



Montana Department of LABOR & INDUSTRY

1
2 **Division: Workforce Services Division**
3 **Category: WIOA**
4 **Effective Date: 11/22/2017**
5 **Last Revised: 10/01/2020**
6 **Policy No.: 10-16**

7 8 **WIOA Title I Youth Program Policy**

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

13 The Workforce Innovation and Opportunity Act (WIOA) of 2014 enacted a comprehensive youth employment
14 program for serving eligible youth, ages 14-24, who face barriers to education, training, and employment. The
15 WIOA Youth program focuses primarily on out-of-school youth (OSY), requiring the state to expend a minimum of
16 75% of WIOA Youth funds on OSY. The program includes 14 program elements that are required to be made
17 available to youth clients. The youth program prioritizes work experience through a 20% minimum expenditure
18 rate for the work experience program element. Youth services are provided in partnership with the WIOA One-
19 Stop System and under the direction of the State Workforce Innovation Board (SWIB).

20 **Scope:** This policy applies to all service providers operating WIOA Title I programs, WIOA Title I program
21 manager(s), WIOA fiscal officers, and the WIOA monitoring team. This policy is effective October 1, 2020.

22 **Policy:**

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

- 24 • Determination of eligibility;
- 25 • An objective assessment that includes a review of the academic and occupational skill levels, as well as
26 the service needs and strengths to identify appropriate services and career pathways;
- 27 • The Individual Service Strategy (ISS) must identify career pathways that include education and
28 employment goals, consider career planning and results of the assessment, and prescribe achievement
29 objectives and services; and
- 30 • Case management must be provided for youth clients, including follow-up services

31 **Youth Eligibility:**

- 32 • In-School Youth (ISY) is defined as:
 - 33 ○ Attending any school at program entry, including youth attending secondary school, post-
34 secondary school, an alternative school or registered home school;
 - 35 ■ WIOA does not consider providers of Adult Education under WIOA Title II, Youth Build
36 programs, and Job Corps programs to be schools.
 - 37 ○ Not younger than age 14 or (unless an individual with a disability who is attending school under
38 State law) older than age 21 at the time of enrollment. Because age eligibility is based on age at

- 39 enrollment, clients may continue to receive services beyond the age of 21 once they are
40 enrolled in the program;
- 41 ○ A low-income individual; and
- 42 ○ One or more of the following:
- 43 ■ Basic skills deficient;
 - 44 ■ An English language learner;
 - 45 ■ An offender;
 - 46 ■ A homeless individual aged 14 to 21, including runaway youth (the definition of low
47 income includes homelessness);
 - 48 ■ Youth in foster care or has aged out of the foster care system or who has attained 16
49 years of age and left foster care for kinship guardianship or adoption (the definition of
50 low-income includes individuals in foster care);
 - 51 ■ A youth who is pregnant or parenting;
 - 52 ■ An individual with a disability; or
 - 53 ■ A youth (14-21) who requires additional assistance to:
 - 54 ● Complete an educational program: a youth who is at risk of dropping out of high
55 school as documented by his/her school; or had previously dropped out of an
56 educational program but has returned to school (including an alternative
57 school); has below average grades; or a youth with poor attendance patterns in
58 an educational program during the last 12 calendar months; or has been
59 suspended or expelled from school within the last 12 calendar months; or has
60 previously been placed in out-of-home care (foster care, group home, or kinship
61 care) for more than 6 months.
 - 62 ● OR
 - 63 ● Secure or hold employment: an in-school youth who has not held a job for more
64 than three consecutive months; or has a poor work history to include no work
65 history; or has been fired from a job in the last 6 calendar months; or lacks work
66 readiness skill necessary to obtain and/or retain employment.
 - 67 ● Note: In each local area, not more than 5 percent of the ISY newly enrolled in a
68 given program year may be eligible based on “requires additional assistance to
69 complete an educational program or to secure or hold employment.”
- 70 ● An Out-of-School Youth (OSY) is defined as:
- 71 ○ Youth who is not attending any school, including youth in home schools that are not registered
72 with the county superintendent;
 - 73 ○ Not younger than 16 nor older than 24 at the time of enrollment. Because age eligibility is
74 based on age at enrollment, clients may continue to receive services beyond the age of 24 once
75 they are enrolled in the program; and
 - 76 ○ One or more of the following:
 - 77 ■ A school dropout;
 - 78 ■ A youth who is within the age of compulsory school attendance and has not attended
79 school for at least the most recent complete school year calendar quarter. School year
80 calendar quarter is based on how a local school district defines its school year quarters.
 - 81 ■ A recipient of a secondary school diploma or its recognized equivalent who is a low-
82 income individual and is either basic skills deficient or an English language learner;
 - 83 ■ An individual who is subject to the juvenile or adult justice system;
 - 84 ■ A homeless individual, aged 16 to 24, which may include a runaway youth;
 - 85 ■ Youth in foster care or has aged out of the foster care system or who has attained 16
86 years of age and left foster care for kinship guardianship or adoption;
 - 87 ■ A youth who is pregnant or parenting;
 - 88 ■ An individual with a disability; or
 - 89 ■ A low-income youth (16-24) who requires additional assistance to:

