**Program Policies
for the**

Prosper Appalachia
Youth Program

**for the
Eastern Kentucky C.E.P. Local Workforce Area**

**funded under the
Workforce Innovation & Opportunity Act
(WIOA)**

Effective July 1, 2023

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Table of Contents –

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Table of Contents, continued

Introduction

A. The Eastern Kentucky Workforce Innovation Board's Directive for Youth Services

Stated in the simplest terms, the mission of the Eastern Kentucky Concentrated Employment Program, Inc., (EKCEP) is to prepare, advance, and expand the workforce of Eastern Kentucky.

EKCEP accomplishes this objective through a solutions-based approach, in which it constantly evaluates the needs of eastern Kentucky's job seekers and employers and redesigns and adapts its services to meet those needs. EKCEP is committed to using the full flexibility provided by the Workforce Innovation and Opportunity Act (WIOA) and its other fund sources to develop and customize services to best meet the specific and unique needs of eastern Kentucky's workers and businesses.

EKCEP also sees itself as a broker that provides access to other workforce, training, and supportive services, and as a catalyst for partnerships within the workforce development system and between workforce development and private industry. EKCEP's Kentucky Career Center/JobSight network of one-stop workforce centers and affiliated sites serve as the hub for many of these brokering and partnership activities throughout the EKCEP region.

EKCEP's Prosper Appalachia Program is the result of work by the Youth Subcommittee of the Eastern Kentucky Workforce Innovation Board (EKWIB). This subcommittee's membership includes EKWIB members who are business leaders and educators, and non- EKWIB members who are community leaders in youth services, criminal justice, apprenticeships, and youth concerns. The activities of the subcommittee are supported by EKCEP staff and current Prosper Appalachia Contractors.

It is the intention of the EKWIB to use its Youth funds provided under the Workforce Innovation and Opportunity Act (WIOA) to deliver services that are relevant to the employment and training needs of youth who are disengaged from the workforce and education, or are in danger of becoming disengaged. The EKWIB desires a robustly structured community-based program that will address essential life skills and work skills, training, career coaching, and supportive service needs, using a structured curriculum in a progression that leads each enrolled youth to attain an industry-recognized credential and/or unsubsidized employment in an occupation that offers a career pathway in a high-wage and high-demand occupation.

As the target population for these services, the EKWIB has chosen Eastern Kentuckians ages 18-24 who:

- Are not attending school of any kind.

— AND —

- Are at risk of long-term unemployment or under-employment due to one of the following barriers:

  - Offenders, those who have involvement in the criminal justice system.
  - Homelessness.
  - Currently in or aging out of foster care.
  - Being a high school dropout.
  - Being pregnant or parenting.
  - An individual with a disability.
  - Being in need of additional assistance to complete an educational program or gain self-sustaining employment.

Although its target population is out-of-school youth, the EKWIB recognizes that many in-school youths in the region struggle with similar barriers, including involvement in the criminal justice system, housing instability, recovery from substance use disorder, aging out of foster care, and pregnancy/parenting. Therefore, the EKWIB will allow a small portion of its Prosper Appalachia Program funds (no more than 15%) to be spent on services to in-school youth who face the same barriers listed above for out-of-school youth.

Delivering the Prosper Appalachia Program will require a community-based approach that includes close working relationships, memoranda of agreement, and partnerships with entities that serve the program's target populations and/or provide services that address the program elements described in this policy manual. These entities include the local courts and criminal justice system, employers, education and training providers, social service agencies, SUD recovery programs, medical and behavioral health providers, crisis stabilization providers, homeless shelters, adult education, vocational rehabilitation services, and other community-based services (including faith-based services).

Most importantly, the program envisioned by the EKWIB will require the establishment of a collaborative partnership with each youth being served that respects and values that youth's potential. These collaborative

partnerships must be based on the recognition that the youth and program staff are jointly responsible to work together to solve problems and act courageously to create a pathway to self-sustainability and meaning.

B. *Purpose of This Handbook*

The purpose of this handbook is to provide vision, strategic guidance, and operational definitions for the Prosper Appalachia Program activities and services delivered with the youth program funds provided under the Workforce Innovation and Opportunity Act (WIOA) in the Eastern Kentucky C.E.P., Inc. local workforce area. The service model and priorities described in this handbook reflect the strategies and objectives of the EKCEP Workforce Innovation Board (EKWIB), the EKWIB's Youth Committee, and the local elected officials of the EKCEP service area, as represented by the EKCEP Board of Directors.

This handbook may be amended as necessary. In the interim, supplementary interpretations or more detailed explanations of polices in this handbook may be issued by EKCEP in memo form.

This handbook contains three sections:

- Section 1: Who We Serve – Our Target Populations
- Section 2: Program Design – A Community Based Service Strategy
- Section 3: Program Elements

While Contractors have agreed to abide by the policies contained in this handbook, this handbook is not intended to cover the full breadth of rules and requirements contained in the Workforce Innovation and Opportunity Act (WIOA) and applicable federal regulations, with which Contractors are equally responsible to comply.

