



Montana Department of LABOR & INDUSTRY

1
2 **Division: Workforce Services Division**
3 **Category: WIOA**
4 **Effective Date: 11/22/2017**
5 **Last Revised:**
6 **Policy No.: 07-16**

7 WIOA Title I Youth Program Policy

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

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

19 **Scope:** This policy applies to all service providers operating WIOA Title I Youth, WIOA Title I Youth program
20 manager(s), WIOA fiscal officers and the WIOA monitoring team. This policy is effective November 22, 2017.

21 **Policy:**

22 Framework of Services to Youth Must Include:

- 23
- 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 ISS must identify career pathways that include education and employment goals, consider career
28 planning and results of the assessment, and prescribe achievement objectives and services; and
 - Case management must be provided for youth clients, including follow-up services.

29 Youth Eligibility:

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

- 1 o One or more of the following:
 - 2 ▪ Basic skills deficient;
 - 3 ▪ An English language learner;
 - 4 ▪ An offender;
 - 5 ▪ A homeless individual aged 14 to 21 which may include a runaway youth;
 - 6 ▪ Youth in foster care or has aged out of the foster care system or who has attained 16
 - 7 years of age and left foster care for kinship guardianship or adoption;
 - 8 ▪ A youth who is pregnant or parenting;
 - 9 ▪ An individual with a disability; or
 - 10 ▪ A youth (14-21) who requires additional assistance to:
 - 11 • Complete an educational program: a youth who is at risk of dropping out of high
 - 12 school as documented by his/her school; or had previously dropped out of an
 - 13 educational program but has returned to school (including an alternative
 - 14 school); has below average grades; or a youth with poor attendance patterns in
 - 15 an educational program during the last 12 calendar months; or has been
 - 16 suspended or expelled from school within the last 12 calendar months; or has
 - 17 previously been placed in out-of-home care (foster care, group home, or kinship
 - 18 care) for more than 6 months.
 - 19 • OR
 - 20 • Secure or hold employment: an in-school youth who has not held a job for more
 - 21 than three consecutive months; or has a poor work history to include no work
 - 22 history; or has been fired from a job in the last 6 calendar months; or lacks work
 - 23 readiness skill necessary to obtain and/or retain employment.
- 24 • An Out-of-School Youth (OSY) is defined as:
 - 25 o Youth who is not attending any school, including youth in home schools that are not registered
 - 26 with the county superintendent;
 - 27 o Not younger than 16 nor older than 24 at the time of enrollment. Because age eligibility is
 - 28 based on age at enrollment, clients may continue to receive services beyond the age of 24 once
 - 29 they are enrolled in the program; and
 - 30 o One or more of the following:
 - 31 ▪ A school dropout;
 - 32 ▪ A youth who is within the age of compulsory school attendance, but has not attended
 - 33 school for at least the most recent complete school year calendar quarter. School year
 - 34 calendar quarter is based on how a local school district defines its school year quarters.
 - 35 ▪ A recipient of a secondary school diploma or its recognized equivalent who is a low-
 - 36 income individual and is either basic skills deficient or an English language learner;
 - 37 ▪ An individual who is subject to the juvenile or adult justice system;
 - 38 ▪ A homeless individual aged 16 to 24 which may include a runaway youth;
 - 39 ▪ Youth in foster care or has aged out of the foster care system or who has attained 16
 - 40 years of age and left foster care for kinship guardianship or adoption;
 - 41 ▪ A youth who is pregnant or parenting;
 - 42 ▪ An individual with a disability; or
 - 43 ▪ A low-income youth (16-24) who requires additional assistance to:
 - 44 • Enter or complete an educational program: a youth who is in need of a high
 - 45 school diploma; or has dropped out of a post-secondary educational program
 - 46 during the last 12 calendar months; or has a diploma but requires additional
 - 47 education in order to obtain or retain employment.
 - 48 • OR
 - 49 • Secure and hold employment: a youth (including a youth with a diploma or
 - 50 equivalent) not currently attending any school and who has not held a full-time
 - 51 job for more than three consecutive months; has a poor work history, to include

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

45 Objective Assessment:

- 46 • Youth clients must receive an objective assessment of the academic levels, skills levels, and services
47 needed. WIOA service providers must use the assessment tools provided through the Montana Career
48 Information System (MCIS). The objective assessment shall include a review of all the following:
 - 49 ○ Basic skills;
 - 50 ○ Occupational skills;

