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Workforce Innovation and Opportunity Act Northern Kentucky Youth Manual

Kentucky Career Center
Northern Kentucky

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Northern Kentucky Area Development District
Local Youth Policy Manual

SECTION 1 – Background and Purpose

The WIOA Title I-B Youth Program provides "high quality services for youth and young adults beginning with career exploration and guidance; continuing support for educational attainment, opportunities for skills training for in-demand industries and occupations; and culminating with a good job along a career pathway or enrollment in post-secondary education." (WIOA Regs) Northern Kentucky has a focus on preparing youth, both In-School and Out-of-School, to fill the pipeline in our 5 in-demand industry sectors; Advanced Manufacturing, Healthcare, Transportation/Logistics, IT/Business/Finance, and Construction and Trades by "promoting evidence-based strategies that also meet the highest levels of performance, accountability, and quality in preparing young people for the workforce." (WIOA Regs)

The Northern Kentucky Workforce Investment Board (NKWIB) has a history of focusing on Out-of-School youth, or Opportunity Youth (youth 16-24 who are not connected to education or the workforce). WIOA's shift in policy to increase focus on OSY meets the needs of Northern Kentucky businesses trying to improve and increase the number of applicants in the pipeline.

The NKWIB regularly reviews Key Performance Indicators (KPI) that reflect the outcomes of the efforts of the NKADD as fiscal agent and the one-stop system. Measurable statistics in the KPI reports include: Job orders posted, new available positions, job referrals/ candidate prescreening, job placements, employer contacts, and new business outreach, all calculated monthly. These reports also review the cumulative year-to-date totals of Job fairs, on-site hiring events, internships/OJT, business tours, and clients in training. Labor Market information is also counted including labor participation rate and unemployment rates, as well as customer satisfaction rates of both the job seekers and the employers. The KPI also captures contact data for employers in the five-identified sectors as determined by the Board. The NKWIB has determined this data is necessary to evaluate the return on investment concerning career center resources.

The purpose of this manual is to summarize the program design of the youth program for all stakeholders.

SECTION 2 – General Program Requirements

The Northern Kentucky Workforce Investment Board (NKWIB) provides oversight for NKY Youth Programming as evidenced in the Vision, Mission and Value Statements:

Vision Statement
The Northern Kentucky Workforce Investment Board will drive innovative workforce development that meets the changing needs of employers and our labor force, resulting in the enhancement of economic development for our region.

Mission Statement
The high impact Northern Kentucky Workforce Investment Board drives policy, direction, and funding oversight for the local workforce investment system. The local workforce investment system promotes:

1. Supporting economic development
2. Connecting education and training to employment
3. Meeting current and future employment needs

Value Statements
Northern Kentucky WIB Value Statements

- Customer Focus: We respond to employer and individual needs with exceptional customer service.
- Self-sufficiency: We promote customer self-sufficiency as critical to achieving a vital and thriving community.
- Innovation: We step beyond traditional thinking by using creativity to develop policy and direction.
- Continuous Improvement: We foster a culture of continuous improvement through regular evaluations of programs and activities using measurable goals and targets.
- Integrity: We act honestly, ethically, and fairly.
- Collaboration: We value the strengths of our community partners and collaborate to ensure effective and efficient service delivery.

The NKWIB solicits feedback from those with demonstrated experience in the employment, training, and education needs of youth. By using a subcommittee of the NKWIB, the Program/Youth Committee, and its subcommittees, the Youth Response Team, and a Young Adult Advisory Board, the NKWIB ensures that parents, youth participants, educators, community-based organizations, OVR and other community members with experience are involved in the design and implementation of our youth programs. (The Youth Response Team is a group of community partners focused on serving the hardest to serve Opportunity Youth [youth 16-24 with no connection to education or employment]. The Youth Adult Advisory Board is a group of participants and/or former participants who assist in guiding the work of the Youth Response Team. Both entities will be discussed in more depth later in the document.)

To ensure that youth receive the most well-balanced services, youth staff are housed within the local Career Centers. Youth learn to navigate the services within the Career Centers, closely guided by youth staff, to ensure they can access those services throughout their working careers to achieve a high demand occupation that will result in a self-sufficient wage. Youth are introduced to partners, as needed, and learn the availability of various services they currently need, as well as services they may need in the future. For some youth, this is their first introduction to Vocational Rehabilitation, Brighton Center, Goodwill, Job Corps, Wagner-Peyser and TANK. Youth are also served within their home counties in various public places, such as libraries and other non-profit agencies for easier access to services and information.

Youth programming prepares youth for post-secondary education and training opportunities, including Registered Apprenticeship Programs that coincide with the five In-demand Industry Sectors. Youth programming also defines a clear career pathway by focusing on strong linkages between academic instruction and occupational education preparing youth for unsubsidized employment opportunities along those career pathways. Program youth staff provide strong linkages to employers in all the in-demand industry sectors focusing on the fastest growing industries. Realizing each youth has individual needs, staff work to link activities to the well-defined service strategy, designed by the youth and their case manager, to ensure goals are met.

Youth programming, through participant’s Individual Service Strategy, must link the individual to their service strategy rather than service provider contract or program years.

There is no self-service concept for the WIOA youth program and every individual receiving services under WIOA youth programming must meet In-School or Out-of-School eligibility criteria and formally enroll in the program.

Enrollment is a collection of documentation and participation in any one of the 14 program elements.

SECTION 3 – Linkages to Community and Partners

As stated above, the NKWIB wants to ensure that parents, youth participants, and members of the community with experience in youth programming, are involved in youth program design and implementation. The NKWIB also ensures that opportunities for former participants to volunteer in the form of mentoring, tutoring and/or other services are available. Location in the Kentucky Career Centers encourages youth to make appropriate connections and allow youth staff to work with a wide range of organizations.

Youth staff work with local high schools, area technology centers, post-secondary institutions, local libraries and non-profits to provide interactive events that support youth in choosing a career pathway. Staff are also a continuous presence at high school resource and career fairs, as well as Career Center job fairs and hiring events.

Staff work with community-based agencies, foster care agencies and other federally funded programs to ensure referrals are taking place. Staff partner with the NKY Safety Net Alliance, a collaboration of 150 partner agencies established to increase the efficiency and effectiveness of safety net services provided to Northern Kentuckians in need to ensure youth have a wide array of services available to them. Staff is also an integral part of the Youth Response Team, a subcommittee of the Program/Youth Committee of the NKWIB, dedicated to closing the gaps in services for Opportunity Youth in the NKY region by developing strategies to ensure no youth 'falls between the cracks.' The Youth Response Team is made up of 32 agencies, educational institutions, non-profits and businesses and is advised by a Young Adult Advisory Board made up of 7 – 10 youth (some former youth participants) in the community who provide feedback and guidance in outreach strategies indirectly assisting in the design and implementation of WIOA youth programming. In addition to a programmatic advisory capacity, alumni are offered an opportunity to work with area Opportunity Youth. Participating organizations and employers involved in the Youth Response Team efforts include, but are not limited to the following;

The Children's Law Center
Legal Aide of the Bluegrass
Campbell County Detention Center
Housing Authority of Covington
Campbell County Schools
Erlanger/Elsmere Schools
NKU
NKY Education Council
Gateway Community and Technical College
Owen County Schools
Boone County Youth Cabinet
Brighton Center
CHFS/DCBS
NaviGo
Cincy Smiles

Covington Partners
Covington Emergency Shelter
Families Matter
Family Resource/Youth Service Centers
Kenton County Fiscal Court
Kentucky Career Center
Life Learning Center
Mubea
Neighborhood Foundations
NKADD
NKY Chamber
NKY Education Council
NKY Home Builder's Association
NKY Independent Health Department
NorthKey
NKY Community Action Commission
Welcome House

Local area justice and law enforcement officials; local public housing authorities; local education agencies; local human service agencies; WIOA Title II adult education providers; local agencies serving those with disabilities; Job Corps representatives; representatives of other area youth initiatives, including those that serve the homeless and private youth initiatives either serve on the Youth Response Team or are part of our linkages through the Kentucky Career Center network.

The NKWIB has a very strong relationship with **Gateway Community and Technical College (GCTC)** as well as **Jefferson Community and Technical College (JCTC).** Through this relationship, we can coordinate training programs with our in-demand sectors, provide specialized training to the job seeker customer of the Career Center system, coordinate outreach for programs by both entities, and jointly promote the training opportunities of both entities.

Staff ensures that all youth are provided with information about the full array of services available through WIOA or other providers and/or Career Center partners. Staff also ensure that training and/or educational programs have the capacity to serve youth either on a sequential or concurrent basis.

SECTION 4 – Referrals

The NKWIB factors all youth into the service equation, serving youth through the Career Center regardless of WIOA eligibility. Youth seeking services receive information about the full array of services available through WIOA programming, KCC partners, and other youth service providers, including educational programs.

Youth staff has adopted the Youth Response Team's philosophy toward a "warm handoff" referral so that youth are handed from one agency to another without breaking contact with the youth. This is done on a referral basis; non-WIOA/non-KCC network agencies providing services to WIOA youth have an MOU in place with the youth service provider to outline services being provided.

The KCC has, on staff, a non-WIOA funded youth staff that guides and directs non-WIOA eligible youth to services and sources of information to assist in meeting their educational and employment needs.

A MOU/MOA is required with any agency that receives WIOA youth referrals that is not a KCC partner.

Options in the NKY area include, but are not limited to;

YouthBuild
HAC's Jobs Plus Grant
Brighton Center
Welcome House
Scholar House
Legal Aide
DCBS
Emergency Shelters
Food Pantries
Life Learning Center
Home Builder's Association
Job Corp
OVR/OFB
NorthKey
Transitions
Post-Secondary Education
Adult Education

SECTION 5 – Youth Committee

The NKWIB, in an effort to remain flexible, has taken on the role of the standing youth committee. Using a subcommittee of the NKWIB, the Program/Youth Committee, with the assistance of the Youth Response Team and the Young Adult Advisory Board acting as consultants, provides information to assist with planning, oversight, and other issues related to the provision of the youth program. The NKWIB is responsible for:

- Recommending policy direction to the local board for the design, development, and implementation of programs that benefit all youth;
- Recommending the design of the comprehensive community youth workforce development system to ensure a full range of services and opportunities for youth, focusing on disconnected youth;
- Recommending ways to leverage resources and coordinate services among schools, public programs, and community-based organizations serving youth;
- Recommending ways to coordinate youth services and youth service providers;
- Providing on-going leadership and support for continuous quality improvement for local youth programs;
- Assisting with planning, operational and other matters related to youth;
- Overseeing eligible youth providers, as well as other youth program responsibilities; and
- Reviewing Youth program performance and recommending the annual budget and resource utilization of WIOA Youth funding to the NKWIB.
- Selecting youth grants or contracts.

The NKWIB focuses on youth strategies which must incorporate **strong framework services** which must include intake (eligibility), objective assessments (TABE, Transitional Work Inventory [TWI] and Work Readiness evaluations) and the development of an individual service strategy, case management, supportive services and follow up services.

SECTION 6 – Procurement Requirements

NKWIB procures all youth services on a competitive basis using local procurement policies.

