



YOUTH PROGRAM

PURPOSE

The purpose of this policy is to provide guidance to Workforce Alliance of the North Bay (Alliance) service providers on the requirements of the Workforce Innovation and Opportunities Act (WIOA) Youth Program.

SCOPE

Workforce Innovation and Opportunity Act Title, I contracted Service Providers

RESPONSIBLE PARTY

Workforce Alliance of the North Bay
Regional Workforce Development Board

REFERENCES

- Workforce Innovation Opportunities Act
- Workforce Services Directive (WSD) 17-07, WIOA Youth Program Requirements
- Workforce Services Directive (WSD) 16-19, Youth Service Eligible Provider List
- Training and Employment Guidance Letter - TEGL 21-16 Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance
- Training and Employment Guidance Letter - TEGL 31-10 Increasing Enrollment and Improving Services to Youth with Disabilities

DOCUMENTS

- WANB Form #108 WIOA 14 Youth Program Elements

DEFINITIONS

Comprehensive Guidance and Counseling – as defined in the DOL Final Rule, Section 681.510, provides individualized counseling to participants. This includes drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate.

Entrepreneurial Skills Training – as defined in the DOL Final Rule, Section 681.560, provides the basics of starting and operating a small business.

Job Shadowing – as defined in TEGL 21-16, is a work experience option where youth learn about a job by walking through the workday as a shadow to a competent worker. The job shadowing experience is a temporary, unpaid exposure to the workplace in an occupational area of interest to the participant. A job shadowing experience can be anywhere from a few hours, to a day, to a week or more.

Leadership Development Opportunities – as defined in the DOL Final Rule, Section 681.520, are opportunities that encourage responsibility, confidence, employability, self-determination, and other positive social behaviors.

Workforce Alliance of the North Bay is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.

Mentoring – as defined in the DOL Final Rule, Section 681.490, must:

- a. Last at least 12 months and may take place both during the program and following exit from the program;
- b. Be a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee; and
- c. Match the youth with an individual mentor with whom the youth interacts on a face to face basis (group mentoring activities and mentoring through electronic means are allowable as long as face-to-face interaction also occurs).

Occupational Skills Training – as defined in the DOL Final Rule, Section 681.540, is an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels, with priority consideration to training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the local area.

Positive Social and Civic Behaviors – as defined in the DOL Final Rule, Section 681.530, are outcomes of leadership opportunities, which are incorporated by local programs as part of their menu of services. Positive social and civic behaviors focus on areas that may include the following:

- a. Positive attitudinal development;
- b. Self-esteem building;
- c. Openness to work with individuals from diverse backgrounds;
- d. Maintaining healthy lifestyles, including being alcohol and drug-free;
- e. Maintaining positive social relationships with responsible adults and peers, and contributing to the well-being of one's community, including voting;
- f. Maintaining a commitment to learning and academic success;
- g. Avoiding delinquency; and
- h. Positive job attitudes and work skills.

Pre-apprenticeship – as defined in the DOL Final Rule, Section 681.480, is a program designed to prepare individuals to enter and succeed in an apprenticeship program registered under the National Apprenticeship Act of 1937 (referred to as a “registered apprenticeship” program) and includes the following elements:

- a. Training and curriculum that aligns with the skill needs of employers in the economy of the State or region involved;
- b. Access to educational and career counseling and other supportive services, directly or indirectly;
- c. Hands-on, meaningful learning activities that are connected to education and training activities, such as exploring career options, and understanding how the skills acquired through coursework can be applied toward a future career;
- d. Opportunities to attain at least one industry-recognized credential; and
- e. A partnership with one or more registered apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship program in a registered apprenticeship program.

Supportive Services – as defined in WIOA Law Section 3(59), means services such as transportation, childcare, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under this Act.

Work Experiences – as defined in the DOL Final Rule, Section 681.600, are a planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience may be



paid or unpaid, as appropriate. A work experience may take place in the private for-profit sector, the non-profit sector, or the public sector.