SECTION 1: Who We Serve – Our Target Population

A. Target Population and Eligibility

i. Target Population: Out-of-School Youth

The Prosper Appalachia Program will target **Out-of-School Youth ages 18-24** who are eligible for services under WIOA.

According to the WIOA definition, an **Out-of-School Youth** is an individual who is age 16 through 24 and not attending any school.

The intent is for the Prosper Appalachia Program to spend 85% to 100% of its funds on Out-of-School Youth ages 18-24.

Out-of-School Youth Eligibility Requirements

The eligibility requirements that a person must meet to qualify for WIOA assistance as an Out-of-School Youth client are listed below. The client:

- Must be age 18 to 24.
- Must not be enrolled in any school.
- Must provide and document the information proving eligibility as an Out-of-School Youth as shown within the WIOA-1 form.
- Must have one or more barriers to employment or education as listed below. To be served by the EKCEP WIOA Prosper Appalachia Program, the person must be one of the following:

  - An offender.
  - Homeless.
  - In foster care, or aged out of the foster care system.
  - Pregnant or parenting.
  - Have a disability.
  - A school dropout (secondary school).
  - A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

    NOTE: Details on the definitions of these barriers are provided in the paragraphs below.

- Male clients age 18 or above **must** be registered with Selective Service in order to be enrolled. No WIOA services can be provided to a male client who has not completed his Selective Service registration. Any referred male client age 18 or above who has not registered with Selective Service must complete Selective Service registration before he can be enrolled or served.

Offender — According to WIOA, an "offender" is an individual "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 who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction" (WIOA Section 3[38]).

Prosper Appalachia Program contractors will collaborate with their local court systems, judges, probation and parole personnel, and/or other partners to determine their preference for the extent of criminal justice system involvement of the youth clients that will be served in their area. Contractors may choose to limit the levels or categories of offenses of clients that the contractor will accept and serve in its local Prosper Appalachia Program. For example: a contractor may choose to exclude youths who have committed sex crimes, armed violent crimes, or other specific types of offenses. Contactors must ensure that any such limits are discussed with and understood by the local criminal justice systems that are collaborating with and providing referrals to that contractor's Prosper Appalachia Program.

A client may document his/her offender status with:

- Juvenile or adult justice system documentation.
- Court records.
- Police records.
- Letter of parole.
- Statement from a halfway house.
- Statement from probation officer.
- Newspaper report (must include name of the newspaper and date of publication).
- Self-attestation (WIOA-2).

Homeless — A homeless person is an individual who lacks a fixed, regular and adequate nighttime residence, including an individual who qualifies under any of the following circumstances:

- Sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;

- Living in a motel, hotel, park, or campground due to the lack of alternative adequate accommodations;
- Living in an emergency or transitional shelter;
- Abandoned in a hospital;
- Awaiting foster care placement;
- Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
- A migratory child (as defined in section 6399 of title 20) who qualifies as homeless because he/she is living in one of the circumstances described above.

A homeless individual meets the criteria defined in sec. 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043-e-2(6)), a homeless youth aged 16 to 24 who meets the criteria defined in sec. 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434(2)) or a runaway. Notice that the Prosper Appalachia Program has chosen to serve a narrower age range than the range allowed under these statutes.

In or Aged Out of Foster Care — An individual who is in foster care or who has aged out of foster care is a person who has attained 18 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement.

School Dropout — The formal definition of a school dropout is a youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. For the purposes of Prosper Appalachia Program, a school dropout is a youth who is above the age of compulsory attendance (18 or above) but dropped out of secondary school either before or after turning 18.

ii. In-School Youth

The Prosper Appalachia Program will not recruit or pursue In-School Youth clients to participate in this Prosper Appalachia Program. However, if circumstances make it appropriate, it is permissible for a contractor to serve a small number of In-School Youth clients, as long as the funds expended on In-School Youth clients **do not exceed 15%** of the contractor's total Prosper Appalachia Program budget. As an alternative, contractors may choose to opt out of serving In-School Youth clients entirely, choosing instead to focus all their Youth efforts on serving the Out-of-School Youth population.

If a Contractor does decide to serve some In-School Youth clients, EKCEP policies and procedures must be followed. Contractors serving In-School Youth must work with existing community and school partners to ensure that the services that are being provided are comprehensive and collaborative efforts to serve the at-risk In-School Youth population of the service area, and not duplicative in nature. EKCEP expects In-School Youth services to prevent these youth from becoming disengaged with education and ensure that they develop an understanding of the working world, evaluate their career alternatives, and develop a path that will lead to a successful career.

In-School Youth who would be appropriate to serve under this program could include youth who are at risk of dropping out of school due to circumstances complicated by their status as:

- Being an offender.
- Being homeless.
- Being in foster care, or having aged out of the foster care system.
- Being pregnant or parenting.
- Having a disability.
- Requiring additional assistance to complete an educational program or to secure employment or hold employment.

