



Missouri Department of Higher Education and Workforce Development

# OWD Issuance 13-2019

Release Number—Program Year

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Effective Date: December 26, 2019  
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**SUBJECT:**

## Statewide Workforce Innovation and Opportunity Act (WIOA) Youth Program Framework and Design Policy

**ATTACHMENTS:** (1)—None

*This Issuance is Official Policy of the Missouri Department of Higher Education and Workforce Development*

**ISSUING AUTHORITY:**

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Director  
Missouri Office of Workforce Development

**THIS ISSUANCE DOES NOT REQUIRE CREATION OR ALTERATION OF A CORRESPONDING LOCAL POLICY**

**KEYWORDS:**

Framework; Individual Service Strategy (ISS), Objective Assessment (OA); Workforce Innovation and Opportunity Act (WIOA); Youth Program

**THIS ISSUANCE AFFECTS:**

Missouri One-Stop Delivery System (MJC/AJCs)  
WIOA Title I Local Areas/Local Boards/Local Plans  
WIOA Title I In-State Funding  
WIOA Title I Performance/Accountability  
WIOA Title I One-Stop Delivery/Service Providers  
WIOA Youth Workforce Investment Activities  
WIOA Section 188 Nondiscrimination Issues  
State of Missouri Workforce System Procedures

**FOR THE ATTENTION OF:**

OWD State Professional Staff  
One-Stop frontline staff  
Chief Elected Officials  
Local Fiscal Agents  
Local WDB Chairpersons  
Local WDB Directors  
Local WDB Members  
One-Stop Operators  
One-Stop Functional Leaders  
Service Providers  
Local Equal Opportunity Officers  
Local Compliance Monitors

**RESCISSIONS:**

DWD Issuance 03-2015, “Workforce Innovation and Opportunity Act (WIOA) Youth Program Framework and Design,” August 12, 2015.

**REFERENCES:**

[OWD Issuance 14-2016](#), “Determining Basic Skills Deficiencies for Workforce Innovation and Opportunity Act Applicants/Participants,” March 20, 2017.

[20 CFR 681.420](#), “How must LWDBs design WIOA youth programs?”

[20 CFR 681.460](#), “What services must local programs offer to youth participants?”

[20 CFR 681.580](#), “What are follow-up service for youth?”

U.S Department of Labor, Employment and Training Administration, Training and Guidance Letter ([TEGL 21-16](#)), “Third WIOA Title I Youth Formula Program Guidance,” March 2, 2017.

**SUMMARY:**

This Issuance transmits the Office of Workforce Development’s (OWD) guidance to local Workforce Development Boards (LWDBs) regarding the parameters of WIOA Youth program design that includes required Objective Assessments, Individual Service Strategies, case management and follow-up services.

## BACKGROUND:

Under WIOA, youth are fully enrolled into the WIOA Youth program after an eligibility determination, completion of an Objective Assessment, the development of an Individual Service Strategy, and participation in one of 14 Title I Youth elements. Recognizing the job skills required for employment in the new millennium, US Department of Labor (USDOL) supports<sup>1</sup> the challenge to the workforce system to provide substantive and quality services to participants funded with WIOA Youth funds. Career exploration and guidance, occupational skills training in in-demand industries, quality work experiences, career pathway development, post-secondary education, and apprenticeships are fundamental principles emphasized in WIOA.

## SUBSTANCE:

WIOA outlines the key components of the WIOA Youth program design as:

- an objective assessment (OA)
- an individual services strategy (ISS)
- case management services
- follow-up services.

LWDBs must ensure that Youth services are provided within this framework. Co-enrollment in both the Adult and Youth funding streams is encouraged; where appropriate it will allow a Youth to access other services and funding and will ease their transition into the workforce. If a youth is determined not eligible for the WIOA Youth program, they should be referred to the Missouri Job Center for other programs and services, including the WIOA Adult program or other partners and agencies that possess expertise which can best serve the participant's needs.

While the blend of Youth services that a participant receives is unique, the WIOA mandates that every Youth enrollment include the following components:

### ○ **Objective Assessment**

Each Youth must receive an OA, a point in time assessment of the Youth's strengths, goals, and barriers. The OA should identify the strengths, talents, and abilities of a Youth, while uncovering any barriers to their active participation in the Youth program and the workforce. The OA should inform the case manager of the category of services the Youth will need, and it is utilized to develop the ISS. WIOA requires the OA to identify career pathways and appropriate services for Youth.

