeship program(s) and that aligns with the skill needs of employers.

Strategies for Long-Term Success

Strategies that increase Registered Apprenticeship opportunities for under-represented, disadvantaged or low-skilled individuals, such that, upon completion, they will meet the entry requirements, gain consideration, and are prepared for success in one or more Registered Apprenticeship programs.

Examples of successful long-term strategies include the following:

- Implementation of strong recruitment strategies focused on outreach to populations under-represented in local, state, and national Registered Apprenticeship programs;
- Development of strong educational and pre-vocational services that prepare individuals to meet the entry requisites of one or more Registered Apprenticeship programs (e.g. specific career and industry awareness workshops, job readiness courses, English for speakers of other languages, Adult Basic Education, financial literacy seminars, math tutoring, etc.);
- Real opportunities to attain at least one industry-recognized credential;
- Exposure to local, state and national Registered Apprenticeship programs and provision of direct assistance to participants applying to those programs;
- Access to Appropriate Support Services in order to facilitate access to appropriate support services during the pre-apprenticeship program and a significant portion of the Registered Apprenticeship program;
- Promotion of greater use of Registered Apprenticeships to increase future opportunities that support the ongoing sustainability of the partnership between pre-apprenticeship providers and Registered Apprenticeship sponsors – these efforts should collaboratively promote the use of Registered Apprenticeship as a preferred means for employers to develop a skilled workforce and to create career opportunities for individuals;
- Meaningful hands-on training that does not displace paid employees in a simulated lab experience or through volunteer opportunities, when possible, neither of which supplants a paid employee but accurately simulates the industry and occupational conditions of the partnering Registered Apprenticeship sponsor(s) while observing proper supervision and safety protocols; and
- Facilitated entry and/or articulation of formalized agreements with Registered Apprenticeship sponsors that enable individuals who have successfully completed the pre-apprenticeship program to enter directly into a Registered Apprenticeship program and/or include articulation agreements for earning advanced credit/placement for skills and competencies already acquired.

Registered apprenticeships may contribute to the success of apprenticeship participants by collaborating with pre-apprenticeship programs by:

- Collaborating on assessment, curriculum and preparatory training,
- Helping to set quality standards,
- Helping to establish competency models and training goals,
- Considering direct entry and advance placement agreements and
- Developing memoranda of understanding.

Pre-apprenticeship activities may include, but are not limited to:

- Auto-Detailing, Auto Body Repair

- Bricklaying
- Cabinetry and Installation
- Computer Repair
- Carpentry
- Concrete
- Construction Skills
- Electrical
- Electronics
- Engineering Studies
- Ethics Course in a Relevant Field
- Furniture Making and Finishing
- General Plumbing
- HVAC Systems
- Machining
- Mechanical
- OSHA Safety Standards Training in Key Areas
- Roofing Installation and Repair
- Vehicle Maintenance or Servicing

50.6.3. Internships (INT)

The purpose of Internship (INT) is to provide a participant with exposure to work and the requirements for successful job retention that are needed to enhance the long-term employability of that participant. Internships are limited in duration, devoted to skill development and enhanced by significant employer investment.

INT Wages and Benefits

- Participants in INT may be compensated for time spent in the INT activity. This compensation can be in the form of incentive and bonus payments or wages for youth.
- If the INT participant receives wages, the WIOA Title I Service Provider is the employer of record. The wages paid to the INT participant must be at the same rates as similarly situated employees or trainees of the employer of record, but in no event less than the higher of the federal or state minimum wage.
- INT participants receiving wages must always be paid for time worked, must not be paid for any scheduled hours they failed to attend without good cause, and must, at a minimum, be covered by Workers' Compensation in accordance with state law. In addition, all individuals participating in an INT activity who are paid wages must be provided working conditions at the same level and to the same extent as other employees of the employer of record working a similar length of time and doing the same type of work.
- Youth INT participants receiving incentive or bonus payments based on attendance must not receive any payment for scheduled hours that they failed to attend without good cause.
- INT participants, who are not receiving wages, must be covered by adequate on-site medical and accident insurance.