POLICY

I. Intake Process

- A. The Intake process is conducted by service provider program staff with the applicant to determine interest and eligibility for the WIOA youth program. Program staff will complete the data entry into the CalJOBS (the State of California's participant tracking system) application. All required data and information collection and maintenance are to be conducted per Alliance policies. This process is to include, but not be limited to:
1. Completion of the program application with applicants signature, applicants parent signature if required, and program staffs signature.
 2. Collection of documentation to substantiate applicants eligibility. This may include a signed release of information to allow the program staff to assist the applicant in collection of documentation to substantiate eligibility.
 - a) Testing to determine Basic Skills Deficiency may be conducted during the Intake Process to help determine eligibility, and if the applicant's enrolled, must be completed within 60 days of the participant's first youth program service.
 3. Explanation and collection of signed acknowledgements for WIOA provisions for Nondiscrimination and Equal Opportunity and Grievance and Complaint procedures.
- B. After the program staff determines the youth's need for, ability to benefit from, and eligibility for services, the service provider will have senior staff review the information and documentation and approve the applicant for program enrollment. The reviewer is to sign the application to authenticate they have completed this review.

II. Enrollment

Enrollment into the WIOA youth program must occur within 45 days of the date of application. In CalJOBS, an individual is considered enrolled in WIOA as of the "Participation Date" that is recorded under the Create Participation section. After information is entered in to the Create Participation section, to fully enroll the youth, the program staff must create an Objective Assessment (Activity 412), Individual Service Strategy (Activity 413) and one other service activity.

A youth may participate only in "412" and "413" activities but DOL has determined that each youth must receive at least one of the 14 program elements outlined under WIOA in order to be considered a participant. In instances where a youth does not receive services beyond "412" and "413," the system will soft exit the participant 90 days after the completion of date of the last activity, and this individual will NOT be included in performance standard calculations. These youth will also be excluded from enrollment number calculations when the Alliance calculates average cost per enrollment figures for the youth program.

- III. Program Design – Service providers will be responsible for administering a youth program model that meets the requirements as described in the Alliance's Request for Proposal (RFP) and Alliance contracts. The youth program must include the required youth program elements as described under WIOA Law, Department of Labor (DOL), and EDD guidance. The program design framework consists of an objective assessment, an individual service strategy, case management, and follow-up services that lead toward successful outcomes for youth participants.



- IV. Objective Assessment - WIOA requires all eligible individuals enrolled in the Youth program must receive an objective assessment that will assess the academic levels, skill levels, and service needs of each participant, which includes a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs reviewed for the purpose of identifying appropriate services and career pathways for participants.
1. The “begin date” of the “412-Objective Assessment” activity must be the same date as the “Participation Date.”
 2. A new Objective Assessment of a participant is not required if the service provider determines it is appropriate to use a recent assessment of the participant conducted pursuant to another education training program. However, this must be documented in CalJOBS.
- B. Individual Service Strategy - The second activity WIOA requires is an individual service strategy (ISS) developed based on the needs of each youth that is directly linked to one or more performance indicators and that shall identify career pathways that include education and employment goals, appropriate achievement objectives, and appropriate services for the participant, taking in to account the Objective Assessment results. This must be entered as the “413-Develop Service Strategies IEP/ISS/EDP.” (The “actual begin date” for this activity can be the same date as the “actual begin date” for the objective assessment activity or a later date.)
1. The ISS is the overall case strategy and plan for the youth. It is to be developed in partnership with the youth and changes over time. It is a living document that must be updated as activities change, achievements are made, and supportive services are issued or addressed.
- C. Case Management – The case management component of the WIOA youth program is conducted throughout the entirety of the youth’s participation. Case management is essential to the success of WIOA service delivery. Case management activities consist of the following, but are not limited to:
1. Direct customer service –objective assessment, ISS development, career planning, coordination of supportive services, referrals, job and work experience placement, outreach, and follow-up.
 2. Monitoring and documenting eligibility, services, and outcomes – Accurate and timely data entry in to CalJOBS, ensuring eligibility and documentation requirements are met according to the latest EDD Technical Assistance Guide (TAG) or DOL standards, determining the appropriate time to exit a youth from program participation and monitoring program exits and performance outcomes.
 3. Provide at a minimum a monthly contact documented in case notes.
 4. Utilize the Alliance technical assistance, policies, and forms for WIOA Youth program service delivery.
 5. Provide the specific services to support youth, based on the youth’s assessment and service strategy, from within the fourteen program elements under WIOA.
- D. Follow up – Follow up is one of the fourteen program elements under WIOA. All youth participants must receive follow up services for a minimum duration of 12 months after exit. The types of services provided must be determined based on the needs of the individual and therefore, the intensity of follow up services may differ for each participant. Follow up services must include more than only a contact attempted or made for securing