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

45 Individual Service Strategy (ISS):

- 46 • The Individual Service Strategy (ISS) with youth must directly link to one or more of the following primary
- 47 indicators of performance:
- 48 ○ **Employment Rate:**
- 49 ▪ The percentage of program clients who are in education or training activities, or in
- 50 unsubsidized employment during the second quarter after exit from the program;

- 1 ▪ The percentage of program clients who are in education or training activities, or in
2 unsubsidized employment, during the fourth quarter after exit from the program; and
3 ○ **Median Earnings:**
4 ▪ The median earning of program clients who are in unsubsidized employment during the
5 second quarter after exit from the program;
6 ○ **Credential Attainment:**
7 ▪ The percentage of program clients who obtain a recognized postsecondary credential, or
8 a secondary school diploma or its recognized equivalent during participation or within
9 one year after exit from the program. A client who has attained a secondary school
10 diploma or its recognized equivalent is included in the percentage of clients who have
11 attained a secondary school diploma or its recognized equivalent only if the client also is
12 employed or is enrolled in an education or training program leading to a recognized
13 postsecondary credential within one year after exit from the program.
14 ○ **Measurable Skills Gain:**
15 ▪ The percentage of program clients who, during a program year, are in an education or
16 training program that leads to a recognized postsecondary credential or employment
17 and who are achieving measurable skill gains toward such a credential or employment;
18 and
19 ▪ All In School Youth are included in this measure and some Out of School Youth who are
20 in occupational skills training, secondary or postsecondary while in the program are
21 included.
22 ○ **Effectiveness in Serving Businesses:**
23 ▪ The indicator of effectiveness in serving businesses. The services provided to
24 businesses while administering the youth program include but are not limited to:
25 • Business Information and Support Services: providing information on state and
26 federal tax credits or workforce investment incentives (WOTC) to businesses;
27 customized workforce information on labor market conditions, industries,
28 occupations, and the characteristics of the workforce; and proactive linkage and
29 referral of establishment to community resources that support their workforce
30 needs.
31 • Workforce Recruitment Assistance: supporting business's search for qualified
32 candidates; conducting special recruitment efforts; conducting pre-employment
33 testing and background checks; and securing information on job requirements
34 and providing businesses with one-stop staff support for candidate screening
35 and pre-employment interviews.
36 • Strategic Planning/Economic Development Activities: participating in community
37 based strategic planning; sponsoring business forums; securing information on
38 industry trends; providing information for the purpose of corporate economic
39 development planning; and collaborating to identify workforce challenges and
40 developing strategies to address those challenges.
41 • Accessing Untapped Labor Pools: outreach to youth, veterans, individuals with
42 disabilities, older workers, ex-offenders, and other targeted demographic groups;
43 industry awareness campaigns; joint partnerships with high schools, community
44 colleges, or other education programs to improve skill levels; and programs to
45 address limited English proficiency and vocational training.
46 • Training Services: funding for training assistance, including customized training,
47 on-the-job training, and incumbent worker training.
48 • Incumbent Worker Training Services: businesses who have received publicly
49 funded incumbent worker training assistance for enrolled youth client.
50 • Rapid Response/Business Downsizing Assistance: a business that received an
51 initial on-site visit or contact to either discuss the range of rapid response

1 services and other assistance available to workers and businesses affected by
2 layoff, plant closures or natural disaster, or plan a layoff response following
3 notification of a current or projected permanent closure or mass layoff, including
4 natural or other disasters.