In-School Youth Eligibility Requirements

In addition to the barriers listed above, youth enrolled as In-School Youth must meet the eligibility requirements listed below. The client must:

- Be **16 to 21** years of age.
- Be attending secondary or post-secondary education.
- Provide and document the information proving eligibility as an In-School Youth as shown within the WIOA-1 form.

B. *Source of Referrals*

The Prosper Appalachia Program is a community-based effort designed to engage community partners to create a community of opportunity and new pathways of success for the youth we serve.

The youth served through this program will come through referrals from cooperative and collaborative partnerships established with homeless shelters, crisis stabilization providers, recovery centers, the criminal justice system, education and training providers, social service agencies, medical and behavioral health providers, adult education, vocational rehabilitation services, with faith-based organizations,concerned family members, and other community-based services (including faith-based services).

SECTION 2: Program Design — A Community-Based Service Strategy

A. *Prosper Appalachia Work-Based Program Design*

The Prosper Appalachia Program is aimed at providing career pathway opportunities to youth who have become disengaged from work and education, and to catch those before they become disengaged. The program's goal is to create a new direction and improved future for these youth by providing them the guidance, support, experiences, and opportunities that will lead them to sustainable employment or education.

Work-based learning opportunities (that may include paid work experiences, internships, apprenticeships, and on-the-job training) have a prominent role in the program design. Because of the importance of work-based learning placements, a significant portion of the program's activities and curricula are dedicated to preparing clients to succeed in these placements, including elements that address the critical essential skills identified by employers:

- People Skills, including:
  - Collaboration and working within teams.
  - Cultural competence.

- Problem Solving, including:
  - Inquiry.
  - Critical thinking.
  - Creativity.

- Professionalism, including:
  - Communication skills.
  - Work ethics.
  - Technical agility and digital literacy.

B. *Employer Partnerships*

Local employers are the source of both the work-based learning placements and the permanent, unsubsidized jobs that are the ultimate objective of the job-seeking clients of this Prosper Appalachia Program. This makes local employers important partners in the Prosper Appalachia Program. Relationships with employers will be carefully maintained to ensure that the needs and concerns of employers are addressed. Employers partnering in the Prosper Appalachia Program will be:

- Included in regular meetings.
- Consulted on program decisions that affect their workplaces.

- Kept fully informed about program progress, including the involvement of the local criminal justice system.

Local employers and their businesses provide important leadership and feedback for improved results and continued improvement of the program's design. They also serve as trainers and can often serve as mentors. The goal of the Prosper Appalachia Program, therefore, is to engage employers in a way that cultivates a clear understanding of the employers' role in the community's effort to improve long-standing workforce participation.

C. A Collective Impact

The needs of youth that adversely affect their participation and success in the workforce are interrelated. Often youth have multiple challenges such as transportation, childcare, substance abuse, health care related needs, learning disabilities, and counterproductive coping behaviors. Unaddressed, any one issue can reduce the likelihood that youth will successfully overcome other issues and find meaningful and self-sustaining employment.

The Prosper Appalachia program strives to work collaboratively with the faith-based community, behavioral health organizations, and other community partners to collectively to address the multiple needs of youth and thus provide the correct combination of services that will unlock the full potential of each individual served.

SECTION 3: Program Service Elements

A. Program Elements

The program elements defined below describe the services provided to participants. These services are provided to individual Prosper Appalachia Program participants in a customized manner to best address each individual's needs in order to optimize outcomes that meet that individual's long-term employment and personal achievement goals, both during participation in the Prosper Appalachia Program and after completion.

The Prosper Appalachia Program is best defined as a collaborative partnershipwith participants that places value and importance on individual responsibilityto do the work necessary to reach their potential. The Prosper Appalachia Program provides important support and opportunity to do that.

Proper case management will communicate this partnership and provide guidance throughout the participant's journey. Case managers must document participant activity and participation in the elements below in the KEE-Suite System while also establishing an Individual Employability Plan (IEP) that is also documented in the KEE-Suite System.

The program elements in the Prosper Appalachia Program are:

i. Labor market and employment information about in-demand industry sectors or occupations available in the local area, including services that provide career awareness, career counseling, and career exploration.

This element is an important part of developing an effective and useful IEP with the client.)

This element provides critical information and self-exploration to help each participant make informed choices and find his/her place in the world of work. The goal for each participant is to develop clear and specific goals for employment and career growth. This includes entry-level employment goals within a specific sector like advanced manufacturing, health care, or one of many other career pathways. It also provides a longer-term growth plan for advancement and his/her ultimate career goal and earning expectations.

Generally, career awareness begins the process of developing knowledge of the variety of careers and occupations available, their skill requirements, working conditions, and training requirements.

