

YOUTH OVERSIGHT COMMITTEE

November 18, 2020

8:30 A.M.

Zoom Platform

PRESENT: K. Shanks-Booth, T. Watts, V. Zepplin

EXCUSED: S. Kittel

GUEST:

STAFF: N. Branosky, D. Achilles, S. Alvord

CALL TO ORDER

Ms. Shanks-Booth called the meeting to order at 8:35 a.m.

APPROVAL OF MINUTES – October 21, 2020

It was moved by Mr. Watts and seconded by Ms. Zepplin and unanimously adopted by voice vote of members present to approve the minutes of October 21, 2020.

MEETING TIME CHANGE

Ms. Alvord informed the committee due to member conflicts, Youth Oversight Committee meetings will change to the 3rd Thursday of the month at 8:30 a.m.

WIOA POLICY REVIEW – Work Experience

Ms. Alvord reported to the committee that the WIOA Work Experience policy has been updated and will need committee approval to move to the full Board for approval at the next board meeting Tuesday, December 15, 2020.

It was moved by Ms. Zepplin and seconded by Ms. Shanks-Booth and unanimously approved by voice vote of members present to approve the WIOA Work Experience Policy.

Incentive Policy Revision

Ms. Alvord reviewed the Incentive Policy modifications to be made and would like to move forward with committee approval pending modifications to move to full Board for approval at the next board meeting Tuesday, December 15, 2020.

It was moved by Ms. Zepplin and seconded by Ms. Shanks-Booth and unanimously approved by voice vote of members present to approve the WIOA Work Experience Policy pending modification.

WIOA UPDATE/DIRECTOR'S UPDATE

Ms. Branosky reported the that unemployment rate in Tompkins County has decrease to 5% from the 10% we were at. Ms. Branosky reported that Ms. Mouillesseaux and herself were asked to do a presentation on WIOA Youth to NYSDOL. NYSDOL would like to visit Tompkins County Career Center to observe how we work with Employers that hire youth participants. Ms. Branosky reported that the Cornell ILR School will give a presentation on January 26th to report how staff is working remotely, new skills employers need, 2021 job growth, and skills that are available in Tompkins County.

ADJOURNMENT

Ms. Shanks-Booth adjourned the meeting at 09:18 a.m.

The next meeting is scheduled for December 17, 2020.

Tompkins County Workforce Development Board WIOA YOUTH Work Experience Policy

Purpose

The purpose of this policy is to define eligibility, assignment, documentation, duration, and salary for Work Experiences assigned to youth enrolled in the WIOA Youth Program. Work Experiences can be paid or unpaid and are assigned to help job-ready youth learn soft skills such as attendance, teamwork, initiative, etc., as well as job related skills they can use to progress towards their career goals.

Background

At least 20% of the program year's Youth Fund (net of Admin portion) must be spent in Youth Work Experience as set by WIOA Section 129 (c)(4). Allowable Work Experience expenses include the following (per TEGL 8-15):

- Wages and 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 a work experience opportunity;
- 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 the work experience; and
- Employability skills/job readiness training to prepare youth for a work experience.

All other expenses not defined as above will not be allowable work experience expenses. Supportive services are a separate program element and cannot be counted toward the work experience expenditure requirement even if the supportive services assist the youth in participating in the work experience (per TEGL 21-16).

Policy

Eligibility:

All youth assessed as eligible youth under WIOA Section 129(a)(1) and enrolled in the WIOA Youth program will be eligible for Youth Work Experience. Youth are required to develop a **career pathway** before beginning a **Work Experience**. If a youth is unsure of their career goal(s), they should complete further career exploration through Career Zone, O*Net Interest Profiler, use of Labor Market Information, etc. and/or through **Job Shadow** experience(s) before beginning a Work Experience.

*Note: Job Shadows can be completed in a couple of hours to a couple of days to expose youth to different careers they are interested in but are not sure that they want to pursue. Job Shadows are **unpaid**, and youth can complete as many as necessary to determine their career pathway.*

A youth's career pathway should be clearly defined in their **Individual Service Strategy (ISS)** before beginning a Work Experience.

