Green Country Workforce Development Board

Youth Programs Policy

IMPORTANT! This document contains important information about your rights, responsibilities, and/or benefits. It is critical that you understand the information in this document, and we will provide the information in your preferred language at no cost to you. Call Tamara Peachey at (918) 316-6519 for assistance in the translation and understanding of the information in this document.

Telephone Relay Service is available by dialing 711 or (800) 722-0353

The Green Country Workforce Development Board (GCWDB) is the policy and guidance board for the Workforce Oklahoma system in Oklahoma. We are business leaders with a commitment to lead a highly skilled, productive workforce in our 18-county area.

The Green Country Workforce Development Board (GCWDB) complies with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, the basis of citizenship status or participation in a WIOA Title-1 financially assisted program or activity.

Green Country Workforce Development Board is an Equal Opportunity Employer/Program. Auxiliary Aids and Services are available upon request to individuals with disabilities. TDD/TTY: 1-800-722-0353 Green Country Workforce Development Boards Workforce Innovation and Opportunity Act Title I program funding statement can be found at: **https://www.greencountryworks.org/eo-funding-page/**

Contents

Purpose 5
Effective Date 5
Policy 5
Funding 5
Program Design and Delivery 5
Participant 5
Eligibility Determination 6
1. Documenting Program Eligibility 6
2. Age Criteria: 6
3. Determining School Status 6
4. Eligibility Barriers: 20 CFR 681.210 7
5. Low Income: 20 CFR 681.250-280 9
6. Program Enrollment 10
7. Self-Attestation 10
8. Eligibility Verification 11
- Steps: 11
9. Basic Eligibility 11
Upload: 11
Virtual Case Management System 11
Case Management 12
Reasonable Accommodations 12
Case Notes 12
Declination of Services 13
Failure to Complete Activities Within Specified Time Frame 13
Uploads 13
Application Case Note and Upload: 14
Case Note 14
Upload: 14
S&T: 14
Basic Eligibility 14
Selective Service Registration: 15
How to Determine Knowing and Willful Failure to Register 16

Referral: 17
Referral Case Note: 17
Upload: 17
Referral Outcome Note: 17
Participation in at least 1 of the 14 Program Elements 18
Program Element 3: Paid and Unpaid Work Experiences: 18
Program Element 4: Occupational Skills Training (OST) 21
Science Technology Engineering Math (STEM) Training 21
Program Element 5: Education Concurrent with Workforce Preparation 21
Program Element 6: Leadership Development Opportunities 22
Program Element 7: Supportive Services 22
Program Element 8: Adult Mentoring 23
Program Element 9: Follow-up services 23
Program Element 10: Comprehensive Guidance and Counseling 24
Program Element 11: Financial Literacy Education 24
Program Element 12: Entrepreneurial Skills Training 26
Program Element 13: Labor Market and Employment Information 26
Program Element 14: Postsecondary preparation and transition activities 27
Stipend and Incentive 27
Incentives 28
Standard Stipend/Incentive Plan 28
Employability Skills/Job Readiness Training Incentive 29
Post-Secondary School Enrollment Incentive Payment 30
Attainment of High School Diploma Incentive Payment 30
Post-Secondary Occupational Skills Training Incentive Payment 30
Basic Skills Deficient Incentive Payment 31
Unsubsidized Employment Incentive Payment 31
Retention in Employment Incentive Payment 31
Workshops and Conferences Stipend Payment 32
Summer Employment Opportunities Stipend Payment/Incentive Payment 32
Work Readiness Workshops Stipend Payment 34
Attaining a Career Readiness Certificate Incentive Payment 34
Stipend or Incentive Payment Case Note: 35
Upload: 35

S&T: 35
Individual Service Strategy: 35
designed for youth, ... 35
Client Progress Review 36
The Client Involvement Statement 36
ISS Case Note(s) must: 37
Upload: 37
S&T: 37
Exits and Outcomes 37
Monitoring 38
Record Retention 39
References: 39

Purpose

This policy establishes GCWDB standards for the implementation, design, and parameters of the WIOA Title I youth formula program, with emphasis on priority of service to out of school youth (OSY) and youth program activities including expenditure, eligibility, and program elements. This policy is established in accordance with applicable state and federal laws and regulations.

Effective Date

October 29, 2026
NOTE: All GCWDB Policies and attachments are available for download at:
https://www.greencountryworks.org/resources/policy-research-best-practices/

Policy

The WIOA Youth Program provides comprehensive services to eligible youth to support their education, training, and employment goals. Services include academic support, skills training, career counseling, work experiences, and other supportive services.

Funding

The primary focus of the Title I Youth Formula Program is to support the educational and career success of OSY, with an expectation that the shift in focus will result in a reconnection of OSY to education and job. The OSY focus is evident in the requirement that a minimum 75 percent (75%) of WIOA youth funds be spent on OSY. The minimum 75% OSY expenditure applies to GCWDB funds and funds reserved by the Governor. Further, the 75% expenditure rate is a minimum requirement. Therefore, GCWDB may spend up to 100 percent of GCWDB youth funds on OSY, if they choose. This decision will be reviewed yearly and reflected in the GCWDB budget which is modified and approved yearly. There is a focus on work experience with a 20 percent (20%) expenditure requirement and 5 percent (5%) above income expenditure limitations as detailed beginning on page 16. In the case of youth participant co- enrolled in the adult or dislocated worker programs, funding may be maximized using cost sharing between programs as funding streams allow.

Program Design and Delivery

All individuals who engage in workforce services through a GCWDA Oklahoma Works American Job Center (AJC) and the State of Oklahoma's (State's) mandated system, the virtual case management system, are entitled to receive an initial assessment and a determination of eligibility for the WIOA Title I youth program.

Participant

For the WIOA Title I youth program, a participant is a reportable individual who has satisfied all applicable program requirements for the provision of services, including Eligibility determination, Objective assessment, Development of an ISS, and Received at least 1 of the 14 program elements. The point of program participation does not begin until after the youth is determined eligible and is enrolled. All youth program elements, except follow-up services, trigger participation following eligibility determination and enrollment, an objective assessment, and completion of the ISS.

Dependent: an applicant who falls into any one of the following categories:
• Under 18 years of age, living with parents or guardians, and is receiving support from them; or
• Age 18-24 and parent(s) or guardian(s) pay(s) for more than 50% of the applicant's support.

Independent: an applicant who falls into any one of the categories below:

- Under 18 years of age, not living with parents or guardians, and is not receiving any support from them;
- Individuals, age 18-24, providing more than 50% of their own support;
- Age 25 or older;
- Married (including separated, but not divorced);
- Has children that receive more than half of their support from the applicant;
- Has dependents other than a spouse or children who live with the applicant and receive more than half of their support from the applicant;
- Lives in own residence or in a residence without financial or other support from parents or guardians;
- Is on active duty in the U.S. armed forces for purposes other than training; or
- A veteran of the U.S. armed forces.

Support: as it relates to dependent financial assistance from parents or guardians to help pay for food, clothing, shelter, utilities, education, medical and dental care, recreation, transportation, and any other living expenses; as well as government-provided cash public assistance and food assistance.

Eligibility Determination

1. Documenting Program Eligibility

Most of the information needed to determine program eligibility will be completed and entered into the system by service provider staff, with cooperation by the applicant, and after self- registration in the virtual case management system is complete. For information on eligibility and documentation requirements, please see WSD 03-2024, WSD 03-2024 Attachment II, and GCWDB DVSDR policy at https://www.greencountryworks.org/resources/policy-research-best-practices/.

2. Age Criteria:

- In-School Youth (ISY): Ages 14-21.
- Out-of-School Youth (OSY): Ages 16-24.

Age is based on time of enrollment. Because of this ISY and OSY may continue to receive services beyond their maximum ages once they are enrolled as long as they are receiving one of the program elements other than follow-up services. It may be appropriate to enroll the youth in the adult program at that time to maximize program resources and to meet the individual's needs.

3. Determining School Status

School status is determined at the time of program enrollment and must be based on the status at the time eligibility determination is made. School status remains the same throughout the youth's participation in the WIOA Title I youth program and is critical as it determines how expenditures will be reported.
Definition of "School" for OSY and ISY Eligibility Determination:

- School status is determined at the time of program enrollment, upon eligibility determination.
- School status remains the same throughout the youth's participation in the WIOA youth program.
- School status is critical as it determines how youth expenditures are reported.

Definition of "School" for out-of-school and in-school youth eligibility determination:
The Department of Labor does **not** consider the following to be schools:

- Adult Education Under Title II of WIOA.
- YouthBuild.
- Job Corps.
- Dropout Re-Engagement Programs; and
- High School Equivalency Programs.

However, there is one exception. Youth attending high school equivalency (HSE) programs, including those considered to be dropout re-engagement programs, funded by the public K–12 school system that are classified by the school system as still enrolled in school are considered ISY.

4. Eligibility Barriers: 20 CFR 681.210

In-School Youth

Must be an individual who is:

a. Attending school (as defined by State law, Oklahoma Code, Title 70-1-106), including secondary and postsecondary school;
b. Not younger than age 14 or (unless an individual with a disability who is attending school under State law, Oklahoma State Department of Education School Law Book Section 168. Students of Legal Age or Oklahoma Code, Title 70-5-132) older than age 21 at time of enrollment;
c. A low-income individual; and
d. One or more of the following barriers:
    1. Basic skills deficient;
        - According to federal regulations 20 CFR 681.290, a participant is considered "basic skills deficient" if they meet one of the following criteria:
            - English Reading, Writing, or Computing Skills: The individual has English reading, writing, or computing skills at or below the 8th-grade level on a generally accepted standardized test.
            - Assessments: The individual is unable to solve problems, read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society. Please see WSD 50-2024, Assessments, to see what methods are acceptable for determining "basic skills deficient."
    2. An English language learner;
    3. An offender;
    4. A homeless individual, a homeless child or youth, or a runaway;
    5. An individual in foster care or who has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
    6. An individual who is pregnant or parenting;
    7. An individual with a disability; or
    8. An individual who requires additional assistance to complete an educational program or to secure

or hold employment as follows:

- A youth with a parent or legal guardian that is currently or previously incarcerated for a felony conviction.
- A youth who lacks parental support. Case managers must include a case note about the lack of parental support and include youth self-attestation in the participant file.
- A youth with a parent or legal guardian who lacks a high school diploma or GED.
- A youth who attends or has attended chronically underperforming school listed as a priority or targeted intervention school on the Oklahoma State Department of Education website https://sde.ok.gov/additional-targetedsupport-and-improvement Additional Targeted Support and Improvement | Oklahoma State Department of Education.
- A youth between 18-21 years of age with a pattern of poor work history. Poor work history includes inability to hold employment for more than three months, non-reoccurring employment income, and sporadic employment.