- 5 • An ISS is required for all WIOA Title I Youth in-school and out-of-school clients. Services provided by the
6 youth program are based on the individual needs of the client; therefore, the client must be involved in
7 the design and implementation of services to ensure their needs are being met.
- 8 • The ISS identifies where the client is, where the client wants to be, and the appropriate mix and
9 sequence of services and support needed to reach realistic goals. The ISS once completed shall be
10 continually updated.
- 11 • The ISS form shall be the basic instrument used to:
 - 12 ○ Document the results of the objective assessment that included the review of the academic and
13 occupational skill levels, as well as the service needs, of each youth for the purpose of
14 identifying the appropriate services and career pathways for clients;
 - 15 ○ Identify the appropriate career pathways that include education and employment goals;
 - 16 ○ Consider career planning and the results of the objective assessment;
 - 17 ○ Prescribe achievement objectives and services for the client including
18 program/employment/career goals, timeline for attainment, expected wage at placement;
 - 19 ○ Determine the mix and sequence of services, including supportive services, and other resources
20 needed to achieve program/employment/ career goals; components of the section include:
 - 21 ▪ Short and long-term objectives;
 - 22 ▪ Which WIOA program element(s) to provide based on the clients' objective assessment
23 that will assist the youth in achieving short and long-term objectives;
 - 24 ▪ Timeline for attainment and date attained;
 - 25 ○ Document how the program element is being provided, i.e., in-house or through a referral with a
26 specific agency or service listed;
 - 27 ○ As appropriate determine effective connections to in-demand industry sectors and occupations,
28 including small businesses; and
 - 29 ○ Discuss the provision of follow-up services that will track the progress of youth after exit from
30 the program based on the youth's needs, providing assistance to help the youth secure better
31 jobs, career development and further education.
- 32 • The ISS shall be reviewed at least quarterly and updated as needed.
- 33 • Service providers shall use the ISS ([ISS \(WIOA.17\)](#)) form.
- 34 • The ISS must be fully completed and signed. A signed copy of the client agreement must be provided to
35 the client and the original attached to the ISS and maintained in the client's file.
- 36 • The TABE agreement is attached to the ISS. The agreement must also be signed and dated by all OSY. A
37 signed copy of this agreement must also be provided to the client and the original attached to the ISS
38 and maintained the client's file.
- 39 • The ISS service must be opened in MWorks on the Employment Plan and services identified through ISS
40 goals opened and closed as appropriate. MWorks Employment Plan must only be signed when major
41 changes are made to goals.
- 42 • Measurable skills gains are not performance measures for the in-school youth however poor math
43 and/or reading skills could be a factor in the client's education and employment goals. Deficiencies
44 shall be discussed with the client to provide them the opportunity to determine how they want to
45 address the deficiencies and explore options for improvement.

46 Youth Services and Activities:

- 47 • The following 14 elements must be available to youth clients. Service providers have the discretion of
48 what specific services are provided to a youth based on the individual's objective assessment and ISS.
49 [Glossary of definitions and terms for 14 required elements](#)

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 for not less than 12 months after the completion of participation;
 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 and services are provided in conjunction with skill goals that may include any of the following services:
 - Basic skills goal;
 - Occupational skills goal;
 - Work readiness skills goal;
 - On-the-Job Training (OJT);
 - Customized training;
 - Work experience; or
 - High School equivalency certificate prep (applies to youth 16 years and older).

Occupational Skills Training:

- Occupation Skills Training, one of the 14 elements that are offered to youth clients, allows Individual Training Accounts (ITA) for OSY ages 18 to 24 using WIOA funds when appropriate. Priority consideration must be given to training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the local area. Such training must:
 - Be outcome-oriented and focused on an occupational goal specified in the ISS;
 - Be of sufficient duration to impart the skills needed to meet the occupational goal; and
 - Result in attainment of a recognized post-secondary credential.
- To receive Occupational Skills Training services the youth must receive, at a minimum:
 - A completed ISS as described above; and
 - A comprehensive and specialized assessment of skill levels and service needs; or
 - Group and/or individual employment counseling; or
 - Case management and career planning.

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

43 Case Management:

- 44 • Case management is conducted throughout the entirety of the youth’s participation, from pre-
45 application through follow-up. Case management is essential to the success of WIOA youth service
46 deliver. Case management activities include:
 - 47 ○ Direct service delivery – orientation, pre-application, eligibility determination, objective
48 assessment, ISS development, career planning, coordination of supportive services, referrals,
49 job and work experience placement, outreach and follow-up.

- 1 ○ Monitoring and documenting eligibility, services and outcomes: Accurate and timely data entry
- 2 into MWorks; ensuring eligibility and documentation requirements are met; and determining the
- 3 appropriate time to exit youth from program and monitor program exits and performance
- 4 outcomes.
- 5 ● A significant failure to meet these case management responsibilities based on program monitoring may
- 6 result in formal corrective action if there is no improvement from one year to the next.
- 7 ● The case manager must inform the client of their responsibilities listed on [ISS \(WIOA.17\)](#) and ensure
- 8 the clients sign the acknowledgement of the responsibilities.