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- Enter or complete an educational program: a youth who is in need of a high school diploma; or has dropped out of a post-secondary educational program during the last 12 calendar months; or has a diploma but requires additional education in order to obtain or retain employment.
 - OR
 - Secure and hold employment: a youth (including a youth with a diploma or equivalent) not currently attending any school and who has not held a full-time job for more than three consecutive months; has a poor work history, to include no work history; has been fired from a job in the last six calendar months; or lacks work readiness skills necessary to obtain and/or retain employment.
- The school status remains the same throughout the youth’s participation in the Youth program for purposes of reporting. If the youth is determined out-of-school at the time of enrollment and subsequently enrolls or enters any type of school qualified under the Youth program, that youth is still considered OSY throughout their participation in the program.
 - Low-income eligibility requirement:
 - In addition to the criteria found at WIOA sec 3 (36) in the definition of “low-income individual”, a youth is low-income if he or she receives or is eligible to receive a free or reduced lunch or if he or she lives in a high poverty area.
 - The criteria applies to the individual even if the school chooses to offer all students free or reduced lunch.
 - If an OSY is a parent living in the same household as a child who receives or is eligible to receive free or reduced lunch based on their income level, then such an OSY would meet the low-income criteria based on his/her child’s qualification.
 - For OSY, only those youth who are the recipient of a secondary school diploma or its recognized equivalent and are either basic skill deficient or an English language learner, and youth who require additional assistance to enter or complete an education program or to secure or hold employment, must be low-income. All other OSY meeting OSY eligibility listed above are not required to be low-income.
 - All in-school youth must be low-income to meet the in-school youth eligibility criteria, except those that fall under the low-income exception.
 - A low-income exception is allowed where 5 percent of WIOA youth may be clients who ordinarily would be required to be low-income for eligibility purposes and meet all other eligibility criteria for WIOA youth except the low-income criteria. Refer to the In-School Youth (WIOA.12) Verification Worksheet or Out-of-School Youth (WIOA.13) Verification Worksheet for complete list of acceptable documentation.
 - Individuals who are recipients of public assistance (TANF, SNAP/Food Stamps, Supplemental Security Income (SSI), Refugee Cash Assistance (RCA), and General Assistance (GA)) may meet Categorical Income Eligibility and considered automatically income eligible and no further income verification is required if the individual has provided acceptable documentation.
 - TANF and SNAP (Food Stamp) documentation must be current and verify that the individual receives or is a member of a household that is receiving TANF or SNAP benefits. Examples of documentation include the Letter of Award if the individual is the recipient, or documentation that lists the individual is a member of the household receiving TANF or SNAP, and documentation such as a TANF or SNAP benefit summary showing the dates to verify that benefits were received within the six-month period prior to application to a WIOA program. Refer to the In-School Youth (WIOA.12) Verification Worksheet or Out-of-School Youth (WIOA.13) Verification Worksheet for complete list of acceptable documentation.
 - SSI, RCA and GA are payments made to a single recipient. The individual applying to WIOA must be the recipient and is currently receiving SSI, RCA or GA to be considered as receiving public assistance and would be considered as a family of one. Examples of

141 acceptable documentation include the Award Letter or other authorization notice to
142 receive cash public assistance. Refer to the In-School Youth (WIOA.12) Verification
143 Worksheet or Out-of-School Youth (WIOA.13) Verification Worksheet for complete list of
144 acceptable documentation.