Note: When reporting barriers, in-school youth who 'require additional assistance to complete an education program or secure or hold employment.' For this particular barrier, it is important that local programs report it only when it is a participant's sole eligibility barrier. WIOA includes a limitation where in each local area only five percent of in-school youth in a given program year can be determined eligible using the "youth who require additional assistance to complete an education program or secure or hold employment" barrier o

Out-of-School Youth:

Must be an individual who is:

a. Not attending any school (as defined under State law);
b. Not younger than age 16 or older than age 24 at time of enrollment; and
c. One or more of the following barriers:
    1. A school dropout;
    2. A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter;
    3. A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English language learner;
    4. An offender;
    5. A homeless individual, a homeless child or youth, or a runaway;
    6. An individual in foster care or who has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
    7. An individual who is pregnant or parenting;
    8. An individual with a disability; or
    9. A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.
        - A youth with a parent or legal guardian that is currently or previously incarcerated for a felony conviction.
        - A youth who lacks parental support. Case managers must include a case note about the lack of parental support and include youth self-attestation in the participant file.
        - A youth with a parent or legal guardian who lacks a high school diploma or GED.
        - A youth who attends or has attended chronically underperforming school listed as a priority or

targeted intervention school on the Oklahoma State Department of Education website https://sde.ok.gov/additionaltargeted-support-and-improvementAdditional Targeted Support and Improvement | Oklahoma State Department of Education

- A youth who attends or has attended chronically underperforming school listed as a priority or targeted intervention school on the Oklahoma State Department of Education website https://sde.ok.gov/additionaltargeted-support-and-improvementAdditional Targeted Support and Improvement | Oklahoma State Department of Education
- A youth between 18-21 years of age with a pattern of poor work history. Poor work history includes inability to hold employment for more than three months, non-reoccurring employment income, and sporadic employment.

5. Low Income: 20 CFR 681.250-280

- Low income applies to all ISY (youth with disability based on own income rather than family)
- OSYs with disabilities are not required to be low-income. For ISYs with disabilities, the youth's own income, rather than his or her family's income, must meet the low-income definition and not exceed the higher of the poverty line or 70 percent of the LLSIL. Updated LLSIL Guidelines: https://www.dol.gov/agencies/eta/llsil.
- Per TEGL 9-22: There are only three instances where low-income status must be documented for OSY. Only those out-of-school youth who are determined eligible by virtue of using: 1) the "basic skill deficient," 2) "English Language Learner," or 3) "an individual who requires additional assistance to enter or complete and educational program or to secure or hold employment" barriers to document the WIOA Section 129(a)(1)(B)(iii) portion of out-of-school youth eligibility must be low income. Other out-of-school youth do not need to be low-income or document their income.
- Additionally, if an individual is not living in a single residence with other family members; that individual is not a member of a family for the purpose of WIOA income calculations. 20 CFR § 675.300 defines family as "two or more persons related by blood, marriage, or decree of the court, who are living in a single residence, and are included in one or more of the following categories:
  - A married couple and dependent children.
  - A parent or guardian and dependent children; or
  - A married couple
- WIOA permits individuals who receive or are eligible to receive free or reduced lunch, foster youth, homeless youth, and youth living in a high-poverty area to automatically be considered low income. (TEGL 9-22) • for-the-WIOA-Youth-Formula-Programhttps://youth.workforcegps.org/resources/2021/03/09/14/03/Directions-forDetermining-High-Poverty-Areas-for-the-WIOA-Youth-Formula-Program
- High Poverty Areas
  - The term low income also includes youth that live in a high-poverty area. Directions to determine if a youth lives in a high poverty area are located at https://youth.workforcegps.org/resources/2021/03/09/14/03/Directions-for-Determining-High-Poverty-Areas-for-the-WIOA-Youth-Formula-Program.
  - The WIOA regulations at 20 CFR § 681.260 define high-poverty areas as a Census tract, a set of contiguous Census tracts, an American Indian Reservation, Oklahoma Tribal Statistical Area (as defined by the U.S. Census Bureau), or other tribal land as defined by the Secretary in guidance or county that has a poverty rate of at least 25 percent as set every five years using American Community Survey 5-Year data. Instructions on the Census Bureau's American Fact Finder homepage at:

https://www.census.gov/data/developers/data-sets/acs-5year.htmlAmerican Community Survey 5-Year Data (2009-2022) (census.gov)

- Not every area in the Oklahoma Tribal Statistical Area (OTSA) is eligible, just as it is not every Census tract, or county in the country, but rather every Oklahoma Tribal Statistical Area that has a poverty rate of at least 25 percent. The OTSA's poverty rates may or may not have a Native American poverty rate of over 25 percent. Each OTSA poverty rate will have to be determined on an individual basis

6. Program Enrollment

There is no self-service concept for the WIOA youth program. Every individual receiving services as a WIOA youth must meet ISY or OSY eligibility criteria and formally enroll in the program. The following individuals are not participants:

a. Individuals who only use the self-service system.
b. Individuals who receive information-only services or activities, which provide readily available information that does not require an assessment by a staff member of the individual's skills, education, or career objectives.

Participant

When an individual completes all applicable program requirements for the provision of services, which include an eligibility determination, objective assessment, development of an individual service strategy, and receive at least one of the 14 WIOA Youth program elements, he or she is considered a participant and therefore a reportable individual. Please remember that all youth program elements, except follow-up services, trigger participation following eligibility determination, an objective assessment, and completion of the individual service strategy. For more information on eligibility and documentation requirements, please see WSD #03-2024, Data Validation and Source Documentation Policy.

7. Self-Attestation

Self-attestation is an acceptable source of documenting almost all program elements related to WIOA Youth eligibility, except for basic skills deficient and low income. As stated in TEGL 23-19, Change 3, the following youth eligibility data elements allow self-attestation as an acceptable source of documentation: school status at program entry, date of birth, individual with a disability, pregnant or parenting, youth who needs additional assistance, foster youth, homeless youth, offender, and English Language Learner. Self-attestation alone is not a sufficient means to validate the low-income data element under current federal data validation guidance. All documentation used to support the reported data element must be retained in the participant file and be available for state and federal monitoring review. If documentation cannot be obtained, local areas should document attempts to secure verification and consult with OESC prior to making a final determination for reporting purposes. Further, if an individual has had no income in the prior six (6) months, the documentation should clearly explain how their basic living needs (food, shelter, utilities, clothing, transportation, medical care, etc.) have been met during that time.

As stated in TEGL 23-19, Change 3, self-attestation means a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. Electronic signatures or a submission from the participant such as an email, text, or unique online survey response are considered an electronic signature or verification; it must be participant generated and traceable to the participant. Self-Attestation documentation must be retained.

8. Eligibility Verification

- **Action:** Review WIOA eligibility criteria.
- **Steps**:

1. Gather required documents from the participant (e.g., proof of age, income verification, school enrollment status). WSD 03-2024, Data Validation and Source Documentation, Attachment II (an excel document), outlines accepted documentation.
   a. Must request an SSN, but cannot require it
   b. Self-attestation is a viable option for documentation for most eligibility requirements. This would be used if the youth does not have access to those records (i.e., birth certificate, ss card, driver's license. We should help participants obtain that documentation for work.
   c. Work authorization is not required UNTIL a participant is receiving a service that requires it (i.e., some training, work experience, job placement) TEGL 10-23.
      Services that can be provided without verifying work authorization:
      - Labor exchange services (Labor Market, Career Guidance, Resume, Job Search)
      - Information on worker rights and where to find legal assistance
      - Referrals to community resources (transportation, childcare, food assistance, housing)
      - Individualized services, such as career assessments, development of an individual employment plan, group counseling, and career planning
      - Basic skills education
      - Assistance in completing paperwork to finalize work authorization
      - Assistance in applying for occupational license

      Services that require verification of authorization to work:
      - Job placement
      - Occupational post-secondary training
      - Work experience
      - Supportive services that represent a direct financial benefit
2. Verify eligibility based on WIOA criteria (e.g., out-of-school youth, low income, at risk of dropping out, homeless, etc. all outlined above).
3. Record the participant's eligibility status and supporting documentation in their file.

9. Basic Eligibility

Case Note

- Date Verified – Identify the date that the information collected in this note was validated
- Age documentation
- Eligibility to Work in the United States documentation
- Selective Service Registration documentation (if applicable)

Upload:

- Documents verifying basic eligibility

Virtual Case Management System

GCWDA does not keep paper files. Any and all case information must be entered, uploaded, noted, and otherwise appropriately documented in Oklahoma's State approved and mandated virtual case management system. If any event is not properly recorded and documented, that event is considered as not occurred.

Case Management

GCWDB requires contact with any participant attending short-term training at least 3 times during the training, and the minimum three case management contacts during the training must take place at the beginning, middle, and end of training. WIOA case management is a client-centered approach designed to provide career exploration and guidance, services, and referral to services to assist youth with overcoming barriers to education and/or employment, support for educational attainment and opportunities for training in high demand occupations and industries, and job placement. Case management involves regular contact with a participant which, at a minimum, must be conducted once a month. Case management is the act of connecting youth to appropriate services, not a program element, and should not be reported as one of the 14 youth program elements in the Participant Individual Record Layout (PIRL). At any point there is a gap in service, it must be noted in case notes and recorded in Schedule a Service Gap in the virtual case management system. Contact with a participant for case management purposes is not considered a program service and will not prevent program exit. Procedures for more frequent contact for individuals enrolled in short-term training programs are particularly important for those in short-term training programs that are scheduled for completion in 30 days or less to help participants address any challenges they face during the short-term training.

Reasonable Accommodations

Including accommodations available at the GCWDB website www.GreenCountryWorks.org, GCWDB policies, and CASAS (GCWDB's chosen NRS approved EFL assessment), GCWDA strives to accommodate all individuals. To this end, GCWDA Oklahoma Works AJCs are equipped with accessibility kits. GCWDA Oklahoma Works AJC staff are expected to orientate themselves with the contents of the bag and request technical assistance from the GCWDA One-Stop Operator (OSO) on any items. Center managers may also request an orientation session on these kits from the OSO. GCWDA Oklahoma Works AJCs strive for 100% accessibility. Comprehensive and affiliate centers are reviewed yearly during center certification.

