



# Montana Department of LABOR & INDUSTRY

1  
2 Division: Workforce Services Division  
3 Category: WIOA  
4 Effective Date: 11/22/2017  
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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  
12 culminating 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.

20 **Scope:** This policy applies to all service providers operating WIOA Title I Youth, WIOA Title I Youth  
21 program manager(s), WIOA fiscal officers and the WIOA monitoring team. This policy is effective December 13,  
22 2018.

### 23 Policy:

#### 24 Framework of Services to Youth Must Include:

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

#### 32 Youth Eligibility:

- 33 • In-School Youth is defined as:
  - 34 ○ Attending any school at program entry, including youth attending secondary school, post-  
35 secondary school, an alternative school or registered home school;
    - 36 ■ WIOA does not consider providers of Adult Education under WIOA Title II, Youth Build  
37 programs, and Job Corps programs to be schools.

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

140 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.

- 145 • 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 levels, skills levels, and services  
148 needed. WIOA service providers must use the assessment tools provided through the Montana Career  
149 Information System (MCIS). The objective assessment will include a review of all the following:
  - 150 ○ Basic skills;
  - 151 ○ Occupational skills;
  - 152 ○ Prior work experience;
  - 153 ○ Employability;
  - 154 ○ Interests;
  - 155 ○ Aptitudes (including interests and aptitudes for nontraditional jobs);
  - 156 ○ Supportive service needs; and
  - 157 ○ Developmental needs.
- 158 • No objective assessment is required if the provider determines it is appropriate to use a recent  
159 assessment (within the last 6 months) of the client conducted by another education or training program.  
160 This may include evaluations completed by a secondary school, Vocational Rehabilitation, adult basic  
161 education and literacy programs or other education or training provider.
- 162 • Academic skills assessments help program staff determine clients' academic skill levels and uncover  
163 any subject areas requiring improvement. Case managers will use assessment results to guide the  
164 academic support services they provide the youth to help them gain aptitudes and increase literacy.  
165 Support may include case managers engaging dedicated tutors to assist clients to improve their math  
166 scores or reading comprehension.
- 167 • Out-of-School Youth (OSY) must be assessed for basic skill deficiencies. All OSY must sign the basic  
168 skills assessment, Test for Adult Basic Education (TABE), agreement form and case managers must  
169 clearly explain the consequences that could result from the youth's failure to test (regardless if it's to  
170 pre-test or post-test) within the required timelines.
  - 171 ○ Pre-testing: OSY clients must be pre-tested using the TABE to determine whether they are basic  
172 skills deficient. All pre-tests must be administered within 10 working days of enrollment. In  
173 extenuating circumstances, a waiver may be requested from the program manager to extend  
174 the date of the pre-test. Providers who fail to administer the pre-test within the prescribed  
175 timelines will be subject to corrective action. The pre-test may not be administered by the  
176 provider prior to client enrollment; however, the provider may utilize a pre-test administered by  
177 ABLE up to six months prior to the first date of youth service delivered. A copy of the TABE  
178 scoring sheet indicating grade level skills must be maintained in the client file. The results of  
179 reading and math must be quantifiable through grade equivalency scores or raw scores from  
180 criterion-referenced assessment tools and entered in MWorks within 7 working days. Plans to  
181 address grade level skills below the ninth grade must be documented on the ISS.
  - 182 ○ Post-testing: OSY who receive services and tested below 9.0 on their pre-test must be post-  
183 tested using the same TABE standardized test that was part of their initial assessment. The  
184 post-test will show gains or losses in educational grade equivalency and be an indication of  
185 correct or incorrect program activities. Post-testing of OSY is required to report measurable skills  
186 gains for performance purposes.
- 187 • No client payments will be made to OSY clients until the pre-tests have been administered or a waiver  
188 has been obtained. The post-test must be administered to clients testing below 9.0 during the first year  
189 following the client's date of first youth program service. Providers who fail to administer either the pre-

- 190 test or post-test within the prescribed timelines will be subject to corrective action which may include  
191 repayment of any funds expended on OSY for the period of time the youth should have been tested.  
192 • In-school youth do not need to be assessed for basic skills; however, the provider must track youth who  
193 are basic skills deficient. Documentation of basic skills deficiencies may include school records, a  
194 current IEP or a report card. Basic skills deficiencies will be documented on the ISS and in case notes  
195 with supporting documentation maintained in the client's file.