- Veterans will receive priority of service in applying for and receiving youth services.

146 Objective Assessment:

147 Youth clients must receive an objective assessment of their academic and occupational skill levels, strengths,
148 and services needed. Providers will use appropriate assessments and other tools to determine individual client
149 needs.

- The objective assessment will include a review of all the following:
 - Basic skills;
 - Occupational skills;
 - Prior work experience;
 - Employability;
 - Interests;
 - Aptitudes (including interests and aptitudes for nontraditional jobs);
 - Supportive service needs; and
 - Developmental needs.
- An objective assessment is not required if the provider determines it is appropriate to use a recent assessment (within the last 6 months) of the client conducted by another education or training program. This may include evaluations completed by a secondary school, Vocational Rehabilitation, adult basic education and literacy programs or other education or training provider.
- Academic skills assessments help program staff determine clients' academic skill levels and uncover any subject areas requiring improvement. Case managers will use assessment results to guide the academic support services they provide the youth to help them gain aptitudes and increase literacy. Support may include case managers engaging dedicated tutors to assist clients to improve their math scores or reading comprehension.
- OSY must be assessed for basic skill deficiencies. The instrument used to assess basic skills is the TABE 11/12. It must be administered by an Adult Education provider funded through Montana's Office of Public Instruction or by a WIOA Title I provider who has permission to administer the test on behalf of Adult Education. This process applies to:
 - OSY without a diploma or the equivalent at the time of enrollment, because they dropped out of school; or are within the age of compulsory school attendance, but have not attended school for at least the most recent complete school year quarter.
 - OSY with a diploma or the equivalent and basic skills deficiencies at the time of enrollment. Note: Pretesting OSY with a diploma and basic skills deficiencies is not necessary. However, youth providers should work with the Adult Education provider to determine if post-testing is appropriate.
- Youth providers must work with the Adult Education provider in their area to schedule TABE pre-testing, remediation, and post-testing if required for their clients. This is no timeline in which OSY must go through the basic skills assessment, however the client should be scheduled for testing as soon as is reasonably possible. Clients who do not follow through with scheduled assessment appointments for pre-testing, remediation, or post-testing may be pulled from Work Experience (WEX) sites and be denied supportive services. Providers will be subject to corrective action which may include repayment of any funds expended on OSY for the time-period when youth should have been tested.
- ISY do not need to be assessed for basic skills; however, the provider must track youth who are basic skills deficient. Documentation of basic skills deficiencies may include school records, a current IEP, or a report card. Basic skills deficiencies will be documented on the ISS and in case notes with supporting documentation maintained in the client's file.