- A public notice is placed in local newspapers and on social media to alert the public of an upcoming release of a Request for Proposals (RFP).
- A Technical Assistance Session is scheduled and publicized.
- Notices are mailed to the NKWIB and NKADD Interested Parties List.
- RFP notices may also be posted with local, regional, state and/or national entities.
- A deadline for submission is established, usually 30 days, but any reasonable time can be used.
- A question-and-answer period for all bids will be established and noted in the Request for Proposal information.
- Services can be sole sourced only when there are no other options.
- Submitted bids not clearly marked as such on the envelope may be opened for identification purposes and resealed until the time for the bid opening.
- Sealed bids will be opened in public by a designated employee at the time and place stated publicly.
- All applicable questions by prospective bidders will be answered in public format for all prospective bidders to review. Responses will be available via the NKADD and KCC websites.
- A file of proposals will be kept either electronically or in hard copy.
- Files will be maintained in accordance with the NKADD Records Retention Schedule.
- The NKWIB may reject any and all bids; however, the reason for rejection should be noted.
- Applicable provisions of state and/or federal laws and regulations will be followed.
- NKWIB staff will review proposals for technical issues only.
- Proposals will be reviewed by the Program/Youth Committee, tabulated and moved to the Executive Committee. The competing Vendors should attend the Proposal meeting to answer Committee member's questions.
- The Executive Committee will review Program/Youth Committee tabulations and comments and move the Proposals to the full NKWIB or send questions for additional information back to the Program/Youth Committee.
- The NKWIB will review Proposal information and move the recommendation to the CLEOs.

Any set of criteria, including but not limited to price, may be used to evaluate the bids.

- The character, integrity, reputation, judgment, experience, and efficiency of the vendor.
- The ability of the vendor to provide the service promptly or within the time specified, without delay or interference.
- The quality of performance by the vendor on previous contracts or proven record of performance.
- The ability of the vendor to maintain fiscal integrity

SECTION 7 – Youth Services

The NKWIB has implemented a comprehensive youth program. As law allows, program funds can be expended prior to eligibility determination on outreach, recruitment, and assessment. Multiple assessment tools are available as there is no standard approach to serving youth, including those with disabilities.

Outreach and Recruitment

Youth staff work with local high schools, area technology centers, post-secondary institutions, local libraries and non-profits to provide events such as Career Exploration Days, workshops, and interactive events. Staff are also a continuous presence at high school resource and career fairs, as well as Career Center job fairs and hiring events. Staff work closely with school counselors to identify specific students in need.

Staff work with community-based agencies, foster care agencies and other federally funded programs to ensure referrals are taking place. Staff partner with the NKY Safety Net Alliance, a collaboration of 150 partner agencies established to increase the efficiency and effectiveness of safety net services provided to Northern Kentuckians in need to ensure the success of our outreach and recruitment efforts. Staff is also an integral part of the Youth Response Team, a subcommittee of the Program/Youth Committee of the NKWIB, dedicated to closing the gaps in services for Opportunity Youth in the NKY region by developing strategies to ensure no youth 'falls between the cracks.' The Youth Response Team is made up of 32 agencies, educational institutions, non-profits and businesses and is advised by a Youth Adult Advisory Board made up of 7 – 10 youth (some former youth participants) in the community who provide feedback and guidance in outreach strategies indirectly assisting in the design and implementation of WIOA youth programming. In addition to a programmatic advisory capacity, alumni are offered an opportunity to work with area Opportunity Youth.

Staff ensures that all youth are provided with information about the full array of services available through WIOA or other providers and/or Career Center partners. Staff also ensure that training and/or educational programs have the capacity to serve youth either on a sequential or concurrent basis.

Career Center youth staff work with local jail programs, through Brighton Center, providing a direct link to the youth program. Staff work with Class D Work Release and Chemical Dependency offenders in a workshop entitled, "Job Search Success." Once released, the clients are encouraged to use Career Center services to attain self-sufficient employment if ineligible for youth or adult programming.

Both the NKADD and the youth service provider are involved in the Housing Authority of Covington's Jobs Plus grant, enabling a direct link to housing clients. These clients are coached through basic skills training into more advanced job skills to attain self-sufficient employment.

Through HUD, clients rent is frozen for up to 4 years to enable the client to move away from subsidies. This creates co-enrollment opportunities.

Campbell County Schools, Erlanger/Elsmere Schools, NKU, NKY Education Council, Gateway Community and Technical College and Owen County Schools are all part of the Youth Response Team. Youth case managers also work with dozens of other schools in the area to provide extensive outreach to as many youth as possible.

Brighton Center, Department for Community Based Services, Northern KY Community Action Commission (YouthBuild), NorthKey and Welcome House are part of the Youth Response Team. They all provide referrals and services for Opportunity Youth in the NKY area. Brighton Center and Welcome House work directly with the homeless population.

Job Corps, Vocational Rehabilitation and Goodwill are represented in the Career Center and Adult Ed is represented on the WIB.

Best Practice

Girl's/Guy's Day Out

Girl's/Guy's Day Out (GDO) is an event that happens annually, at a minimum, usually in our lower counties. However, similar events also take place in our upper counties. Girl's Day Out won the NADO Innovation Award in 2014. GDO started as a grass-roots effort with the Carroll County Training Consortium, (a group of businesses along the I-71 corridor) asking the NKADD to provide more young people, especially females, with knowledge of local industry so that the industries could improve their talent pipeline.

Staff put together a ½ day event by partnering with the Carroll County Training Consortium, Jefferson Community and Technical College, local high schools from five counties and the Carroll County Area Technology Center. The event consisted of speakers from local industries giving brief, interactive talks to the youth about their functions, their place in the community, and wages and education needed to attain positions. In addition, interactive STEM events were set up to entice the youth to learn more about the type of work being conducted in their community. Tours of the Area Technology Center were conducted using Area Technology staff, and learning games were available. Youth leave the event knowing more about their community, the path to self-sufficiency and the steps they can systematically take to achieve their goals but more importantly youth leave with the knowledge of the various partners to contact for guidance when deciding upon a career pathway.

Carroll County Training Consortium partners include, but are not limited to; Nucor Steel, North American Stainless, Kentucky Utilities, PMC Organometallix, and Dow Chemical.

SECTION 8 – Intake and Eligibility Determination

The Eligibility Determination process with an assessment of the customer needs and strengths. If staff determine that youth need WIOA services, the collection of eligibility determination documentation begins, including (list is not all-inclusive); driver's license, social security card, passport or birth certificate, income proof (if necessary) and barrier documentation. Information is entered in KEE-Suite, documents are uploaded, and consent forms are signed. Labor Market Information is presented at this time to guide the youth to a self-sufficient career path and the continued development of the IEP/ISS. The Youth Participant Emotional Wellness Screening Tool should be provided at this time to allow for appropriate resource referrals if needed. The youth have the option to 'opt-out' at the bottom of the form. If the youth checks or chooses 'sometimes, often or always' on one or more of the questions, a referral should be made to a mental health professional. Due to the nature of the content within the screening questions this document *should not* be uploaded to the KEE Suite file. At this point in time, if youth are determined ineligible for WIOA youth services, they will be connected to an Adult WIOA staff person and offered referrals based on their individual needs. In addition, we have several referral partners that have signed MOU's with the subcontracting youth service provider to provide specific services to opportunity youth (Sec. 681.470), including; Life Learning Center, NKY Community Action Commission, and KY Skills U. Any youth determined ineligible, or youth who cannot be served by any WIOA staff must be referred for further assessment, as necessary, or to appropriate programming to meet their skills and/or training needs.

Out of School Youth

<u>Out-of-School Priority</u>
A minimum of 75% of youth funds are dedicated to Out-of-School youth. Youth Out-Of-School status is determined at eligibility. A youth who is determined as an Out-of-School youth at eligibility remains an OSY for the purpose of the 75% expenditure requirement. The NKWIB monitors spending bi-monthly at every meeting through our official KPI (Key Performance Indicators).

Local Administrative costs are not subject to the 75% minimum, expenditures can be calculated using the below guidelines taken from the Kentucky Youth Manual;

1. Taking the LWDA's total NFA for Youth in a Program Year;
2. Reducing the total by 10% for program administration; and
3. Determining 75% of the remaining total.

Due to the large number of Opportunity Youth in the Northern Kentucky area, Out-of-School youth has been the target audience for youth services at the direction of the NKWIB prior to the requirement set forth in WIOA in an effort to increase the talent pipeline.

A youth meets the definition of Out-of-School Youth if he or she is:

A. Not attending school (per Kentucky's definition of not attending school)
B. Between 16 and 24 years old at the time of enrollment and is one or more of the following:
    1. A school dropout;
    2. A low-income individual with a secondary school diploma or its recognized equivalent and:
        i. Basic skills deficient; or
        ii. An English language learner;
    3. An offender;
    4. Homeless, i.e. lacks a fixed, regular and adequate nighttime residence;
    5. A runaway;
    6. In foster care, has aged out of foster care, or has attained the age of 16 years old and left foster care for kinship, guardianship or adoption;
    7. A youth who has been removed from his/her home and is in an out-of-home placement;
    8. Pregnant or parenting;
    9. An individual with a disability; or
    10. A low-income individual who requires additional assistance to enter or complete an education program or to secure or hold employment, as defined by the LWDB (see definition below).

Participants may continue to receive services beyond the age of 24 once they are enrolled in the program prior to age 24.

Low-income eligibility requirements apply to Out-of-School Youth only if:

- They are recipients of secondary school diplomas or its recognized equivalent and are either basic skills deficient or an English language learner
- Requires additional assistance to enter or complete an educational program or to secure or hold employment.

In School Youth

A youth meets the definition of In-School Youth if he or she is:

A. Attending secondary school, including secondary and post-secondary school;
B. Between 14 and 21 years old at the time of enrollment. The age requirement is extended for youth with disabilities because school districts must provide programs and services to eligible youth with disabilities attending secondary school until they turn 22 years old. Youth with a disability who turn 22 years old during the school year must continue to receive services from the school district until the end of the school year (ARS 15-764);
C. A low-income individual and one of the following:

1. Basic skills deficient;
2. An English language learner;
3. An offender;
4. Homeless youth, i.e. lacks a fixed, regular and adequate nighttime residence;
5. A runaway;
6. In foster care, has aged out of foster care, or has attained 16 years old and left foster care for kinship guardianship or adoption;
7. A youth who has been removed from his/her home and is in an out-of-home placement;
8. Pregnant or parenting;
9. An individual with a disability; or
10. Requires additional assistance to complete an educational program or to secure and hold employment, as defined by the LWDB.

The state has defined, <u>and the NKWIB has adopted with no changes or additions</u>, the following criteria for "requires additional assistance to complete an educational program, or to secure and hold employment":

- Has been fired from a job within the 12 months prior to application;
- No previous work experience/never held a job;
- Has never held a full-time job (30+ hours per week) for more than 13 consecutive weeks;
- Difficulty with social interaction or behavioral problems;
- History of family disruptions, such as divorce, legally separated parents, family violence, alcohol or drug abuse;
- One or more parents incarcerated;
- A student participating in an alternative program/setting;
- Functioning at least one or more grade levels below his/her age group in the areas of reading and math (for youth 18-24 if they are functioning at grade 11 or under);
- A student who has failed two or more subjects during the prior two years of school attendance; or
- One or more parents lack a high school diploma/GED.

If a youth turns 21 years old during participation, he/ she may continue to receive services.

Note*:* Individuals who are 22 years and older attending postsecondary education do not meet the age requirement for ISY (14-21 years old) and do not meet the WIOA Title I-B Youth Program eligibility requirements. These individuals may be served by the WIOA Title I-B Adult Program.