documentation in order to report a performance outcome. Follow up services must follow the guidelines outlined in the Alliance's Follow Up policy.

A participant exit date is determined as follows:

1. After a participant has completed their last service under the WIOA program, a case closure must be entered into CalJOBS. Ninety days after the closure date, CalJOBS will soft exit the participant from the WIOA program. The soft-exit process will record the exit date to match the end date of the last reported service in CalJOBS.
2. If additional services are required, the case closure has been entered, but the 90 days have not yet lapsed, the case closure shall be deleted, and a new activity will be entered with a start date reflecting the date the service began. The 90 day "exit" clock will be reset and will begin again upon the entry of the next case closure.
3. If additional services are required after the 90-day period lapses, the individual must begin the application/registration process again. The eligibility documentation must be updated to reflect the circumstances of the individual on the date of the new application.

V. Program Elements

The service provider must have available all of the fourteen program elements identified in WIOA Section 129(c)(2) to provide to youth participants. Although, all 14 program elements must be available in the local area, it is not required all are provided to each participant. The service provider has the flexibility to determine what specific services a youth will receive based upon the youth's Objective Assessment and ISS.

Program elements may be available by leveraging resources from other partner programs or other community resources. Referrals to these resources should be made, as appropriate.

The provided 14 elements shall be recorded on the WANB form 108, WIOA 14 Youth Program Elements. This form is used to record the elements what were provided and who provided them.

- A. **Program Element 1:** Tutoring, study skills training, and evidence-based dropout prevention and recovery strategies that lead to completion of secondary school diploma or its recognized equivalent or for a recognized postsecondary credential.
 1. Strategies under this element must lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.
 2. Tutoring, study skills training, and instruction services focus on providing academic support, helping a youth identify areas of academic concern, assisting with overcoming learning obstacles, and providing tools and resources to develop learning strategies. This element may be provided one-on-one or in a group setting, through resources or workshops. This element does not include training services that lead to recognized postsecondary credentials.
 3. Secondary school dropout prevention strategies intended to lead to a high school diploma include services and activities that keep a youth participant in school and engaged in a formal learning and/or training setting. Strategies include, but are not limited to, tutoring, literacy development, active learning experiences, after-school opportunities, and individualized instruction.
- B. **Program Element 2:** Alternative secondary school services, or dropout recovery services, as appropriate.



1. Alternative secondary school services, such as basic education skills training, individualized academic instruction, and English as a Second Language training, are those that assist youth who have struggled in traditional secondary education. Dropout recovery services, such as credit recovery, counseling, and educational plan development, are those that assist youth who have dropped out of school. These services are to be provided with the goal of helping participants to re-engage and persist in education that leads to the completion of a recognized high school equivalent.
- C. **Program Element 3:** Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, including the following:
1. Summer employment opportunities and other employment opportunities available throughout the school year
 2. Pre-apprenticeship programs
 3. Internships and job shadowing
 4. On-the-job training opportunities
- Labor standards apply in a work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists. Work experiences must include academic and occupational education. The educational component may occur concurrently or sequentially with the work experience. Further academic and occupational education may occur inside or outside the work site. The work experience employer can provide the academic and occupational component, or it may be provided separately in the classroom or through other means. The academic and occupational education component refers to contextual learning that accompanies a work experience. It includes the information necessary to understand and work in specific industries and/or occupations.
- D. **Program Element 4:** Occupational skill training, which includes priority consideration for training program that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations.
1. Staff and/or youth service providers must give priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area. Individual Training Agreements (ITAs) may be utilized for OS youth. Although IS youth may not use youth program funded ITAs, IS youth between the ages of 18 and 21 may co-enroll in the WIOA Adult program and may receive training services through an ITA funded by the adult program.
- E. **Program Element 5:** Education offered concurrently with and in the same context as workforce preparation activities and training for specific occupation or occupational cluster.
1. This program element reflects an integrated education and training model and allows workforce preparation activities and/or basic academic skills to be taught within the same time frame and connected to hands-on occupational skills training in a specific occupation, occupational cluster, or career pathway.
- F. **Program Element 6:** Leadership development opportunities, including community service and peer-centered activities encouraging responsibility, and other positive social and civic behaviors.