INT Worksite Eligibility

- INT may be conducted at public, private, for-profit and non-profit worksites.
- The use of INT must involve a substantial investment of effort by employers accepting the interning participants and must not be used in a manner that subsidizes or appears to subsidize private sector employers.

INT Length of Training

- The total participation in the INT activity for any participant must not exceed 500 hours per enrollment. In addition, for in-school youth, INT participation must be limited to twenty (20) hours per week during the school year. In-school youth may participate in INT full-time during summer vacation and holidays.
- Internship agreements must be written only for positions for which a participant would not normally be hired because of lack of experience in that occupation or other barriers to employment.
- The Internship activity may be used in conjunction with OJT with the same employer. However, when this occurs, INT must precede the On-the-Job Training and the OJT training time for the participant must be reduced in accordance with the OJT policies in this section.
- If the worksite employer hires the participant during INT participation, the INT activity for that participant must be ended.

50.6.4. Job Shadowing (SHW)

The purpose of Job Shadowing (SHW) is to expose participants to jobs available in the private or public sector through job shadowing, instruction and, if appropriate, limited practical experience at actual worksites. Job Shadowing may take place at public, private non-profit or private-for-profit work sites.

SHW Wages and Benefits

The participant must not receive wages for the time spent in SHW. The participant is not necessarily entitled to a job at the end of the Job Shadow period.

SHW Worksite Eligibility

The site that hosts the SHW must derive no immediate advantage from the activities of the participant and on occasion the operation of the host site may actually be impeded. In the case of private-for-profit organizations, the participant must not be involved in any activity that contributes, or could be expected to contribute, to additional sales or profits or otherwise result in subsidization of wages for the organization.

SHW Length of Training

- The total participation in the SHW activity for any participant in any one occupation must not exceed 160 hours per enrollment.
- The length of a participant's enrollment in SHW is limited to a maximum of 640 hours, regardless of the number of SHWs conducted for the participant.
- Job Shadow activities must include a schedule for the participant to follow, regular contact by a staff person, a maximum length of time allowed in the activity and documentation that the participant and staff are making the required contacts and following the established schedule.

- Participants enrolled in a Job Shadow activity must be covered by adequate on-site medical and accident insurance.

50.6.5. On-the-Job Training (OJT)

The purpose of On-the-Job Training (OJT) is to train a participant in an actual work situation that has career-advancement potential in order to develop specific occupational skills or obtain specialized skills required by an individual employer that the participant does not already possess.

OJT Wages and Benefits

- Since OJT is employment, state and federal regulations governing employment situations apply to OJT. Participants in an OJT must be compensated at the same rates, including periodic increases as trainees or employees who are similarly situated in similar occupations by the same employer. Wages paid must not be less than the highest of federal or state minimum wage or the prevailing rates of pay for individuals employed in similar occupations by the same employer.
- Participants in an OJT must be provided benefits and working conditions at the same level and to the same extent as other trainees or employees working a similar length of time and doing the same type of job.
- Each participant in an OJT must be covered by Worker's Compensation in accordance with State law.

OJT Employer Eligibility

- OJTs may not be written with temporary staffing agencies or employee-leasing firms for positions that will be "hired out" to other employers for probationary seasonal, temporary or intermittent employment. The only instance in which a temporary staffing agency may serve as the employer of record is when the OJT position is with the staffing agency itself and not a position that will be "hired out."
- In situations where an employer refers an individual to the WIOA Title I youth program for eligibility determination with the intent of hiring that individual under an OJT contract, the individual referred to the WIOA Title I youth program may be enrolled in an OJT with the referring employer only when the referring employer has not already hired the individual and an objective assessment and the ISS have been completed which support the development of an OJT with the referring employer.
- Prior to re-contracting with an OJT employer, the past performance of that employer must be reviewed. An OJT contract must not be entered into with an employer who has previously exhibited a pattern of failing to provide OJT participants with continued long-term employment as regular employees with wages, benefits and working conditions at the same level and to the same extent as similarly situated employees. OJT participants that voluntarily quit, are terminated for cause, or are released due to unforeseeable changes in business conditions need not result in termination of employer eligibility for future OJT contracts.
- An employer that has been excluded from OJT contracting because of the requirement described above may again be considered for an OJT placement one year after that sanction was imposed. In this re-contracting situation, if the employer fails to retain the participant after the OJT ends, and

there is no apparent cause for dismissing the employee, the employer must not receive any future OJT contracts.