Definition of the Work Experience:

According to the Federal Register Vol 81, no. 161-681.600, Work Experiences:

- are a planned, structured learning experience that takes place in a workplace for a limited period of time.
- may be payed or unpaid, as appropriate.
- may take place in the private for-profit sector, the non-profit sector, or the public sector.
- provide the youth participant with opportunities for career exploration and skill development.
- must include academic and occupational education. The educational component may occur concurrently or sequentially with the work experience. Further academic and occupational education may occur inside or outside the workplace.

Labor Standards:

Labor Standards apply in any Work Experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists. 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.

Types of Work Experience:

Work experiences are meant to be short-term, planned, structured job-related learning experiences. The types of Work Experience for eligible youth include the following categories:

- 1.) Summer Employment opportunities and other employment opportunities available throughout the school year;
- 2.) Pre-apprenticeship programs;
- 3.) Internships and job shadowing; and
- 4.) On-the-job training (OJT) opportunities as defined in WIOA sec. 3(44) and in §680.700 of the same chapter.

Reasons for Work Experience:

- 1.) Assessment (determine youth's readiness, skills needed, interests, etc.) *Note: Work Experience(s) for assessment purposes should be brief (i.e. job shadow, career exploration) and may occur as often as needed. It is recommended that a single Work Experience for assessment purposes last no longer than 4 weeks maximum.*
- 2.) Skill Gain (i.e. soft or hard skills needed for the youth's identified career pathway)
- 3.) Reference Gain (i.e. development of work history)
- 4.) Potential for **unsubsidized** employment/hire upon completion of the Work Experience

Duration of the Work Experience:

As Work Experience are meant to be short-term, planned, structured job-related learning experiences, there will be a maximum hour limit set for a youth's lifetime. This should be clearly communicated with the youth and with the worksites before a work experience begins. The TCWDB has set local limit that each youth is allotted **up to a total of 480 hours (i.e. 12 weeks of full time work) of paid Work Experience** during their enrollment in the WIOA youth program **provided funding is available**. *Note: Any unpaid work experiences such as job shadowing does not detract from the 480 hours.*

Administrative Override: There may be instances where a youth will need more than 480 hours of **paid** work experience support (i.e. youth with disabilities requiring extensive job coaching). Staff must submit thorough documentation of support for why additional hours are needed for this youth, with a timeline for how many additional hours are needed, not to be extended “indefinitely”. The purpose of the work experience is to transition to unsubsidized work; therefore, a detailed plan of transition must be in place for any youth determined to need an extension of hours. The use of an Administrative Override is pending on funding availability, to be determined on a case-by-case basis.

Education/Training Component:

At least one **education/training component** must be incorporated into the Work Experience as defined in TEGL 21-16: “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”. Therefore, the **education/training** component(s) should:

- directly relate to the Work Experience and assist the youth with their career goals;
- be clearly defined in the youth’s ISS **before** the youth starts a Work Experience;
- occur inside or outside the workplace; and
- occur either concurrently or sequentially with the Work Experience.

In keeping with best practice regarding youth development and learning theory, it is recommended that the education/training component **occur concurrently** with the Work Experience and **occur inside the workplace**.

Note: HSE Classes and general Work Readiness Workshops cannot count as the education/training component unless it specifically relates the work experience/needs of the youth to obtain their career goal(s) and is documented as such in the youth’s ISS and in OSOS Comments.

Fiscal Management:

Youth will earn the NYS regulated minimum wage. Youth counselors are responsible for collecting youth’s timesheets, submitting to their fiscal departments, and putting a copy of the timesheet in the youth’s paper file. Each youth counselor’s fiscal department will control payroll and produce checks, and the youth counselor is responsible for delivering checks to youth.

WIOA Youth priority on Work Experience: WIOA places a priority on providing valuable work experiences to youth and has set a **20% minimum budget expenditure** to go towards the Work Experience. Youth counselors should communicate with their fiscal department and/or direct Supervisor to track if they are spending **at least 20% of their budget on Work Experience**, and to make sure they know how much money is left to spend on Work Experience throughout the fiscal year. TEGL 23-14 states that this **20% minimum** is calculated based on *overall* non-administrative local area youth funds and is not applied separately for In School Youth (ISY) and Out of School Youth (OSY).