Additional accessibility information is provided in the Vital Service and Information Notice (Attachment ZZ). Under Section 188 of WIOA and related regulations, providers must provide reasonable accommodations to qualified individuals with disabilities, unless providing the accommodation would cause undue hardship. No qualified individual with a disability may be excluded from participation in or be denied the benefits of a service, program, or activity or be subjected to discrimination because facilities are inaccessible or unusable by said individual.

Case Notes

Case notes, referred to as both Client Notes (pre-enrollment) and Program Notes (post-enrollment) in the virtual case management system, must be entered each time contact is made or attempted with a client and any time action is taken on a client's behalf. Case notes must provide detailed information on the coordination of services and all case management activities must be documented in detail. Detailed case notes are an important aspect of case management because they tell the story of an individual and help maintain continuity of services at every stage of service provision (i.e., application, eligibility determination, enrollment, identified services and needs, services provided, referrals made, and status of participation at any given point through follow-up to exit). Monitors or other authorized personnel should be able to read case notes and ascertain where an individual is in the GCWDB WIOA process, what the relevant needs are and how needs are addressed. Case notes describe an individual's application to and participation in WIOA programs, providing eligibility information, tracking progress and setbacks in the achievement of stated objectives, providing facts pertinent to an individual's training and employment, detailing service needs, provision and referrals, and detailing outcomes. Information contained in case notes should be relevant to the eligibility, enrollment, needs, services, and education and employment

goals of the individual. Service provider staff must maintain a written record of communication with participants from the date of application to exit through follow-up. Case managers are required to enter case notes at every interaction, point of contact or attempted contact with an individual, every contact or action on behalf of an individual, when the participant receives a service, has a status update or outcome, or makes contact with a case manager. Points of contact include all correspondence with the participant, including email, phone call, text, letter, private message, verbal, written messages, and mail-outs to the individual. Case notes should be entered timely following the event or contact. Case notes may be grouped together when services are sequential and/or provided on the same day. If more than one service is provided on the same day, each service must:

- Be distinguishable by type and/or title of service (e.g., Eligibility, IEP, ITA, etc.),
- Provide complete description of each service, and
- Correlate with uploaded and recorded documentation on the same day.

Case notes should NOT include any Health Insurance Portability and Accountability Act (HIPAA) protected information.

On December 6th, 2018, the U. S. Department of Labor, Employment and Training Administration, Division of Workforce Investments, Region IV provided advice of the STAR method for case noting. The STAR case note method consists of: S – Situation, background, set the scene; T – Task or Target, specifics of what is required, when, where, who; A – Action, what you did, skills used, behaviors, characteristics; R – Result, outcome, what happened. This method is recommended to include in program notes by GCWDB. All case notes *must*:

- Be detailed, reflecting the complete interaction or action,
- Have the proper use of pronouns, subject-verb agreement, correct spelling, be coherent, and contain accurate information,
- Be entered daily (under normal circumstances) after any action related to the case and no more than seven (7) days under special circumstances, and Be consistent with other information entered in the virtual case management system

Declination of Services

At any point an individual declines WIOA services, a detailed case note must be entered.

Failure to Complete Activities Within Specified Time Frame

If any required action of service provider staff is not completed within a specified time frame, an explanation in the form of a detailed case note must be entered.

Uploads

All documents related to any case note must be uploaded in the virtual case management system. Uploaded documentation must be clear and legible. Some documentation may be source documents for more than one data element and need only to be uploaded one time, provided all data elements are indicated prior to the upload. Upload documentation according to the guidelines below.
Click on “Add New Document” Documentation Item:

- Choose the item being uploaded. Uploaded Documentation:
- Universal: Documentation used to determine eligibility.
- Enrollment: Documentation used to validate or support data elements, career services, training, performance measures, or other documents required by state and/or local policy.

- Eligibility: documentation was used to determine eligibility.
- Validation: documentation was used to validate data/information entered into the virtual case management system.
- Supporting: documentation is used to support a service and training entry or case note entered into the virtual case management system.
- Follow-up: documentation to support follow-up services.
- Employment Planning: documentation used to support employment planning. Data Elements to be verified:
- Data Elements to be verified vary by enrollment.
- If multiple enrollments are chosen, you will be required to choose the applicable data element for each enrollment.

There is no self-service concept for the WIOA youth program. Every individual receiving services as a WIOA youth must meet ISY or OSY eligibility criteria and formally enroll in the program.

The following individuals are not participants:

- Individuals who only use the self-service system,
- Individuals who receive information-only services or activities, which provide readily available information that does not require an assessment by a staff member of the individual's skills, education, or career objectives.

This is the beginning of the initial assessment which, for youth, provides a base for the objective assessment and building blocks for ISS development.

Application Case Note and Upload:

Case Note

- Includes the date the application was received
- Includes the date contact or attempted contact was made to the applicant
- Includes if the contact was in person, by telephone, or if a voicemail, text message, or other communication was made
- Includes what was said or conveyed during the contact
- Includes that applicant was advised of complaint procedures and provided a copy of Complaint Procedures Condensed from https://www.greencountryworks.org/resources/policy-research-best- practices/

Upload:

- Completed GCWDB WIOA Application for Services (form or online digital record)
- Referral form if one exists
- Signed Complaint Procedures Condensed

S&T:

- Orientation to WIOA Services (for applicants in GCWDA)
- Referral to WIOA Services (for applicants outside GCWDA)

Basic Eligibility

All WIOA program applicants must provide documentation of basic eligibility:

- Age/date of birth,
- Selective Service registration (if applicable), and
  Eligibility to work in the United States, see List of Acceptable Documents to Verify Eligibility to Work in the

GCWDB DVSDR policy at https://www.greencountryworks.org/resources/policy- research-best-practices/ .

Selective Service Registration:

The service provider that enrolls individuals in WIOA Title I-funded activities is the entity responsible for verifying selective service registration for males seeking to enroll in WIOA programs. If a male turns 18 while participating in any applicable services, registration with Selective Service must be completed no later than 30 days after he becomes 18 in order to continue to receive WIOA Title I-funded services. If a man under the age of 26 refuses to register with the Selective Service, WIOA Title I-funded services must be suspended until he registers.

Acceptable documentation showing registration status includes:

- Selective Service Acknowledgement letter
- Form DD-214 "Report of Separation"
- Screen printout of the Selective Service Verification which can be found at https://www.sss.gov/verify/. For males who have already registered this website can be used to confirm their Selective Service number as well as the date of registration, by entering a last name, social security number, and date of birth.
- Selective Service Registration Card
- Selective Service Verification Form (Form 3A)
- Stamped Post Office Receipt of Registration

Exceptions to Selective Service Registration
For U.S. citizens, Selective Service registration is not required if the individual falls within one of the following categories.*In these instances, service staff may proceed with enrollment and service delivery:

- Men born on or before December 31, 1959;
- Men who are serving in the military on full-time active duty;
- Men attending the service academies;
- Disabled men who are continually confined to a residence, hospital, or institution; and/or
- Men who are hospitalized, institutionalized, or incarcerated are not required to register during their confinement; however, they must register within 30 days after being released if they have not yet reached their 26th birthday.
- Persons who were designated female at birth and have since undergone gender reassignment.**

For non-U.S. citizens, Selective Service registration is not required if the man falls within one of the following categories:
Non-U.S. male who came into this country for the first time after his 26th birthday. Acceptable forms of supporting documentation include:

- Date of entry stamp in his passport;
- I-94 with date of entry stamp on it; or
- Letter from the U.S. Citizenship and Immigration Services (USCIS) indicating the date the man entered the United States presented in conjunction with documentation establishing the individual's age.
- Non-U.S. male who entered the U.S. illegally after his 26th birthday must provide proof that he was not living in the U.S. from age 18 through 25.
- Non-U.S. male on a valid non-immigrant visa.

*Note: This list is not intended to be exhaustive. Please visit the Selective Service website for more information

about the registration requirements at www.sss.gov. Selective Service also provides a quick reference chart at https://www.sss.gov/wp- content/uploads/2020/11/WhoMustRegisterChart.pdf showing who must register.

**Note: Per the Selective Service website, individuals who are born female and have a gender transition are not required to register regardless of their current gender or transition status. U.S. citizens or immigrants who are born male and have had a gender transition are still required to register.

Males 26 and Older Who Are Not Registered
GCWDB requires a completed Selective Service Status Form, available at https://www.sss.gov/forms, signed by the applicant, and a signed detailed statement that outlines the reason(s) why the participant did not register with Selective Service to the GCWDB Executive Director or designated board staff for review and final determination.

If the Director determines the non-registration was knowing and willful, the participant has the option of requesting a Status Information Letter from the Selective Service website using the Selective Service Status Form.

Requesting a Status Information Letter
An individual may obtain a Status Information Letter (https://www.sss.gov/forms) from Selective Service if he believes he was not required to register or did register but cannot provide any of the documentation listed in Section 3 of the Selective Service Status Form. If an individual decides to request a Status Information Letter, they will need to describe, in detail, the circumstances that prevented him from registering (e.g., hospitalization, institutionalization, incarceration, and/or military service from age 18 through 25) and provide documentation of those circumstances to the Selective Service System (SSS). The documentation should be specific as to the dates of the circumstances.

If the Status Information Letter indicates that an individual was not required to register for the Selective Service, then he is eligible to enroll in a WIOA-funded service and service provision should proceed. If the Status Information Letter indicates that the individual was required to register but failed to do so, the individual may only receive services if they can provide evidence to establish the failure to register was not knowing and willful. All costs associated with grant-funded services provided to non-eligible individuals may be disallowed.

How to Determine Knowing and Willful Failure to Register
GCWDB Executive Director or designated board staff will be responsible for evaluating the evidence presented by the individual to determine whether the failure to register was a knowing and willful failure. The individual should be encouraged to offer as much evidence and in as much detail as possible to support his case. Evidence must include the individual's signed A written explanation and supporting documentation of his circumstances at the time of the required registration and the reasons for failure to register. The following are examples of documentation/evidence that may be of assistance in making a determination in these cases:

- Service in Armed Forces. Evidence that a man has served honorably in the U.S. Armed Forces such as DD Form 214 or his Honorable Discharge Certificate. Such documents may be considered sufficient evidence that his failure to register was not willful or knowing.
- Third Party Affidavits. Affidavits from parents, teachers, employers, doctors, etc. concerning reasons for not registering may also be helpful to grantees in making determinations in cases regarding willful and knowing failure to register.

In order to establish consistency regarding the implementation of the requirement, SSS has designated the following questions as a model for determining whether a failure to register is knowing and willful.