Individuals will be provided opportunities to explore in-demand

occupations, assess what is needed for achievement within those occupations, and take interest inventories and aptitude assessments as a means to build confidence in their choices and abilities to execute their plan.

Career counseling or guidance provides advice and support in making these important decisions about career pathways to pursue. Career guidance also includes information and assistance about résumé development, interview skills, and opportunities for work experience and the benefits of postsecondary training.

U.S. Department of Labor electronic tools that are relevant to youth include <u>My Next Move</u> and <u>Get My Future.</u>

ii. <u>Activities to prepare for and transition to postsecondary education and training.</u>

These activities include exploring opportunities for postsecondary education options within the Kentucky Community & Technical College System (KCTCS), four-year colleges, technical education, and apprenticeships. This includes activities to visit and explore training programs and:

- Assisting participants to take entrance exams.
- Assisting participants with applications.
- Searching and applying for financial aid and scholarships.

iii. <u>Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.</u>

This program element, simply stated, describes the over-arching principle that the services provided through the Prosper Appalachia Program are interconnected and reflect an integrated education and training model. Workforce preparation, basic skills training, and work-based learning are delivered at the same time and within the context of the participants' goals. For example: An individual may be working with Skills U to earn his/her GED while attending technical training (GED Plus). During this time, he/shemay be receiving needed supportive services and exploring work experience opportunities aligned with his/her technical training. Although there are a multitude of integrated service examples, the principle is the same: education and workforce services are all offered concurrently and within the same context.

iv. <u>Paid and unpaid work experiences that have as a component academic</u>

Work-based learning opportunities — which include Work Experience, Internships, On-the-Job Training, Job Shadowing, and other placements — are an important component of the Prosper Appalachia Program.

Work Experience

Work Experience is a service that provides Prosper Appalachia with the opportunity to learn basic work skills and workplace behaviors through a subsidized work placement with an employer. A Work Experience placement is a planned, structured learning experience that occurs in a real working environment. In a Work Experience placement, the contracted service provider will be the employer of record.

In addition to the opportunity to earn wages while learning valuable skills, this service also provides a client with an opportunity to connect with an employer in the community and demonstrate his/her work ethic, reliability, honesty, and value as a worker — all of which will be important factors in in helping the client obtain unsubsidized employment. In some cases, Work Experience placements can result in unsubsidized employment for the client after the Work Experience placement ends; in other cases, the client will take the experience, skills, and behaviors learned from Work Experience into his/her job search for permanent employment elsewhere.

In general, the following guidelines apply to paid work experiences:

- A paid work experience may take place in the private-for-profit sector, the non-profit sector, or the public sector.
- Labor standards apply in any work experience where an employee/employer relationship exists, as defined by the Fair Labor Standards Act or applicable State law.
- Consistent with 20 CFR 680.840 et. seq., funds provided for work experiences may not be used to directly or indirectly aid in the filling of a job opening that is vacant because the former occupant is on strike, or is being locked out in the course of a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving a work stoppage.
- A paid work experience helps youth understand proper workplace behavior and what is necessary in order to attain and retain employment. It can serve as a steppingstone to unsubsidized employment and is an important step in the

process of developing a career pathway for youth.
- A paid work experience should be made available to any youth who has been assessed as capable of participating in work activities. The particular activity (pre-apprenticeship, OJT, etc.) should be determined based on the objective assessment of the youth, and the justification recorded in the youth's ISS.

Youth who could benefit from work activities include youth:

- who have little or no previous work history;
- have only informal work experience (e.g., mowing lawns, babysitting);
- have unsuccessful work history (worked only for very short durations);
- can use the Work Experience placement to get hands-on experienceand develop general workplace skills or skills relating to a career of interest;
- can build a relationship with and/or demonstrate abilities and work ethic to an employer who is hiring or may be hiring in the near future.

Work Experience Limits

A Prosper Appalachia Program Client's Work Experience placement may include between 80 hours and 600 hours of work. However, a client may not be placed with a single employer for more than 480 hours of work.

Within these parameters, contractors may determine the length of placement that is most reasonable, effective, and productive for the youth client, the employer providing the work site, and the contractor's program budget. The 600-hour limit is not intended to entitle every client to 600 hours of Work Experience; contractors are expected to use shorter-duration placements generally and use their fiscal and programmatic judgment to determine when full-length placements are appropriate.

If a client in this program's target population struggles or fails in a Work Experience placement (due to inappropriate behaviors, difficulty with authority figures, personality conflicts, poor conflict resolution skills, or other characteristic issues), the contractor may choose to withdraw the client from that Work Experience placement, work further with the client on the work readiness and behavioral issues involved, and then place the client in another Work Experience placement — as long as the total number of work hours for all placements for that client does not exceed the maximum of 600 work hours.

The 600-hour limit does not include time spent in basic educational skills instruction or other instructional services offered by the Prosper Appalachia Program. These services are unpaid activities.

