



Montana Department of LABOR & INDUSTRY

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2 **Division: Workforce Services Division**
3 **Category: WIOA**
4 **Effective Date: 11/22/2017**
5 **Last Revised: 07/01/2020**
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 July 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, which may include a runaway youth;
 - 47 ▪ Youth in foster care or has aged out of the foster care system or who has attained 16
 - 48 years of age and left foster care for kinship guardianship or adoption;
 - 49 ▪ A youth who is pregnant or parenting;
 - 50 ▪ An individual with a disability; or
 - 51 ▪ A youth (14-21) who requires additional assistance to:
 - 52 • Complete an educational program: a youth who is at risk of dropping out of high
 - 53 school as documented by his/her school; or had previously dropped out of an
 - 54 educational program but has returned to school (including an alternative
 - 55 school); has below average grades; or a youth with poor attendance patterns in
 - 56 an educational program during the last 12 calendar months; or has been
 - 57 suspended or expelled from school within the last 12 calendar months; or has
 - 58 previously been placed in out-of-home care (foster care, group home, or kinship
 - 59 care) for more than 6 months.
 - 60 • OR
 - 61 • Secure or hold employment: an in-school youth who has not held a job for more
 - 62 than three consecutive months; or has a poor work history to include no work
 - 63 history; or has been fired from a job in the last 6 calendar months; or lacks work
 - 64 readiness skill necessary to obtain and/or retain employment.
 - 65 • Note: In each local area, not more than 5 percent of the ISY newly enrolled in a
 - 66 given program year may be eligible based on “requires additional assistance to
 - 67 complete an educational program or to secure or hold employment.”
 - 68 • An Out-of-School Youth (OSY) is defined as:
 - 69 ○ Youth who is not attending any school, including youth in home schools that are not registered
 - 70 with the county superintendent;
 - 71 ○ Not younger than 16 nor older than 24 at the time of enrollment. Because age eligibility is
 - 72 based on age at enrollment, clients may continue to receive services beyond the age of 24 once
 - 73 they are enrolled in the program; and
 - 74 ○ One or more of the following:
 - 75 ▪ A school dropout;
 - 76 ▪ A youth who is within the age of compulsory school attendance, but has not attended
 - 77 school for at least the most recent complete school year calendar quarter. School year
 - 78 calendar quarter is based on how a local school district defines its school year quarters.
 - 79 ▪ A recipient of a secondary school diploma or its recognized equivalent who is a low-
 - 80 income individual and is either basic skills deficient or an English language learner;
 - 81 ▪ An individual who is subject to the juvenile or adult justice system;
 - 82 ▪ A homeless individual, aged 16 to 24, which may include a runaway youth;
 - 83 ▪ Youth in foster care or has aged out of the foster care system or who has attained 16
 - 84 years of age and left foster care for kinship guardianship or adoption;
 - 85 ▪ A youth who is pregnant or parenting;
 - 86 ▪ An individual with a disability; or
 - 87 ▪ A low-income youth (16-24) who requires additional assistance to:
 - 88 • Enter or complete an educational program: a youth who is in need of a high
 - 89 school diploma; or has dropped out of a post-secondary educational program

90 during the last 12 calendar months; or has a diploma but requires additional
91 education in order to obtain or retain employment.

92 • OR

93 • Secure and hold employment: a youth (including a youth with a diploma or
94 equivalent) not currently attending any school and who has not held a full-time
95 job for more than three consecutive months; has a poor work history, to include
96 no work history; has been fired from a job in the last six calendar months; or
97 lacks work readiness skills necessary to obtain and/or retain employment.

98 • The school status remains the same throughout the youth’s participation in the Youth program for
99 purposes of reporting. If the youth is determined out-of-school at the time of enrollment and
100 subsequently enrolls or enters any type of school qualified under the Youth program, that youth is still
101 considered OSY throughout their participation in the program.

102 • Low-income eligibility requirement:

103 ○ In addition to the criteria found at WIOA sec 3 (36) in the definition of “low-income individual”, a
104 youth is low-income if he or she receives or is eligible to receive a free or reduced price lunch or
105 if he or she lives in a high poverty area.

106 ■ This criteria applies to the individual even if the school chooses to offer all students free
107 or reduced lunch.

108 ■ If an OSY is a parent living in the same household as a child who receives or is eligible to
109 receive free or reduced lunch based on their income level, then such an OSY would
110 meet the low-income criteria based on his/her child’s qualification.