1. Leadership development opportunities may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors. Activities may include:
 - a) Exposure to postsecondary educational possibilities;
 - b) Community and service-learning projects;
 - c) Peer-centered activities, including peer mentoring and tutoring;
 - d) Organizational and teamwork training, including team leadership training;
 - e) Training in decision-making, including determining priorities and problem solving;
 - f) Citizenship training, including life skills training such as parenting and work behavior training;
 - g) Civic engagement activities which promote the quality of life in a community; and
 - h) Other leadership activities that place youth in a leadership role such as serving on youth leadership committees.

- G. **Program Element 7:** Supportive services. For further detail on supportive services, see WANB Policy #1001 "Supportive Services."

- H. **Program Element 8:** Adult mentoring for a duration of at least 12 months that may occur both during and after program participation.
 1. Adult mentoring must last at least 12 months and may take place during the period of participation or following program exit. Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of the company. Youth providers should ensure appropriate processes are in place to adequately screen and select mentors. If mentors are sparse, case managers may serve as mentors.

- I. **Program Element 9:** Follow up services for not less than 12 months after the completion of participation.
 1. Follow-up services are critical services provided for a minimum of 12 months after a youth exits from the program to help ensure the youth is successful in employment and/or postsecondary education. All youth participants must be offered an opportunity to receive follow-up services that align with their ISS and must be provided follow-up services for a minimum of 12 months unless the participant declines to receive follow-up services, or the participant cannot be located or contacted.
 2. Follow-up services must include more than only a contact attempted or contact made for securing documentation in order to report a performance outcome.
 3. Follow-up services may begin immediately following the last expected date of service in the youth program when no future services are scheduled. Follow-up services do not cause the exit date to change and do not trigger re-enrollment in the program.
 4. Follow-up services may include (but must begin after exit to count as follow-up services):
 - a. Regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise;
 - b. Supportive services;



- c. Adult mentoring;
 - d. Financial literacy education;
 - e. 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
 - f. Activities that help youth prepare for and transition to postsecondary education and training.
- J. **Program Element 10:** Comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth.
- 1. Comprehensive guidance and counseling provides individualized counseling to participants. This may include drug and alcohol abuse counseling and referral to partner programs, as appropriate. When referring participants to necessary counseling that cannot be provided by the local youth program or its service providers, the local youth program must coordinate with the organization it refers to in order to ensure continuity of service.
- K. **Program Element 11:** Financial literacy education.
- 1. Financial literacy education may include activities which:
 - a. Support the ability of participants to create budgets, initiate checking and savings accounts at banks, and make informed financial decisions;
 - b. Support participants in learning how to effectively manage spending, credit, and debt; including student loans, consumer credit, and credit cards;
 - c. Teach participants about the significance of credit reports and credit scores, what their rights are regarding their credit and financial information, how to determine the accuracy of a credit report and how to correct inaccuracies, and how to improve or maintain good credit;
 - d. Support a participant's ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions;
 - e. Educate participants about identity theft, ways to protect themselves from identity theft, and how to resolve cases of identity theft and in other ways understand their rights and protections related to personal identity and financial data;
 - f. Support activities that address the particular financial literacy needs of non-English speakers, including providing the support through the development and distribution of multilingual financial literacy and education materials;
 - g. Support activities that address the particular financial literacy needs of youth with disabilities, including connecting them to benefits planning and work incentives counseling;
 - h. Provide financial education that is age appropriate, timely, and provides opportunities to put lessons into practice, such as by access to safe and affordable financial products that enable money management and savings; and
 - i. Implement other approaches to help participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high quality, age-appropriate, and



relevant strategies and channels; including, where possible, timely and customized information, guidance, tools, and instruction.