196 **Individual Service Strategy (ISS):**

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

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

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- The TABE agreement is attached to the ISS. The agreement must also be signed and dated by all OSY. A signed copy of this agreement must also be provided to the client and the original attached to the ISS and maintained the client's file.
  - The ISS service must be opened in MWorks on the Employment Plan and services identified through ISS goals opened and closed as appropriate. MWorks Employment Plan must only be signed when major changes are made to goals.

294 **Youth Services and Activities:**

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

335 **Occupational Skills Training:**

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

- 338 must be given to training programs that lead to recognized post-secondary credentials that align with in-  
339 demand industry sectors or occupations in the local area. Such training must:
- 340 ○ Be outcome-oriented and focused on an occupational goal specified in the ISS;
  - 341 ○ Be of sufficient duration to impart the skills needed to meet the occupational goal; and
  - 342 ○ Result in attainment of a recognized post-secondary credential.
- 343 ● To receive Occupational Skills Training services the youth must receive, at a minimum:
    - 344 ○ A completed ISS as described above; and
    - 345 ○ A comprehensive and specialized assessment of skill levels and service needs; or
    - 346 ○ Group and/or individual employment counseling; or
    - 347 ○ Case management and career planning.
  - 348 ● Training services are any WIOA-funded and non-WIOA funded training services. Individuals will be  
349 afforded opportunities for participation in training activities designed to improve participation in the  
350 workforce and lead to higher earning for individuals who successfully complete them. Training activities  
351 for persons in these groups will be provided in the context of the state's vision to provide universal  
352 access for all customers. Training services may be provided to ages 16 - 24.
  - 353 ● A client may enroll in WIOA-funded training while his/her application for a Pell Grant is pending if the  
354 WIOA provider has made arrangements with the training provider and the client regarding allocation of  
355 the Pell Grant, if it is subsequently awarded. In that case, the training provider must reimburse the WIOA  
356 provider the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including  
357 any education fees the training provider charges to attend training. Reimbursement is not required from  
358 the portion of the Pell Grant assistance disbursed the participation for education-related expenses, such  
359 as fees, books and supplies.
  - 360 ● Training services will be provided through providers listed on the [Montana Eligible Training Provider List](#)  
361 [\(ETPL\)](#) unless noted otherwise in the following list of training services. Out-of-state and on-line training  
362 provider programs must be on their state's ETPL; and, if not on that state's list, the service provider  
363 must determine why not. If the provider is not eligible by another state, then they cannot be added to  
364 Montanan's ETPL, and cannot be used as a training provider. If there is another reason (i.e. they are not  
365 on their state's list due to an overly cumbersome application process), the provider can be added to  
366 Montana's ETPL through the normal application process, [ETPL Policy](#). As documentation, an ETPL  
367 printout will be included in the client's file.
  - 368 ● Training services may include:
    - 369 ○ Occupational skills training, including training for nontraditional employment and for training  
370 programs operated by the private sector; (requires ETP)
    - 371 ○ Programs that combine workplace training with related instruction, which may include  
372 cooperative education programs; (requires ETP)
    - 373 ○ Training programs operated by the private sector; (requires ETP)
    - 374 ○ Skill upgrading and retraining; (requires ETP)
    - 375 ○ Entrepreneurial training; (requires ETP)
    - 376 ○ Short-term job readiness training; (does not require ETP)
    - 377 ○ Adult education and literacy activities conducted at ABLE provided in combination with services  
378 for the Incumbent Worker Training program; (does not require ETP)
    - 379 ○ Customized training conducted with a commitment by a business or group of businesses to  
380 employ an individual upon successful completion of the training; (does not require ETP) or
    - 381 ○ Short-term pre-vocational training that that is generally one week (40 hours) or less which does  
382 not provide certification or a credential upon completion. (does not require ETP)
  - 383 ● Training Payments: Service providers must verify and pay tuition and other training costs in accordance  
384 with the training provider's documented payment policy or terms. WIOA funding may be used for any  
385 expenses considered to be part of the tuition, fees, room and board, books, supplies and tools required  
386 by the course that cannot be met from the Pell Grant or other grant assistance. When a client is co-  
387 enrolled in WIOA or non-WIOA programs, the case manager will coordinate with the training provider and



388 other program(s) to ensure the client’s training needs are met and there is no duplication of service.  
389 WIOA funding will always be a supplement to other grant assistance.