190 Individual Service Strategy (ISS):

- 191 • The Individual Service Strategy (ISS) with youth must directly link to one or more of the following primary
192 indicators of performance:
 - 193 ○ **Employment Rate:**
 - 194 ▪ The percentage of program clients who are in education or training activities, or in
195 unsubsidized employment during the second quarter after exit from the program;
 - 196 ▪ The percentage of program clients who are in education or training activities, or in
197 unsubsidized employment, during the fourth quarter after exit from the program; and
 - 198 ○ **Median Earnings:**
 - 199 ▪ The median earning of program clients who are in unsubsidized employment during the
200 second quarter after exit from the program;
 - 201 ○ **Credential Attainment:**
 - 202 ▪ The percentage of program clients who obtain a recognized postsecondary credential, or
203 a secondary school diploma or its recognized equivalent during participation or within
204 one year after exit from the program. A client who has attained a secondary school
205 diploma or its recognized equivalent is included in the percentage of clients who have
206 attained a secondary school diploma or its recognized equivalent only if the client also is
207 employed or is enrolled in an education or training program leading to a recognized
208 postsecondary credential within one year after exit from the program.
 - 209 ○ **Measurable Skills Gain:**
 - 210 ▪ The percentage of program clients who, during a program year, are in an education or
211 training program that leads to a recognized postsecondary credential or employment
212 and who are achieving measurable skill gains toward such a credential or employment;
213 and
 - 214 ▪ All In-School Youth are included in this measure and some Out of School Youth who are
215 in occupational skills training, secondary or postsecondary, while in the program are
216 included.
 - 217 ○ **Effectiveness in Serving Businesses:**
 - 218 ▪ The indicator of effectiveness in serving businesses. The services provided to
219 businesses while administering the youth program include but are not limited to:
 - 220 • Business Information and Support Services: providing information on state and
221 federal tax credits or workforce investment incentives (WOTC) to businesses;
222 customized workforce information on labor market conditions, industries,
223 occupations, and the characteristics of the workforce; and proactive linkage and
224 referral of establishment to community resources that support their workforce
225 needs.
 - 226 • Workforce Recruitment Assistance: supporting business's search for qualified
227 candidates; conducting special recruitment efforts; conducting pre-employment
228 testing and background checks; and securing information on job requirements
229 and providing businesses with one-stop staff support for candidate screening
230 and pre-employment interviews.
 - 231 • Strategic Planning/Economic Development Activities: participating in community
232 based strategic planning; sponsoring business forums; securing information on
233 industry trends; providing information for the purpose of corporate economic
234 development planning; and collaborating to identify workforce challenges and
235 developing strategies to address those challenges.
 - 236 • Accessing Untapped Labor Pools: outreach to youth, veterans, individuals with
237 disabilities, older workers, ex-offenders, and other targeted demographic groups;
238 industry awareness campaigns; joint partnerships with high schools, community
239 colleges, or other education programs to improve skill levels; and programs to
240 address limited English proficiency and vocational training.

- 241 • Training Services: funding for training assistance, including customized training,
242 on-the-job training, and incumbent worker training.
- 243 • Incumbent Worker Training Services: businesses who have received publicly
244 funded incumbent worker training assistance for enrolled youth client.
- 245 • Rapid Response/Business Downsizing Assistance: a business that received an
246 initial on-site visit or contact to either discuss the range of rapid response
247 services and other assistance available to workers and businesses affected by
248 layoff, plant closures or natural disaster, or plan a layoff response following
249 notification of a current or projected permanent closure or mass layoff, including
250 natural or other disasters.
- 251 • An ISS is required for all WIOA Title I Youth in-school and out-of-school clients. Services provided by the
252 youth program are based on the individual needs of the client; therefore, the client must be involved in
253 the design and implementation of services to ensure their needs are being met.
- 254 • The ISS identifies where the client is, where the client wants to be, and the appropriate mix and
255 sequence of services and support needed to reach realistic goals. The ISS, once completed, will be
256 continually updated.
- 257 • The ISS form will be the basic instrument used to:
 - 258 ○ Document the results of the objective assessment that included the review of the academic and
259 occupational skill levels, strengths, as well as the service needs, of each youth for the purpose
260 of identifying the appropriate services and career pathways for clients;
 - 261 ○ Identify the appropriate career pathways that include education and employment goals;
 - 262 ○ Consider career planning and the results of the objective assessment;
 - 263 ○ Prescribe achievement objectives and services for the client including
264 program/employment/career goals, timeline for attainment, expected wage at placement;
 - 265 ○ Determine the mix and sequence of serviced, including supportive services, and other resources
266 needed to achieve program/employment/career goals; components of the section include:
 - 267 ▪ Short and long-term objectives;
 - 268 ▪ Which WIOA program element(s) to provide based on the clients' objective assessment
269 that will assist the youth in achieving short and long-term objectives;
 - 270 ▪ Timeline for attainment and date attained;
 - 271 ○ Document how the program element is being provided, i.e., in-house or through a referral with a
272 specific agency or service listed;
 - 273 ○ As appropriate determine effective connections to in-demand industry sectors and occupations,
274 including small businesses; and
 - 275 ○ Discuss the provision of follow-up services that will track the progress of youth after exit from
276 the program based on the youth's needs, providing assistance to help the youth secure better
277 jobs, career development, and further education.
- 278 • The ISS will be reviewed at least quarterly and updated as needed.
- 279 • Service providers will use the ISS WIOA.17 form.
- 280 • The ISS must be fully completed and signed. A signed copy of the client agreement must be provided to
281 the client and the original attached to the ISS and maintained in the client's file.
- 282 • The TABE agreement is attached to the ISS. The agreement must also be signed and dated by all OSY. A
283 signed copy of this agreement must also be provided to the client and the original attached to the ISS
284 and maintained the client's file.
- 285 • The ISS service must be opened in the MIS Employment Plan; and services identified through ISS goals
286 opened and closed as appropriate. The MIS Employment Plan need only be printed and signed when
287 major changes are made to goals.