Note**:** Basic skills deficient is defined as "at or below the 8^{th} grade level on a generally accepted standardized test. (TEGL 19-16)

Note: An English Language Learner can be defined as an individual that is unable to "read, write or speak English at a level necessary to function on a job, in the individual's family, or in society" is defined by scoring below a 8^{th} grade equivalent on the TABE in language or reading due to a language barrier, is unable to communicate without an interpreter, or is attending ESL classes.

Addition to Selective Service Policy

Effective 8/10/2020: Please recognize that not every client's gender is easily discernible. This requires all staff to reconsider how to present some questions. Below is an example of how to ask ALL clients if they have registered for Selective Services.

Example:

If you are required to register for Selective Services, have you completed this requirement?

Registration Requirement

Males 18 through 25 years old (up to 26 years old) are required to register within 30 days of turning 18 but can register up to the age of 26. If the client was institutionalized the entire time of the registration requirement, they will be exempt but will need to prove the length of time of the institutionalization. If you were released for any period longer than 30 days during this window, you were required to register with the Selective Service System.

US citizens or immigrants who are born male and changed their gender to female are still required to register. Individuals who are born female and changed their gender to male are not required to register.

Gender KEE-Suite Policy

Do NOT ask a client their gender. If the client would like to be identified differently than noted on their birth certificate, let them decide whether to share that information with you. Since we are not required to validate gender, the source documentation does not need to match the KEE-Suite entry.

If a client does identify differently than noted on their birth certificate, for KEE-Suite purposes, enter the information as the client identifies. This will require a note in Kee-Suite for monitors.

Example KEE-Suite Note

(Client's Name) identifies as (XXXXX). This identification does not match their (birth certificate/driver's license). However, out of respect for our client, we recognize their identification and entered their interpretation in KEE-Suite, as stated by the client.

(Effective 8/10/2020, per state guidance, Rachel Adams)

A client is required to register under the name listed on their identification. If a client has a change of name after registration it must be documented in case notes.

(Effective 2/23/2022, per state guidance, Rachel Adams)

SECTION 9 – Determining Low-Income Status

Low Income Youth Definition

- A **low-income youth** is an individual who:
    - Receives, is a member of a family that receives, or has received in the past six months, cash payments under a federal, state, or local income-based public assistance program (e.g. Temporary Assistance to Needy Families (TANF);

Note: Section 8 housing is insufficient criteria for meeting the requirements of this definition.

- Receives annual income in relation to family size that does not exceed the higher of the federal poverty guidelines or 70% of the USDOL LLSIL for each program year;
- Receives, is a member of a family that receives, or has received in the past six months, assistance through SNAP;
- Qualifies as a homeless individual who lacks a fixed, regular and adequate nighttime residence;
- Is a foster child for whom state or local government payments are made;
- Is a member of a family whose income does not meet low-income requirements, but is an individual with a disability, and therefore can be counted as a family of one so that individual income meets the low-income requirement;
- Receives Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI);
- Receives, is a member of a family that receives, or has received within the past six months, assistance through the Refugee Cash Assistance (RCA), a federally-funded need-based cash benefit for refugees and other eligible beneficiaries, who are not eligible for other cash assistance programs, such as TANF;
- Receives, or is eligible to receive, a free or reduced-price lunch under the Richard B. Russell National School Lunch Act (NSLA), determined per the individual and not on the entire school’s eligibility, or
- Is a youth who lives in a high poverty area, as determined by the American Community Survey.
- Youth living in high poverty areas are automatically considered low-income individuals. WIOA defines a high poverty area as a census tract, set of census tracts, an American Indian reservation, Oklahoma Tribal Statistical area (as defined by U.S. Census Bureau), Alaska Native Village, or Alaska Native Regional Corporation Area, Native Hawaiian Village Homeland Area, or other tribal land as defined by the USDOL Secretary in guidance, or a county with a poverty rate of at least 25 percent as set every five years using the American Community Survey five-year data.

- LWDBs must use Determining High Poverty Census Tracts in Kentucky (TEGL 21-16) and the High Poverty Census Tracks Spreadsheet (TEGL 21-16), or other tools developed by the LWDB to determine if a youth lives in a high poverty area by census tract. NKWIB accepts the tools developed by Kentucky.

Income

Unemployment insurance and child support count toward income, as well as old age and survivor's insurance benefits (Social Security payments for retirement or for certain survivors of people who have retired and then passed away.)

Low Income Criteria

All In-School Youth must be low-income unless included in the five percent low-income exception, explained below.

Low-income eligibility requirements apply to Out-of-School Youth only if:
They are recipients of secondary school diplomas or its recognized equivalent and are at least one of the following:

- Basic skills deficient;
- An English language learner; or
- In need of additional assistance to enter an educational program or to secure employment.

Low Income Chart/Self-Sufficiency Chart/5% Exception

The Low-Income Chart and the Self-Sufficiency Chart are documents released yearly by the Department of Labor.

LWDB's must not serve more than 5% of youth who do not meet low-income requirements but meet all other eligibility requirements. The 5% is calculated using the combined total of In-School and Out-of-School youth. NKADD staff monitors the use of this exception and anyone qualifying under this rule must be approved by NKADD staff prior to WIOA enrollment. It is the responsibility of the NKADD to stay within the 5% limit.

The percentage of non-low-income youth will be calculated based on the percent of newly enrolled youth in a LWDB's WIOA Title-I-B Youth Program in a given program year who would ordinarily be required to meet the low-income criteria.

Note: Not more than 5% of In School Youth newly enrolled in a program year may be eligible based on the Needs Additional Assistance barrier.

Eligibility Barrier Definitions

A youth is **basic skills deficient** when one of the following definitions applies:

- The youth performs any of the following at or below an 8.0 grade level:
    - Compute or solve math problems;
    - Read English;
    - Write English; or
    - Speak English.
- The youth is unable to:
    - Compute or solve problems, or
    - Read, write, or speak English at a level necessary to function on a job, in the individual's family, or in society, as determined in local policy.

Note: The NKWIB interprets 'basic skills deficient' consistent with 20 CFR 681.290.

English Language Learner (ELL) is defined as an individual who has limited ability in reading, writing, speaking, or comprehending the English language, and:

- Whose native language is other than English; or
- Lives in a family or community environment where a language other than English is the dominant language.

Dropout is defined as an individual who is no longer attending school and who has not received a secondary diploma or its recognized equivalent. Individuals who have dropped out of postsecondary education are not considered "drop out" for purposes of WIOA Title I-B Youth Program eligibility.

Staff must verify how it determined a youth participant met the definition of Dropout. The verification must be included in the case management system of record.

Offender is defined as an adult or juvenile who:

- Is or has been subject to any stage of the criminal justice process, and for whom services under this act may be beneficial; or
- Requires assistance overcoming artificial barriers to employment resulting from a record of arrest or conviction.

Parenting includes either a custodial or non-custodial mother or father. When a youth is within the WIOA Title I-B Youth Program age eligibility requirements, the age the youth became a parent does not factor into the definition of parenting.

A **pregnant** individual only includes the expectant mother.

Family is defined as two or more related by blood, marriage, or decree of 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 (20 CFR 675.300).

Note: When an individual is not living in a single residence with other family members the individual is not considered a member of the family for the purpose of WIOA Title I-B income calculation unless claimed on another's taxes, see below.

For the definition of family-

- Dependent is defined as a child who is:
  - Under age 18 at the end of the previous calendar year, or
  - Over age 18 and under age 24 at the end of the previous calendar year and was a student.

- Regardless of residence and/or citizenship, anyone claimed as a dependent on another person's federal income tax return for the previous year must be presumed part of the person's family for the current year. To negate this assumption, the person who was claimed as the dependent for income tax purposes is required to provide information that demonstrates the person is no longer financially dependent.

- Runaway youth, emancipated youth and court adjudicated youth separated from family through an involuntary temporary residence elsewhere (e.g. institutionalized, incarcerated, placed as result of court order) must not be classified as a dependent.

SECTION 10 – School Status

Attending School

For the purposes of eligibility, **Attending School** is defined as:

- See Kentucky Revised Statutes (KRS) 159.010. Requires any person between **6 and 18 years** of age to attend public school for the full term. Full term as defined in KRS 158.070.
- See KRS 159.030 - Exemptions from compulsory attendance.

However, for purposes of WIOA, the Department does not consider providers of adult education under title II of WIOA, YouthBuild, Job Corps program, high school equivalency programs, or dropout re-engagement programs to be schools. Therefore, in all cases except the one provided below, WIOA youth programs may consider a youth to be an OSY for purposes of WIOA youth program eligibility if he or she attends adult education provided under title II of WIOA, YouthBuild, Job Corps, high school equivalency programs, or dropout re-engagement programs regardless of the funding source of those programs. Youth attending high school equivalency programs funded by the public K-12 school system who are classified by the school system as still enrolled in school are an exception; they are considered ISY.

Individuals 22 and older attending postsecondary education – ISY, including those attending postsecondary education, must be between the ages of 14-21. A youth attending postsecondary education who is 22 at the time of eligibility determination would not be eligible for the WIOA youth program because they are in school and over the age of 21. The individual could be served through the WIOA adult program. (TEGL- 21-16)

The enrollment process may occur over time. School status is determined at eligibility. Once the school status is determined that school status remains the same throughout the youth's participation in the Youth Program.

Youth who are temporarily not attending school because of a break (Winter, Spring, Fall or Summer) but are enrolled to continue after the break are attending school and be enrolled as ISY. The same applies if the youth is planning to attend a different school after the break.

When a youth is in the Title I-B Youth Program between high school and post-secondary, the youth is considered in-school if they have registered for classes, even if the youth has not yet begun classes at the time of the WIOA Title I-B Program enrollment. However, if the youth graduates high school and registers for postsecondary education, but does not follow through with attending postsecondary education, then the youth would be considered an OSY.

Youth who are participating in online secondary and post-secondary school are attending school. Likewise, youth who are homeschooled, or attending public, private or chartered secondary/post-secondary schools are attending school.

SECTION 11 – Documentation for Eligibility

Documentation must be collected in a timely manner for eligibility determination. Attempts to secure documentation and outcomes must be recorded in KEE-Suite promptly and accurately. Data entry must be completed within 10 days of documentation collection and no staff assisted service should be delivered until eligibility is determined.

General Requirements

NKWIB service providers must use KEE-Suite for eligibility determinations for the WIOA Title I-B Youth Program and for data validation. The checklist in KEE-Suite identifies source documents, which are documents used to verify eligibility requirements. All eligibility documents must be uploaded into KEE-Suite.

NKWIB will ensure that reasonable attempts have been made to secure source documentation as identified in KEE-Suite.

The *WIOA Applicant Statement* may be used as permitted when the information is unverifiable or unreasonably difficult for the applicant to obtain.

For high-risk OSY*, the WIOA Applicant Statement is acceptable to allow upfront enrollment of the youth in limited circumstances.

***High-risk OSY** means not having a high school diploma or HSE and meeting the eligibility criteria as listed in the Eligibility Section.

Note: A determination of the OSY "Requires additional assistance to enter or complete an education program or to secure or hold employment, as defined by the NKWIB" is not sufficient for a determination that the OSY individual is high-risk. As such, the WIOA Applicant Statement may not be used for upfront enrollment for youth that meet only this eligibility criteria.

NKWIB staff ensure all youth who are less than 18 years old have a WIOA Applicant Statement signed by the youth's parent, guardian, or a responsible adult/collaborating witness. By signing the form, the youth's parent, guardian, or a responsible adult /collaborating witness gives permission for the youth to participate in the program and verifies the information on the form is accurate.