Work Experience Wages

The hourly wage paid to a Prosper Appalachia Program client for a WorkExperience placement:

- **Must** be at least the legal minimum wage.
- **May not** exceed the prevailing wage that the employer pays to entry-level employees who are hired without subsidy.
- **May** generally correspond to the prevailing wage paid to regular employees hired without subsidy, but may not exceed $15 per hour without pre-approval from EKCEP.

Within these limits, the hourly wage paid to a Prosper Appalachia Program client for a Work Experience placement may be determined by the local contractor, in collaboration with the employer.

Work Experience Educational Components

Contractor's local programs have the flexibility to determine the appropriate type of academic and occupational education necessary for a specific work experience. Work Experience must also include an educational component that:

- Refers to contextual learning that accompanies a work experience.
- Consists of *both* academic and occupational education.
- May occur concurrently or sequentially with the work experience.
- May occur inside or outside of the work site.
- Can be provided by the work experience employer, provided separately in a classroom, or through other means. States and localareas have the flexibility to decide who provides the education component.

Internships

An internship is a work-based training placement with an EKWIB-approved private sector employer that has an established training schedule and program for interns. The terms, procedures, and wages for internships may vary, depending upon the employer's approved training program.

Unpaid Job Shadowing

In Unpaid Job Shadowing, a youth learns about a job by walking through the workday as a shadow to a competent worker. This allows the youth to witness firsthand work environment, see employability, and occupational skills in practice, to learn the value of professional training, and to explore potential career options.

Unpaid Job Shadowing is intended as temporary, unpaid exposure to the workplace in an occupational area of interest to the participant. This activity can range anywhere from a few hours to a day, or a week, or more and provides an opportunity for youth to conduct short interviews with people in their prospective professions to learn more about those fields.

Pre-Apprenticeship Programs

As discussed in 20 CFR 681.480, pre-apprenticeship is a program designed to prepare individuals to enter and succeed in an apprenticeship program and includes the following elements:

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

On-The-Job Training (OJT)

On-the-Job training (OJT) is skills training provided to an employee by an employer while the employee is engaged in productive work.

OJT is provided under a contract with an employer in the non-profit sector or private sector. Under an OJT contract, the employer provides occupational training for a WIOA client who is their employee in exchange for up to a percentage of reimbursement of the client's wages by WIOA. The wage reimbursement compensates the employer for the extraordinary costs of training and the additional supervision needed during the training process and will be determined on a case by case basis, not to exceed 75%.

When appropriate and endorsed by the employer, OJT can be linked to Work Experience or to classroom trainings like Skills U Adult Education, literacy, Work SENSE training, and job retention skills.

The duration of an OJT training period is limited to the time required for the client to become proficient in the occupation for which he/she is training. In determining the appropriate length of the training period, consideration will be given to the skill requirements of the occupation and the client's academic and occupational skill level, prior work experience, and Individual Employment Plan. The Occupational Information Network (O*NET) contains average training lengths for occupations and may be used as a guide in making this determination.

The limit on wages paid during the training period will be specified in each contract. Wages must be appropriate and customary for a trainee in the job(s) covered by the contract.

The employer:

- Must pay a wage of at least **the minimum wage** per hour for the job(s) for which OJT will be provided.
- Must be doing business in a sector that EKCEP has identified as a sector of emphasis for occupational training. These sectors include:

  o Healthcare.
  o Skilled trades.
  o Manufacturing.
  o Business services including information technology.
  o Energy creation and transmission.

  NOTE: OJT may also be provided in other expanding or emerging industries or occupational areas when it is in the best interest of economic development and regional economic growth. These decisions may be made on a case-by-case basis by EKCEP under the direction of the Eastern Kentucky Workforce Innovation Board.

- Must be training employees whose positions represent an expansion or extension of their workforce, not routine turnover.
- May select a previous employee for OJT, but the position must be different from the one that the employee previously held at the company.
- May choose to pay the trainee a higher wage than the maximum wage EKCEP will use as a basis for OJT reimbursement ($19.25 per hour, due to the state wage cap). However, the employer will be responsible

for 100 percent of the wages above $19.25 per hour; <u>no portion of wages above $19.25 per hour will be reimbursed by EKCEP</u> for an OJT.

- <u>Cannot</u> be eligible for OJT funds if the company has relocated within the last 120 days from another location that resulted in the loss of jobs.
- <u>Cannot</u> use OJT-funded trainees to replace employees laid off within six months prior to the date of the OJT application.

v. <u>Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referrals, as appropriate.</u>

Comprehensive guidance and counseling provides individualized counseling to participants. This includes career and academic counseling, drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate. When referring participants to necessary counseling that cannot be provided by program staff, program staff will coordinate with the organization it refers to in order to ensure continuity of service. When resources exist within the local program or its service providers, it is allowable to provide counseling services directly to participants rather than referring youth to partner programs.