111 ○ For OSY, only those youth who are the recipient of a secondary school diploma or its recognized
112 equivalent and are either basic skill deficient or an English language learner, and youth who
113 require additional assistance to enter or complete an education program or to secure or hold
114 employment, must be low-income. All other OSY meeting OSY eligibility listed above are not
115 required to be low-income.

116 ○ All in-school youth must be low-income to meet the in-school youth eligibility criteria, except
117 those that fall under the low-income exception.

118 ■ A low-income exception is allowed where 5 percent of WIOA youth may be clients who
119 ordinarily would be required to be low-income for eligibility purposes and meet all other
120 eligibility criteria for WIOA youth except the low-income criteria. Refer to the In-School
121 Youth (WIOA.12) Verification Worksheet or Out-of-School Youth (WIOA.13) Verification
122 Worksheet for complete list of acceptable documentation.

123 ○ Individuals who are recipients of public assistance (TANF, SNAP/Food Stamps, Supplemental
124 Security Income (SSI), Refugee Cash Assistance (RCA), and General Assistance (GA)) may meet
125 Categorical Income Eligibility and considered automatically income eligible and no further
126 income verification is required if the individual has provided acceptable documentation.

127 ■ TANF and SNAP (Food Stamp) documentation must be current and verify that the
128 individual receives or is a member of a household that is receiving TANF or SNAP
129 benefits. Examples of documentation include the Letter of Award if the individual is the
130 recipient, or documentation that lists the individual is a member of the household
131 receiving TANF or SNAP, and documentation such as a TANF or SNAP benefit summary
132 showing the dates to verify that benefits were received within the six-month period prior
133 to application to a WIOA program. Refer to the In-School Youth (WIOA.12) Verification
134 Worksheet or Out-of-School Youth (WIOA.13) Verification Worksheet for complete list of
135 acceptable documentation.

136 ■ SSI, RCA and GA are payments made to a single recipient. The individual applying to
137 WIOA must be the recipient and is currently receiving SSI, RCA or GA to be considered as
138 receiving public assistance and would be considered as a family of one. Examples of
139 acceptable documentation include the Award Letter or other authorization notice to
140 receive cash public assistance. Refer to the In-School Youth (WIOA.12) Verification

141 Worksheet or Out-of-School Youth (WIOA.13) Verification Worksheet for complete list of
142 acceptable documentation.

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

144 **Objective Assessment:**

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

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Individual Service Strategy (ISS):

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

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

286 Youth Services and Activities:

- 287 • The following 14 elements must be available to youth clients. Service providers have the discretion of
288 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

335 **Occupational Skills Training:**

- 336 • Occupation Skills Training, one of the 14 elements that are offered to youth clients, allows Individual
337 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 supplement other grant assistance.

390 **Follow-up activities:**

- 391 • Follow-up activities must also be provided to youth clients who exit to self-employment or agricultural,
392 railroad or federal government employment for a minimum of 12 months.
- 393 • Clients placed in follow-up must be contacted at least once per quarter to obtain wage date.

394 **Case Management:**

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

411 **Youth Incentives:**

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

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

436 whether the award will be in the form of cash or non-cash. Incentives, both cash and non-cash, must be
437 in an amount that is consistent to each youth receiving an incentive for their achievement. If a provider
438 determines that the amount awarded for the attainment of one goal is \$10, then all youth achieving
439 that goal and receiving an incentive award will receive \$10.