288 Youth Services and Activities:

- 289 • The following 14 elements must be available to youth clients. Service providers have the discretion of
290 what specific services are provided to a youth based on the individual's objective assessment and ISS.

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1. Tutoring, study skills training and instruction leading to secondary school completion, including dropout prevention strategies;
 2. Alternative secondary school offerings;
 3. Paid and unpaid Work Experiences (WEX) that have academic and occupational education as a component of the work experience which may include:
 - Summer employment opportunities and other employment opportunities available throughout the school year;
 - Pre-apprenticeship programs;
 - Internships and job shadowing; and
 - On-the-job training opportunities;
 4. Occupational skill training with priority consideration for training programs that lead to recognized post-secondary credential that align with in-demand industry sectors or occupations;
 5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
 6. Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors;
 7. Supportive Services;
 8. Adult mentoring for the duration of at least 12 months that may occur both during and after program participation;
 9. Follow-up services must be provided to all clients after completion of participation. Clients in follow-up must be contacted by the case manager every 30 days and remain in follow-up for 12 months. If the client declines to receive follow-up services or cannot be located or contacted, enrollment in follow-up is not necessary. Follow-up services may include:
 - Limited supportive services;
 - Adult Mentoring
 - Financial Literacy education;
 - Services that provide labor market and employment information such as career awareness, demand industry sectors or occupations available, such as career awareness, career counseling, and career exploration services; and
 - Activities that help youth prepare for and transition to postsecondary education and training
 10. Comprehensive guidance and counseling which may include drug and alcohol abuse counseling as well as referrals to counseling, as appropriate to the needs of the individual youth.
 11. Financial literacy education;
 12. Entrepreneurial skills training;
 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; and
 14. Activities that help youth prepare for and transition to post-secondary education and training.
- Youth goals may be provided in conjunction with youth services as shown in the examples below:
 - Basic skills goal; activities to improve basic education skills for youth with proficiencies below the ninth-grade level
 - Occupational skills goal; high School equivalency certificate prep (applies to youth 16 years and older).
 - Work readiness skills goal; work experience

337 **Occupational Skills Training:**

- 338 • Occupation Skills Training, one of the 14 elements that are offered to youth clients, allows Individual
339 Training Accounts (ITA) for OSY ages 16 to 24 using WIOA funds when appropriate. Priority consideration