All youth should receive career and academic counseling. Other counseling should be provided as necessary, depending on the needs of the individual youth as determined through the intake and assessment process and as recorded in the youth's ISS.

Examples of qualifying activities include:

- Drug and alcohol counseling.
- Mental health counseling/therapy.
- Career counseling.
- Educational counseling.
- Supplementing guidance and counseling activities with additional materials and resources.

*Note: Informal guidance and counseling from well-meaning but inexpert individuals **do not** qualify as appropriate services within this element.*

vi. <u>Occupational skills training, which may include training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area.</u>

Definition

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

Individual Training Accounts (ITAs)

The most common method of providing financial assistance, if needed, to youth enrolled into occupational skills training is through an Individual Training Account (ITA).

An Individual Training Account (ITA) is a payment agreement established on behalf of a client with a training provider. WIOA funds for an ITA can only be used to pay for training programs that are listed on Kentucky's Eligible Training Provider List (ETPL). Trainings must also fall within a sector that EKCEP has identified as a sector of emphasis for occupational training. These sectors include:

- Healthcare.
- Skilled trades.
- Manufacturing.
- Business services including information technology.
- Energy creation and transmission.

NOTE: An ITA may also be allowed in other expanding or emerging industries or occupational areas when it is in the best interest of economic development and regional economic growth. These decisions may be made on a case-by-case basis by EKCEP under the direction of the Eastern Kentucky Workforce Innovation Board.

ITA — Financial Aid Coordination

All clients seeking an ITA for training that will be provided by an institution that is approved to administer Title IV funds under the Higher Education Act (HEA) must apply for financial aid. The amounts of WIOA funding to be allocated will take into account all other state and federal financial assistance that is available to the client. This includes the Commonwealth's Work Ready Scholarships and occupational training provided through GED Plus.

The client should apply for financial aid as soon as possible. The Career Advisor will help the client complete the necessary application(s) for

financial aid and/or refer the client to the training provider's financial aid office.

NOTE: WIOA funds are not to be included as "other income" on any financial aid application. WIOA funds are considered a resource only after financial aid eligibility is established.

ITA — WIOA Application for Financial Assistance (WAFA)

The WAFA is used to determine:

- If a client is in need of WIOA financial assistance.
- How the WIOA financial assistance, if needed, will be coordinated with other state and federal financial assistance.

The WAFA establishes the cost of attendance (COA) and the amount of financial need (if any) that remains after other state and federal financial assistance is considered. WIOA funds are used to meet only the portion of the remaining need that consists of direct training costs (i.e., tuition and fees). WIOA funds are **not** used to pay the other estimated associated costs of attendance, including books or supportive services such as transportation, meals, or childcare.

WIOA funds are a supplement to other sources of financial aid, excluding loans.

ITA costs are paid through a voucher system. A voucher will be issued after the need for assistance is established by completing the WAFA and the resources that will be used to meet the COA are identified. If the available assistance through WIOA, Pell, and other resources will not cover the total COA, the client must show how he/she will meet the remaining balance of the COA before a WIOA voucher will be issued. The Career Advisor should document in case notes how the client will meet the remaining balance of the COA. If the client cannot demonstrate how the entire COA will be paid, a WIOA voucher will not be issued.

Vouchers are generally written for a single term or semester. However, a voucher may be written for an entire training program if that program is not divided into terms or semesters. A completed copy of the electronic WAFA and WAFA voucher must be uploaded in KEE-Suite.

ITA — Limits for Financial Assistance

The limit for maximum financial assistance through an ITA is $7,000**.**

The WAFA limits ITA funding to:

- $2,000 per semester for full-time students.
- $1,000 per semester for part-time students.
- $1,000 per summer term.

Although there is no time limit for completing ITA training, it is expected that the approved training will be completed by the time the limit for WIOA financial assistance is reached.

NOTE: Waivers to the limits for Financial Assistance may be granted by EKCEP, Inc. upon request when the training is not eligible for financial aid, is of high quality, and is in a high demand occupational area for which the participant shows high aptitude and ability to benefit.

ITA — Eligible Training

Training paid for through an ITA must be:

- In a career sector that EKCEP has identified as a sector of emphasis for occupational training. EKCEP may identify other sectors of emphasis by memo to meet changing conditions within the region.
- Provided by an eligible training provider approved by EKCEP.
- Provided by a training provider listed on Kentucky's Eligible Training Provider List (ETPL).

See EKCEP's Participant Handbook for all requirements related to ITAs.

Non-Individual Training Account (Non-ITA) Training

A Non-Individual Training Account (Non-ITA) is a payment agreement established on behalf of a group of clients or an individual with an approved training provider.

Non-ITA Occupational Training is provided under a contract with EKCEP and a training provider for occupational training. EKCEP develops the Non-ITA contract with the training provider in coordination with the Prosper Appalachia Program provider.

vii. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of a secondary school diploma or its recognized equivalent.