9 **Youth Incentives:**

- 10 ● Providers are encouraged but not required to provide incentives. Providers may determine whether to
- 11 provide an incentive award however if they choose to provide incentive awards they will base the award
- 12 amount on their fund availability. Incentives, both cash and non-cash must be in an amount that is
- 13 consistent to each youth receiving an incentive for their achievement. If a provider determines that the
- 14 amount awarded for the attainment of one goal is \$10, than all youth achieving that goal and receiving
- 15 an incentive award will receive \$10.
- 16 ● Incentives may also be awarded to youth who have successfully completed the WIOA program and
- 17 obtained full-time unsubsidized employment.
- 18 ● Incentives may be given to youth if the provision of an incentive is included in the client's ISS. The ISS
- 19 shall describe the plans for preparing the youth for post-secondary education and/or employment,
- 20 finding effective connections to the job market and businesses, and understanding the links between
- 21 academic and occupational learning, and setting and achieving goals, and for providing incentives as
- 22 appropriate to youth who achieve goals. Providers must also document the plans for providing
- 23 incentives based upon the youth attaining one or more of the goals described below in the case notes.
- 24 The youth must be an active client in the WIOA Youth program to receive an incentive.
- 25 ● Youth incentives may not include entertainment costs such as movie or sporting event tickets or gift
- 26 cards to movie theaters or other venues whose sole purpose is entertainment.
- 27 ● Non-cash incentive examples include but are not limited to:
 - 28 ○ Gift certificates (restaurant, retail and school book stores);
 - 29 ○ Plaques;
 - 30 ○ Cap and gown;
 - 31 ○ Class picture; or
 - 32 ○ Class ring.
- 33 ● Cash incentives awards for a client are limited to \$500 for the entire program year.
- 34 ● The cash or non-cash dollar amounts listed in the incentive plan are suggested award amounts. Youth
- 35 service providers have discretion in determining the actual award amount and whether it will be in the
- 36 form of cash or non-cash.
- 37 ● Attainment of a skill goal (basic work readiness or occupational skill goals). A copy of the completed
- 38 goals screen is required for reimbursement of accomplished skill goal. Clients may be awarded up to
- 39 the following amounts per goal:
 - 40 ○ Attainment of one goal: \$10
 - 41 ○ Attainment of two goals: \$15
 - 42 ○ Attainment of three goals: \$25
- 43 ● Attainment of Literacy or Numeracy gain applies to OSY who are basic skills deficient; actively
- 44 participating in program services; and who have achieved an increase of at least one educational
- 45 functioning level. A copy of the measurable skills screen and documentation showing results of pre and
- 46 post-test are required documentation for reimbursement. Clients may be awarded up to the following
- 47 amounts:
 - 48 ○ \$25 cash or gift certificate for increase of .5 to 1.0 grade level.
 - 49 ○ \$50 cash or gift certificate for increase of 1.1 to 1.9 grade level or more.

- 1 o \$75 cash or gift certificate for testing 9.0 or above in both reading and math on the TABE if
- 2 increase is more than three grade levels after second year of program participation.
- 3 • Attainment of a secondary school diploma or equivalent applies to clients, whether in school or out-of-
- 4 school, who at the time of enrollment have not attained a high school diploma or equivalent and are
- 5 awarded such during program participation. For purposes of this policy, attainment of a secondary
- 6 school diploma or equivalent includes:
- 7 o High school diploma;
- 8 o General Equivalency Diploma (GED); or
- 9 o HiSet.
- 10 Clients may be awarded a cash incentive up to \$250 for obtaining their High School Diploma, GED or
- 11 HiSet. A copy of the diploma, GED or HiSet certification is required documentation for reimbursement.
- 12 Clients may not be awarded cash incentives for attending GED/State sponsored high school
- 13 equivalency classes.
- 14 • Returning to school for OSY who are both out-of-school and basic skills deficient at enrollment may
- 15 receive up to the following incentives for returning to school and successful completion. A copy of the
- 16 diploma, post-secondary degree or documentation of completion of first term from school official is
- 17 required documentation for reimbursement.
- 18 o The first term: \$50 limit
- 19 o Attainment of a Diploma or Degree: \$250 limit.
- 20 • Attainment of occupational skills credential applies to those clients who are enrolled in training, have
- 21 not received an occupational skills credential and attain an occupational skills credential during
- 22 participation. An occupational skills credential is defined as a nationally recognized degree or
- 23 certificate. Credentials include, but are not limited to, post-secondary degrees, recognized skill
- 24 standards, and licensure of industry-recognized credentials. A copy of the occupational skills credential
- 25 or degree from two year or community college is required documentation for reimbursement.
- 26 o Up to \$250 may be awarded for attainment of an occupational skills credential.
- 27 • Attendance in high school applies to those clients enrolled in secondary education that achieve a GPA of
- 28 2.0 or higher. School records showing GPA is required documents for reimbursement.
- 29 • Incentives are based on:
- 30 o The grade point average for 4 quarters;
- 31 o School attendance (the number of days absent or tardy per semester); and
- 32 o Grade related/core classes.