- 340 must be given to training programs that lead to recognized post-secondary credentials that align with in-
 341 demand industry sectors or occupations in the local area. Such training must:
- 342 ○ Be outcome-oriented and focused on an occupational goal specified in the ISS;
 - 343 ○ Be of sufficient duration to impart the skills needed to meet the occupational goal; and
 - 344 ○ Result in attainment of a recognized post-secondary credential.
- 345 ● To receive Occupational Skills Training services the youth must receive, at a minimum:
 - 346 ○ A completed ISS as described above; and
 - 347 ○ A comprehensive and specialized assessment of skill levels and service needs; or
 - 348 ○ Group and/or individual employment counseling; or
 - 349 ○ Case management and career planning.
 - 350 ● OSY will be afforded access to training activities designed to improve participation in the workforce;
 351 leading to higher earnings and self-sufficiency. Training activities for persons in these groups will be
 352 provided in the context of the state’s vision to provide universal access for all customers.
 - 353 ● Training services may be provided to enrolled OSY ages 16 – 24, following the guidance below:
 - 354 ○ Who are unable to obtain other grant assistance for such services, including Federal Pell Grants;
 - 355 or
 - 356 ○ Require assistance beyond that made available under other grant assistance programs,
 357 including Pell Grants.
 - 358 ● To determine if financial assistance is needed the service provider must assist the client in applying for
 359 financial aid and make the necessary referrals.
 - 360 ● Clients who obtain a Federal Pell Grant must utilize the full Pell Grant toward training costs and WIOA
 361 funds may assist with any need after the Pell has been applied;
 - 362 ● Service providers may utilize WIOA funding to assist a client whose training costs must be paid in order
 363 to begin training while the application for a Federal Pell Grant is pending;
 - 364 ● If such individual is subsequently awarded a Federal Pell Grant, the training provider must reimburse
 365 the service provider the WIOA funds used to pay the training costs.
 - 366 ● Training services will be provided through providers listed on the Montana Eligible Training Provider List
 367 (ETPL) unless noted otherwise in the following list of training services. Further information regarding the
 368 ETPL may be accessed in the ETPL Policy. An ETPL printout will be included in the client’s file.
 - 369 ● Training services may be WIOA or non-WIOA funded.
 - 370 ○ Non-WIOA funded training does not require ETP.
 - 371 ● Training services may include:
 - 372 ○ Occupational skills training (YOU), including training for nontraditional employment and for
 373 training programs operated by the private sector; (requires ETP)
 - 374 ○ Programs that combine workplace training with related instruction, which may include
 375 cooperative education programs; (requires ETP)
 - 376 ○ Training programs operated by the private sector; (requires ETP)
 - 377 ○ Skill upgrading and retraining; (requires ETP)
 - 378 ○ Entrepreneurial training; (requires ETP)
 - 379 ○ Short-term prevocational or job readiness training that is generally one week (40 hours) or less
 380 which does not provide certification or a credential upon completion; (does not require ETP)
 - 381 ○ Adult education and literacy activities conducted at ABLE provided in combination with services
 382 for the Incumbent Worker Training program; (does not require ETP)
 - 383 ○ Customized training conducted with a commitment by a business or group of businesses to
 384 employ an individual upon successful completion of the training; (does not require ETP) or
 - 385 ○ On-The-Job Training (OJT), (does not require ETP); or
 - 386 ○ Registered Apprenticeships or other programs that combine workplace training with related
 387 instruction.
 - 388 ● Service providers must verify and pay tuition and other training costs in accordance with the training
 389 provider’s documented payment policy or terms. WIOA funding may be used for any expenses

390 considered to be part of the Cost of Attendance (i.e. tuition, fees, room and board, books, supplies and
391 tools required by the course) that cannot be met from the Pell Grant or other grant assistance. When a
392 client is co-enrolled in WIOA or non-WIOA programs, the case manager will coordinate with the training
393 provider and other program(s) to ensure the client's training needs are met and there is no duplication
394 of service. WIOA funding will always supplement other forms of grant assistance.

395 **Follow-up activities:**

- 396 • Follow-up activities must also be provided to youth clients who exit to self-employment or agricultural,
397 railroad or federal government employment for a minimum of 4 quarters.
- 398 • Clients placed in follow-up must be contacted at least once per quarter to obtain wage date.

399 **Case Management:**

- 400 • Case management is conducted throughout the entirety of the youth's participation, from pre-
401 application through follow-up. Case management is essential to the success of WIOA youth service
402 delivery. Case managers are required to have monthly contact with their clients; and if unable to make
403 contact after six (6) attempts in a 90-day period, close all services effective the date services were last
404 provided. Case management activities include:
 - 405 ○ Direct service delivery – orientation, pre-application, eligibility determination, objective
406 assessment, ISS development, career planning, coordination of supportive services, referrals,
407 job and work experience placement, outreach and follow-up.
 - 408 ○ Monitoring and documenting eligibility, services and outcomes – accurate and timely data entry
409 into MIS; ensuring eligibility and documentation requirements are met; and determining the
410 appropriate time to exit youth from program and monitor program exits and performance
411 outcomes.
- 412 • A significant failure to meet these case management responsibilities based on program monitoring may
413 result in formal corrective action if there is no improvement from one year to the next.
- 414 • The case manager must inform the client of their responsibilities listed on ISS WIOA.17 and ensure the
415 clients sign the acknowledgement of the responsibilities.