These services focus on providing academic support, helping

participants identify areas of academic concern, assisting with overcoming learning obstacles, and providing tools and resources to develop learning strategies.

Tutoring

Tutoring involves a tutor and a youth. The tutor helps the youth acquire knowledge and skills in a specific area (e.g., math, reading, chemistry). The tutor provides instruction and the youth practices knowledge and skills being taught while the tutor observes.

The tutor provides feedback on the youth's performance, allowing the youth to learn from his/her mistakes

Examples of tutoring services include:

- Actual instruction provided one-on-one, in a group setting, or through resources and workshops.
- Regular, structured sessions in which individualized instruction occurs.
- Instruction based on goals derived from the youth's individual service strategy (ISS).
- Instruction provide by a qualified instructor.
- Assessment to determine if the youth is making progress.

Tutoring is **not:**

- Meetings with teachers or tutors to discuss youth's progress. (This may qualify as case management.)
- Supplying books or school supplies. (This qualifies as supportive services.)
- Paying school fees. (This qualifies as supportive services.)
- Activities provided by an unqualified instructor.

Tutoring should be part of the ISS for out-of-school youth (OSY) who are basic skills deficient and other youth who may require tutoring based on the results of the objective assessment of their academic skill levels. Additional instructional assistance must be provided to youth with disabilities as necessary.

Study Skills Training should be provided to youth who have been determined to have difficulty learning on their own. For example, if an objective assessment indicates that a youth lacks good study habits, the youth worker should identify Study Skills Training as an appropriate program element for the youth in the ISS.

*viii.*Alternative secondary school services, or dropout recovery services.

While the activities within both these types of services may overlap, each are provided with the goal of helping youth to re-engage and persist in education that leads to the completion of a recognized high school equivalent.

Alternative Secondary School Services

Alternative secondary school services (such as basic education skills training, individualized academic instruction, and English as a Second Language training) are services that assist youth who have struggled in traditional secondary education. An alternative education program means a comprehensive educational program delivered in anontraditional learning environment that is distinct and separate from the existing general or special education program. The Commonwealth's Skills U qualifies as an alternative secondary school service for those without a high school diploma or its equivalent.

Dropout Recovery Services

Dropout recovery services (such as credit recovery, counseling, and educational plan development) are services that assist youth who have dropped out of school.

ix. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and positive social and civic behaviors.

The Prosper Appalachia Program will initiate opportunities for participants toengage/re-engage and habilitate/rehabilitate into communities. Opportunities in leadership development are intended to create valued relationships within the community.

Leadership development opportunities are opportunities that encourage responsibility, confidence, employability, self-determination and other positive social behaviors. They include:

- Community and service learning projects.
- Peer-centered activities, including peer mentoring and tutoring.
- Organizational and teamwork training, including team leadership training.
- Training in decision-making, including determining priorities and problem solving.

- Citizenship training, including life skills training such as parenting and work behavior training.
- Civic engagement activities that promote the quality of life in a community.

Positive social and civic behaviors are outcomes of leadership opportunities that are incorporated by the Prosper Appalachia Program. Positive social and civic behaviors focus on areas that may include:

- Positive attitudinal development.
- Self-esteem building.
- Openness to work with individuals from diverse backgrounds.
- Maintaining healthy lifestyles, including being alcohol-free and drug-free.
- Maintaining positive social relationships with responsible adults and peers, and contributing to the well-being of one's community, including voting.
- Maintaining a commitment to learning and academic success.
- Avoiding delinquency.
- Postponing parenting and responsible parenting, including child support education.
- Positive job attitudes and work skills.
- Keeping informed about community affairs and current events.

x. Financial literacy education.

The lack of credit, poor credit, and financial hardship negatively impact employment opportunities and lead to poor financial decisions that negatively impact upward mobility and success. Financial literacy education activities include those that:

- Support the ability of participants to create budgets, initiate checking and savings accounts at banks, and make informed financial decisions.
- Support participants in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards.
- Teach participants about: the significance of credit reports and credit scores; what their rights are regarding their credit and financial information; how to determine the accuracy of a credit report and how to correct inaccuracies; and how to improve or maintain good credit.

- Support a participant's ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions.
- Educate participants about identity theft, ways to protect themselves from identify theft, and how to resolve cases of identity theft and in other ways understand their rights and protections related to personal identity and financial data.
- Support activities that address the particular financial literacy needs of non-English speakers, including providing support through the development and distribution of multilingual financial literacy and education materials.
- Provide financial education that is age appropriate, timely, and provides opportunities to put lessons into practice, such as by access to safe and affordable financial products that enable money management and savings.
- Implement other approaches to help participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health stability by using high quality, age appropriate, and relevant strategies and channels, including, where possible, timely and customized information, guidance, tools, and instruction.

xi. Supportive services.

As defined in WIOA Sec, 3(59), supportive services for youth are 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.
- Assistance with educational testing.
- Reasonable accommodations for youth with disabilities.
- Referrals to healthcare.
- 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.
- Payments and fees for employment and training-related applications, tests, and certifications.