The following Documents are required to be uploaded to KEE Suite for Eligibility:

- Backup Documentation (driver's license, SS card, birth certificate, selective service, etc.)
- Barrier Documentation
- Income History Form (if applicable)- See Attachment 1.
- Low Income Documentation (if applicable)
- WIOA-2- See Attachment 2.
- School Status Verification

When the youth file is ready for eligibility determination by the NKWIB staff, send an email to melinda.ford@nkadd.org and tonia.slone@nkadd.org . The subject line in the email should include the client's name, KEE Workforce Case Number, the enrolled program and the qualifier. ***"Example: Email Subject Title: Eligibility Verification: John Doe WFC# 000000000 WIOA Youth- Parenting***

Note: Please allow 10 business days for NKWIB staff to review and provide the eligibility determination.

SECTION 12 – Co-Enrollment

Co-enrollment means enrollment of a customer in more than one program during the same time frame. Co-enrollment allows for additional resources for training and financial support, enhanced service delivery and increased customer support resulting in greater outcomes.

- Individuals who meet the respective program eligibility requirements may participate in programs concurrently. Subcontractors must:
  - Ensure the youth meets eligibility criteria for both programs to co-enroll participants;
  - Determine the appropriate level of service or combination of services that will be provided to youth age 18-24 based on the youth's service needs, and if the participant is career-ready based on the objective assessment of the occupational skills, prior work experience, employability, and participant's needs;
  - Identify and track the funding streams for youth who are enrolled concurrently;
  - Ensure services are not duplicated; and
  - Ensure previous foster care youth who have been co-enrolled in WIOA Title I-B Youth Program and Adult/Dislocated Worker Program and are now adults continue to remain eligible for both the Youth Program and Adult Program services and do not require re-determination of eligibility.

Note: NKWIB and subcontractor staff will also comply with state and federal guidance on co-enrollment policies and practices.

Note: 20 CFR 681.450 states: "Local youth programs must provide service to a participant for the amount of time necessary to ensure successful preparation to enter post-secondary education and/or unsubsidized employment."

- WIOA Title I-B Youth Program participants may also be co-enrolled with the following partner programs:
  - Adult Education and Literacy Programs;
  - Migrant Seasonal Farm Workers Program (MFSWs) at the point of entry to the One-Stop system to assure equity of services is provided;
  - Jobs Program (TANF/K-TAP Work Program);
  - Youth Build;
  - Job Corps;
  - Supplemental Nutrition Assistance Program Employment and Training; or
  - Other employment-related programs.

- When youth are co-enrolled, services provided by partner programs must be added to the Local Area Plan under partner-provided services. When a service is provided by a partner that uses the KEE-Suite system (such as Employment Service or Trade Adjustment Assistance) the services do not need to be added to partner-provided services on the local plan because KEE-Suite automatically considers the individual co-enrolled when he/she is receiving services from more than one program that uses KEE-Suite.

SECTION 13 – Objective Assessment

The objective assessment must be addressed in every WIOA youth file through various tools as defined below outlined in TEGL No. 21-16.

- Academic Skills are measured using the TABE and Education Level reached (Career, Employment Service Plan (CES), under Education/Training)
- Skills Level is part of the CES as gathered under work experience, volunteer experience and education level gained.
    - Basic Skills – CES and Work Readiness pre-test (state issued)
    - Occupational Skills – CES - headings: Employment History and Education/Training
    - Prior Work Experience – CES – heading: Employment History
    - Employability – CES (Employment History/Education Background, Volunteer Experience) and Work Readiness pre-test
    - Interests – ONET is an interest inventory – separate test done by all clients
    - Aptitudes – measured through CES (Education and Training, Volunteer Experience) and verbal evaluation
    - Supportive Service Needs – CES – heading: Career Goals – Assistance I will need, and Learning Challenges I would like to share, as well as Barriers that might affect my success
    - Developmental Needs – Presuming the definition of Developmental Needs is; adaptability, analytical skills, action oriented, business knowledge, communication, customer focus and decision making – these are addressed at the time of eligibility determination, as well as, throughout the program. EX: If a potential client does not turn in eligibility paperwork in a timely manner, a note is made in the case management data system which would reflect this and be interpreted as 'not action oriented'. EX: If a potential client does not return phone calls or texts, it is noted in KEE-Suite and is interpreted as poor communication skills.
- Service Needs – Evaluated using the CES and verbal exchange

This measurement of needs and strengths is gained through traditional testing, as well as folder reviews and/or observation and interviews, as described in TEGL 21-16. Previous basic skills assessment results may be used if the assessment has been conducted in the past six months.

All assessment tools are valid, reliable, and appropriate for youth and are easily adaptable for those with disabilities, in addition to, fair, cost effective, well-matched to the test administrator's qualifications, and easy to administer. All tests are appropriate for the target audience. For youth who may have conditions that prove to be barriers to the assessment process, the Department for Vocational Rehabilitation is available to assist. The following is a list of tests available for assessment (other tests are available through partners, as needed):

- ONET Interest Profiler- The customer answers 60 questions relating to work tasks. The results show the different scores for each career cluster (social, enterprising, conventional, investigative, artistic), and display a list of the jobs based on customer responses.
- TABE- Test for Adult Basic Education-tests on language, reading, mathematics. Must be certified to administer this test.
- Work Readiness Pretest- Asks questions on work readiness, including work experience, job search, applying for jobs, and if youth completed a resume.
- Self Sufficiency Matrix- A tool that assesses client needs on a holistic level. The domains are housing, income, employment, health care, adult education, life skills, and community life. Customers score themselves with the help of the career coach, which lets case managers know what resources to provide more intensively.

Individual Service Strategy

Development of the Individual Service Strategy/Individual Employment Plan (ISS/IEP) begins immediately with a thorough objective assessment, consisting of a measurement of academic skills, skills level assessment, service needs, and strengths. NKY uses assessment instruments that are valid and appropriate for the target population and provides reasonable accommodation in the assessment process. The ISS/IEP must include identification of appropriate career pathways including educational goals, employment goals (including non-traditional, taking into consideration career planning and the results of the objective assessment), appropriate achievement objectives and services.

The Service Strategy will include the addition of basic needs also required to determine the overall needs and strengths of the client, as well as short and long-term goals. The ISS/IEP will specify which of the 14 program elements are needed to assist the participant in meeting his/her educational and career goals. The Service Strategy is fluid and should change as the youth develops and gains skills, education, and work experience. The Service Strategy documents and updates achievements and accomplishments of the client's experience and should be linked to the performance goals of the youth. Developing the Service Strategy provides youth with short-term and long-term goals that will assist them in reaching their ultimate educational and employment objectives. Staff assists each youth in identifying their specific barriers and strengths. For barriers, staff will assist the youth in solving the issues or refer them to a partner agency with the resources to assist. The Service Strategy identifies goals and the pathways necessary to complete those goals incorporating the 14 youth program elements.

Note*:* The NKWIB requires that participation and services are linked to the ISS/IEP rather than the timing of youth service provider contracts or program years.

SECTION 14 – Youth Program Elements

The objective assessment (measurement of academic skills, skills level, service needs and strengths) and the development of the ISS/IEP determine which of the 14 required program elements will be provided. Youth can request additional elements or staff may adjust needs at any time during the program based on the changing needs of the youth.

Any element not provided with WIOA funding is provided by a partner agency and defined in an MOU.

I. Tutoring, Study Skills Training, Instruction, and Dropout Prevention activities that lead to completion of a high school diploma or recognized equivalent- typically provided by referrals to *Skills U or Brighton Center*, online tutoring recommendations and case manager counseling.

II. Alternative Secondary School and Dropout Recovery Services assist youth who have struggled in traditional secondary education or who have dropped out of school – typically provided by referrals to *Skills U, Brighton Center or YouthBuild*.

III. Paid and Unpaid Work Experience is a structured learning experience in a workplace and provides opportunities for career exploration and skill development – referrals provided by *Youth Case Management Team*. Workplace opportunities could take place in any of our local businesses.

IV. Occupational Skills Training is an organized program of study that provides specific skills and leads to proficiency in an occupational field – typically provided by *Gateway Community and Technical College (GCTC, Jefferson Community and Technical College (JCTC), Brighton Center or YouthBuild.*

V. Education Offered Concurrently with Workforce Preparation is an integrated education and training model combining workforce preparation, basic academic skills, and occupational skills – Referred through the Youth Case Management Team in collaboration with *GCTC, JCTC, Brighton Center and/or YouthBuild*.

VI. Leadership Development Opportunities encourage responsibility, confidence, employability, self-determination, and other positive social behaviors – Could be offered by any of our partnering organizations; *Brighton Center, NKY Community Action, KCC, Youth Case Management Staff, etc., typically through community service activities.*

VII. Supportive Services enable an individual to participate in WIOA activities – provided by *Youth Case Management Staff, NKCAC, local churches, Dress for Success, Brighton Center, and various other local entities*.

VIII. Adult Mentoring is a formal relationship between a youth and an adult mentor with structured activities where the mentor offers guidance, support, and encouragement – *Can be set up by Youth Case Management Staff, through various churches, etc.*

IX. Follow-up Services are provided following program exit to help ensure youth succeed in employment or education – *Youth Case Management Staff*

X. Comprehensive Guidance and Counseling provides individualized counseling to participants, including drug/alcohol and mental health counseling – provided by

NorthKey or Transitions depending upon the type of counseling needed. (See Youth Participant Emotional Wellness Screening Tool Attachment 6)

XI. Financial Literacy Education provides youth with the knowledge and skills they need to achieve long-term financial stability – provided by *Youth Case Management Staff, Brighton Center or KCC.*

XII. Entrepreneurial Skills Training provides the basics of starting and operating a small business and develops entrepreneurial skills – Workshops through *Youth Case Management Staff or NKCAC.*

XIII. Services that Provide Labor Market Information offer employment and labor market information about in-demand industry sectors or occupations – *An interactive site that allows youth to explore careers/job titles created by the NKADD and available through a link at nkcareercenter.org*

XIV. Postsecondary Preparation and Transition Activities helps youth prepare for and transition to postsecondary education and training – *Youth Case Management Staff*.

More comprehensive Youth Element Definitions are available upon request.

Best Practice

LMI Information is available online in a creative and interactive page for each high demand industry sector. This will allow our youth, as well as other Career Center customers to take advantage of current LMI data on site or in their homes, nkcareercenter.org, go to Resources, then LMI (Labor Market Info) Interactive Tool.

SECTION 15 – Case Management

Case management is intended to ensure access to workforce development activities and supportive services. Staff contact/meet with youth monthly, at a minimum, until goals developed as part of the ISS/IEP are met. Staff track caseloads on a spreadsheet which tracks communication, training, work experience placement, etc. as part of the subcontractor's procedures. This is recorded in KEE-Suite through notes, service program attachment, and outcome tracking. Staff reassesses periodically to monitor goal achievement. Staff uses various modes of communication to reach out to youth; phone, text, email, mail, collaboration with other agencies serving the youth. If youth do not respond in a timely manner, staff attempt to reach youth weekly and use follow up contacts to connect to youth and increase contacts to weekly until youth are back on track.