Procedure

1.) **Assess eligibility** of youth under WIOA Section 129(a)(1). Once eligibility in the WIOA Youth program is established, all youth must complete:

- an Objective Assessment (following TCWDB Objective Assessment Policy guidelines); and
- an ISS which clearly outlines a youths’ career pathway (if career pathway is unknown, refer to Eligibility section above for career exploration options).

2.) Staff must **document** the assignment of a Work Experience in OSOS as a Service provided (use Achievement Objective tab in the Customer Module, Services Window, Services Tab), and further document in OSOS Comments the Work Experience location, **start date**, job duties, education/training component, correlation with career pathway, progress and **end date**. Any updates to the youth's ISS should be updated in OSOS as well. *For further directive, staff should please refer to the "411 on WIOA Title I Youth Program Services" (Nov. 2019 updated) document.*

3.) A Work Experience assignment should correlate with the youth's career pathway, take any disabilities/limitations into consideration, and be age appropriate (comply with labor laws).

4.) Employers providing Work Experiences should complete a **Worksite Agreement** and copies should be kept in the youth's paper file for access during monitoring procedures. Each worksite should have at least one designated **Worksite Supervisor** who the youth report to, signs timesheets, and provides updates/evaluation feedback to the youth counselor.

5.) **Worksite Supervisors** and **Youth** must both sign a completed **Job Training Outline** which specifies the youth's work experience goals, academic and occupational education components that will be incorporated, and a detailed work description (hourly wage rate, number of hours to be worked per week, start and end date, general work duties, etc.).

4.) Copies of timesheets should be kept in the youth's paper file along with copies of any payroll documents.

5.) Youth counselors are to maintain **routine communication** with Worksite Supervisors to:

- determine what new skills the youth has learned;
- obtain feedback from the worksite supervisor;
- ensure the youth is complying with their assigned work schedule;
- determine if the worksite is a good fit for the youth; and
- determine how long the youth is expected to remain at the worksite.

If it is determined that the youth is not a good fit for the worksite, or if the youth redefines their career pathway, the youth may be reassigned to a **new** Work Experience. Youth counselors and/or Worksite Supervisors have the right to end a youth's Work Experience early due to any misconduct on the youth's part.

6.) **Evaluation** forms should be given to all Worksite Supervisors to complete on a routine basis (attaching the evaluation form to the youth's timesheet is an effective method to encourage evaluation completion). Questions/Comments sections can be general or tailored specifically to address specific concerns/barriers with the youth's progress.

7.) **Site Visits** should be conducted on a routine basis and can be **scheduled** in advance to ensure the Worksite Supervisor and youth will be available or can be **unannounced** as the Youth counselor sees fit.

8.) It is the responsibility of the Youth counselor to meet the needs of the Business (worksite) and maintain a successful working relationship while tracking youth's progress and providing WIOA-based **Supportive Services** and activities to the youth as needed for their success.

9.) **Education/Training Component:** see section above re: incorporation of concurrent or sequential education/training component; documentation in ISS and OSOS Comments must clearly outline the connection of the education/training component to the youth's identified career pathway.

10.) The Worksite Supervisor and the youth should be notified **at least 1 week prior to the youth's final day of work**. Youth should be encouraged to speak with their Supervisor about continuing employment or obtaining a professional job reference to aid in their job search. The **end date** of the youth's Work

Experience should be noted in both the youth's ISS and in the OSOS Services Tab and Comments section.

11.) Updated record should be kept ensuring youth does not surpass their maximum lifetime allotment of **480 hours of paid work experience** (exceptions to maximum hours apply in the event of an Administrative Override occurring; however, detailed records must still be maintained).

Tompkins County Workforce Development Board

WIOA YOUTH Incentive Policy

Purpose

The purpose of this policy is to establish guidelines for the use of Workforce Innovation and Opportunity Act (WIOA) funds for incentives for youth participating in WIOA activities.

Background

The Workforce Innovation and Opportunity Act 20 CFR 681.650 allows for the awarding of incentive payments for recognition and achievement in WIOA related activities. Incentives are allowable to youth enrolled into the WIOA Title I Youth program. They are intended to encourage and motivate WIOA youth to reach specific goals and obtain positive outcomes. This policy shall only apply to youth participants as the WIOA regulations do not specifically provide for incentives for adult and dislocated worker participants.