OJT Payment and Training Length

- Payment by WIOA Title I programs to employers is compensation for the extraordinary costs of training participants, including costs of classroom training and compensation for costs associated with the lower productivity of such participants.
- A trainer must be available at the employment site to provide training under an OJT contract. For example, a truck driving position where the driver drives alone or without immediate supervision or training would not be appropriate for OJT.
- The appropriate reimbursement is 50% of the wages paid by the employer to the participant during the period of the training agreement. In limited circumstances, the reimbursement may be up to 75% of the wage rate of the participant when the following conditions are considered:
 - The characteristics of the participants taking into consideration whether they are individuals with barriers to employment, length of unemployment and current skill level;
 - The size of the employer, with an emphasis on small and medium sized businesses;
 - The quality of employer-provided training and advancement opportunities, for example of the OJT contract is for an in-demand occupation and will lead to an industry recognized credential; and
 - Any additional factors the local board determines to be appropriate, which may include, the number of employees participating in the training, wage and benefit levels of those employees (at present and anticipated upon completion of the training), and relation of the training to the competitiveness of a participant.
 - The factors used to decide an increase of wage reimbursement above 50% must be documented within the training plan.
- Wages are considered to be monies paid by the employer to the participant. Wages do not include tips, commissions, piece-rate based earnings or non-wage employer fringe benefits.
- Payment for overtime hours and holidays is only allowable in accordance with local policies. Holidays may be used as the basis for OJT payments only if the participant actually works and receives training on the holiday.

OJT Contracts

An OJT contract with an employer can be written for a maximum of 1040 hours.

Under no circumstances can an OJT contract be written for a participant if the hours of training required for the position in which the participant is to be trained is determined to be less than 160 hours.

The number of OJT training hours for a participant must be determined using the following standardized chart, unless the Local Service Plan contains an alternative methodology for determining the length of OJTs. The hours specified must be considered as a departure point for determining actual training hours. If the total number of training hours for the OJT position cannot be provided during the maximum contract length allowable, as many training hours as possible must be provided.

SVP* Level	Hours
1	80
2	160
3	520
4	1,040
5	2,080
6+	4,160

Source: SVP-Scaled Value of Proficiency (O*NET)

OJTs are designed to be limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, prior work experience of the participant, and the service strategy of the participant. The OJT training hours for a participant must be reduced if a participant has prior-related employment or training in the same or similar occupation. Previous training or experience, which occurred so long ago that skills gained from that experience are obsolete, may be disregarded to the extent that those skills need to be relearned or re-acquired.

The number of training hours for a participant may be increased based upon the individual circumstances of the participant, such as disability. Local plans will need to identify the circumstances for reduction/increase of length of an on-the-job training.

The number of hours of training for any participant, as well as the process for extending or reducing those training hours from the basic method of determination must be documented in the participant's ISS.

OJTs for Employed Workers

- OJTs may be written for employed workers when the following additional criteria are met:
 - The employee is not earning a self-sufficiency wage as defined in the Local Service Plan; and
 - The OJT relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy or other appropriate purposes identified in the Local Service Plan.
- Documentation of the appropriateness including the assessment (participant and employer/business), contract, training plan, progress skill evaluation, invoices and other financial records, etc. must be noted in the data management system.