Every OA must include an evaluation of the skills the youth possesses and what skills the youth needs to develop in each of the following categories:

- **Basic skills**— Standardized testing is utilized to evaluate literacy and numeracy skill level. Local areas must establish a series of instruments to discover basic skills levels<sup>2</sup> for Out-of-School Youth (OSY). For In-School Youth (ISY), the educational institution the youth attends is to provide an assessment of basic skills. A local area must use assessments that are valid and appropriate for a youth and provide reasonable accommodations for youth with disabilities, where needed.
- **Occupational skills**— should include a review of the occupational skills that the youth has gained/learned through prior work experience, whether paid or unpaid, in a specific industry or occupation, such as customer service, welding, cash handling, etc.

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<sup>1</sup> U.S. Department of Labor's (USDOL) Training and Employment Guidance Letter ([TEGL 23-14](#)), "Workforce Innovation and Opportunity Act (WIOA) Youth Program Transition," March 26, 2015.

<sup>2</sup> OWD Issuance 14-2016, "Determining Basic Skills Deficiencies for WIOA Applicants/Participants," March 20, 2017.

- **Prior work experience**— job experience gained by previous employment, it can include paid or unpaid employment.
- **Employability**— skills that are required to secure employment, and maintain employment. This includes work and job readiness skills such as resume assistance, interview skills, or retention ability.
- **Interests**—work-related interests that can identify potential training and occupational goals. Interest inventories may be utilized to discover interests.
- **Aptitudes**—occupational talents and abilities utilized to identify potential training and occupational goals. Career and Aptitude Assessments may be utilized to discover aptitudes.
- **Supportive service needs**—identified areas where additional assistance is needed to eliminate potential barriers to, and enable active participation in, Youth program activities.
- **Developmental needs**— Skills the youth needs to develop employability and career-related skills in each of the categories above such as problem-solving, professionalism, time-management skills, or having a positive attitude.

Each element of the OA must be addressed to develop a comprehensive picture of the Youth’s individual circumstances and to ensure the program meets the Youth’s needs. LWDBs can utilize a recent OA administered by another entity if it was conducted within 60 days prior to the WIOA enrollment. Where appropriate, OWD encourages LWDBs and Youth providers to utilize standardized assessments to strengthen the quality of the Youth’s OA.

○ **Individual Service Strategy (ISS)**

Each Youth participant must receive an ISS. The ISS, a plan designed to meet the Youth’s specific training and employment goals, is developed jointly between the case manager and the Youth participant. Case Managers should use the Youth’s OA when developing the ISS.

This ISS is a crucial and dynamic document that requires:

- all goals, needs, and barriers identified on the OA be addressed
- updates when educational or career goals are achieved, or when the Youth participant’s circumstances warrant a change.
- a roadmap for WIOA Youth service delivery.
  - an identified a career pathway linked to one or more the performance indicators listed in WIOA Section 116(b)(2)(A)(ii). “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<sup>3</sup>. Career Pathways includes counseling to support an individual in achieving the individual’s education and career goals.

○ **Case Management Services**

Every WIOA Youth participant is required to receive case management services. All Youth participants should be made aware of the breadth of services available to them. However, LWDBs are not required to provide all 14 services to every Youth participant. The services that a Youth participant receives while

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<sup>3</sup> Act of August 16, 1937 (commonly known as the “National Apprenticeship Act”; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.) (referred to individually in this Act as an “apprenticeship”, except in section 171);

enrolled into the WIOA Youth program should be tailored to and congruent with their goals, strengths, and barriers identified on the OA and as documented on the ISS.

WIOA services provided to Youth participants must be posted in the statewide case management system, include an applicable electronic Case Note, and incorporate any required program or financial documentation in the participant hard copy or electronic file.