GPA Range	1 Quarter	2 Quarter	3 Quarter	4 Quarter
2.0-2.99	\$20	\$20	\$20	\$20
3.0-3.49	\$30	\$30	\$30	\$30
3.5-4.0	\$50	\$50	\$50	\$50

- 33 • Clients may receive the following incentives for attendance. Youth may receive only one attendance
- 34 incentive per semester. School records showing attendance is required documents for reimbursement.
- 35 o \$50 cash or gift certificate for perfect attendance.
- 36 o \$25 cash or gift certificate for missing less than two days of school and being tardy less than
- 37 two times.
- 38 • Clients may receive the following incentives for core class grade related improvements. School records
- 39 showing grade or pass/fail record is required documents for reimbursement.
- 40 o \$10 cash or gift certificate for going from failing to passing.
- 41 o \$20 cash or gift certificate for passing all classes with a C or higher (apply this incentive to the
- 42 GPA or Grade Related incentive, not both).
- 43 o \$30 cash or gift certificate for increasing one full grade.
- 44 o \$40 cash or gift certificate for passing all classes for the school year.

- 1 • School completion incentive applies to youth who are out-of-school and employed full-time and are
- 2 enrolled in an educational program leading to the attainment of a GED/state approved high school
- 3 equivalency diploma, professional license or certificate. The incentive is limited to those clients who are
- 4 in good standing and actively progressing toward accomplishment of a GED/state approved high school
- 5 equivalency diploma or professional license or certificate as described in the ISS. A copy of the
- 6 GED/state approved high school equivalency diploma or professional license or certificate is required
- 7 for reimbursement.
 - 8 ○ \$50 for receiving a GED/state approved high school equivalency diploma.
 - 9 ○ \$75 for receiving a professional license/certificate.
- 10 • Job retention incentive applies to youth who have successfully completed the WIOA program and are
- 11 employed full time. Verification of employment and a quarterly progress report by the case manager are
- 12 required for reimbursement.
 - 13 ○ \$25 for getting a job.
 - 14 ○ \$100 for retaining the same job for 3 months.
 - 15 ○ \$150 for retaining the same job for 6 months.
 - 16 ○ \$200 for retaining the same job for 9 months.
- 17 • Providers must document the plans for providing incentives based upon the youth attaining one or more
- 18 goals in the youth's case notes in MWorks. Youth incentives are included in Youth Services objective.
- 19 Service providers shall track incentive awards, whether cash or non-cash, through the Objectives and
- 20 Services section of the MWorks Employment Plan following the same funding process of obligating,
- 21 authorizing and making payments as with any service that has funding attached.

22 **Administrative Requirements:**

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

24 **Funding:**

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

28 **Monitoring and Evaluation:**

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

30 **References:**

- 31 • [20 CFR 681 Youth Activities](#)
- 32 • [WIOA Section 129](#)
- 33 • [ISS Form \(WIOA.17\)](#)
- 34 • [ETPL Policy](#)
- 35 • [MCA 39-51-204 1m](#)
- 36 • [MOA \(WIOA.22\)](#)
- 37 • [Training Summary \(WIOA.22.c\)](#)
- 38 • [Union Concurrence Form \(WIOA.22b\)](#)
- 39 • [Timesheet \(WIOA.22.d\)](#)
- 40 • [2 CFR 200 Uniform Administrative Requirements](#)
- 41 • [TEGL 08-15](#)
- 42 • [WIOA Section 3 \(36\) - Low income definition](#)
- 43 • [Verification Worksheet 5% Low Income Exception \(WIOA.14\)](#)
- 44 • [In-School Youth Verification Worksheet \(WIOA.12\)](#)
- 45 • [Out-of-School Youth Verification Worksheet \(WIOA.13\)](#)
- 46 • [TEGL 10-16](#)
- 47 • [TEGL 21-16](#)