- L. **Program Element 12:** Entrepreneurial skills training.
1. Entrepreneurial training must develop the skills associated with entrepreneurship. Such skills may include, but are not limited to, the ability to:
 - a. Take initiative;
 - b. Creatively seek out and identify business opportunities;
 - c. Develop budgets and forecast resource needs;
 - d. Understand various options for acquiring capital and the trade-offs associated with each option; and
 - e. Communicate effectively and market oneself and one's ideas.
 2. Approaches to teaching youth entrepreneurial skills include, but are not limited to, the following:
 - a. Entrepreneurship education that provides an introduction to the values and basics of starting and running a business. Entrepreneurship education programs often guide youth through the development of a business plan and also may include simulations of business start-up and operation;
 - b. Entrepreneurship development which provides supports and services that incubate and help youth develop their own businesses. Enterprise development programs go beyond entrepreneurship education by helping youth access small loans or grants that are needed to begin business operation and by providing more individualized attention to the development of viable business ideas; and
 - c. Experiential programs that provide youth with experience in the day-to-day operation of a business. These programs may involve the development of a youth-run business that young people participating in the program work in and manage. Or, they may facilitate placement in apprentice or internship positions with adult entrepreneurs in the community.
- M. **Program Element 13:** Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career counseling, and career exploration services.
1. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area may include career awareness, career counseling, and career exploration services. Labor market information tools may be utilized to help participants make effective decisions about education and careers, as well as facilitate awareness of career fields that are likely to provide long-term employment and earnings in the local labor market.
 2. Career awareness begins the process of developing knowledge of the variety of careers and occupations available. Career exploration is the process in which youth choose an educational path and training or a job that fits their interests, skills and abilities. Career counseling or guidance provides advice and support in making decisions about what career paths to take. Career counseling services may include providing information about resume preparation, interview skills, potential opportunities for job shadowing, and the long-term benefits of postsecondary education and training.



- N. **Program Element 14:** Activities that help youth prepare for and transition to postsecondary education and training.
1. This element includes activities that help youth prepare for and transition to postsecondary education and training after attaining a high school diploma or its recognized equivalent. These services include exploring postsecondary education options, including technical training schools, community colleges, four-year colleges and universities, and registered apprenticeships. Additional services include, but are not limited to, assisting youth to prepare for SAT/ACT testing; assisting with college admission applications, searching and applying for scholarships and grants, filling out financial aid applications, and connecting youth to postsecondary education programs.

VI. Expenditure Requirements

- A. Out of School Youth – WIOA shifts the primary focus of youth formula funds to support the educational and career success of OSY. At least 75% of the WIOA youth formula allocation must be spent on workforce investment activities for OSY, after subtracting funds spent on administrative costs.
- B. Work Experience (WEX) – WIOA places a priority on providing youth with occupational learning opportunities through WEX. At least 20% of the WIOA youth formula allocation must be spent on WEX. The WEX expenditure rate is calculated after subtracting funds spent on administrative costs. Additionally, the expenditure rate is not applied separately for In-School Youth and Out of School Youth. WEX activities include the following:
 1. Summer employment opportunities and other employment opportunities throughout the year.
 2. Pre- apprenticeship programs
 3. Internships and Job shadowing
 4. On-the-job training (OJT)

VII. Work Experience (WEX)

WEX provides youth an invaluable opportunity to develop workplace skills. Paid and unpaid WEX must include **academic and occupational education** and may include the program elements.

The required academic and occupational education (e.g., workforce preparation activities, basic academic skills, and hands-on occupational skills training) must be taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway.