KEE-Suite includes progress notes on KCC customers. Effective case management practices include comprehensive case notes. Case notes document details about: intake, evaluations, participation, outcomes, service decisions, one-on-one meetings, achievements, and follow-up services. The purpose of case notes is to provide a detailed description of an individual's participation in services. Case notes for each youth should ideally be entered on a monthly basis, at a minimum, more often is preferable, but in no instance can there be more than 90 days between case notes as this indicates more than 90 days without services. An excess of 90 days between documented services is a gap in service and is not permitted. Entering case notes does not keep a participant from exiting, a service program must be entered to continue services.

Each enrolled youth will have case notes in KEE-Suite documenting relevant information beginning with intake and continuing through case management, training and/or internship, and follow-up services. Documenting information listed below aligns with local policy.

Detailed case notes will include the following:

- History and details of the youth's situation, including both strengths and barriers;
- WIOA activities provided or planned;
- Description of how the youth will benefit from designated services;
- Details of significant events;
- The need for modifications in the youth's training or services;
- Information provided orally or electronically by service providers;
- information on contact with the youth to include:
    - date and manner of contact (face-to-face, phone call, text e-mail, Facebook, etc.);
    - purpose of the contact;
    - information provided by the youth;
    - outcomes of the contact; and if quoting the youth, must use quotations and state exactly as it was stated.

- Youth's progress toward goals;
- Need for additional services;
- New information pertaining to youth's employability;
- Verification of post-exit outcomes (must meet the requirements of data validation).

Case notes should ONLY include staff opinion, comments, and personal details about the youth to the extent that the information relates to the likely employability and/or training success of that individual. Medical information that is relevant to the successful case management of the client but not required for eligibility or to prove a barrier should be kept as a hard copy in a secure location.

Case notes will be written at the time of the event or contact and entered in KEE-Suite as soon as possible, not to exceed 3 business days. Case notes will provide a complete and relevant narrative of an individual's progress through all stages of participation.

With performance reporting being a top priority at both the state and federal level, the Kentucky Education and Labor Cabinet issued this directive:
Case Note Policy # 22-002 Issued 2/15/2022):

> Case notes shall be entered for each customer in the case management system of record documenting relevant information beginning with intake and continuing through case management, training, and follow-up services. Case notes shall be written at the time of the event or contact and entered into the case management system of record as soon as possible, but not later than 3 business days following the event or contact. Extenuating circumstances such as system unavailability may be grounds for a brief extension to enter case notes, and such extensions will be considered on a case-by-case basis.
> The purpose of case notes is to provide a detailed description of an individual's participation in services. Case notes must be clear, relevant and useful. Effective case management practices include comprehensive case notes to detail intake, evaluations, participation, outcomes, service decisions, one-on-one meetings, achievements and follow-up services.
> Detailed case notes should individualize the customer and, at minimum, include the following information:
> - the needs of the customer;
> - history and details of the customer's situation, including both strengths and barriers;
> - activities provided or planned (if applicable);
> - brief description of how the customer will benefit from designated services;
> - details of significant events;
> - any need for modifications in the customer's training or services;
> - information provided verbally or electronically by service providers;

- customer’s progress toward goals;
- any need for additional services;
- any new information pertaining to customer’s employability; and
- verification of post-exit outcomes.

Should the client obtain self-sufficient employment as a result of provisions of **Individualized Service Strategy**, this information will be reported in the **Outcomes** section of KEE-Suite. This will be done when the client is completed from WIOA services.

Note*:* Case notes do not constitute an ‘activity’. As long as a staff -assisted service is entered in KEE-Suite, a customer will not be exited.

Note: To participate in the WIOA youth program, the following must occur; eligibility determination, an objective assessment, and ISS/IEP and participation in one of the 14 youth program elements. This must be clearly documented in KEE-Suite case notes. (20 CFR 681.320)

Best Practice

To ensure all requirements are met for youth program participation, a variation of the following note must be placed in KEE-Suite notes:

Client has undergone eligibility determination (2-part approval process by supervisor and NKADD staff), has had an objective assessment, has worked with a career counselor to develop a career/educational plan and has discussed LMI with a career counselor to reach a career goal.

Section 16 – Training/Work Experience/Apprenticeship

The objective assessment and the Individual Service Strategy begin the discussion about training/work experience. Using all the tools at our disposal, case managers can assist youth in determining their career path, as well as the steps needed to accomplish their goals. Once a career path is laid out and aligns with the Individual Service Strategy and local sector strategies, and steps to success are outlined, training/work experience/apprenticeship is considered.

Work Experience

20 CFR 681.600 defines work experience as "a planned, structured learning experience that takes place in a workplace for a limited period of time."

Work experiences must include academic and occupational education. Of total expenditures, minus admin costs, 20% of the local youth allocation must be spent of work experience. The NKWIB monitors all spending bi-monthly at each meeting through our official KPI report (Key Performance Indicators).

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 work experience.

Clients should score 9.0 or above in Math and Reading on the TABE to be considered for work experience unless an exception is made at the time of file approval. Exceptions must be entered into case notes and defendable.

Clients must complete diversity, equity and inclusion training prior to being placed at any Work Experience sites. This should be detailed in case notes in KEE-Suite.

When determining the number of hours for Work Experience, the following should be considered:

- Current Skills, Skills gaps, Needed Skills for In-Demand Occupations and Prior Work Experience
- Client cannot begin a work experience until all parties have signed/approved the Worksite Agreement.

Internships/Work Experience can last up to six months, up to 40 hours per week, with pay rate matching the rate of other employees in similar positions, up to $16.00 per hour, not to exceed 1,040 hours. (Per WIB policy, 1/12/2021)

Worksite Agreements must contain the following:

1. Duration of WEX
2. Remuneration
3. Tasks and Duties
4. Supervision
5. Health & Safety Standards
6. Identification of the academic and educational component; including how it will be provided
7. Other conditions, such as consequences of not adhering to the agreement, and
8. Termination Clause

Completed Worksite Agreements must be uploaded in KEE Suite. The latest versions of the I-9, W-4, and K-4 must be completed and turned in to your finance department.

A job description for each Work Experience must be uploaded to KEE Suite prior to the first day at the worksite. Worksite timesheets and pay stubs must be uploaded to KEE Suite monthly.

If the worksite and client are agreeable to the Worksite Agreement being extended beyond the dates listed on the contract, *and* the client has not maxed out the 1040 hours limit, an amended contract must be completed, signed, and uploaded to KEE Suite.

If a client is pursuing a Work Experience, the "Need for WEX" is developed. The Training Assessment should be completed in the Service Program tab in KEE Suite and customized for the WEX program. The Need for WEX should also be detailed in case notes and include the following 6 questions.

- Is suitable employment available? Case managers will need to provide LMI data to support that employment will indeed be available once the WEX is completed.
- Will customer benefit from participating in WEX? Case managers will need to explain why the client needs the WEX based on the client's current skills and education level.
- Is there a reasonable expectation for employment following participation in WEX? Additional LMI data can be added in this area, as well as an explanation that the client will be able to successfully use the work experience to attain employment.

- Is WEX reasonably available for customer participation? A case manager will need to document the accessibility of the work experience and explain how the client will be able to access the worksite.
- Is the customer qualified to undertake and compete participation for WEX? The case manager will use the information in the Objective Assessment/Individual Service Strategy to build a case that the client can succeed on their path to employment, as well as attaining an educational credential.
- Is WEX placement suitable? The case manager will summarize the entire criteria and indicate the criteria has been met, the case manager must state that WEX is necessary for self-sufficient employment.

The following Documents are required to be uploaded to KEE Suite for Work Experience:

- Worksite Agreement- See Attachment 3
- Job Description
- Worksite Timesheets
- Pay Stubs

Training

The NKWIB Educational/Training funding policy is $3500.00 per fiscal year for up to two years. Excerpt from TEGL 21-16

ISY cannot use youth program funded ITAs. However, ISY between the ages of 18 -21 may co-enroll in the WIOA Adult program if the young adult's individual needs, knowledge, skills, and interests align with the WIOA adult program and may receive training services through an ITA funded by the adult program.

School status at the time of enrollment may determine which options are appropriate for 18 – 24-year-olds because young adults who are in school are only eligible for the Title I youth program if they are 21 or younger at the time of enrollment. TEGL 21-16

Clients may pursue short-term training certificate programs that do not exceed one year of training. The NKWIB Educational/Training funding policy for short term training is $5000 for the first fiscal year, not to exceed $7000 total, and not to exceed 104 weeks without prior approval by the NKWIB Director (per WIB policy, May 2021).

If a client is going to pursue training, the "Need to Train Criteria" is developed. The 6 'state-approved' questions are answered and reviewed by NKADD staff.

- Is suitable employment available? – Case managers will need to provide LMI data to support that employment will indeed be available once training is completed.
- Will customer benefit from appropriate training? – Case managers will need to explain why the client needs the training based on the client's current skill and education level.

- Is there a reasonable expectation for employment following training? – Additional LMI data can be added in this area, as well as an explanation that the client will be able to successfully use their training to attain employment.
- Is training reasonably available? – A case manager will need to document the accessibility of the training and explain how the client will be able to access the training.
- Is the customer qualified to undertake and complete the training? – The case manager will use the information in the Objective Assessment/Individual Service Strategy to build a case that the client can succeed on their educational path, as well as attaining employment after completion of training.
- Is training suitable and available of the Eligible Training Provider List (ETPL), if applicable? – The case manager will summarize the entire criteria and indicate the criteria has been met, the case manager must state the training is listed on the ETPL and that training is necessary for self-sufficient employment.

Background Consideration: If the youth has a background, disclosure of charges is necessary to determine likelihood of employability prior to training consideration. Should the customer choose not to disclose charges, 3 letters of intent to hire will be required with the training request. If the client discloses the background and reviewing staff doubts the likelihood of employment, 3 letters of intent to hire can be provided to strengthen their case.

The Training Request must be approved, and an Educational Enhancement Obligation Form signed and approved prior to the client sitting in class.

Any courses dropped prior to completion are subject to the pay scale indicated in the training institution's catalog. Dropped courses must be pre-approved by the NKADD staff or will become the fiscal responsibility of the client. When dropping courses, clients need to contact their case manager to ensure they are still within WIOA compliance. Clients must be enrolled and must be in good standing according to rules established by the training institution.

Reimbursements for training related costs such as certification testing are permitted and require submission of the NKY WIOA Youth Client Reimbursement Invoice along with the receipt of payment. Payments must be made by cash, credit card or personal check. Payments made by check or credit card must be in the participant's name.

If a participant is actively enrolled in an educational and/or training program, they MUST have a goal set under Measurable Skills Gain. One goal must be set for each fiscal year the client is attached to a service program **with an end date no later than June 30th each year**. If the client continues into the next fiscal year, the start date of the following MSG should be July 1st. The state has directed us to set an MSG prior to the start of training and/or education. All MSG entries must adhere to the data entry policy. The MSG must be set at the time of submitting the Training Request. The MSG goal must be clear, concise, and measurable. If the MSG is not measurable it will not count. Once completed, the result must be entered to document the attainment. The attainment should also be captured in case notes in KEE Suite. See Attachment 4

The following Documents are required to be uploaded to KEE Suite for Training:

- TABE Scores
- ONET Assessment Results
- Educational Enhancement Obligation Form/Voucher- per Fiscal Year- See Attachment 5
- Class Schedule
- Attendance Sheets
- Copy of Grades per Quarter/Semester
- Proof of credential, upon completion
- Pre-Hire Letter(s) (if applicable)
- Reimbursement Invoice (if applicable)- See Attachment 6

Successful Employment is the goal of training.