Reasonable incentives are allowable only if the local workforce board has written policies and procedures governing incentive payments, and the provision of an incentive is included in the participant's Individual Service Strategy (ISS). This document provides the policy of the Tompkins Workforce Development Board (TCWDB) for granting incentive awards to youth enrolled in the WIOA Title I youth program.

Policy

It is the policy of the TCWDB to offer reasonable incentives to youth participants to encourage the youth to participate in and complete WIOA Title I activities. Any incentive shall be limited to WIOA youth programs, **including youth who are enrolled in Follow-Up Services**. The justification and strategy for providing and/or awarding incentives must be clearly defined in the youth's ISS.

For the purposes of this policy, the term "incentive" shall mean an inducement intended to motivate achievement and is communicated to the participant prior to participation in an activity. Goals and/or training outcomes eligible for an incentive must be linked to an achievement related to training, employment, work readiness skills, occupational skills, and/or basic skills attainment goals as stated in the participants' ISS and documented in accordance with applicable WIOA regulations.

All incentive awards are subject to the availability of WIOA funds and are not an entitlement. TCWDB may suspend or withdraw authorization for incentive payments at any time and at the sole discretion of TCWDB.

Youth incentive award payments are limited to a lifetime amount of \$2,500 maximum per eligible youth. Youth incentive award payments may not include entertainment, such as movie or sporting events tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment and may not include gift cards with activation fees (such as Visa, Mastercard or AMEX cards). **Incentives should only be grocery, superstore, or convenient store gift cards/gas cards.**

As per TEGL 21-16, incentives paid for with WIOA funds must be connected to recognition of achievement of milestones in the program tied to work experience, education, or training. Incentives must be tied to the goal of a specific planned activity, outlined in writing in the youth's ISS prior to the commencement of the activity. Specifically, TCWDB approves of the following methods of incentive use:

1.) SKILLS GAIN

ACTIVITY	AMOUNT
TABE Post-Test Without Recognized Gain	\$10
TABE Post-Test WITH Recognized Gain (increased by at least one (1) EFL)	\$20
Increase in functioning level on any TCWDB approved basic skills assessment	\$20
Submitted Recognized Postsecondary Transcripts	\$20
Submitted Recognized Progress Report, rated at Satisfactory or better	\$50
Obtained Recognized Occupational Skills Certificate	\$30

2.) CREDENTIALS

Completed 15 hours of recognized TASC/HSE Classes and/or Tutoring	\$30
Completion of semester in college	\$300
Obtained Recognized Credential	\$50

3.) WORK READINESS ACTIVITIES (i.e. soft skills, financial literacy, resume, interviewing, job shadowing, etc.)

Completion of work readiness classroom training	\$25 per completed workshop sessions; maximum \$400 awarded
Improvement demonstrated on Work Experience participant evaluation by Work Experience supervisor, based on average of overall scores	\$20

4.) UNSUBSIDIZED EMPLOYMENT

Submitted 1 st Paystub	\$10
Submitted 3 rd Paystub	\$20
Verified Recognized Employment, Education, or Training Enrollment – 2 nd Quarter after Exit	\$30
Verified Recognized Employment, Education, or Training – 4 th Quarter after Exit	\$30

Procedure

The TCWDB shall require all WIOA service providers and grantees receiving funds from a grant or contract administered by TCWDB to comply with this policy and applicable procedures. It is the responsibility of each service provider to become aware of all applicable regulations and to monitor personnel and client activities to ensure compliance. TCWDB shall review grantee compliance with this policy during the annual monitoring process.

At a minimum, service providers shall:

- 1.) document the need for the incentive and justify issuance of the award in the participant's ISS and in OSOS (describing what was awarded and why)
- 2.) maintain records of documentation that activity was completed (i.e. sign-in sheets, certificates of completion, paystubs, etc.) as well as records verifying the client received the award through an original signature on a receipt form.
- 3.) maintain a running record of the "lifetime" expenditures per youth to ensure provided incentives does not exceed the maximum allowable \$2,500.00 per youth; youth shall remain on this record until they have aged out of the WIOA youth program, as exited youth may re-enroll in program if they were exited for reasons other than completion.