In determining whether the failure was "knowing," GCWDB Executive Director or designated board staff will consider:

- Was the individual aware of the requirement to register?
- If the individual knew about the requirement to register, was he misinformed about the applicability of the requirement to him (e.g., veterans who were discharged before their 26th birthday were occasionally told that they did not need to register)?
- On which date did the individual first learn that he was required to register?
- Where did the individual live when he was between the ages of 18 and 26?
- Does the status information letter indicate that Selective Service sent letters to the individual at that address and did not receive a response?

In determining whether the failure was "willful," GCWDB Executive Director or designated board staff will consider:

- Was the failure to register done deliberately and intentionally?
- Did the individual have the mental capacity to choose whether or not to register and decide not to register?
- What actions, if any, did the individual take when he learned of the requirement to register?

If GCWDB Executive Director or designated board staff determine it was not a knowing and willful failure and the individual is otherwise eligible, services may be provided. If the service provider staff determines that evidence shows that the individual's failure to register was knowing and willful, WIOA services must be denied. All documents must be uploaded into the virtual case management system.

Referral:

The design framework services of local youth programs must ensure that WIOA youth service providers meet the referral requirements for all youth participants, including:

- Providing participants with information about the full array of applicable or appropriate services available through GCWDB or other eligible providers, or one-stop partners;
- Referring participants to appropriate training and educational programs that have the capacity to serve them either on a sequential or concurrent basis using the Referral to Partner or Community Resource available at https://www.greencountryworks.org/resources/policy-research- best-practices/ ;
- Ensuring referral to youth who apply for enrollment in a program of WIOA youth activities and either do not meet the enrollment requirements for that program or cannot be served by that program. The eligible training provider of that program must ensure that the youth is referred for further assessment, if necessary, or referred to appropriate programs to meet the skills and training needs of the youth.
- Ensuring appropriate referrals to an applicant who declines GCWDB WIOA services.
- Entering referral information in the virtual case management system under "Interagency Referrals."

Referral Case Note:

- Includes referral date
- Includes the partner, agency, community organization name referred to
- Includes a statement as to why the referral is made

Upload:

- Completed Referral to Partner or Community Resource

Referral Outcome Note:

- Restates referral case note information
- States outcome of the referral

Participation in at least 1 of the 14 Program Elements

WIOA includes fourteen (14) program elements. All elements must be included in the WIOA Youth program design. Although these program elements must be made available to all eligible youth participants between the ages of fourteen (14) through twenty-four (24), not all elements must be funded with WIOA youth funds. Also, GCWDB service provider has the discretion to determine which elements to provide to a participant based on the participant's assessment results and ISS. Receipt of program elements is critical to ensure that youth who are actively participating in programs are not exited due to ninety (90) days of no service. All fourteen (14) WIOA youth program elements are contained in the PIRL and GCWDB youth programs should ensure that services received are reported in the applicable program element in the PIRL.

Program Element 1: Tutoring, study skills training, instruction, and dropout prevention services

Element 1 includes "tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that 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. Secondary school dropout prevention strategies include services and activities that keep a young person in-school and engaged in a formal learning and/or training setting. This program focuses on in-school services relating to attainment of a high school diploma.

The element includes:

- Tutoring, study skills training, and instruction that lead to a high school diploma;
- Secondary school dropout prevention services intended to lead to a high school diploma.

Resources for study skills training include:

- https://www.howtostudy.org/index.php
- https://www.testtakingtips.com/study/index.htm
- https://www.mometrix.com/academy/test-anxiety-tips/
- https://www.test-preparation.ca/
- https://www.recordnations.com/articles/record-keeping-students/

This is not an exhaustive list.

However, this element does not include:

- Dropout recovery strategies that lead to completion of high school equivalency. Those are included in program element 2;
- Training services leading to a postsecondary credential. Those are included in program element 4.

Program Element 2: Alternative secondary school services or dropout recovery services

Element 2 includes alternative secondary school services such as basic education skills training, individualized academic instruction, and English as a Second Language training, or those services 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. While the activities within both types of services may overlap, each are provided with the goal of helping youth to re-engage and persist in education that leads to the completion of a recognized high school diploma equivalency.

Program Element 3: Paid and Unpaid Work Experiences:

Element 3 is 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. Labor standards apply in any work experience where an employee/employer relationship is, as defined by the Fair Labor Standards Act and State law. Funds provided for work experiences may not be used to directly or indirectly aid in the filling of a job opening that is vacant because the former occupant is on strike or is being locked out in the course of a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving a work stoppage. Work experiences provide the youth participant with opportunities for career exploration and skill development.

TEGL No. 8-15 provides further discussion of allowable expenditures that may be counted toward the work experience expenditure requirement and articulates that program expenditures on the work experience program element can be more than just wages paid to youth in work experience. Allowable work experience expenditures include the following:

- Wages/stipends paid for participation in a work experience;
- Staff time working to identify and develop a work experience opportunity, including staff time spent working with employers to identify and develop the work experience;
- Staff time working with employers to ensure a successful work experience, including staff time spent managing the work experience;
- Staff time spent evaluating the work experience;
- Participant work experience orientation sessions;
- Employer work experience orientation sessions;
- Classroom training or the required academic education component directly related to the work experience;
- Incentive payments directly tied to the completion of work experience; and
- Employability skills/job readiness training to prepare youth for a work experience.

Supportive services are a separate program element and cannot be counted toward the work experience expenditure requirement even if supportive services assist the youth in participating in the work experience. This element is a critical component in the youth program, as this is the only element that has a minimum percentage of expenditure requirements. WIOA requires a minimum of 20% of GCWDB youth funds to be expended on work experience. Please note that:

- GCWDB administrative funds are not subject to the twenty (20%) requirement; and
- Leveraged resources cannot count toward the twenty (20%).

Work experience must include academic and occupational education:

- The educational component may occur concurrently or sequentially with the work experience;
- The academic and occupational education component may occur inside or outside the work site;
- The work experience employer can provide the academic and occupational education component, or such components may be provided separately in the classroom or through other means;
- GCWDB service provider has the flexibility to decide who provides the education component;
- The occupational education component can be provided by the Work Experience Employer when it is identified in the Trainee Work Plan and addressed in the Trainee Evaluation;
- 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;
- The academic component can be provided by the Occupational Skills Training Provider when identified in the ISS and the occupational education component can be provided by the Work Experience Employer

when it is identified in the Trainee Work Plan and addressed in the Trainee Evaluation. The ISS and a program note should identify how the academic component from OSY and occupational educational component from WEX add to the employability of the participant;

- GCWDB service provider has the flexibility to determine the appropriate type of academic and occupational education necessary for a specific work experience.

Categories of work experience. WIOA identifies four categories of work experience:

- Summer employment opportunities and other employment opportunities throughout the year;
- Pre-apprenticeship programs;
- Internships and job shadowing*; and
- On-the-job training opportunities.

* Please remember that the job shadowing work experience is a temporary, unpaid exposure to the workplace in an occupational area of interest to the participant.

Every individual enrolled in WIOA youth must be offered a work experience. Instructions for WEX are found at https://www.greencountryworks.org/resources/policy-research-best-practices/.

Further Clarification on supportive services as an allowable work experience expenditure: TEGL 21-16 stated that "supportive services are a separate program element and cannot be counted toward the work experience expenditure requirement even if supportive services assist the youth in participating in the work experience." However, TEGL 9-22, provided flexibility to allow supportive services that enable a WIOA youth participant participate in a work experience can count towards the work experience expenditure requirement. This element is a critical component in the youth program, as this is the only element that has a minimum percentage of expenditure requirements. WIOA requires a minimum of 20% of local area youth funds to be expended on work experience.

Please note that:

- Local area administrative funds not subject to 20% requirement; and
- Leveraged resources cannot count toward the 20%.

Work experiences must include academic and occupational education:

- The educational component may occur concurrently or sequentially with the work experience.
- The academic and occupational education component may occur inside or outside the work site.
- The work experience employer can provide the academic and occupational component, or such components may be provided separately in the classroom or through other means;
- Local areas have the flexibility to decide who provides the education component.
- 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.
- Local programs have the flexibility to determine the appropriate type of academic and occupational education necessary for a specific work experience.

Categories of work experience. WIOA identifies four categories of work experiences, but it is not all inclusive (TEN 22-19). Other types of work experiences may be included as long as the activity meets the definition of work experience in 20 CFR § 681.600{a), that work experiences are a planned, structured learning experience that takes place in a workplace for a limited period of time, then the activity may be considered a work experience. For example, a Registered Apprenticeship may count as a type of work experience because it meets the definition of a work experience. Work experience may include:

- Summer employment opportunities and other employment opportunities throughout the year;

- Pre-apprenticeship programs;
- Registered Apprenticeship; • Internships and job shadowing; and
- On-the-job training opportunities.

*Note A job shadowing work experience is a temporary, unpaid exposure to the workplace in an occupational area of interest to the participant.

Program Element 4: Occupational Skills Training (OST)

Element 4 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. GCWDB must select training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in GCWDA. GCWDB has determined the in-demand occupations and industry sectors for the GCWDA which may be viewed by clicking the Demand Occupations List available at https://www.greencountryworks.org/resources/policy-research-best-practices/.
Such training must:

- Be outcome-oriented and focused on an occupational goal specified in the individual service strategy;
- be of sufficient duration to teach the skills needed to meet the occupational goal; and
- lead to the attainment of a recognized postsecondary credential.

WIOA allows Individual Training Accounts (ITAs) for OSY, ages 16 to 24, using WIOA youth funds, when appropriate. ITAs allow participants the opportunity to choose the training provider that best meets their needs. To receive funds from an ITA, the training provider must be on the State Eligible Training Provider List. WIOA Youth program funds cannot be used to provide ITAs to ISY. However, ISY between the ages of 18 and 21 may co-enroll in the WIOA Adult program if it is determined that the youth meet the eligibility criteria and program meets the youth needs. After co-enrollment, an ISY may receive training services through an ITA using Adult program funds.
The State of Oklahoma allows competitive procurement of ISY occupational skills training. WSD 12-2024 WIOA Title I Youth Program Guidance

Science Technology Engineering Math (STEM) Training
Some of the measures of contract performance for GCWDB's service provider are the measures defined as the projected cumulative [WIOA Title I] participant service level for "Receiving Occupational Training" and "Receiving a Credential" which are designed to support entry into a STEM occupation. The GCWDB wants the service provider to promote and encourage participants to enter STEM occupations. The GCWDB service provider is responsible for career counseling and training geared toward introduction and identification of STEM occupations with eligible program participants. GCWDB has developed our own definition of a STEM Occupation. There are two parts:
An occupation that is classified as STEM in the O*Net Online database:
https://www.onetonline.org/find/stem

1. An occupation that is otherwise recognized by GCWDB as a STEM occupation.
   A complete list of STEM Occupations appears in STEM Occupations (Attachment E).