Apprenticeship

Registered Apprenticeship is a proven model of job preparation that combines paid on-the-job training (OJT) with related instruction to progressively increase workers' skill levels and wages. Registered Apprenticeship is also a business-driven model that provides an effective way for employers to recruit, train, and retain highly skilled workers. It allows employers to develop and apply industry standards to training programs, thereby increasing productivity and the quality of the workforce. As an "earn and learn" strategy, Registered Apprenticeship offers job seekers immediate employment opportunities that pay sustainable wages and offer advancement along a career path. Graduates of Registered Apprenticeship programs receive nationally recognized, portable credentials, and their training may be applied toward further post-secondary education. (TEGL 13-16)

All Registered Apprenticeship programs consist of the following five core components – direct business involvement, OJT, related instruction, rewards for skill gains, and a national occupational credential:

- Business Involvement. Businesses are the foundation of every Registered Apprenticeship program, and the skills needed for workforce success form the core of the model. Businesses must play an active role in building Registered Apprenticeship programs and are involved in every step of their design and execution.
- On-the-Job Training. Every Registered Apprenticeship program includes structured OJT. Companies hire apprentices and provide hands-on training from an experienced mentor. This training is developed by mapping the skills and knowledge the apprentice must learn over the course of the program to be fully proficient at the job.
- Related Instruction. Apprentices receive related instruction or classroom style training that complements the OJT. This instruction helps refine the technical and academic skills that apply to the job. Related instruction may be provided by a community college,

technical school or college, an apprenticeship training school, or by the business itself. This instruction can be provided at the school, online, or at the work site.

- Rewards for Skill Gains. Apprentices receive increases in pay as their skills and knowledge increase. Progressive wage gains reward and motivate apprentices as they advance through training and become more productive and skilled at their job.
- National Occupational Credential. Every graduate of a Registered Apprenticeship program receives a nationally recognized credential, referred to as a Certificate of Completion, which is issued by the U.S. Department of Labor (USDOL) or a federally recognized SAA. This portable credential signifies that the apprentice is fully qualified to successfully perform an occupation. Many Registered Apprenticeship programs – particularly in high-growth industries such as health care, advanced manufacturing, and transportation – also offer interim credentials as apprentices master skills as part of a career pathway. (TEGL 13-16)

The length of training and the skills and competencies required for mastery of an occupation are set by industry. Traditional Registered Apprenticeship programs are time-based and require a specific number of hours of OJT and related instruction. Increasingly, however, industries are using competency-based programs that reflect mastery of key skills and allow workers to progress at their own pace. The Registered Apprenticeship system currently approves time-based, competency-based and hybrid time-and-competency-based programs and is encouraging industries to transition to competency-based programs to enhance program effectiveness and potentially widen the pool of apprentices. (TEGL 13-16)

Through Registered Apprenticeship, employers attract and retain highly qualified employees, and improve productivity and the quality of services and products. State and local workforce systems that use Registered Apprenticeship as a workforce strategy meet the needs of job seekers for sustainable careers and the needs of businesses for a skilled workforce. Adopting robust Registered Apprenticeship programs in the context of economic development strategies creates seamless pipelines of skilled workers and flexible career paths to meet current and future workforce demands. (TEGL 13-16)

Best Practice

Example of “need to train” criteria eligible for approval

1. Computer and Information technology is a high-demand industry, with a current employment figure of more than 3,300 in the NKY region according to KYSTATS. However, the client currently lacks the training and certification necessary to retain employment in the field. In the past 12 months, he has been fired from two jobs because of his lack of education in the IT field, indicating he could not keep up with the increasing job demands. His work experience also has not provided him with any credential which would make him employable at self-sufficient wages. Meanwhile, a search for Information Technology jobs within only 10 miles of Jacob’s home returns a

result of more than 500 available jobs. Client will need to complete training to reliably access and hold these positions.

2. Client currently holds only a high school diploma. As a result, he has worked a high number of jobs in a short period of time, unable to retain employment at self-sufficient wages. Upon completing this training in Computer and Information Technologies, client can expect to obtain employment at an average wage of $38.44/hour according to KYSTATS. Client has already received resume assistance through the case manager and will continue to receive assistance with job searching techniques. This ensures that client is job ready by the time he completes this training program.

3. Computer and Information Technologies is a high-demand and broad field with hundreds of opportunities available. According to KYSTATS, computer occupations are projected to grow by 18.94% in openings by 2024. The category of “computer occupations” represents 13 different job titles, showing a large variety of occupations available to those who have completed training. Among these, ‘computer systems analysts” and “network and system administrators” most closely match the training the client will be completing. These occupations hold average wages of $38.44 and $37.06, respectively – well into the range needed to achieve self-sufficiency. The large variety and density of jobs available in this field mean that there will be an increase of more than 600 job openings available in the NKY region by 2024. This does not include Cincinnati, only a few miles away, which, as a technological hub, will see an increase of another 690 openings by 2024 according to the Ohio Department of Jobs and Family Services. Using personal transportation, client will easily be available to work in any of the areas where computer occupations are in high demand.

4. Gateway Community and Technical College is only a few miles from client’s home. Client has personal transportation but is also near bus line.

5. Client holds a skill set and interests that correlate strongly with success in this training. On the TABE assessment, client scored grade equivalencies of 12.9+ in Language and Applied Mathematics. This will allow him to fully grasp complicated problems and apply his knowledge effectively to solve them. Client also scored high grade equivalencies of 10.2 in Math Computation and 11.2 in Reading, ensuring the client will be successful in understanding and completing his training. In addition, on an interest profiler assessment, client scored most highly in Realistic and Investigative characteristics, showing that he enjoys working hands-on with complex problems. Furthermore, Gateway (client’s choice) offers no-cost tutoring services for any student, and the nature of his online courses means that they are always accessible from his computer. These courses also allow the client to access instruction an unlimited number of times and make progress at his own pace. With regular support from case management, the client should successfully complete.

6. Training is currently available and listed on the ETPL. Client has been assessed using multiple objective measures and has scored highly in all areas necessary to be successful in this training. Client has researched the field and reached an educated conclusion that this training is the right choice to achieve self-sufficiency. Client has also been in frequent communication with his case manager, who is confident that he has the skills and interests necessary to successfully complete the training.

SECTION 17 – Business Services

WIOA is designed to improve job/career options for jobseekers through the job-driven workforce system that links talent to businesses contributing to economic growth.

Local youth staff work in collaboration with the local Business Services Team to match youth talent with businesses that can cultivate youth skills to meet the needs of the business. The local Youth Program Coordinator is an active member of the BST Core Team. Through collaboration with the local Business Services Team, the constant bombardment of business causing 'business fatigue' is avoided through a streamlined process intended to serve businesses more efficiently and support Kentucky's four primary components:

- Identify a primary point of contact for client development within each WIOA region,
- Streamline workforce resource delivery,
- Unify and coordinate outreach and information,
- Leverage multiagency data sharing system.

SECTION 18 – Support Services/Incentive Payments

Support Services

20 CFR 681.570 describes supportive services for youth as defined in WIOA Sec. 3(59), as services that enable an individual to participate in WIOA activities. These services include but are not limited to, the following:

- Linkages to community services,
- Assistance with transportation,
- Assistance with childcare and dependent care,
- Assistance with housing,
- Needs-related payments,
- 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. (TEGL 21-16)

The NKWIB reserves the right to limit the type of supportive services available locally based on the availability of funding.

*Supportive services for travel mileage needs to be completed on the Client Mileage Log Reimbursement Form along with proof of distance such as a printout from MapQuest.

Incentive Payments

Incentives are for recognition and achievements directly related to training activities and work experiences. The local program delivering incentives must have written policies in place governing the award of incentives and must ensure that incentives are tied to the goals of the program. Incentives must be outlined in writing, align with policies and in accordance with 2 CFR part 200.
Policies must be in writing and submitted to the NKADD for approval prior to implementation.

- Incentive payments much be tied to specific goals outlined in the ISS
- Incentive payments cannot be linked to entertainment activities

- Incentive payments must be related to attaining or obtaining employment or a goal on the individual's career path as defined in the ISS

The local program delivering incentives must have written policies in place governing the award of incentives and must ensure that incentives are tied to the goals of the program. Incentives must be outlined in writing, align with policies and in accordance with 2 CFR part 200.

SECTION 19 – Programs Exits

Youth who have not received a service funded by the WIOA Title I-B Youth Program or funded by a partner program for 90 consecutive calendar days from the date of last service, and is not scheduled for future services, is considered to have exited the program. Youth may re-enroll in the WIOA Title I-B Youth Program at any time if they remain eligible. Re-enrollment requires a new eligibility determination.

Exits Excluded from Participation

The date of exit is the last date a service was provided to a participant. Case notes must include the reason for exit and documentation should be uploaded into KEE-Suite.

1. The participant will not be counted in performance if they exit the program for any of the following reasons:
    a. **Deceased**- participant died during participation in a WIOA Title I-B program;
    b. **Institutionalized**- participant is residing in a correctional institution or facility providing 24-hour support, such as a prison or hospital, and is expected to remain institutionalized for at least 90 calendar days;
    c. **Health/Medical**- participant is receiving medical treatment that precludes entry into unsubsidized employment or continued participation in a WIOA program (this does not include temporary conditions expected to last for less than 90 calendar days);
    d. **Entered into active military duty**- participant who is a reservist and has been called to active duty or participant enlists and reports for active duty which prevents participation in WIOA Title I-B Youth Program; and
    e. **Foster care**-participant is in the foster care system as defined in 45 CFR 1355.20 (a) and exits the program because the participant has moved from the LWDB as part of such a program or system.
2. When a participant receives services from multiple programs, the most recent service end date is the date of exit. Follow- up services provided to youth do not extend the exit date.

Gaps in Service

A youth participant may be placed in a 'gap in service' when a situation arises that will temporarily prevent program participation for greater than 90 consecutive calendar days. The gap in service will provide time for the youth to address barriers to continued participation without exiting the program. Eligibility does not need to be re-determined at the end of the gap in service.

A gap in service extends a participant's exit date for 90 calendar days from the time he or she is placed into the gap. The gap in service must be related to:

a. A delay before the beginning of training;
b. A health/medical condition, or providing care for a family member with a health/medical condition; or
c. A temporary move from the area that prevents the individual from participation in services, including National Guard or other related military service.

A gap in service may be extended for an additional 90 consecutive calendar days (for a total of 180 consecutive calendar days) to resolve the issue that is preventing a participant from completing program services. The extended gap in service must be related to:

a. A health/medical condition, or providing care for a family member with a health/medical condition; or
b. A temporary move from the area that prevents the individual from participation in services, including National Guard or other related military service.

All gaps in service must be referenced in case notes detailing the reason for the gap in service.

Note: Case notes do not constitute an “activity”. If a staff-assisted service is entered in KEE-Suite, a customer will not be exited.

SECTION 20 – Follow up Services

20 CFR 681.580 describes follow-up services as "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. (TEGL 21-16)

The exit date is determined when the participant has not received services in the Youth program or any other DOL-funded program in which the participant is co-enrolled for 90 days and no additional services are scheduled. The 12-month follow-up requirement is completed upon one year from the date of exit. (TEGL21-16)

Follow-up services may include, but are not limited to;

- Supportive services,
- Adult mentoring,
- Financial literacy education,
- LMI,
- Postsecondary education and training preparation activities.

Follow up for 1 year is required unless the youth has voluntarily opted out of follow-up, or the participant cannot be located or contacted. Each youth should have follow-up services customized directly to their needs. An attempt at two-way contact must be documented once a month, at a minimum, more often is encouraged.