Payments for activities that are not needed in order for the youth to

participate in WIOA services and purchases of items that are not necessary for the youth to participate in WIOA youth services are not considered allowable supportive services. Examples of <u>non</u>-qualifying supportive services expenditures include the payment of fines, penalties, or court costs.

Supportive services should be provided to address needs or issues that are identified during the intake and assessment process. Any issue that would hinder the ability of the youth to participate in WIOA youth services should be addressed through the provision of supportive services. A plan for what supportive services will be provided and how they are provided **must** be included in the youth's ISS.

The provision of supportive services is based upon the specific needs and circumstances of each individual. Providers of the Prosper Appalachia Program are responsible for maintaining fair and reasonable policies for meeting the supportive service needs of participants in ways that encourage responsible behavior by participants and meet high standardsof fiscal responsibility and efficacy for agencies utilizing federal funding provided by WIOA.

xii. <u>Entrepreneurial skills training.</u>

Entrepreneurial skills training provides the basic information about starting and operating a small business. Such training must develop the skills associated with entrepreneurship that include, but are not limited to, the ability to:

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

Examples of Qualifying Activities

Examples of qualifying entrepreneurial skills training activities include:

Entrepreneurship education that provides an introduction to the values and basics of starting and running a business — Entrepreneurship education programs often guide youth through the development of a business plan and may also include simulations of business start-up and operation.

Enterprise development which provides supports and services that incubate and help youth develop their own businesses — Enterprise development programs go beyond entrepreneurship education by helping youth access small loans or grants that are needed to begin business operation and by providing more individualized attention to the development of viable business ideas.

Experiential programs that provide youth with experience in the day-to-day operation of a business — These programs may involve the development of a youth-run business that young people participating in the program work in and manage. Or, they may facilitate placement in apprentice or internship positions with adult entrepreneurs in the community.

xiii. <u>Adult mentoring, for a total of at least 12 months, including during the period of participation and/or after completion.</u>

Adult mentoring offers many documented benefits to youth. In addition to the direct benefits provided to youth, the benefits are reciprocal for the mentors and organizations. To be effective, mentoring relationships must be long-standing, at least one year, and well organized.

Participants will be provided adult mentoring that:

- Lasts at least 12 months and may take place both during the program and following exit from the program.
- Be a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee.
- May include mentoring activities through electronic means, however, at a minimum, the local youth must be matched with an individual mentor with whom the youth interacts on a face-to-face basis.

Contractors that provide the Prosper Appalachia Program must ensure appropriate processes are in place to adequately screen and select mentors. Mentoring may include workplace mentoring in which the local program matches a youth participant with an employer or employee of a company.

Mentoring is not case management and is not provided by case managers or other service providers unless they meet the definition of adult mentoring. Mentoring is not sporadic and is not simply providing self-help

materials.

xiv. <u>Follow-up services for not less than 12 months after the completion of participation, as appropriate.</u>

The Prosper Appalachia Program's priority focus is to assist participants to enter employment and/or training in a career pathway that will result in sustainability and continuous growth and upward mobility. Also, successful program graduates will serve as inspiration and potential mentors to participants. Follow-up services, therefore, are critical services that are provided to youth upon exit from the program to help ensure the youth are successful in employment and/or post-secondary 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.
- The leadership development and supportive service activities.
- Assistance in securing better paying jobs, career pathway development, and further education or training.
- Work-related peer support groups.
- Adult mentoring.
- Financial literacy education.

Follow-up services may begin immediately following the last date of service. Follow-up services <u>do not</u> cause the exit date to change and <u>do not</u> trigger re-enrollment in the program. Follow-up services are provided to all youth in some form for a minimum duration of 12 months, unless the participant declines to receive follow-up services or in cases where the participant cannot be located or contacted. Follow-up services include more than merely attempting a contact or making a contact to secure documentation in order to report a performance outcome.

Note: *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. At that point, the date of exit is applied retroactively to the last date of service. Once 90 days of no services (other than follow-up services, self-service, and information-only services and activities) occurs and the participant has an official exit date applied retroactively to the last date of service, the program continues to provide follow-up services for the remaining 275 days ofthe 12-month follow-up requirement. The 12-month follow-up requirement is completed upon one year from the date of exit. At the time ofenrollment, youth should be informed that follow-up services will be provided for 12 months following exit. If at any point in time during the program or during the 12 months following exit the youth requests to*

opt out of follow-upservices, they may do so. In this case, the request to opt out or discontinue follow-up services made by the youth must be documented in the case file.

B. *Performance Measures*

WIOA tracks client performance on the basis of job retention, wage gain, credential attainment, completions, and placements. Performance measures are negotiated annually and reflected within the executed EKCEP WIOA contract. All participant information must be entered and documented into the KEE Suite data management system. Only the information reported in this system will count towards performance.