Program Element 5: Education Concurrent with Workforce Preparation

Element 5 reflects an integrated education and training model (IET) and describes how workforce preparation activities, basic academic skills, and hands-on occupational skills training are to be taught within the same time

frame and connected to training in a specific occupation, occupational cluster, or career pathway.

This program element refers to the concurrent delivery of:

- Program Element 2: Alternative Secondary School Services or Dropout Recovery Services;
- Program Element 3: Work Experience; and
- Program Element 4: Occupational Skills Training.

The three components above all fit under different WIOA youth program elements and are only counted here under Element 5 if they occur concurrently as part of an IET model.

Program Element 6: Leadership Development Opportunities

Element 6 includes opportunities that encourage responsibility, confidence, employability, self- determination, and other positive social behaviors such as:

- Exposure to postsecondary educational possibilities;
- Introduction to CareerTech, colleges and universities,
- OJT, RA, Internship opportunities,
- Assistance to sign up for tours, orientations, etc.,
- Community and service-learning projects;
- Peer-centered activities, including peer mentoring and tutoring;
- Organizational and teamwork training, including team leadership training;
- Training in decision-making, including determining priorities and problem solving;
- Citizenship training, including life skills training such as parenting and work behavior training;
- Civic engagement activities which promote the quality of life in a community;
  through non-profits, clubs, faith-based organizations, community organizations such as: Senior Citizen Centers, libraries, economic development entities, chambers of commerce, Main Street programs, tourism entities, parks, and recreation departments; and
- Activities that place youth in a leadership role such as serving on GCWDB's Youth Committee. Oklahoma Bar Association offers several resources at https://www.okbar.org/freelegalinfo/ including "You're 18 Now" at https://oklaw.org/resource/youre-18-now-its-your-responsibility and available as an app at https://www.okbar.org/yag/.

Program Element 7: Supportive Services

Program Element #7: Supportive Services: Include services that enable an individual to participate in WIOA activities. These services include, but are not limited to:

- Linkages to community services.
- Assistance with transportation.
- Assistance with childcare and dependent care.
- Assistance with housing.
- Needs-related payments for (youth ages 18-24 enrolled in WIOA youth training services)
- Assistance with educational testing.
- Reasonable accommodations for youth with disabilities.
- Legal aid services.
- Referrals to health care.

• Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear.
• Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; and
• Payments and fees for employment and training-related applications, tests, and certifications.

GCWDB Supportive Services Policy https://www.greencountryworks.org/policy-research-best-practices/

Program Element 8: Adult Mentoring

Element 8 defines the timeframe for adult mentoring as lasting at least twelve (12) months. Adult mentoring may take place both during the program and following exit from the program. It may 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:

- The youth must be matched with an individual mentor and interact on a face-to-face basis.
- Mentoring may include workplace mentoring where the youth participant is matched with an employer or employee of a company.

Case managers are allowed to serve as mentors in areas where adult mentors are scarce. GCWDB provides the following links as potential resources for mentors:

- Oklahoma Mentoring Organizations list by Oklahoma Foundation for Excellence https://www.ofe.org/oklahoma-mentoring-organizations/
- For teacher preparation student's https://www.ok.gov/octp/Professional_Development/Mentoring_PDI/index.html
- Big Brothers Big Sisters https://bbbsok.org/
- Oklahoma Creativity Project https://creativeoklahoma.org/about/ link to entrepreneur mentoring program https://creativeoklahoma.org/okemp/
- The National Mentoring Partnership search for a local mentoring program https://www.mentoring.org/get-involved/find-a-mentor/#zipsearch2

Program Element 9: Follow-up services

Provide at least 12 months of follow-up services after program completion to ensure long-term success. This includes critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-up services may include regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise.

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.
Five program elements are permitted as follow-up services during the follow-up period:
• Supportive Services.
• Adult Mentoring.
• Financial Literacy Education.
• 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
• Activities that help youth prepare for and transition to postsecondary education and training

*Note Any program element other than the 5 listed above requires reenrollment in the program for a youth to receive them.

Additional Requirements:

- All youth participants must be offered an opportunity to receive follow-up services that align with their individual service strategies for a minimum of 12 months unless the participant declines to receive follow-up services, or the participant cannot be located or contacted.
- The types of services provided, and the duration of services must be determined based on the needs of the individual and therefore, the type and 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 to report a performance outcome.
- Local programs should have policies in place to establish how to document and record when a participant cannot be located or contacted.
- At the time of enrollment, youth must be informed that follow-up services will be provided for 12 months following exit. If at any point in time during the program or during the 12 months following exit the youth requests to opt out of follow-up services, they may do so.

Program Element 10: Comprehensive Guidance and Counseling

Element 10 includes comprehensive guidance and counseling that provides individualized counseling to participants. This includes drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate.

- When referring participants to necessary counseling that cannot be provided by the GCWDB youth program or its service providers, the GCWDB youth program must coordinate with the organization it refers to in order to ensure continuity of service and using the Referral to Partner or Community Resource available at https://www.greencountryworks.org/resources/policy-research-best-practices/. GCWDB requires that this program element be provided by a counselor holding a certificate or licensure.

Program Element 11: Financial Literacy Education

Element 11 is financial literacy education. Youth providers may use the free resource below to deliver "Financial Literacy Education" which will satisfy this specific Youth Program Element.

a) The State of Oklahoma released this resource in 2015 and it continues to be a viable tool.
   - Developed by the Consumer Financial Protection Bureau (CFPB) federally sponsored;
   - It is a financial empowerment toolkit for social programs to equip frontline staff with fundamental financial empowerment principles, an understanding of consumer protection issues, tools, and skills to help clients understand what financial empowerment and stability mean for them and to refer clients to other related local financial empowerment services.
     - Link: http://www.consumerfinance.gov/your-money-your-goals/
     - Videos: https://www.youtube.com/watch?v=Q-3X6ciTjP0&feature=youtu.be&list=PLrfmdUlWzRF2-wzQblJaR3vVERdc3Thqk

b) Program element 11 may include activities:

- To support the ability of participants to create budgets, initiate checking, and savings accounts at banks, and make informed financial decisions;
- To support participants in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards;
- That 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, how to correct inaccuracies, and how to improve or maintain good credit;
- That support a participant's ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions;
- That educates participants about identity theft, ways to protect themselves from identify 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;
    - https://www.identitytheft.gov/
- That 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;
- That support activities that address the particular financial literacy needs of youth with disabilities, including connecting them to benefits planning and work incentives counseling;
- That provides 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
- That 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.

Additional resources include:

https://www.oklahomamoneymatters.org/index.shtml,
http://www.oklahomajumpstart.org/,
https://www.federalreserveeducation.org/,
https://www.consumer.ftc.gov/,
https://www.consumerfinance.gov/,
https://studentaid.gov/,
https://www.ucango2.org/,

and many other banks offer education programs and resources, as well as professional organizations such as:

- Oklahoma Society of CPA's at https://www.oscpa.com/for-the-public/financial-literacy, or
- The American Institute of CPA's at https://www.360financialliteracy.org/.

The federal government offers information and services at https://www.usa.gov/ with links to topics such as:

- Benefits, Grants and Loans,
- Consumer Issues, or
- Money and Taxes. These lists are not exhaustive.

Program Element 12: Entrepreneurial Skills Training

Element 12 includes entrepreneurial skills training, which provides the basics of starting and operating a small business. Such training must develop the skills associated with entrepreneurship. Such skills may include, but are not limited to the ability to:

- Take initiative;
- Creatively seek out and identify business opportunities;
- Develop budgets and forecast resource needs;
- Understand various options for acquiring capital and the trade-offs associated with each option; and
- Communicate effectively and market oneself and one's ideas.

Approaches to teaching youth entrepreneurial skills may include, but are not limited to:

- 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 may include simulations of business start- up and operation,
- Enterprise 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
- 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.

Following are resources for entrepreneurial education:

- https://www.sba.gov/, and
- from the Oklahoma Creativity project https://creativeoklahoma.org/okemp/, plus
- https://www.workforcegps.org/. This list is not exhaustive.

Program Element 13: Labor Market and Employment Information

Element 13 includes services that provide labor market and employment information about in- demand industry sectors or occupations available in the GCWDB, such as career awareness, career counseling, and career exploration services.

WIOA youth programs and providers should become familiar with state and federal LMI data and LMI tools, which are provided for free by agencies, in order to share relevant LMI with youth. DOL (Department of Labor) electronic tools particularly relevant to youth include:

- My Next Move at https://www.mynextmove.org/, and
- Get My Future at https://www.careeronestop.org/GetMyFuture. Other resources available are:
- OKCareerGuide.org at https://okcareerguide.kuder.com/landing-page, where youth can learn about their interests, skills, and values with researched based assessments; plan their education and career goals based on real-time assessments; and succeed by making confident career choices via career

planning tools.

- Through Oklahoma Employment Security Commission (OESC) https://www.ok.gov/oesc/Labor_Market/index.html.

Program Element 14: Postsecondary preparation and transition activities

Activities to Prepare for Post-Secondary Education: Assist youth in transitioning from high school to higher education or vocational training. This prepares ISY and OSY for advancement to post-secondary education after attaining a high school diploma or its recognized equivalent. These services include exploring post-secondary education options including technical training schools, community colleges, 4-year colleges and universities, and Registered Apprenticeship.
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 the proper Financial Aid applications and adhering to changing guidelines; and
• Connecting youth to postsecondary education programs such as OkCollegeStart.org at OKcollegestart - Inclusive Postsecondary Education More information about WIOA Youth Program Elements and Resources is available at: https://ion.workforcegps.org/resources/2017/01/31/09/44/WIOA_Youth_Program_Elements

Additional services include, but are not limited to:

- Assisting youth to prepare for SAT/ACT testing;
    - https://www.powerscore.com/sat/help/content_practice_tests.cfm
    - https://www.mometrix.com/academy/act-practice-test/
    - https://www.test-guide.com/free-act-practice-tests.html
    - http://www.act.org/content/act/en/products-and-services/the-act/test- preparation.html
    - https://collegereadiness.collegeboard.org/sat/k12-educators/resource-library
- Assisting youth research, scheduling, and evaluating supportive service needs to attend college, career tech, or training provider technology tours, campus tours, informational sessions, or orientations.
- Assisting with college admission applications.
- Searching and applying for scholarships and grants;
- Filling out the proper financial aid applications, such as https://studentaid.gov/h/apply-for- aid/fafsa, and adhering to changing guidelines.
- Connecting youth to postsecondary education programs such as OkCollegeStart.org at https://www.okcollegestart.org/;

Stipend and Incentive

Stipends:

When an employer-employee relationship does not exist, a stipend may be used as an allowable payment for participation in activities such as occupational skills training or classroom activities, including high school equivalency preparation, work readiness, or employability skills training. Local areas have flexibility in determining when and how to pay stipends, however they must have a policy in place that guides the payment of those stipends. Having clear written policies and procedures in alignment with Federal regulations allows frontline staff to understand when and how they might offer stipends in order to help youth achieve their goals.