50.7. TRAINING ACTIVITIES

Entry into Training services requires an objective assessment (OBA) and the development of the Individual Service Strategy (ISS). Youth teams are encouraged to review the circumstances before the participant enters into training services. Local areas must first seek training programs that lead to recognized post-secondary credentials in in-demand industries or occupations. Training should be outcome-oriented and focus on a career pathway goal outlined in the participants ISS. See Applicant and Participant Process section.

50.7.1. Registered Apprenticeship (APP)

Registered Apprenticeship (APP) is a proven approach for preparing youth participants for jobs while meeting the needs of employers. It is an employer-driven, “learn while you earn” model that combines on-the-job training, combined with job-related instruction in curricula tied to the attainment of national skills standards. Registered Apprenticeship is a flexible training strategy that can be customized to meet the needs of any business. Apprentices can be new hires, dislocated workers, youth or incumbent workers - anyone who needs skill upgrades.

While it is used in traditional industries such as construction and manufacturing, Registered Apprenticeship is also an excellent tool for use in training and development in growing industries such as health care, information technology, transportation and logistics, agriculture, hospitality and energy. There are five components to a typical Registered Apprenticeship Programs which include:

- **Business Involvement.** Employers are the foundation of every Registered Apprenticeship Program.
- **Structured On-the-Job Training.** Apprenticeships always include an on-the-job training (OJT) component. OJT focuses on the skills and knowledge an apprentice must learn during the program to be fully proficient on the job. This training is based on national industry standards, customized to the needs of a particular employer.
- **Related Instruction.** Apprenticeships combine on-the-job learning with related instruction on the technical and academic competencies that apply to the job. Education partners collaborate with business to develop the curriculum, which often incorporates established national-level skill standards.
- **Rewards for Skill Gains.** Apprentices receive wages when they begin work, and receive pay increases as they meet benchmarks for skill attainment which serves to reward and motivate apprentices as they advance.
- **Nationally Recognized Credential.** Every graduate of a Registered Apprenticeship Program receives a nationally-recognized credential. This is a portable credential that signifies to employers that apprentices are fully qualified for the job.

Developing Registered Apprenticeship Programs for the following industries in Iowa is a state priority:

- Advanced Manufacturing
- HealthCare
- IT
- Hospitality
- Agriculture
- Construction

Placement into a Registered Apprenticeship (APP) provides for an effective means to record an apprenticeship training and employment activity.

When connecting and developing individuals for successful completion in a registered apprenticeship program, career plans must be developed and documented to support the participant’s career pathway. Benchmark goals must also be recorded.

Successful completion for registered apprentices may be recorded at the point when an individual may be able to provide a self-sustainable wage in the event of premature departure from the apprenticeship.

All participant progress must be documented in the data management system.

50.7.2. Customized Training (CUS)

The purpose of Customized Training (CUS) is to provide training that is specific to an employer (or group of employers) specific requirements so that individuals will be hired by the employer after successful completion of the training.

Customized training is designed to provide local areas with flexibility to ensure that training meets the unique needs of the job seekers and employers or groups of employers.

Please ensure the following when considering Customized Training for participants:

- Customized training is training normally provided in a classroom setting that is designed to meet the special requirements of an employer or group of employers;
- The employer(s) must commit to hire an individual upon successful completion of the training;
- The employer must pay a significant portion of the cost of the training (not less than 50%); and
- Participants enrolled in CUS must be covered by adequate medical and accident insurance.
- Documentation of the CUS and participant progress must be noted in the data management system.

50.7.3. Entrepreneurial Training (ENT)

The purpose of Entrepreneurial Skills Training (ENT) is to provide participants the basics of starting and operating a small business. Youth entrepreneurial skills training must be provided according to developmentally-appropriate types and methods of teaching entrepreneurial skills. Staff is strongly encouraged to engage local business and community leaders in this process as there is a wealth of available resources to supplement this type of training for youth participants.

Such training may develop the skills associated with entrepreneurship. Such skills include, but are not limited to, the ability to:

- Take initiative,
- Creatively seeking out and identify viable business opportunities,
- Develop budgets and forecast resource needs,
- Understand various options for acquiring capital and the trade-offs associated with each, and
- Communicate effectively to market oneself and one's ideas.