416 **Youth Incentives:**

417 For recognition and achievement in training activities and work experiences, WIOA permits incentive payments
418 to youth clients, provided the incentives are tied to specific program goals, outlined in writing before the start of
419 the program, aligned with the local program's organizational policies, and issued with respect to the
420 requirements included in Cost Principles in 2 CFR 200.

- 421 • WIOA-funded incentives for youth clients must be tied to achievement of training, work experience,
422 and/or education milestones and outcomes and documented in the client's ISS. The ISS will describe
423 the plans for preparing the youth for post-secondary education and/or employment, finding effective
424 connections to the job market and businesses, and an understanding of the links between academic
425 and occupational learning. The youth must be an active client in the WIOA Youth program to receive an
426 incentive. Incentives may also be awarded to youth who have successfully completed the WIOA program
427 and obtained full-time unsubsidized employment.
- 428 • Providers must document the plans for providing incentives based upon the youth attaining one or more
429 goals in the youth's ISS and in case notes in MIS. Service providers will track incentive awards, whether
430 cash or non-cash, through the Objectives and Services section of the MIS Employment Plan following
431 the same funding process of obligating, authorizing, and making payments as with any service that has
432 funding attached.
- 433 • WIOA-funded incentive payments may not be used for activities such as recruitment, submitting
434 eligibility documentation, and program participation. Youth incentives may not include entertainment
435 costs such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole
436 purpose is entertainment.
- 437 • Cash incentive awards are limited to \$500 per client over the course of their program participation.

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- This policy contains suggested cash and non-cash dollar amounts. Providers have discretion to determine the actual amount of the award (up to the limits specified below), based on youth achievement of training, work experience, and education milestones and outcomes; funding; and whether the award will be in the form of cash or non-cash. Incentives, both cash and non-cash, must be in an amount that is consistent to each youth receiving an incentive for their achievement. If a provider determines that the amount awarded for the attainment of one goal is \$10, then all youth achieving that goal and receiving an incentive award will receive \$10.
 - Non-cash incentive examples include but are not limited to:
 - Gift certificates (retail and school book stores);
 - Plaques;
 - Cap and gown;
 - Class picture; or
 - Class ring.
 - OSY who are basic skills deficient in literacy and/or numeracy; actively participating in program services; and who have achieved an increase of at least one educational functioning level may be awarded up to the following amounts based on pre- and post-test scores. The same test must be used for pre- and post-tests. The required documentation is a copy of the MIS measurable skills screen and documents showing pre- and post-test results.
 - \$25 cash or gift certificate for increase of .5 to 1.0 grade level;
 - \$50 cash or gift certificate for increase of 1.1 to 1.9 grade level or more;
 - \$75 cash or gift certificate for testing 9.0 or above in both reading and math on the TABE if increase is more than three grade levels after second year of program participation.
 - OSY who enroll in school with basic skills deficiencies may receive up to the following incentives for returning to school and successful completion. Required documentation is a copy of the diploma or post-secondary degree or documentation of completion of first term from school official.
 - The first term: \$50 limit;
 - Attainment of a Diploma or Degree: \$250 limit.
 - School completion incentive applies to OSY, who are employed full-time and enroll in an educational program leading to the attainment of a GED/state approved high school equivalency diploma, professional license or certificate. The incentive is limited to those clients who maintain good standing and actively progress toward accomplishment of a GED/state approved high school equivalency diploma or professional license or certificate as described in the ISS. Required documentation is a copy of the GED/state approved high school equivalency diploma or professional license or certificate.
 - \$250 for receiving a GED/state approved high school equivalency diploma;
 - \$250 for receiving a professional license/certificate.
 - Clients may receive the following incentives for core class grade related improvements. Required documentation are school records showing grade or pass/fail records.
 - \$10 cash or gift certificate for going from failing to passing for one semester;
 - \$20 cash or gift certificate for passing all classes with a C or higher for one semester;
 - \$30 cash or gift certificate for increasing one full grade for the school year;
 - \$40 cash or gift certificate for passing all classes with a C or higher for the school year.
 - Attainment of a secondary school diploma or equivalent applies to clients, whether ISY or OSY, who at the time of enrollment have not attained a high school diploma or equivalent and are awarded such during program participation. For purposes of this policy, attainment of a secondary school diploma or equivalent includes:
 - High school diploma; or
 - HiSet.
- Clients may be awarded a cash incentive up to \$250 for obtaining their High School Diploma or HiSet. Required documentation is a copy of the diploma or HiSet certification. Clients may not be awarded cash incentives for attending state-sponsored high school equivalency classes.