- A. Youth formula funds may be used to pay wages and related benefits for WEX in the public, private, for profit or non-profit sectors when the participant's Objective Assessment and ISS indicate that a WEX is appropriate. Additionally, youth formula funds may be used to pay wages and staffing costs for the development and management of WEX. Staff costs incurred for the functions and activities directly serving participants may count as program costs such as:
 1. Staff time spent identifying potential work experience opportunities.
 2. Staff time working with employers to develop the work experience.
 3. Staff time spent working with employers to ensure a successful work experience.
 4. Staff time spent evaluating the work experience.
 5. Classroom training or the required academic education component directly related to the work experience.
 6. Orientation sessions for participants and employers.
 7. Incentive payment to youth for an achievement directly tied to the work experience.



8. Employability skills/job readiness training to prepare youth for a work experience.

All work experience activities must be paid experiences, with the exception of Pre-Apprenticeship and Job Shadowing activities. Youth WEX participants may be assigned paid WEX positions, with an hourly pay rate to be determined at the time of WEX assignment, which will be the employer's entry level wage for the similar position, but no less than State minimum wage and not to exceed \$15 per hour.

B. Youth WEX placements will be time-limited using the following criteria:

1. Youth WEX participants in OJT shall have a contract established with the OJT provider. All OJT contracts shall be limited to a period of time required for a participant to become proficient in the occupation for which the training is being provided, not to exceed 6 months under normal circumstances. In determining the appropriate length of the contract, consideration will be given to the skill requirements of the occupation, the academic and occupation skill level of the participant, prior work experience, and the participant's individual employment plan. OJT contract time periods which exceed 6 months will need the Alliance's Workforce Development Board (WDB) Director review prior to approval, and any exceptions granted by the WDB Director will not exceed a total contract time period of 12 months. All OJTs must follow the guidelines outlined in the Alliance's OJT policy.

C. Youth WEX participants in any youth WEX program which is not OJT shall have placements time-limited not to exceed 6 months or 480 hours in duration under normal circumstances. Exceptions to this time limit can be proposed to the WDB Director on an individual basis, allowing for a 6-month extension when approval has been obtained by the WDB Director.

All minors under 18 years of age employed in the State of California must have a permit to work. [EC49160; LC 1299] The Federal Fair Labor Standards Act also requires a certificate of age for working minors. The State Permit to Employ and Work ("Permit") is accepted as the Federal certificate [EC 49110, 49112, 49113, 49116]. A youth participant, under 18 years of age and assigned to WEX, must have a copy of their permit to work in the case file.

Workers' compensation benefits must be available for injuries suffered by the participant while performing WEX activities.

VIII. Individual Training Accounts (ITA) – ITA's are only allowable for OSY, aged 16-24. ITAs may only be utilized for training vendors that appear on the State of California's Eligible Training Provider List (ETPL). WIOA Youth funds may not be utilized to fund an ITA for an OSY with a training provider that is headquartered outside of California and does not have an in-state training facility, even if the provider is listed on another State's ETPL.

IX. Braiding Funds – Braiding funds is the process of using different funding streams to support different needs for the same participant while maintaining documentation to support the charging and allocations of cost to the separate funds. Service providers may use braided funds to provide more comprehensive services to participants and maximize partner resources available to assist youth. Braiding funds must meet the following criteria:

- A. The cost of each funding stream is tracked, documented, and allocated based on the proportional benefit.
- B. The cost benefits two or more programs in proportions that can be determined without undue effort or cost.



- C. The youth meets the eligibility requirement for each program from which they are receiving funds.

An example is when the WIOA Title I youth program and the WIOA Title II adult education program are used to serve eligible youth. The WIOA Title I resources can provide career guidance, work experiences, and leadership development, while the WIOA Title II resources can provide adult education and literacy activities.

- X. System Validation and Monitoring

The Alliance will be responsible for the review of all WIOA case records for eligibility. The review will be based on the information and eligibility documents contained in the participant's file.

Case record information, documentation, and verifications must be retained for a minimum of three years. Additional guidelines are outlined in the Alliance's Oversight and Monitoring policy.

POLICY UPDATE HISTORY

Date Board Approves – New Policy

INQUIRIES

Questions regarding this policy can be sent to Operations Unit.