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

- Entrepreneurship education that provides an introduction to the values and basics of starting and running a business. Entrepreneurship education programs often guide youth through the development of a business plan and may also include simulations of business start-up and operation;

- Enterprise development which provides supports and services that incubate and help youth develop their own businesses. Enterprise development programs go beyond entrepreneurship education by helping youth access small loans or grants that are needed to begin business operation and by providing more individualized attention to the development of viable business ideas;
- Experiential programs that provide youth with experience in the day-to-day operation of a business. These programs may involve the development of a youth-run business that young people participating in the program work in and manage. Or, they may facilitate placement in apprentice or internship positions with adult entrepreneurs in the community;
- The methods of providing ENT may include payment for classes in small business development, marketing, accounting, financing or any other courses that could contribute to a participant's goal of self-employment. On-site observation and instruction in business skills may also be provided, as well as individualized instruction and mentoring;
- Entrepreneurial training may not be used for training in job specific skills other than business management. However, it may be provided concurrently or consecutively with specific skill training in IST or OJT for the purpose of establishing an enterprise that utilizes those skills; and
- Payments under ENT are limited to training programs and activities that provide instruction in business operation and management. Funds may not be used for any direct costs associated with the establishment or operation of the business (e.g. materials, inventory, overhead, advertising, etc.)

All participants who are enrolled in ENT must apply for any financial assistance for which they may qualify, including Pell Grants. For purposes of this requirement, financial assistance does not include loans.

Normally, an ENT would be completed with the start-up of the business. The exceptions would be if there were ongoing mentoring activities or a class/classes that need to be completed relating to management of the business.

Documentation of the ENT and participant progress must be noted in the data management system.

50.7.4. Occupational Skills Training (IST)

The purpose of Occupational Skills Training (IST) is to provide individuals with the technical skills and information required to perform a specific job or group of jobs. IST is typically conducted in a classroom setting, but can also consist of online, ICN or self-study programs, etc. The emphasis on Occupational Skills Training (IST) requires local areas give priority consideration for training programs that lead to a recognized post-secondary credential that aligns with in-demand industries or occupations in the local area.

When seeking occupational skills training for a participant, career planners must guide participants to training programs that lead to self-sufficient employment through attainment of recognized post-secondary credentials in in-demand industries or occupations. Such training must be outcome-oriented and focused on an occupational goal in a participant's individual service strategy, and the training must be of sufficient duration to impart the skills needed to meet that occupational goal.

For all IST cases, local areas must ensure that the training program, at a minimum, adheres to the following guidelines:

- All participants who are enrolled in IST must apply for any financial assistance for which they may qualify. Financial aid or scholarships must be used to cover the education/training expenses prior to IST funds being expended.
- WIOA Title I Youth funding may only be used to pay for tuition, books, fees and required materials for coursework as required.
- All participants who are enrolled in IST must be covered by the training institution's tuition refund policy. In the absence of a refund policy established by the training institution, the WIOA Title I Youth Service Provider must negotiate a reasonable refund policy with the training site.

50.7.5. On-the-Job Training (OJT)

On-the-Job Training (OJT) allows the participant to train onsite at a place of employment, while he or she is doing the actual job. A professional trainer or experienced employee serves as the course instructor using hands-on training often supported by formal classroom training.

OJT is a training activity. See Experiential Learning Activities for additional details regarding this activity.

50.7.6. Remedial and Basic Skill Training (RBS)

Under the WIOA Title I Youth program, RBS activities may be offered as remedial basic skills training services only, and may be offered as a stand-alone service or in combination with other allowable services. The purpose of RBS is to enhance the employability of participants by upgrading basic literacy skills through basic and remedial education courses, literacy training, ELL training and Adult Education and Literacy and in consideration of the following guidelines:

- Remedial and Basic Skill Training may be conducted in a classroom setting or on an individual basis.
- RBS may be used to improve academic or language skills prior to enrollment in other training activities such as IST.
- Remedial and basic skills training may include; tutoring, study skills training, and other remedial and basic skills activities.