The following employment outcome information should be in KEE-Suite case notes;

Company Name
Company Address
Job Title
Wage
Hours
Upgrades/Increases in wage or function
Start/End Date

Best Practice (Summarized from Federal Issuance #62, April 23, 2001)

- Develop a close mentoring relationship before and after placement.
- Develop a systematic approach for maintaining contact and interaction with the youth during follow-up services.

- Provide engaging follow-up activities to help keep youth interested and connected.
- Meet physical and emotional, as well as vocational needs.
- When youth is employed, maintain a non-intrusive contact with employers. Follow-up staff should visit the job site as soon after the youth starts a job, if possible, and meet the employer and/or supervisor.

EEO Policy

It shall be the policy of the Northern Kentucky Workforce Investment Board (NKWIB) to foster and ensure equal opportunity and nondiscrimination in the operation of WIOA funded programs consistent with the guidelines of WIOA Public Law 113-128 programs and activities.

General Principles

- Programs shall be open to all qualified individuals. No one shall be excluded from participation, denied benefits, subjected to discrimination, subjected to retaliation, or denied gainful employment because of race, color or national origin, age, disability, sex, sexual orientation, gender identity, religion, political affiliation or belief, veteran status, or citizenship. In addition, sexual harassment is against the law. Acts of sexual harassment are grounds for a discrimination complaint based on sex under Title VII of the Civil Rights Act of 1964.
- Clients, applicants, participants, and provider staff shall be free to file complaints and participate in hearings, alternative dispute resolution, investigations, or compliance reviews without the threat of intimidation, coercion, or discrimination. There shall be no retaliation or reprisal against an individual who has opposed a practice prohibited by the nondiscrimination and equal opportunity provisions of the WIOA or an individual who has otherwise exercised any rights and privileges under the WIOA nondiscrimination and equal opportunity provisions.
- Programs shall be open to citizens and nationals of the United States, lawfully admitted permanent resident aliens, lawfully admitted refugees and parolees, and other individuals authorized by the United States Attorney General to work in the United States.
- Efforts shall be made to develop programs that contribute to lifelong learning, occupational development, upward mobility, development of new careers, and overcome sex stereotyping in occupations traditional to the other sex.
- Fair employment practices shall be maintained in recruiting, hiring, transferring, promoting, training, and compensating all staff. These same principles shall apply to layoffs and terminations.

SECTION 21 – Attachments

Attachment 1

Northern Kentucky Workforce Investment Area (WIOA)
Income History Form

List name(s) and relationship of all people (including yourself) related by blood, marriage, or adoption living in the household.

Name	Relationship	Name	Relationship
____________________	/ ____________	____________________	/
____________________	/ ____________	____________________	/

Have any of the above people earned money in the last six months?

- ☐ Yes
- ☐ No

If you answered Yes, please attach a copy of a pay stub for each job.

FOR OFFICE USE ONLY:

TOTAL AMOUNT

Total Countable Income for Six Months ________________

Six Months Annualized Income _____________

Number in Family ________________

LLISL for Family Size Indicated Above ________________

Reviewed By: Date:

Attachment 2

WORKFORCE INNOVATION AND OPPORTUNITY ACT, TITLE 1
WIOA – 2

IDENTIFYING INFORMATION

Applicant's Last Name ____ First Name ____ M.I. ____

EKOS ID#______________________________

APPLICANT STATEMENT/SELF-ATTESTATION I hereby certify, under penalty of perjury, that ____________________

(If applicant cannot obtain satisfactory witness or provide a telephone contact, explain in area above.)

I attest that the information stated above is true and accurate, and I understand that the above information, if misrepresented, or incomplete, may be grounds for immediate termination and/or penalties as specified by law.

Applicant's Signature ____ Date ____ Parent/Legal Guardian's Signature ____ Date ____

CORROBORATING WITNESS SIGNATURE

I attest that the information stated above is true and accurate, and I understand that the above information, if misrepresented, or incomplete, may be grounds for penalties as specified by law.

Signature of Corroborating Witness ____ Date ____ Witness' Relationship to Applicant ____

Address of Witness ____ Phone Number of Witness ____

PART A

FOR OFFICE USE ONLY

ELIGIBILITY ITEM	DOCUMENT INSPECTION Document or computer screen/program viewed Document # and expiration date (if available)	TELEPHONE/EMAIL VERIFICATION
		Agency: ______________________ Individual: ______________________ Phone # : ______________________
		Verification provided:
		Date/time verified

STAFF STATEMENT For Part A and/or Part B above, I attest that:

- The above applicant statement is being used for documentation of the following eligibility criteria: ____________________
- The document inspected or computer inquiry verified the item required determining eligibility for the WIOA program.
- The information recorded by me on this document was obtained through telephone contact. If provided by an agent, all information was obtained from data previously determined and recorded in the applicant's records at the agency providing the eligibility verification.

Authorized Staff Signature ____ Date ____

PART C

PART C

Attachment 3

YOUNG ADULT TALENT DEVELOPMENT SERVICES
INTERNSHIP PROGRAM

This contract made and entered into by and between Young Adult Talent Development Services, a project of Workforce Innovation and Opportunity Act, implemented by the Brighton Center, hereafter referred to as Young Adult Talent Development Services (YATDS) and

____

Worksite Provider Name

____

Worksite Provider Address

hereinafter called the Worksite Provider.

It is mutually agreed by and between the parties hereto as follows:

The Worksite Provider shall provide an internship position for ___________________________________ hereinafter called the "intern" under the Young Adult Talent Development Services Program, in accordance with the terms and conditions set forth and pursuant in this contract.

The dates during which this agreement is in effect are from ____________-________________or for the maximum of 1,040 work hours. Brighton Center, as the employer of record, will compensate the intern ________ an hour.

Work site address:

_____ (   ) **___ Worksite Provider**

I. Contract Period; Entry Period; Amendments; Cancellations

A. The terms and conditions of this agreement may be amended at any time during the contract period by mutual agreement of the parties in writing; and

B. The Worksite Provider may cancel this agreement at any time if any party is not adhering to the agreement by notifying YATDS. YATDS shall have the right to cancel this contract at any time.

II. The Worksite Provider Obligations, Assurances and Certifications

These assurances and certifications hold:

A. The Worksite Provider shall comply with all applicable federal; state and local labor laws and state corporate statutes where applicable;

B. No individual shall be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any such program because of race, color, religion, gender, national origin, age, disability or political affiliation or belief, or participation in programs funded under the Workforce Innovation & Opportunity Act (WIOA), as amended, in admission or access to opportunity or treatment in, or employment in the administration of, or in connection with any WIOA-funded program or activity. (Age Discrimination Act of 1975, Section 504 of the Rehabilitation Act of 1973, PL. 93-112, Title IX of the Education Amendments of 1972, American With Disabilities Act of 1990, P.L. 101-336 and Title VI and VII of the Civil Rights Act of 1974, Workforce Innovation & Opportunity Act of 2015);

C. The Worksite Provider shall maintain the confidentiality of all information whether written or verbal provided by or about any intern seeking or receiving services under this contract except as approved and authorized in writing by the intern or as otherwise authorized by law (privacy Act 1974(p.L.93-579), 5D.S.C. 552x);

D. The Worksite Provider shall provide the intern a safe work place and assure that where the intern is engaged in activities not covered under the Occupational Safety and Health Act of 1970, as amended, the intern shall not be required or permitted to work, be trained, or receive services in buildings or surroundings or under working conditions which are unsanitary, unreasonably hazardous or dangerous to the intern's health and safety;

E. The Worksite Provider will need to be in compliance with the Americans with Disabilities Act (ADA). ADA standards apply to places of public accommodation, commercial facilities, and state and local government facilities. This will ensure access to the built environment for people with disabilities.

F. The intern shall not be terminated without prior notice to both the intern and Young Adult Talent Development staff in order to provide an opportunity for correction or improvement unless the termination results from flagrant actions or gross misconduct by the intern with notification to YATDS staff;

G. If the Worksite Provider has no formal procedures for resolving employee grievances and/or complaints, means of redress under state and federal law will be available to the intern. The intern will be duly informed of company procedures at the time of hire;

H. The Worksite Provider shall hold the Brighton Center harmless from any and all losses, claims, expenses, actions caused by interns that result in injury to persons, damages or losses relative to any person, corporation, partnership or any other entity; and to indemnify, the Brighton Center from any and all liability, loss or damage suffered resulting from acts or omissions of the Worksite Provider or claims or judgments resulting there from;

I. Provide a mentor to assist the intern in becoming oriented to work and the workplace to include a written description of job duties;

J. Provide work experience to help the intern learn employment skills and employment retention skills;

K. The Worksite provider will provide flexibility for the intern to work on educational goals. YATDS will ensure an educational component to the program is in place.

   a. Educational Component will be provided by:

      i. School/Institution:______________________

      ii. Degree program: ____________________

L. Provide on-site supervision and training.

M. Assure that there is sufficient work available to occupy each individual placed.

N. Provide sufficient equipment and/or materials to do the job in a sanitary and safe environment.

O. Limit an individual to the number of hours assigned, not to ex[ ] hours per calendar week; Worksite provider will be responsible for payment for hours wor[ ] in excess of hours per calendar week.

P. Allow reasonable access by the Young Adult Talent Development Specialist or its authorized agent to the worksite during working hours for the purposes of monitoring.

Q. Report any personnel problems or injuries as they occur during the course of the placement to the internship site supervisor, Young Adult Talent Development Specialist, and Young Adult Talent Development Coordinator.

R. The Worksite Provider hereby certifies by its signature hereinafter that it is legally entitled to enter into this contract with the Brighton Center, and certifies that it is not and will not be violating either directly or indirectly any conflict of interest law or principle by the performance of this contract.

S. Worksite Provider will conduct background checks as needed.

III. Worksite Provider

I have read this agreement and understand the provisions contained herein and verify the contents correctly reflecting our Young Adult Talent Development Services Internship Program commitment. I understand this agreement is not effective and binding until signed by all parties to the agreement.

Approved By:

________________________________ ____

Printed Name of Worksite Provider | Signature of Authorized Official / Date

________________________________ ____

E-mail Address | Printed Name & Title

____

Name of Internship Site

VI. Brighton Center

____

Career Coach Signature / Date

____

Printed Name and Office

Approved By:

____ _________________________________

Supervisor Signature/Date Project Manager's Initials

Attachment 4

Measurable Skills Goals/Gains Cheat Sheet

If a participant is actively enrolled in an educational and/or training program, they MUST have a goal set under Measurable Skills Gain. One goal must be set for each year the client is attached to a service program. All MSG entries must adhere to the data entry policy. The state has directed us to set a MSG prior to the start of training.
This is a two-step process.

Step 1 – Set the MSG at the time you enter the training request. Regardless of when you enter the goal it must be completed by 6/30.

Click on 'Measurable Skills Gain' tab inside the Workforce Case. It's located at the top of the customer's KEE-Suite page (it could also be under More).
Scroll down to 'Measurable Skills Gain' and click 'New'.
Add a 'Service Program', these will populate from the Service Program section.
Choose an 'Attained Credential Type' from the dropdown menu.
Add 'Start Date'.
Add a measurable goal in the 'Comments' section.
Hit 'Save'.
The 'MSG' should now be listed under the 'Measurable Skills Gains' section.
Please note that the Created Date' and the 'Last Modified Date' for the MSG will be the same when first created. This will change and MUST change when you update your MSG prior to 6/30 of each year.