Stipend and incentive payments made to participants in the youth program are different from payments made as a supportive service. When providing stipends and incentives, service providers must be mindful of the

requirements of the state and federal funding sources as well as other board policies.
This policy does not mandate that stipends and incentives are paid but only establishes the guidelines, minimum requirements, and procedures to be followed should the service provider decide to provide stipends and/or incentives. Stipends and incentives are provided according to funding available and should be consistent among participants. If a stipend or incentive differs from the schedule outlined in policy, a detailed program must be entered explaining the reason. Stipends and Incentives are not intended to be the only avenue to provide direct client services and service providers should use caution when implementing this policy as all stipends and incentives are to be factored into the total amount of supportive services for each youth.
Incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. Such incentives for achievement could include improvements marked by testing or other successful outcomes. USDOL has also clarified that incentives are not allowed for activities such as recruitment, submitting eligibility documentation, or just simply showing up for the program. You are allowed to pay incentives to WIOA ISY and OSY for milestones such as receiving a high school diploma or high school equivalency or other acceptable credentials. Also, the work experience incentive must be directly tied to the completion of work experience.

Incentives

20 CFR 681.640 Incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. The provision of such incentives must be in accordance with the requirements contained in 2 CFR part 200.
• **Allowable cost:** cost must be necessary and reasonable. Incentives should support the objectives that directly benefit the participant.
• **Reasonable costs:** cost must reflect what a prudent person would pay.
• **Allocable costs:** Cost must be assignable to the federal award and tracked appropriately.
• **Consistent treatment:** Incentives must be applied consistently across all participants in similar circumstances.
• **Adequately documented:** All expenses must be supported by clear, complete, and detailed documentation. Documentation verifies and supports the factors affecting allowability of costs contained in 2 CFR 200.403.

Standard Stipend/Incentive Plan

This plan describes stipend and incentive payments that may be offered to eligible enrolled youth program participants served in GCWDA. Service providers are required to ensure all payments are made in a way to be fair to all participants within each category. Each type and benchmark should be considered a singular service/activity with singular payment and not in combination or conjunction with another type or benchmark at a time of service.

Conditions: Incentives must be directly tied to the goals of the WIOA program and must comply with federal guidelines.
Examples include:
• Earning a high school diploma or GED.
• Completing an occupational skills training program.
• Demonstrating significant improvement in literacy or numeracy skills.
• Achieving positive outcomes in work experiences or internships, such as obtaining and retaining employment in the second and fourth quarter after exit or completion of the work experience.
Procedures:
• Incentives will be disbursed upon verification of achievement.
• Documentation of the achievement must be maintained in the participant's file. Limitations and Controls:
• Local workforce development boards must establish policies to ensure incentives are used appropriately and

within budget constraints.
• Regular monitoring and oversight are required to ensure compliance with all applicable regulations.

Employability Skills/Job Readiness Training Incentive

Eligibility: Any youth participant who successfully completes a Work Experience Orientation component, such as the Dynamic Futures program or Virtual Job Shadow. Participants Completing programs such as Dynamic Futures may not also earn additional incentives for completing Pathful explorer Virtual Job Shadow Flex lessons and/or Pathful Explorer Mini Lesson components. An additional incentive will be provided if the participant completed the virtual job shadow 60 videos in 60 days component.

Benchmark: Completion of 35+ hours of employability skills or job readiness training such as Dynamic Futures.
Payment: $400

Documented By: Certificate of completion or Employability Skills/Job Readiness Training report documenting 35+ hours.

Benchmark: 60 job shadow videos viewed within 60 days. Must have a minimum of 6 hours documented and uploaded.

Payment: $100

Documented By: Report to indicate completion.

Pathful Explore a.k.a Virtual Job Shadow Career Exploration Incentive Payment

Eligibility: any participant who completes 60 Pathful Explore a.k.a Virtual Job Shadowing videos, from Career Central in Virtual Job Shadow, in 60 days.

Benchmark: completion of 60 Pathful Explore a.k.a Virtual Job Shadowing videos, from Career Central in Pathful Explore a.k.a Virtual Job Shadow, in 60 days following enrollment in the youth program.

Payment: up to $100 payable upon documented completion.

Documented By: a printed record of completion from Pathful Explore a.k.a Virtual Job Shadow verified by a case manager, case manager signature, and date, signed and uploaded.

Pathful Explore a.k.a Virtual Job Shadow Flex Lessons Incentive Payment

Eligibility: any participant who completes a Flex Lesson(s) by Pathful Explore a.k.a Virtual Job Shadow assigned by their case manager.

Benchmark: completion of a lesson(s).

Payment: up to $50 per flex lesson and payable upon documented completion.

Documented by: a printed record of correct completion from Pathful Explore a.k.a Virtual Job Shadow verified and checked for content by a case manager, case manager signature and date signed, and uploaded

Pathful Explore a.k.a Virtual Job Shadow Mini Lesson Incentive Payment

Eligibility: any participant who completes a lesson(s) assigned by their case manager. Benchmark: completion of a lesson(s).

Payment: based on lessons defined and schedule as follows and payable upon documented completion.

- **Self-Discovery including:** Long and Short-Term Goals, Setting SMART Goals, Determine Your Personal Goals up to $100.00
- **Employability Soft Skills including:** Verbal Communication, Written Communication, Personal Development Essay up to $100.00
- **Time Management including**: What is Time Management, Self-Management & Independence up to $100
- **Team Building including:** Relationship Building, Teamwork and Collaboration up to$100

College & Career Research including: Job Shadowing, Internships, A Summer Job Guideline for Teens, How to Pick a College Major, Personal Essay up to $100

- **Land the Job including:** Resume Preparation, Composing an Effective Cover Letter, Asking for Recommendations and Securing References, Job Applications 101, Maintaining a Professional Appearance, Honing Your Interview Skills, and including completion of a resume that includes three references consisting of name, company, title, address, e-mail, phone, relationship, and years acquainted all verified good references by a case manager with any poor references replaced, and a cover letter for application to a targeted Work Experience up to $250
- **Financial Literacy including:** Budgeting Basics Part I, Budgeting Basics Part II, Checking and Savings Part I: Opening Your Accounts, Checking and Savings Part II: Using Your Accounts, Credit Basics, and including completion the Shared Flex Lesson, Becoming Familiar with Your Financial Life a budget, up to $250
  Documented by: a printed record of correct completion from Pathful Explore a.k.a Virtual Job Shadow verified by a case manager, case manager signature and date signed, and uploaded.

Post-Secondary School Enrollment Incentive Payment

Eligibility: Any participant who is enrolled in a recognized post-secondary school who was not already enrolled in a recognized post-secondary school at the date of WIOA Title I youth program participation.

Benchmark: successful completion of a semester/trimester of post-secondary school at full-time status for one calendar year.

Payment: up to $50.00 per semester/trimester, payable at the end of each semester/trimester after enrollment into the WIOA Program and at the end of each semester/trimester thereafter. This incentive is not available to students who enroll in a short-term training project (less than one semester in length) which does not result in a credential/certificate.

Documented by: post-secondary school enrollment paperwork as well as a progress report from the school, attendance records, and grade reports (Participant must provide the original document. After review, a copy of the original will be uploaded).

Attainment of High School Diploma Incentive Payment

Eligibility: any participant who has not yet completed a high school diploma or the High School Equivalency certificate (GED) at the time of enrollment into WIOA Title I youth program.

Benchmark: receipt of a high school diploma or its equivalent.

Payment: up to $200, payable upon the documented attainment of a high school diploma or its equivalent.
Documented by: diploma or its equivalent (Participant must provide the original document. After review by service provider staff, a copy of the original will be maintained in the participant file and uploaded).

Post-Secondary Occupational Skills Training Incentive Payment

Eligibility: any participant who is enrolled in an occupational skills training program and has completed the program that is linked to the Board's Demand Occupations whether or not the training was paid for by WIOA funds.

Benchmark: completion of a post-secondary occupational skills certificate or degree granted by a Career Tech, college, or university (including public or private schools), whether or not the training was paid for with WIOA financial assistance.

Payment: see "Type of Attainment" below for payment schedule.

Documented by: receipt of certificate or degree from training institution (Participant must provide the original document. After review by service provider staff, a copy of the original will be maintained in the participant file and uploaded).

Type of Attainment:

- Career Tech Certificate/Industry Recognized Certificate up to $100.00

- Associates Degree up to $200.00
- Bachelor's Degree up to $400.00
  "Demand Occupation" refers to skills training in support of an occupation that is included on the board's current official list of Demand Occupations.

Basic Skills Deficient Incentive Payment

Eligibility: Youth participants who were assessed as having a deficiency in basic skills measured by a WIOA/board approved assessment process during the objective assessment.

Benchmark Out-of-school Youth: Achievement of an increase by one or more functioning levels in reading and/or math per approved standardized test/assessment utilized in the objective assessment for basic skills until the participant is no longer basic skills deficient.

Payment: up to $50.00 per measure per functioning level increase (Maximum up to $200.00 in a 12-month period), payable only after verification of post-test/assessment results.

Documented by: pre-assessment/test scores and post-assessment/test using an approved standardized test or performance assessment, documented in the appropriate testing section in the online system, and captured in case notes.

Unsubsidized Employment Incentive Payment

Eligibility: Any participant who was not employed at of the date of participation. This incentive is reserved for participants who accept unsubsidized employment, which does not interfere with school attendance, and which is considered employment that leads to self-sufficiency.

Benchmark: Obtaining a job or jobs that: (a) Offers a work schedule of at least thirty-two (32) hours per week; (b) Has an expected duration of at least six (6) months; and (c) Is not subsidized by any State or Federal program funding. Payment: up to $100.00 (one time only) after two (2) months of work.

Documented by: Participant statement self-certifying hours per week, status/duration of job, and hourly wage accompanied by the participant's first paycheck or a hiring letter signed by the employer indicating hours per week, status/duration of job, and hourly wage. (Participant must provide the original document. After review by service provider staff, a copy of the original will be maintained in the participant file and uploaded).