The 14 services that each LWDB is required to make available to their Youth participants include:

- **Tutoring, study skills training, instruction and evidence-based dropout prevention**—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). Such services focus on providing academic support, helping a youth identify areas of academic concern, assisting with overcoming learning obstacles, and providing tools and resources to develop learning strategies. Secondary school dropout prevention strategies include services and activities that keep a young person in-school and engaged in a formal learning and/or training setting.
- **Alternative secondary school services or dropout recovery services that lead to a recognized high school equivalent**—alternative secondary school services, such as basic education skills training, individualized academic instruction, and English as a Second Language training, are those that assist youth who have struggled in traditional secondary education. Dropout recovery services, such as credit recovery, counseling, and educational plan development, are those that assist youth who have dropped out of school.
- **Paid and unpaid work experiences**—“a planned, structured learning experience that takes place in a workplace for a limited period of time.” Work Experiences must have academic and occupational components that may occur concurrently or sequentially. Categories of work experiences are:
  - 1) Summer employment opportunities and other employment opportunities available throughout the school year;
  - 2) Pre-apprenticeship programs (that prepare Youth to enter and succeed in a registered apprenticeship)<sup>4</sup>;
  - 3) Internships (paid or unpaid) and job shadowing (temporary and unpaid exposure to workplace)<sup>5</sup>; and
  - 4) On-the-Job training opportunities<sup>6</sup>.

Refer to OWD’s most recent policy on WIOA Youth Program Work Experiences<sup>7</sup> for more information.

- **Occupational Skills Training (OST)**—LWDBs must give priority consideration to training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the local area. DOL allows Individual Training Accounts for out-of-school youth (OSY) age 16-24. OST training must:
  - 1) Be outcome-oriented and focused on an occupational goal specified in the Individual Service Strategy; and
  - 2) Be of sufficient duration to impart the skills needed to meet the occupational goal; and

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<sup>4</sup> [TEGL 21-16](#) and [20 CFR 681.480](#), “What is a pre-apprenticeship program?”

<sup>5</sup> [TEGL 21-16](#)

<sup>6</sup> [WIOA Section 3\(44\)](#) and [20 CFR 680.700](#), “What are the requirements for on-the-job training?”

<sup>7</sup> [OWD Issuance 07-2019](#): WIOA Work Experiences for Youth Participants, September 19, 2019.

3) Lead to the attainment of a recognized postsecondary credential.

- **Education offered concurrently with workforce preparation and training for a specific occupation**— this is an integrated education and training model and describes how workforce preparation activities, basic academic skills, and hands-on occupational skills training are to be taught within the same timeframe and connected to training in a specific occupation, occupational cluster, or career pathway. This activity refers to concurrent service delivery.
- **Leadership Development Activities**—opportunities that encourage responsibility, confidence, employability, self-determination, and other positive social behaviors such as: (a) exposure to postsecondary educational possibilities; (b) community and service learning projects; (c) peer-centered activities, including peer mentoring and tutoring; (d) organizational and team work training, including team leadership training; (e) training in decision-making, including determining priorities and problem solving; (f) citizenship training, including life skills training such as parenting and work behavior training; (g) civic engagement activities which promote the quality of life in a community; and (h) other leadership activities that place youth in a leadership role such as serving on youth leadership committees, for instance a Standing Youth Committee.
- **Supportive Services**—services that enable a WIOA Youth to participate in WIOA activities. These services include but are not limited to:
  - 1) linkages to community services
  - 2) assistance with transportation
  - 3) assistance with child care and dependent care
  - 4) assistance with housing
  - 5) needs-related payments
  - 6) assistance with educational testing
  - 7) reasonable accommodations for youth with disabilities
  - 8) legal aid services
  - 9) referrals to health care
  - 10) assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear
  - 11) assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes
  - 12) payments and fees for employment and training-related applications, tests, and certifications.
- **Adult Mentoring**—for a duration of at least 12 months and may take place both during the program and following exit from the program and be a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee. While group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the local youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis<sup>8</sup>. Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company. Local programs should ensure appropriate processes are in place to adequately screen and select mentors. DOL acknowledges that in a few areas of the country finding mentors may present a burden to a program. While DOL strongly prefers that case managers not serve as mentors, WIOA allows case managers to serve as mentors in areas where adult mentors are sparse.

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<sup>8</sup> [20 CFR 681.490](#), “What is adult mentoring?”