Step 2 – Update the MSG to show obtained/unobtained.

Click on 'Measurable Skills Gain' tab inside the Workforce Case. It's located at the top of the customer's KEE-Suite page (it could also be under More).
Scroll down and click the drop arrow next to the 'MSG' related to the current program year.
Click Edit
Update the 'Attainment Status'
Enter the 'End Date'.
Go to 'Comments' section at the bottom. Immediately following the entered goal, enter the attainment achieved. Do Not Delete the Goal.
Click 'Save'.
Back on the 'MSG' page, you should see that your 'Last Modified Date' changed to the current date.

Attachment 5

1st 2nd 3rd

Workforce Innovation and Opportunity Act (WIOA)
Educational/Career Enhancement Fund
Youth Obligation Form

_________ _____________________________ ___________________________________
Fiscal Year Client ID Number

____ ___________________________________
Training Vendor Course of Study/Industry Sector

☐ In School ☐ Out of School

Training Type: (select one):
☐ Regular ($3,500 1st year/$3,500 2nd year) ☐ Short-term ($5,000 1st year/$2,000 2nd year)

Financial Award Analysis
Obtain a copy or information from the training institution on the total cost of tuition, fees, books and any additional requirements for records.

Available Funding Sources (Documentation must be attached)	$0 Amount
Total Training Costs (including books, supplies, transportation, other allowable costs)	$
Federal Pell Grant	0
Scholarships/Grants/Other Financial Aid	0
Other Sources (please specify)	0
Vocational Rehabilitation/Social Services	0
Total Non-WIOA Available Resources	0
WIOA Training Resources Needed	$
Additional Resources Needed (In excess of WIOA Resources)	0

If a Federal Pell Grant amount is not listed above, please explain why. ___ Not Available
____
____
____
____

Explain how the participant will cover the cost of the 'Additional Resources Needed' which is in excess of the amount awarded, if applicable. ____

____
____
____
____
____

Needed/Requested amount broken down for the following allowable usage list:
_______________Tuition
_______________Books and Supplies
_______________Fees for School
_______________Gas for Transportation
_______________Uniforms or related Clothing
_______________Parking pass
_______________Miscellaneous educational/career related items
_______________TOTAL TRAINING NEEDS – Must equal 'WIOA Training Resources' needed from above chart

Training Institution

$_____________________
Total Obligated Amount for Training – This amount will equal tuition, books, fees and parking pass from allowable usage list. Should the participant be awarded a Federal Pell Grant not listed above, the training provider must reimburse the NKADD any funding paid up to the amount of the awarded Pell.

Documented in KEE-Suite? Yes or N/A (Circle One)

Reimbursement Request must be submitted monthly by the 8th of each month with the final annual submission due on August 8th.

A participant must have applied for a Federal Pell Grant prior to enrollment in WIOA funded training. The following must be documented in the case management system of record;
Final determination of the Federal Pell Grant application, and
Awarded amount, if applicable

Participant Agreement
I agree to the following terms:

1. I understand that the NKADD will pay training costs incurred through my enrollment/attendance at the above-named training vendor, not to exceed the amount listed above or in excess of $3,500 per fiscal year up to two years (max: $7,000) or for short term training (training length under one year) costs may not exceed $5,000 for one year, not to exceed $7,000 over two years. I understand that any costs incurred in excess of the limits listed above will be my responsibility.

2. No cost can be incurred prior to approval for training funds. If a participant sits in class prior to approval, the participant cannot attain WIOA funds for that semester but can re-apply for funds for the following semester.
3. The cost of training must be no more than actual costs incurred by the client for the above-named course of study and may not be more than those charged to other students at the institution for the same program. Allowable miscellaneous costs, if documented by the school as being required of all students and related directly to the course of study, may be approved.
4. I agree to attend classes in my course of study and complete the course of study within 104 weeks. If I need to exceed 104 weeks, I will seek permission from the NKADD's project manager through my case manager in advance.
5. I will supply my case manager with a copy of my course schedule for each academic term in which I enroll. I agree to only use WIOA funds for courses required to complete my course of study.
6. Apply for financial aid (at a minimum, the Pell Grant) by the deadline for each semester in which I am enrolled as a WIOA participant in the above-named training vendor. I agree to the exchange of information between the WIOA office at the NKADD and the financial aid office (FAO) at the above-named training vendor regarding my financial status and/or that of my family for purposes of determining my eligibility to receive financial aid at the above-named school. I also agree that WIOA and the FAO may discuss aspects of my case as it pertains to my situation and my application for financial aid. I agree to provide a copy of my notice of award of financial aid to my WIOA career coach.
7. If the Pell Grant and/or other financial aid is awarded, these dollars must be used first to pay for the cost of tuition, books, educational fees and educational related supplies.
8. Maintain the minimum grade point average required to remain a student in good standing at the above-named training vendor. Continuation of WIOA payments is based upon satisfactory progress as documented by review of grades. I understand that it is my responsibility to provide grades earned while pursuing the above-named course of study to my career coach after each grading period. I understand that if a course must be repeated, as a result of either withdrawal or failure on my part, it will be repeated at the next available offering at my expense.
9. Maintain accurate time records of my attendance in required classes at the above-named training vendor. Time records must be submitted in a timely manner to the appropriate career counselor. If I am participating in a distance or on-line learning class or program under this agreement, I agree to the conditions listed in Item #11 below. Attendance must be continual. Ceasing to attend without prior written approval of the Northern Kentucky Workforce Investment Area through your career counselor or submit time records to document such attendance will mean noncompliance with this agreement and can result in loss of training funds.
10. Immediately inform the WIOA office at the NKADD and my WIOA career coach of any change in my status at the above-named training vendor. Any change in your course of study must be requested in writing prior to the change and receive approval

from the Northern Kentucky Workforce Investment Area through your career counselor.

11. If I am participating in a distance or on-line class program under this agreement, I agree to personally participate in all required learning activities associated with this class or program. I also agree to devote the time required to this class or program to ensure appropriate progress and successful completion of this class or program.

12. I agree to comply with the local Reporting Requirements while in WIOA sponsored training and for one year following completion of that training. I understand these reporting requirements are intended to provide information on the quality of my training to the Northern Kentucky Workforce Investment Board. The Reporting Requirements will be explained by my career counselor.

I understand that failure to comply with any of the terms described above or failure to contact my career counselor may result in discontinuation of WIOA funding. I understand that payment by the NKADD of costs within the limits of this agreement is contingent upon the availability of federal funding granted to the Workforce Investment Board/ADD through the WIOA by the U. S. Department of Labor (USDOL) through the Kentucky Education Cabinet, Office of Employment & Training, Division of Workforce Services. In the event that funding is reduced or terminated, the NKADD, in its sole discretion, reserves the right to reduce or terminate this agreement. Such a reduction or termination shall be for the convenience of the NKADD and shall not be the subject of appeal or litigation and shall release the NKADD from any obligations hereunder to compensate me.

________________________________	________________________________
Client Signature Date	Parent Signature (if under age 18)
________________________________	________________________________
Career Counselor Date	Supervisor Signature Date

Approved clients are eligible to receive the amount listed above, not to exceed a total maximum of $3,500 per fiscal year ($7,000.00 total) or $5,000 for the first fiscal year for short term training (not to exceed $7,000.00 total) per Workforce Investment Board (WIB) policy.

Participants are subject to the catalog for this training vendor in effect between ________________ and ______________. Any courses dropped prior to completion are subject to the pay scale indicated in the above-mentioned catalog. Dropped courses must be pre-approved by the NKADD staff or will become the fiscal responsibility of the participant. When dropping courses, participants need to contact their case manager to ensure they are still within WIOA compliance. Participants must be enrolled and must be in good standing according to rules established by ________________________________ (hereinafter called the School).

Prior to the commitment to pay for specified costs, the NKADD shall review financial aid applications and awards, when applicable; to document the cost of attendance and unmet need (if any). In the event an individual's unmet need does not justify assistance provided by WIOA or a cost is incurred prior to WIOA registration and approval of the participant named in this agreement to attend the program specified in this agreement, the NKADD will not be obligated to pay for costs on behalf of the participant.

TRAINING PROVIDER
If you have questions, please call at 859-283-1885 or e-mail at liberty.kordish@nkadd.org\

This funding agreement expires June 30, __________.
Any items named above must be purchased between July 1, __________ and June 30, __________.
Invoices received by the close of business on the 8th of the month (or the next business day if the 8th falls on a weekend) will be paid on the 20th of the month. If invoices are not received by the NKADD by close of business on the 8th of the month (or the next business day if the 8th falls on a weekend), they will be held until the next month.

Final invoices for the fiscal year (ending June 30th of each year) must be submitted no later than close of business, August 8th following the end of that fiscal year. If final invoices for the fiscal year are not received by the NKADD by close of business, August 8th following the end of that fiscal year it will not be able to be paid using WIOA funding.

The NKADD is a tax-exempt organization. Our tax-exempt number is SD-8-100.

Your invoice for the purchase of the above-named items should be mailed to the attention of Liberty Kordish at **NKADD 22 Spiral Drive Florence, KY 41042** or emailed to liberty.kordish@nkadd.org

Please provide the name of the vendor, a contact person, email and phone number.

Vendor: ______________________________ **Contact Person**: __________________________
Email Address: ________________________ **Phone Number** : _________________________

Attachment 6

Youth Program Element 10 Comprehensive Guidance and Counseling: Screening Tool

Instructions for LWDA Staff:

This screening is only a preliminary screening tool and should:

- Be conducted as part of the individual's intake process and it should be completed by the individual, unless accommodations are required.
- Not be considered a diagnostic tool. The responses provided in this screening are relative to the individual's overall life situation and should only be perceived as a potential indication of the individual's mental health needs.
- Offer an opportunity for LWDA staff to screen for potential stress factors in the individual's life that might negatively impact the individual's successful completion of Title I services.
- Facilitate the provision of mental health resources to the individual when appropriate. If mental health indicator(s) are identified by the individual, LWDA staff should offer the individual a referral to counseling services (in-house or through an external partner agency if the LWDA does not have staff/youth providers with the required credentials).

Notes:

(1) A mental health indicator is when the individual checks one or more behavioral items with sometimes, often or always.

(2) If the individual is unable to read the form independently (e.g., due to a disability), LWDA staff should accommodate the individual's need by reading the wellness screening tool at loud in a private setting with a non-judgmental and impartial attitude.

Potential Stress Factors:

- The pandemic / general isolation
- Employment
- School stress
- Relationships
- Finances
- Health
- Family trouble

Youth Participant Emotional Wellness Screening Tool

Individual's Name: ______________________ Date: ______________

Instructions:

For each item below, check the one category that best describes your emotional wellbeing *during the past month.*

Description:

- **Never** – you never or very rarely feel or act this way,
- **Sometimes** – you feel or act this way approximately once per week,
- **Often** – you feel or act this way at least three times per week,
- **Always** – you feel or act this way almost every day.

Behavioral Item	Never	Sometimes	Often	Always
Reluctant to go to school or elsewhere because of fears				
Recurrent thoughts about past difficulties or painful events				
Excessively worries about multiple things (e.g., school, family, health, etc.)				
Depressed or irritable mood most of the day				
Loss of interest in previously enjoyable activities				
Constant feeling of worthlessness or inappropriate guilt				
Thoughts about dying or wouldn't care if you die				
Substance Use or Abuse				

I wish to "opt-out" of completing this form.