Employment in a subsidized Work Experience activity/job or On-the-Job Training does not meet the qualification benchmark for this incentive.

Retention in Employment Incentive Payment

Eligibility: Any participant who entered unsubsidized employment during the period of his/her enrollment in the WIOA Youth program.

Benchmark: Successful retention in a job or jobs that: (a) Offers a work schedule of at least thirty-two (32) hours per week; and (b) Is not paid for nor subsidized by State or Federal program funding.

Payment: See schedule below. The maximum amount of cumulative payments to an individual participant is up to $500.00

Documented by: Presentation of an employer-generated record, letter, etc., indicating hours per week and duration of job. (Participant must provide the original document. After review by Youth Provider staff, a copy of the original will be maintained in the participant file and uploaded).

Retention Period Incentive Payment Cumulative Incentive:

- 3 Months up to $ 50.00
- 6 Months up to $ 100.00
- 9 Months up to $ 150.00
- 12 Months up to $ 200.00

Employment in a subsidized Work Experience activity/job or On-the-Job Training does not meet the qualification benchmark for this incentive.

Workshops and Conferences Stipend Payment

Eligibility: Any participant who has participated in a Workshop or Conference focusing on Leadership Development or any one of the fourteen (14) Elements. To be eligible for this stipend, the agenda for the workshop or conference must reflect a length of at least two (2) hours, at least three (3) hours, or at least four (4) hours. Cannot be used in conjunction with item ten (10) Work Readiness Workshops; participants can only be paid for one of the other of these. Workshop total hours do not include breaks for lunch.

Benchmark: Successful completion of the time allotted Workshop/Conference

Documented by: a signed Attendance Record and description of the Workshop/Conference (such as an agenda, program, or brochure).

Payment: Conference Duration Stipend Payment

- 2 hours up to $30.00 total
- 3 hours up to $45.00 total
- 4 or more hours up to $60.00 total

Documented by: Attendance records and detailed description of the workshop/conference, including date, time, and topic(s). The virtual case management system case note and quick service entry and any follow-up documentation (such as a written report by the participant on the workshop/conference). All documentation of workshop including all sign-in sheets, agendas, workbooks, etc. must be kept in a separate file from the participant file and must be available for review when monitored.

Summer Employment Opportunities Stipend Payment/Incentive Payment

Eligibility: Any participant who is enrolled in a summer employment opportunity subsidized employment program (whether paid for by WIOA or not) during the 'summer months' starting in May and ending in September with the emphasis on increasing work readiness skills, employability skills, life skills, soft skills, etc. The work experience portion of the program must be at least three (3) weeks in length and may include a combination of other services, programs, and workshops but MUST include an academic enrichment piece.

Benchmark #1: Successful completion of a work readiness class/program with an eighty-five (85%) attendance record and completion of all class assignments. Work readiness class/program should focus on increasing work readiness skills. Work readiness skills include world-of-work awareness, labor market knowledge, occupational information, values clarification and personal understanding, career planning and decision making, and job search techniques (resumes, interviews, applications, and follow-up letters). They also encompass survival/daily living skills such as using the phone, telling time, shopping, renting an apartment, opening a bank account, and using public transportation. They also include positive work habits, attitudes, and behaviors such as punctuality, regular attendance, presenting a neat appearance, getting along, and working well with others, exhibiting good conduct, following instructions, and completing tasks, accepting constructive criticism from supervisors and co-workers, showing initiative and reliability, and assuming the responsibilities involved in maintaining a job. This category also entails developing motivation and adaptability, obtaining effective coping and problem- solving skills, and acquiring an improved self-image. Can not be used in conjunction with item eight (8) Workshops/conferences and/or eleven (11) Work Readiness Workshops; participants can only be paid for one of the other of these.

Payment: up to $25 per evaluation reflecting a measurable skill gain.

Documented by: The virtual case management system program note, quick service entry of stipend payment, and records of attendance and completion of any classroom assignments and uploaded.

Benchmark #2: Completion of GCWDB designated staff approved Academic Enrichment workbook along with

completion of the Work Experience worksite agreement (defined as not having been fired or quitting before contract estimated end date). The workbook/curriculum must provide an appropriate mix of work maturity and career exploration, basic academic skills (math, reading, writing, language, etc.), and should reinforce study skills techniques and drop-out prevention strategies as well as provide activities to develop leadership, decision making, and citizenship skills.
Payment: incentive up to $300, max amount payable; one time only per enrollment.
Documented by: verification of workbook completion via program notes, grading of workbook, and signature page signed by staff and participant, program notes detailing career counseling conducted with participant regarding all issues and items in the workbook that were incorrect or needed addressing, attainment of worksite agreement evaluations conducted by worksite supervisor, and review of all participant time sheets for correct hours and satisfactory attendance and quick service entry of incentive payment.
Benchmark #3: Completion of Key Train assessment (not the 'pre-assessment'), any learning modules assigned, and completion of the Work Experience worksite agreement (defined as not having been fired or quitting before contract estimated end date).
Payment: incentive up to $200 total paid to youth at completion of all assigned modules to the satisfaction of staff and completion of Work Experience
Documented by: Verification of completion of academic enrichment activities shall be through the virtual case management system Program notes as well as any progress reports (uploaded) from Key Train program documenting hours of work and progress within each module. Verification of completion of Work Experience will be review of contract and trainee plan as well as Service and Training Plan. Quick service entry of incentive payment.

Regular (non-summer) Work Experience Stipend Payment/Incentive Payment Eligibility:
Eligibility: Any participant who is enrolled in a work experience (whether paid for by WIOA or not) with the emphasis on increasing work readiness skills, employability skills, life skills, soft skills, etc. The work experience portion of the program must be 520 hours in length, may include a compilation of other services, programs, and workshops, and must include an academic component and occupational education components, addressed in the WIOA Trainee Work Plan.
Benchmark 1: Successful completion of one-third (1/3) of the total work experience with an employee evaluation showing a favorable performance rating (a measurable skill gain of the occupational educational component) and perfect punctuality and attendance.
Payment: Up to $50.00 for the first 173 hours worked with a WIOA WEX Trainee Evaluation rating of "Good" or "Excellent" on six (6) or more items and up to $50.00 for perfect attendance and punctualit
Documented by: The first WIOA WEX Trainee Evaluation showing a "Good" or "Excellent" rating on six (6) or more items and perfect attendance and punctuality reflected on the WIOA Trainee Time Sheet for the first 173 hours.
Benchmark 2: Successful completion of two-thirds (2/3) of the total work experience with an employee evaluation showing a favorable performance rating (a measurable skill gain of the occupational educational component) and perfect punctuality and attendance.
Payment: Up to $50.00 for the second 173 hours worked and a WIOA WEX Trainee Evaluation rating of "Good" or "Excellent" on eight (8) or more items, improvement on any item marked "Unsatisfactory" or "Satisfactory" from the first evaluation, and up to $50.00 for perfect attendance and punctuality.
Documented by: The second WIOA WEX Trainee Evaluation showing a "Good" or "Excellent" rating on eight (8) or more items, improvement on any item marked "Unsatisfactory" or "Satisfactory" from the first evaluation, and perfect attendance and punctuality reflected on the WIOA Trainee Time Sheet for the second 173 hours worked.
Benchmark 3: Successful completion of 520 hours of total work experience with an employee evaluation showing a favorable performance rating (a measurable skill gain of the occupational educational component) and perfect

punctuality and attendance.
Payment: Up to $50.00 for the final 174 hours worked and a WIOA WEX Trainee Evaluation rating of "Good" or "Excellent" on ten (10) or more items, improvement on any item marked "Unsatisfactory" or "Satisfactory" from the second evaluation, and up to $50.00 for perfect attendance and punctuality.
Documented by: The third WIOA WEX Trainee Evaluation showing a "Good" or "Excellent" rating on ten (10) or more items, improvement on any item marked "Unsatisfactory" or "Satisfactory" from the second evaluation, and perfect attendance and punctuality reflected on the WIOA Trainee Time Sheet for the final 174 hours worked.

Work Readiness Workshops Stipend Payment

Eligibility:
Any participant who has participated in a Work Readiness Workshop focusing on work readiness skills prior to being placed at a work experience worksite. Work readiness class/program should focus on increasing work readiness skills. Work readiness skills include world-of-work awareness, labor market knowledge, occupational information, values clarification and personal understanding, career planning and decision making, and job search techniques (resumes, interviews, applications, and follow-up letters). They also encompass survival/daily living skills such as using the phone, telling time, shopping, renting an apartment, opening a bank account, and using public transportation. They also include positive work habits, attitudes, and behaviors such as punctuality, regular attendance, presenting a neat appearance, getting along, and working well with others, exhibiting good conduct, following instructions, and completing tasks, accepting constructive criticism from supervisors and co-workers, showing initiative and reliability, and assuming the responsibilities involved in maintaining a job. This category also entails developing motivation and adaptability, obtaining effective coping and problem- solving skills, and acquiring an improved self-image. To be eligible for this stipend, the agenda for the workshop must reflect a length of at least two (2) hours. Cannot be used in conjunction with item 7 Workshops/conferences; participants can only be paid for one of the other of these.
Benchmark: Successful completion of the time allotted Work Readiness Workshop with evidence of a signed attendance record and description of the Work Readiness Workshop to include any related topics covered, any Q&A provided, handout materials, any follow-up documentation written report by the participant regarding the Work Readiness Workshop, evaluations, etc.) as appropriate.
Payment: up to $10.00 per full hour of attendance (partial hours cannot be counted) Documented by: The virtual case management system program notes, quick service entry, and attendance records and detailed description of the Workshop including agenda, related topics
covered, any Q&A provided, handout materials, and any follow-up documentation (such as a written report by the participant regarding the Work Readiness Workshop, evaluations, etc.) as appropriate. Documentation uploaded.

Attaining a Career Readiness Certificate Incentive Payment

Eligibility: Any participant who has successfully completed the work keys test and scored a bronze certificate or higher. Participants are only allowed to be paid one time for this type of incentive while
participating in WIOA youth programs.
Benchmark: Successfully attaining a bronze, silver, gold, or platinum Career Ready Certificate, with evidence of test scores in case files and uploaded to the virtual case management system.
Payment scale/schedule:

- Bronze Certificate up to $10.00
- Silver Certificate up to $50.00
- Gold Certificate up to $100.00
- Platinum Certificate up to $200.00

Documented by: The virtual case management program note and uploaded, participants WorkKeys testing 'receipt' or actual CRC card/Certificate.