- **Follow-up services**—provided to all Youth for a minimum of 12 months unless it is documented that the participant declined to receive follow-up services or the participant cannot be located<sup>9</sup>. 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 begin immediately following the last expected date of service in the Youth program when no future services are scheduled and may include:
  - 1) supportive services
  - 2) adult mentoring
  - 3) financial literacy education
  - 4) labor market information (i.e. career awareness, career counseling, or career exploration)
  - 5) activities that help youth prepare for transition to postsecondary education and training.
- **Comprehensive guidance and counseling**—provides individualized counseling to participants. This includes drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate. When staff refer participants to partner programs, coordination is integral to ensure WIOA services are not interrupted.
- **Financial literacy education**—supports the ability of participants to create budgets, initiate checking and savings accounts at banks, how to effectively manage spending, credit, and debt, teaches participants about the significance of credit reports and credit scores; supports a participant’s ability to understand, evaluate, and compare financial products, services, educate participants about identity theft, ways to protect themselves from identify theft, support activities that address the particular financial literacy needs of non-English speakers, support activities that address the particular financial literacy needs of youth with disabilities, provides financial education that is age appropriate, timely, and provides opportunities to put lessons into practice.
- **Entrepreneurial skills training**—provides the basics of starting and operating a small business. Such training must develop the skills associated with entrepreneurship. Such skills may include, but are not limited to, the ability to:
  - take initiative;
  - creatively seek out and identify business opportunities;
  - develop budgets and forecast resource needs;
  - understand various options for acquiring capital and the trade-offs associated with each option; and
  - Communicate effectively and market oneself and one’s ideas.
- **Services that provide Labor Market Information (LMI)**—employment information about in-demand industry sectors or occupations available in the local area. This may include career awareness, career counseling, and career exploration services. Career awareness begins the process of developing knowledge of the variety of careers and occupations available, their skill requirements, working conditions and training prerequisites, and job opportunities across a wide range of industry sectors. The process in which youth choose an educational path and training or a job which fits their interests, skills and abilities can be described as career exploration. Career counseling or guidance provides advice and support in making decisions about what career paths to take. Career counseling services may include providing information about resume preparation, interview skills, potential opportunities for job shadowing, and the long-term benefits of postsecondary education and

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<sup>9</sup> [TEGL 21-16](#), pg. 19.



training (e.g., increased earning power and career mobility). LMI identifies in-demand industries and occupations and employment opportunities; and, provides knowledge of job market expectations including education and skills requirements and potential earnings. All WIOA Youth are to have access to LMI; it should be utilized in developing the ISS.

- **Postsecondary preparation and transition activities**—postsecondary preparation and transition activities and services prepare ISY and OSY for advancement to postsecondary education after attaining a high school diploma or its recognized equivalent. These services include exploring postsecondary education options including technical training schools, community colleges, 4-year colleges and universities, and registered apprenticeships. Additional services include, but are not limited to, assisting youth to prepare for SAT/ACT testing; assisting with college admission applications; searching and applying for scholarships and grants; filling out the proper Financial Aid applications and adhering to changing guidelines; and connecting youth to postsecondary education programs.

- **Follow-up Services**

All Youth participants are placed into follow-up after the completion of all WIOA enrollment activities. While in follow-up, all youth must be offered an opportunity to receive follow-up services<sup>10</sup> that align with their ISS. Follow-up services are critical services that must have a minimum of 12 months in duration, are unique to the individual and are designed to support the Youth to ensure their success in post-secondary education or unsubsidized employment. Follow-up services may be provided beyond 12 months at the State or LWDB's discretion.

- **Quarterly Follow-up**

Providing quality follow-up services is different from completing required quarterly follow-up for performance. While Case Managers are required to contact Youth participants or their employer to obtain supplemental employment information in order to complete the quarterly follow-up tabs in the statewide case management system, this type of contact is **not** an example of an allowable follow-up service. Every attempt should be made to engage the Youth into meaningful and substantive follow-up services.

## **ROLES, RESPONSIBILITIES, and REQUIRED ACTIONS:**

Effective immediately, all LWDB Directors and Missouri Job Center Leadership should inform Frontline Workforce System staff of these requirements.

All Frontline Workforce System Staff handling WIOA Youth enrollments and case management services should immediately apply these requirements.

## **TIMELINE:**

**All Missouri Workforce System Staff** — Implementation of these rules ..... **Immediate and Continuous**

## **INQUIRIES:**

Please direct all questions or comments regarding this Issuance document to [dwdpolicy@dhewd.mo.gov](mailto:dwdpolicy@dhewd.mo.gov). All active Issuances are available at [jobs.mo.gov/dwdissuances](http://jobs.mo.gov/dwdissuances). Expired/rescinded Issuances are available on request.

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<sup>10</sup> [20 CFR 681.580](http://20CFR681.580), "What are follow-up services for youth?"

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