Remedial and Basic Skill Training activities must include a documented schedule for the participant to follow, regular contact by a career planner, an established timeline for completion and documentation of progress towards completion of the goal.

50.7.7. Secondary Education Certification (SEC)

The purpose of Secondary Education Certification (SEC) is to enhance the employability of participants by upgrading their level of education.

Secondary Education Certification activities may be conducted in a classroom setting or on an individual basis. SEC must be categorized as:

- Secondary school;
- Alternative school, or
- Individualized study.

Participation in this component must be expected to result in a high school diploma, high school equivalency certificate or an Individualized Educational Program (IEP) diploma.

SEC activities must include a documented schedule for the participant to follow, regular contact by a career planner, an established timeline for completion and documentation of progress towards completion of the goal.

50.7.8. Co-enrollment with Title I Adult/Dislocated Worker

Additional training options may be available through co-enrollment with the Title I Adult or Dislocated Worker programs.

Incumbent Worker Training (IWT)

Incumbent worker training is designed to ensure that employees of a company are able to gain the skills necessary to retain employment and advance within the company or to provide the skills necessary to avert a layoff and must increase both a participant's and a company's competitiveness. Please refer to WIOA Title I Adult & Title I Dislocated Worker policies for additional guidance regarding this activity.

Transitional Jobs (TJB)

The primary goal of Transitional Jobs is to establish a work history, demonstrate success in a work environment and develop skills to obtain and retain unsubsidized employment. If Transitional Jobs are allowable in your local service plan, please refer to WIOA Title I Adult & Title I Dislocated Worker policies for additional guidance regarding this activity.

50.8. SUPPORT SERVICES

Support service payments may be provided, when necessary, to enable a participant to participate in a WIOA Title I activity or a partner activity. Support service payments may also be made to participants during the provision of follow-up services based upon their needs and only to enable the participant to participate in a WIOA Title I activity or partner activity.

- Support service payments can be made only when the participant is unable to obtain the service through other programs providing such services.
- The criteria, procedure or formula described in the Local Service Plan (LSP) is used to determine the eligibility for, and the amount of, support service payments for each individual participant.
- This criteria, procedure or formula must be applied to all participants in any program or activity for which support service payments are provided.
- The LSP must specify any limits, payment rates, maximum amount of payments and maximum length of time for support services to be available to participants.
- The need for and the amount of support service payments must be documented in the data management system and hard copy justification of support placed in the participants file.
- Support service payments, which assist a parent, spouse or legal guardian's participation in a youth participant's training, are allowable under the Title I Youth Program. Such payments might include reimbursement for transportation costs or childcare for a parent to attend a conference regarding a youth participant's progress toward achievement of the objectives of the ISS.

- Support service payments must not be made for activities in which the participant failed to participate, without good cause.

Allowable support service payments can be made based on the following guidelines, and in adherence with any locally developed policy.

50.8.1. Clothing (CHG)

The cost of items such as clothes and shoes that are necessary for participation in WIOA Title I activities such as interviewing, employment, or work experiences. Items such as uniforms and protective gear are generally allowable.

50.8.2. Counseling (CLG)

The costs of personal counseling services that will enhance a participant's employability are allowable. This may include employment, financial, individual, family and drug and alcohol abuse counseling.

Major personal or emotional problems affecting employability may require referral to an adequate outside counseling or health care agency.

50.8.3. Dependent Care (DPC)

The cost of dependent care from licensed daycare providers or from private sources agreed upon by the participant and WIOA Title I Service Provider, are allowable.

Dependent care includes child or adult care for which the participant would normally be responsible.

50.8.4. Financial Assistance (FAS)

The purpose of a financial assistance payment is to make a payment to a Service Provider or vendor on behalf of a participant to cover an emergency financial need that, if unmet, would prevent the participant from participating in WIOA Title I activities.