Stipend or Incentive Payment Case Note:
Incentive payments are permitted for recognition and achievement directly tied to training activities and work experience. Case notes must indicate the following:

- Date incentive payment was requested.
- How incentives are tied to the goals of the program identified in the participant's ISS.
- The amount of the incentive payment and how the payment was made.
- How the incentive payments are connected to recognition of achievement of milestones in the program tied to work experience, education, or training. Such incentives for achievement could include improvements marked by acquisition of a credential or other successful outcomes.
- Details of the incentive payment, such as the credential obtained, the completion of a work experience, or any other successful outcome.

Upload:

- Verification of the participant's receipt of an incentive by obtaining an original signature on a receipt form.
- Stipend and Incentive Request (Attachment H)

S&T:

- Incentive Payment
-

Individual Service Strategy:

The design framework services of local youth programs must include an **Individual Service Strategy (**ISS**)** designed for youth,
which is jointly developed by the youth and the case manager. Each participant's plan is entered by choosing "Individual Service Strategy" in the Enrollment Details section of WIOA Program Details, WIOA Enrollments and the appropriate program. The initial development of an ISS will identify where the participant currently is, where the client wants to be, and the appropriate mix and sequence of services and support to meet needs and overcome **all** barriers indicated in the virtual case management system Demographic Snapshot to reach a realistic employment goal or begin a career pathway. Updates to the ISS are required when there are changes to the employment goal(s), the training goal, and/or services necessary to remove barriers and achieve the goals listed in the ISS. The ISS must:

- Be based on the individual needs of the youth participant;
- Be directly linked to one or more indicators of performance described below:
    - Employment Rate – 2nd Quarter After Exit;
    - Employment Rate – 4th Quarter After Exit;
    - Median Earnings – 2nd Quarter After Exit;
    - Credential Attainment;
    - Measurable Skill Gains; and
    - Effectiveness in Serving Employers.
- Identify career pathways that include education and employment goals;
- Consider career planning and the results of the objective assessment;

- Prescribe achievement objectives and services for the participant.

The ISS includes the fourteen (14) components below, and are further described in The Virtual Case Management System Virtual IEP/ISS, Attachment G.

- Comprehensive Assessment & Career Research.
- Employment Goals & Achievement Objectives.
- Training Goals.
- Client Strengths and Attributes.
- Combination of Services to Overcome Needs and all Barriers.
- Assistive Technology Needs for Achieving Goals
- Client Responsibilities and Agency Responsibilities.
- Economic Need Statement and Planning.
- Supportive Service Needs.
- Follow-up Services Planned.
- Performance Goals & Accountability Indicators.
- Client Progress Review.
- Additional Notes.
- Client Involvement Statement.

The initial development of the ISS requires entries in the virtual case management system for components one (1) through eleven (11) and component thirteen (13). However, the initial entry for Supportive Service Needs (component nine [9]) may, for example, be a statement that the participant has indicated they currently have no supportive service needs, and the topic will be reviewed during future contacts. Additionally, an entry of not applicable (N/A) may be entered in a section that does not pertain to the individual. For example, N/A may be entered when there are no Assistive Technology Needs (component ten [10]), or when Additional Notes (component thirteen [13]) are not vital to the initial ISS.

Client Progress Review

Progress reviews of the ISS goals must be documented in component twelve (12) of the ISS, Client Progress Review. The ISS must be reviewed on a regular basis, no less than quarterly, and may be reviewed more frequently as determined necessary by GCWDB. Progress reviews of the ISS must be conducted at least once a month for active participants. If a youth is unable to meet the case manager at the case manager s public location, the case manager may arrange contact at another mutually agreed upon public location or through another available method. Additional contact for reviews may be made by phone, text messaging, mail, email, office or on-site visits or other available media. Reviews will focus on progress in the training program, progress towards the employment goal, supportive service needs and any personal needs related to the achievement of the employment goal.

The Client Involvement Statement

The final component of the ISS is a signed virtual or paper Client Involvement Statement. The participant must agree to the employment goal(s), achievement objectives, and combination of services listed in their ISS, and virtually sign the Client Involvement Statement upon development. When the ISS/Client Involvement Statement is signed virtually, it must be addressed in the participant’s program notes. In the event of virtual services being rendered with the participant or case manager off site, the Client Involvement Statement in the Data Validation

and Source Documentation Requirements policy at https://www.greencountryworks.org/resources/policy-research- best-practices/ may be used.

The ISS must be amended when necessary to reflect any deviations from the initial ISS. Changes to the ISS do not require a new virtual signature unless there is a change in the training or employment goals, achievement objectives, or the combination of services to be provided. Case management updates do not require a new client involvement statement. If a participant has completed the last service in the ISS and enters follow-up, but later determines that they need additional services beyond the five elements allowed in follow-up and is scheduled to exit in ninety
(90) days; the ISS may be revised, and additional services added to keep the participant from exiting.

ISS Case Note(s) must:

- Include statements that detail progress in meeting objectives, changes in training/educational needs or employment goals, accomplishments, and setbacks.
- Document a connection to the applicable performance and/or outcomes.
- Include details of all modifications to the ISS explaining why the modification occurred.

The client must be provided with a copy of the ISS at enrollment and when modifications are made. ISS Case Note regarding Progress Review additional information:

- The date the review was conducted in the event the note is not entered into the virtual case management system on the date the actual periodic review was conducted, as the system will automatically refer to the date that the note is entered. The note must be entered into the system no less than 48 hours after the review, with the exception of weekends, holidays, closures, sick days, or other unforeseeable events that would prevent a note entry within forty- eight (48) hours.
- If the case manager is unable to reach the participant for routine progress review updates or the participant does not follow-up, the case manager must document each contact attempt/lack of follow-up in a case note. The case manager must exhaust all sources of contact, including alternate contacts, as part of the progress review process.

Upload:

- Individual Service Strategy (ISS) Client Involvement Statement (in the GCWDB DVSDR policy at https://www.greencountryworks.org/resources/policy-research-best-practices/

S&T:

- ISS

Exits and Outcomes

The case manager must accurately record in the virtual case management system all services received, and the end date(s) associated with all services. Case managers are required to explain and offer follow-up services; however, a participant may decline follow-up services. When the individual's the virtual case management system record indicates that no services funded by any program tracked by the system were recorded for 90 days and there is no gap in service recorded, the virtual case management system will automatically exit the individual from the WIOA program (and any other common enrollment program) recording the date of the last service received as the common exit date of all programs.

- Career managers must record in the Exit Questions screen the Other Reason for an Exit when a participant did not return to the program for ninety (90) days due to circumstances beyond their control. This screen is

not available for input until the participant has exited the program. The career managers must also enter a case note recording the information about the circumstances.

Once a participant exits the program the career manager must answer all questions applicable to the participant in the Upon Exit and Job Placement section of the Exit Questions screen. Program outcomes must be answered, and follow-up contact with the participant maintained so updates on the training status can be made.

- When a participant receives any Type of Recognized Educational/Occupational/Certificate /Diploma/Degree, it must be uploaded into the virtual case management system by choosing Enrollment as the item type and choosing Supporting as the Documentation type. The credential must be recorded in the virtual case management system in the Outcomes section and then select Fourth Quarter after Exit.
- Once a participant exits the program, the Upon Exit and Job Placement questions in the Exit Questions section of the virtual case management system *must* be completed. Program outcomes must be answered, and follow-up contact with the participant maintained so updates on the training status can be made.
- If a participant does not return to the program for ninety (90) days due to extenuating circumstances, the Exit Questions section of the virtual case management system must be completed by selecting Other Reasons for Exit and selecting the reason from the drop-down menu. This screen is not available for input until the participant has exited the program. The case manager must also enter a case note recording the information about the circumstances.
- Once a participant exits the program, the Exit Questions section for In-School Status must be answered by selecting the applicable description in the drop-down menu.
- Employment in the second and fourth quarters after exit will be automatically captured from wage record data attained with Unemployment Insurance (UI) wage records. Supplemental wage information must also be collected and entered in the Wages section After Exit of the virtual case management system to meet this requirement.

  Exit Case Note must, at minimum, contain:
  - The reason for exit
  - The participant employment exit information, including place of employment, number of hours working, wage, and position
  - The details of the exit in case notes, documenting all action plans, activities, and training has been completed
  - The services provided and outcomes attained while in the program
  - An offer of follow-up services and document any formal refusal of follow-up services
  - The reason follow-up services are not planned, including but not limited to:
    - Institutionalized
    - Health/medical or family care
    - Deceased
    - Reserved forces called to active duty
    - Relocated to a mandatory program

Monitoring

The GCWDB is responsible for monitoring and oversight of local Title I programs to ensure fiscal and programmatic accountability. Monitoring will be conducted per GCWDB Monitoring policy found at https://www.greencountryworks.org/resources/policy-research-best-practices/.

GCWDB acknowledges that OESC, USDOL and USDE have the authority to monitor and assess activities to ensure that federal awards are used for authorized purposes in compliance with Final Rules, federal regulations, and State and local policies, and that those laws and regulations are enforced properly, including but not limited to 20 CFR 683.400(c)(1), 683.410(b)(2), and 29 CFR 38.51. *These agencies* maintain oversight of recipient and sub-recipient compliance, including GCWDB, the Green Country One-Stop Operator, GCWDB's fiscal agent and program service provider. OESC will conduct program, fiscal, equal opportunity and nondiscrimination, and performance/data quality on-site and desktop monitoring.

Record Retention

In accordance with CFR 627.460(a)(1), Oklahoma requires local areas and WIOA providers to retain records in the participants file and maintain the file for at least three years following the date on which the final cost report charged to a program year's allotment is submitted, or until all audit and litigation issues are resolved, whichever is later. If any litigation, claim, or audit is started before the expiration of the three-year period, the records then must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action has been taken.

Authorization for Clarifications and Additions

The GCWDB Executive Director is authorized to issue additional instructions, guidance, approvals and/or forms to further implement the requirements of this policy, without making substantive change to the policy, except in situations where new or updated state and federal guidance is issued.

References:

- Workforce Innovation and Opportunity Act (WIOA) (Pub. L. 113-128)
- 20 CFR Part 681
- 2 CFR Part 200
- 20 CFR 677.155
- 20 CFR 675.300
- TEGL 9-22 Rescinded
- TEN Training and Employment Notice no. 06-25
- TEGL 8-15
- TEGL 23-19, Change 3
- TEN 22-19
- TEGL 10-23
- WSD #21-2024
- WSD #03-2024 Data Validation and Supporting Documentation Policy
- WSD #24-2024 LWDB Roles and Responsibilities
- WSD 50-2024 Assessments
- WSTA-03-2026 Documentation-of-Low-Income-Status-for-WIOA-Youth-Services