- 440 • Non-cash incentive examples include but are not limited to:
 - 441 ○ Gift certificates (retail and school book stores);
 - 442 ○ Plaques;
 - 443 ○ Cap and gown;
 - 444 ○ Class picture; or
 - 445 ○ Class ring.
 - 446 • OSY who are basic skills deficient in literacy and/or numeracy; actively participating in program services;
447 and who have achieved an increase of at least one educational functioning level may be awarded up to
448 the following amounts based on pre- and post-test scores. The same test must be used for pre- and
449 post-tests. The required documentation is a copy of the MIS measurable skills screen and documents
450 showing pre- and post-test results.
 - 451 ○ \$25 cash or gift certificate for increase of .5 to 1.0 grade level;
 - 452 ○ \$50 cash or gift certificate for increase of 1.1 to 1.9 grade level or more;
 - 453 ○ \$75 cash or gift certificate for testing 9.0 or above in both reading and math on the TABE if
454 increase is more than three grade levels after second year of program participation.
 - 455 • OSY who enroll in school with basic skills deficiencies may receive up to the following incentives for
456 returning to school and successful completion. Required documentation is a copy of the diploma or
457 post-secondary degree or documentation of completion of first term from school official.
 - 458 ○ The first term: \$50 limit;
 - 459 ○ Attainment of a Diploma or Degree: \$250 limit.
 - 460 • School completion incentive applies to OSY, who are employed full-time and enroll in an educational
461 program leading to the attainment of a GED/state approved high school equivalency diploma,
462 professional license or certificate. The incentive is limited to those clients who maintain good standing
463 and actively progress toward accomplishment of a GED/state approved high school equivalency
464 diploma or professional license or certificate as described in the ISS. Required documentation is a copy
465 of the GED/state approved high school equivalency diploma or professional license or certificate.
 - 466 ○ \$250 for receiving a GED/state approved high school equivalency diploma;
 - 467 ○ \$250 for receiving a professional license/certificate.
 - 468 • Clients may receive the following incentives for core class grade related improvements. Required
469 documentation are school records showing grade or pass/fail records.
 - 470 ○ \$10 cash or gift certificate for going from failing to passing for one semester;
 - 471 ○ \$20 cash or gift certificate for passing all classes with a C or higher for one semester;
 - 472 ○ \$30 cash or gift certificate for increasing one full grade for the school year;
 - 473 ○ \$40 cash or gift certificate for passing all classes with a C or higher for the school year.
 - 474 • Attainment of a secondary school diploma or equivalent applies to clients, whether ISY or OSY, who at
475 the time of enrollment have not attained a high school diploma or equivalent and are awarded such
476 during program participation. For purposes of this policy, attainment of a secondary school diploma or
477 equivalent includes:
 - 478 ○ High school diploma; or
 - 479 ○ HiSet.
- 480 Clients may be awarded a cash incentive up to \$250 for obtaining their High School Diploma or HiSet.
481 Required documentation is a copy of the diploma or HiSet certification. Clients may not be awarded
482 cash incentives for attending state-sponsored high school equivalency classes.
- 483 • Work experience incentive is based on a series of evaluations over the course of a youth's work
484 experience:
 - 485 ○ Up to \$50 for a satisfactory (fair or above) written evaluation by supervisor after 3 pay periods;

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

505 Youth Stipends

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

- 510 ● Stipend payments must be based on the actual time of participation in the activity as documented on
- 511 the attendance or time sheet. The attendance sheet must be signed by the participant and the
- 512 instructor before the stipend payment may be made. A copy of the attendance sheet must be
- 513 maintained in the client's file. Providers will track stipend payments through the Objectives and
- 514 Services section of the MWorks Employment Plan following the same funding process of obligating,
- 515 authorizing, and making payments as with any service that has funding attached.
- 516 ● Stipends may be paid based on actual hours of attendance. Providers have the discretion to
- 517 determine the amount of the stipend payment up to but not exceeding the current state minimum
- 518 wage. Stipends must be paid in an amount consistent with other WIOA youth receiving stipends in the
- 519 same classroom activity.
- 520 ● Classroom activities (seat time) include but are not limited to:
- 521 ○ Work Readiness Skills
- 522 ○ Financial Literacy Education;
- 523 ○ Entrepreneurial Skills Training; and
- 524 ○ Career Awareness classroom activities
- 525
- 526 ● Stipends may be used to count toward WEX activities e.g., Work Readiness Skills workshops.
- 527 ● A stipend is not an entitlement and may be provided on a case-by-case basis as determined by the
- 528 provider.
- 529 ● A stipend is not a supportive service.

530 Administrative Requirements:

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

532 **Monitoring and Evaluation:**

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

534 **References:**

- 535 • [20 CFR 681 Youth Activities](#)
- 536 • [WIOA Section 129 Youth Workforce Investment Activities](#)
- 537 • [Eligible Training Provider List \(ETPL\) Policy](#)
- 538 • [MCA 39-51-204 \(m\) Exclusions from Definition of Employment](#)
- 539 • [2 CFR 200 Uniform Administrative Requirements](#)
- 540 • [TEGL 23-14 Youth Activities](#)
- 541 • [TEGL 08-15 Youth Program Transition Guidance](#)
- 542 • [TEGL 10-16, Change 1 Performance Accountability](#)
- 543 • [TEGL 21-16 Youth Formula Program Guidance, including Low-income Definition](#)
- 544 • [TEGL 26-16 Additional Youth Formula Program Guidance](#)