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- Work experience incentive is based on a series of evaluations over the course of a youth’s work experience:
 - Up to \$50 for a satisfactory (fair or above) written evaluation by supervisor after 3 pay periods;
 - At the end of the work experience, up to \$100 for achieving satisfactory (fair or above) written evaluations 90 percent of the time.
 - Note: Incentive payments directly tied to a work experience is an allowable work experience expenditure.
 - Attainment of occupational skills credential applies to those clients who are enrolled in training, have not received an occupational skills credential, and attain an occupational skills credential during participation. An occupational skills credential is defined as a nationally recognized degree or certificate. Credentials include, but are not limited to, post-secondary degrees, recognized skill standards, and licensure of industry-recognized credentials. Required documentation is a copy of the occupational skills credential or degree from two-year or community college. Up to \$250 may be awarded for attainment of an occupational skills credential.
 - Job retention incentive applies to youth who have successfully completed the WIOA program and are employed full time. Required documentation is verification of employment and a quarterly progress report by the case manager.
 - \$25 for getting a job;
 - \$100 for retaining the same job for 3 months;
 - \$150 for retaining the same job for 6 months;
 - \$250 for retaining the same job for 12 months.

510 **Youth Stipends**

511 Stipends are allowable in the WIOA Title I Youth program. The intent of providing stipends is to encourage and
512 motivate WIOA youth to participate in certain classroom activities (seat time) that prepare youth for work
513 experiences and help youth reach specific goals and obtain positive outcomes. Providers must document the
514 plans for providing stipends on the ISS and in case notes.

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- Stipend payments must be based on the actual time of participation in the activity as documented on the attendance or time sheet. The attendance sheet must be signed by the client and the instructor before the stipend payment may be made. A copy of the attendance sheet must be maintained in the client’s file. Providers will track stipend payments through the Objectives and Services section of the MIS Employment Plan following the same funding process of obligating, authorizing, and making payments as with any service that has funding attached.
 - Stipends may be paid based on actual hours of attendance. Providers have the discretion to determine the amount of the stipend payment up to but not exceeding the current state minimum wage. Stipends must be paid in an amount consistent with other WIOA youth receiving stipends in the same classroom activity.
 - Classroom activities (seat time) include but are not limited to:
 - Work Readiness Skills
 - Financial Literacy Education;
 - Entrepreneurial Skills Training; and
 - Career Awareness classroom activities
 - Stipends may be used to count toward WEX activities e.g., Work Readiness Skills workshops.
 - A stipend is not an entitlement and may be provided on a case-by-case basis as determined by the provider.
 - A stipend is not a supportive service.

535 **Administrative Requirements:**

- 536
- The WIOA Title I Youth program manager(s) will provide technical assistance to case managers.

537 **Monitoring and Evaluation:**

- 538 • A formal monitoring will be conducted by the entity designated by SWIB.

539 **References:**

- 540 • [20 CFR 681 Youth Activities](#)
- 541 • [WIOA Section 129 Youth Workforce Investment Activities](#)
- 542 • [Eligible Training Provider List \(ETPL\) Policy](#)
- 543 • [MCA 39-51-204 \(m\) Exclusions from Definition of Employment](#)
- 544 • [2 CFR 200 Uniform Administrative Requirements](#)
- 545 • [TEGL 23-14 Youth Activities](#)
- 546 • [TEGL 08-15 Youth Program Transition Guidance](#)
- 547 • [TEGL 10-16, Change 1 Performance Accountability](#)
- 548 • [TEGL 21-16 Youth Formula Program Guidance, including Low-income Definition](#)
- 549 • [TEGL 26-16 Additional Youth Formula Program Guidance](#)