FAS may be used for such things as:

- Housing Assistance
- Auto Repair
- Eyewear Repair
- Other Critical Participant Needs

FAS may not be used to pay any type of fines or penalties imposed because of failure to comply with any federal, State, local law or statute.

50.8.5. Health Care (HLC)

Health care assistance could be made available to participants when lack of assistance will affect their ability to obtain or maintain employment.

This support service would be used as a last resort, and only when no other resources are available to the participant.

50.8.6. Miscellaneous Services (MSS)

Bonding and legal aid services are an allowable cost unless funds are available from other resources. If bonding is an occupational requirement, it should be verified that the participant is bondable before the participant is placed in training for that occupation.

The cost of required tools is allowed.

All policies and procedures set forth in the Iowa Title I Fiscal Administration policy section and should be applied to property purchased with WIOA Title I funds. The cost of licenses or application fees is allowable if required for employment.

Miscellaneous Services must be defined in the Local Service Plan.

50.8.7. Residential/Meals Support (RMS)

Residential/Meals Support (RMS) is an allowable cost and includes the cost of lodging for each night away from the participant's permanent home required for continued program participation.

The cost for meals while the participant is away from home or in travel status for required training is allowable.

This support service is not intended to cover living expenses for long term activities, such as dormitory expenses while in training.

50.8.8. Services for Individuals with Disabilities (SID)

The cost of special services, supplies, equipment and tools necessary to enable a participant with a disability to participate in training is allowable.

It is not an allowable use of WIOA Title I funds to make capital improvements to a training or work site for general compliance with the Americans with Disabilities Act requirements.

Please refer to the Accessibility Statement for additional information on serving the youth with disabilities.

50.8.9. Stipends (STI) - Youth Only

Reasonable stipends may be used to assist the participant with additional or subsistence costs incurred by participating in any of the fourteen (14) youth services provided the provision of a stipend is included in the participant's ISS.

Stipends must be a lump-sum amount for a specific time frame and may not be based on an hourly rate.

Local boards should take into account the cost effectiveness of providing stipends based upon local youth funding levels and the capacity of the local youth program to provide a quality offering of the required youth program elements as well as stipends.

50.8.10. Supported Employment and Training (SET)

Supported Employment and Training payments are allowable to provide participants requiring individualized assistance with one-on-one instruction and support necessary to enable them to complete occupational skill training and obtain and retain competitive employment.

SET may only be used in training situations that are designed to prepare the participant for continuing non-supported competitive employment.

SET may be conducted in conjunction with Experiential Learning activities such as: INT, OJT, SHW, PRE and WEP.

An example of SET use would be the hiring of a job coach to assist an individual who has been placed in competitive employment.

Employment positions supported at sheltered workshops or similar situations may not utilize SET.

50.8.11. Transportation (TRN)

The cost of transportation necessary to participate in WIOA Title I activities and services, including job interviews, is allowable.

50.8.12. Incentive Payments (INB)

Incentive payments to youth participants are allowed for recognition and achievement directly tied to training activities and experiential learning activities. INB must be based upon a local policy that is described in the Local Service Plan (LSP) and applied consistently to all participants, as defined in the LSP.

- Incentive payments must meet all of the following:
 - Tied to the goals of the specific program;
 - Outlined in writing before the commencement of the program that may provide incentive payments;
 - Align with the local program's organizational policies; and in accordance with the requirements contained in the Uniform Administrative Requirements 2 CFR 200.
- The INB payment policy described in the Local Service Plan must be based on:
 - Attendance or achievement of basic education skills,
 - Pre-employment/work maturity skills, or
 - Occupational skills as identified in the ISS for the participant.
- The INB payment must be a lump sum based on achievement/attendance, for a specific time frame, and may not be based on an hourly rate.
- The INB policy may be based on a combination of attendance and achievement or one or the other.

Federal funds may not be spent on entertainment costs. Therefore, incentives may not include entertainment, such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment. Internal controls must be in place to safeguard cash which also apply to safeguarding of gift cards, which are essentially cash.