390 **Case Management:**

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

407 **Youth Incentives:**

408 For recognition and achievement in training activities and work experiences, WIOA permits incentive payments  
409 to youth participants, provided the incentives are tied to specific program goals, outlined in writing before the  
410 start of the program, aligned with the local program’s organizational policies, and issued with respect to the  
411 requirements included in Cost Principles in 2 CFR 200.

- 412 • WIOA-funded incentives for youth participants must be tied to achievement of training, work experience,  
413 and/or education milestones and outcomes and documented in the client’s ISS. The ISS will describe  
414 the plans for preparing the youth for post-secondary education and/or employment, finding effective  
415 connections to the job market and businesses, and an understanding of the links between academic  
416 and occupational learning. The youth must be an active client in the WIOA Youth program to receive an  
417 incentive. Incentives may also be awarded to youth who have successfully completed the WIOA program  
418 and obtained full-time unsubsidized employment.
- 419 • Providers must document the plans for providing incentives based upon the youth attaining one or more  
420 goals in the youth’s ISS and in case notes in MWorks. Service providers will track incentive awards,  
421 whether cash or non-cash, through the Objectives and Services section of the MWorks Employment Plan  
422 following the same funding process of obligating, authorizing, and making payments as with any service  
423 that has funding attached.
- 424 • WIOA-funded incentive payments may not be used for activities such as recruitment, submitting  
425 eligibility documentation, and program participation. Youth incentives may not include entertainment  
426 costs such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole  
427 purpose is entertainment.
- 428 • Cash incentive awards are limited to \$500 per client over the course of their program participation.
- 429 • This policy contains suggested cash and non-cash dollar amounts. Providers have discretion to  
430 determine the actual amount of the award (up to the limits specified below), based on youth  
431 achievement of training, work experience, and education milestones and outcomes; funding; and  
432 whether the award will be in the form of cash or non-cash. Incentives, both cash and non-cash, must be  
433 in an amount that is consistent to each youth receiving an incentive for their achievement. If a provider  
434 determines that the amount awarded for the attainment of one goal is \$10, then all youth achieving  
435 that goal and receiving an incentive award will receive \$10.
- 436 • Non-cash incentive examples include but are not limited to:

- 437           ○ Gift certificates (retail and school book stores);
- 438           ○ Plaques;
- 439           ○ Cap and gown;
- 440           ○ Class picture; or
- 441           ○ Class ring.
- 442       ● OSY who are basic skills deficient in literacy and/or numeracy; actively participating in program services;
- 443       and who have achieved an increase of at least one educational functioning level may be awarded up to
- 444       the following amounts based on pre- and post-test scores. The same test must be used for pre- and
- 445       post-tests. A copy of the measurable skills screen and documentation showing results of pre and post-
- 446       test are required documentation for reimbursement.
- 447           ○ \$25 cash or gift certificate for increase of .5 to 1.0 grade level;
- 448           ○ \$50 cash or gift certificate for increase of 1.1 to 1.9 grade level or more;
- 449           ○ \$75 cash or gift certificate for testing 9.0 or above in both reading and math on the TABE if
- 450           increase is more than three grade levels after second year of program participation.
- 451       ● OSY who enroll in school with basic skills deficiencies may receive up to the following incentives for
- 452       returning to school and successful completion. A copy of the diploma, post-secondary degree or
- 453       documentation of completion of first term from school official is required documentation for
- 454       reimbursement.
- 455           ○ The first term: \$50 limit;
- 456           ○ Attainment of a Diploma or Degree: \$250 limit.
- 457       ● School completion incentive applies to OSY, who are employed full-time and enroll in an educational
- 458       program leading to the attainment of a GED/state approved high school equivalency diploma,
- 459       professional license or certificate. The incentive is limited to those clients who maintain good standing
- 460       and actively progress toward accomplishment of a GED/state approved high school equivalency
- 461       diploma or professional license or certificate as described in the ISS. A copy of the GED/state approved
- 462       high school equivalency diploma or professional license or certificate is required for reimbursement.
- 463           ○ \$250 for receiving a GED/state approved high school equivalency diploma;
- 464           ○ \$250 for receiving a professional license/certificate.
- 465       ● Clients may receive the following incentives for core class grade related improvements. School records
- 466       showing grade or pass/fail records are required documents for reimbursement.
- 467           ○ \$10 cash or gift certificate for going from failing to passing for one semester;
- 468           ○ \$20 cash or gift certificate for passing all classes with a C or higher for one semester;
- 469           ○ \$30 cash or gift certificate for increasing one full grade for the school year;
- 470           ○ \$40 cash or gift certificate for passing all classes with a C or higher for the school year.
- 471       ● Attainment of a secondary school diploma or equivalent applies to clients, whether ISY or OSY, who at
- 472       the time of enrollment have not attained a high school diploma or equivalent and are awarded such
- 473       during program participation. For purposes of this policy, attainment of a secondary school diploma or
- 474       equivalent includes:
- 475           ○ High school diploma; or
- 476           ○ HiSet.
- 477       Clients may be awarded a cash incentive up to \$250 for obtaining their High School Diploma or HiSet. A
- 478       copy of the diploma or HiSet certification is required documentation for reimbursement. Clients may not
- 479       be awarded cash incentives for attending state-sponsored high school equivalency classes.
- 480       ● Attainment of a skill goal (basic skills, basic work readiness, or occupational skill goals). A copy of the
- 481       completed goals screen is required for reimbursement of accomplished skill goal. Clients may be
- 482       awarded up to the following amounts per goal:
- 483           ○ Attainment of one goal: \$10;
- 484           ○ Attainment of two goals: \$15;
- 485           ○ Attainment of three goals: \$25.
- 486       ● Work experience incentive is based on a series of evaluations over the course of a youth's work
- 487       experience:

- 488 ○ Up to \$50 for a satisfactory (fair or above) written evaluation by supervisor after 3 pay periods;
- 489 ○ At the end of the work experience, up to \$100 for achieving satisfactory (fair or above) written
- 490 evaluations 90 percent of the time.
- 491 ○ Note: Incentive payments directly tied to a work experience is an allowable work experience
- 492 expenditure.
- 493 ● Attainment of occupational skills credential applies to those clients who are enrolled in training, have
- 494 not received an occupational skills credential, and attain an occupational skills credential during
- 495 participation. An occupational skills credential is defined as a nationally recognized degree or
- 496 certificate. Credentials include, but are not limited to, post-secondary degrees, recognized skill
- 497 standards, and licensure of industry-recognized credentials. A copy of the occupational skills credential
- 498 or degree from two-year or community college is required documentation for reimbursement.
- 499 ○ Up to \$250 may be awarded for attainment of an occupational skills credential.
- 500 ● Job retention incentive applies to youth who have successfully completed the WIOA program and are
- 501 employed full time. Verification of employment and a quarterly progress report by the case manager are
- 502 required for reimbursement.
- 503 ○ \$25 for getting a job;
- 504 ○ \$100 for retaining the same job for 3 months;
- 505 ○ \$150 for retaining the same job for 6 months;
- 506 ○ \$250 for retaining the same job for 12 months.

## 507 Job Administrative Requirements:

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

## 509 Monitoring and Evaluation:

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

## 511 References:

- 512 ● [20 CFR 681 Youth Activities](#)
- 513 ● [WIOA Section 129](#)
- 514 ● [ISS Form \(WIOA.17\)](#)
- 515 ● [ETPL Policy](#)
- 516 ● [MCA 39-51-204 1m](#)
- 517 ● [MOA \(WIOA.22\)](#)
- 518 ● [Training Summary \(WIOA.22.c\)](#)
- 519 ● [Union Concurrence Form \(WIOA.22b\)](#)
- 520 ● [Timesheet \(WIOA.22.d\)](#)
- 521 ● [2 CFR 200 Uniform Administrative Requirements](#)
- 522 ● [TEGL 08-15](#)
- 523 ● [WIOA Section 3 \(36\) - Low income definition](#)
- 524 ● [Verification Worksheet 5% Low Income Exception \(WIOA.14\)](#)
- 525 ● [In-School Youth Verification Worksheet \(WIOA.12\)](#)
- 526 ● [Out-of-School Youth Verification Worksheet \(WIOA.13\)](#)
- 527 ● [TEGL 10-16](#)
- 528 ● [TEGL 21-16](#)