



OPERATIONAL POLICY No. OP -441

Subject: Youth Program - 14 Elements Policy, Change 1

Effective date: PY2021, retroactive to August 16, 2021

CITATIONS:

20 CFR § 681.460(a)(1), 20 CFR § 681.600(a), TEGL 21-16, p. 15, 20 CFR §§ 680.840, 20 CFR § 681.590, TEGL 23-14, p. 8, 20 CFR § 681.540, 20 CFR § 681.550, 81 FR 56124, 20 CFR § 681.630, 20 CFR § 681.520, 20 CFR § 681.570, 20 CFR § 680.900, 20 CFR § 681.490, 20 CFR § 681.510, 20 CFR § 681.500, 20 CFR § 681.560, 81 FR 56182, 20 CFR § 681.580, 20 CFR § 681.580, and 81 FR 56183.

BACKGROUND:

The Workforce Innovation and Opportunity Act (WIOA) requires that every local workforce development area make 14 program elements available. These program elements are services that are intended to assist youth in preparing for the workforce. While all program elements must be made available in a local area, each youth does not have to receive all 14 elements (Local areas must make follow-up services available to all youth for at least 12 months after program exit). In general, youth workers decide which program elements to provide to youth based on their objective assessment and record a plan to provide these services in the youth's Individual Service Strategy (ISS) that is directly tied to at least one indicator of performance. In general, it is expected that each youth will receive exposure to multiple program elements during their participation in the WIOA youth program. The ISS, which must be developed with input from the youth, must also have particular goals for each program element provided, and indicate the progress made by the youth towards these goals.

POLICY:

This policy is intended to provide the following:

- Descriptions for each of the program elements, including the expected positive outcomes.
- Examples of activities that would or would not count as a service under that element.
- Guidance on which youth should receive the particular elements.
- Information on documenting each element.

To participate in WIOA Youth programs, a youth must be enrolled. Enrollment requires:

- 1) An eligibility determination
- 2) The provision of an objective assessment
- 3) Development of an Individual Service Strategy; and
- 4) Participation in any one of the 14 youth program elements

Note on recording - A service cannot be recorded as a particular program element if it doesn't meet the criteria provided in this policy. For example, sending an e-mail message to a youth does not count as a follow-up service, and cannot be recorded as such in WCOS. Additionally, there is overlap between portions of some program elements.

Fourteen Elements:

The Program Element categories below provides an overview and easy reference for finding applicable program elements and identifies which program elements relate to one another. In addition, categories include which WCOS Activity Code, WIOA Form(s) to use, along with submission information. This information will facilitate the consistent reporting of services across the local area and prevent duplicated reporting of the same service in multiple reporting categories.

Program Element 1: Youth Tutoring, study skills training and instruction

WCOS Activity Code: #406	Form: WCCNM – Youth Elements Form WIOA 7	Submit to WCCNM Fiscal Department for Payment
---------------------------------	---	--

The services under this program element help lead the participant towards the completion of a high school diploma, its recognized equivalent or a recognized postsecondary credential. Services are intended to keep youth in school and engaged in a formal learning or training setting. Examples include:

- academic support such as tutoring;
- helping youth identify areas of academic concern;
- assisting with overcoming learning obstacles;
- providing tools and resources to develop learning strategies;
- literacy development;
- other employability skills as applicable;
- active learning experiences;
- after-school opportunities; and
- individualized instruction.

Depending on the service involved, WCCNM may find it appropriate to provide these services one-on-one, in a group setting, by referring participants to resources in the community, and/or through workshops.

For WCOS reporting purposes, dropout recovery services aimed at youth who withdrew from postsecondary training/education prior to successful completion are documented under this element. Youth Provider staff must use element 2, "alternative secondary school services or high school dropout recovery services," to document any dropout recovery services aimed at getting a youth who has dropped out of high school back into high school or an alternative secondary school/equivalency program.

Services under this activity are available for in-school youth that have not obtained their High School Diploma or its recognized equivalent and out-of-school youth that have not obtained their High School Diploma or its recognized equivalent and/or their post-secondary diploma/credential. (Students that have their High School Diploma and/or post-secondary diploma/credential should use Element 5 as needed).

Program Element 2: Alternative secondary school services

WCOS Activity Code: #415	Form: WCCNM – Youth Elements Form WIOA 7	Submit to WCCNM Fiscal Department for Payment
---------------------------------	---	--

The services under this program element are intended to help youth who (a) have dropped out of high school OR (b) are currently struggling with traditional high school and would benefit from an alternative secondary school program. Services are aimed at reengaging youth so they pursue education that leads to the completion of high school diploma or its recognized equivalent. Examples of services include:

- basic education skills training;
- individualized academic instruction;
- English language learning;
- counseling related to re-engaging youth in secondary education;
- educational plan development;
- preparation for high school equivalency attainment (for high school dropouts only); and
- educating youth about alternative secondary school programs within the school district and helping them through the process of connecting to an appropriate program.

Services under this activity are available for in-school and out-of-school youth.

Program Element 3: Youth - Paid and unpaid work experience

WCOS Activity Codes:	Forms: WCCNM – All applicable Youth Employment Forms	Submit to Youth Provider Fiscal Department for Payment
-----------------------------	---	---

#400 Summer Employment		
#407 Paid/Unpaid Work Experience (including Pre-Apprenticeship)		
#408 Youth Internship		
#409 Youth Job Shadowing		

The services under this program element provide planned, structured learning experiences that take place in a workplace for a limited period of time. Services are focused on providing participants with opportunities for career exploration and skill development. A participant's paid or unpaid work experience must be tied to the goals identified in his/her individual service strategy.

Work experience may take place in the private for-profit sector, the non-profit sector, or the public sector and can be paid or unpaid, as appropriate. The WCCNM or service providers may directly provide structured work experience opportunities relating to community service projects that are outside of the organization's day-to-day operations.

The following services may constitute work experience:

- **employment opportunities;**
- **pre-apprenticeship programs;**
- **internships;**
- **job shadowing;** and
- **on-the-job training (OJT)** opportunities (co-enrolled with the Adult/DW Program only).

Note: NMDWS requires pre-apprenticeship programs to be approved by the WCCNM Training and Service Provider Committee.

This program element also includes any activities that help the youth prepare for the specific work experience.

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. Additionally, Title I Youth Program funds may not be used to directly or indirectly aid in filling 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 work experience must include both academic **and** occupational education components. Academic and occupational education must be designed to provide participants with contextual learning that may occur concurrently or sequentially with the work experience and may occur inside or outside the work site. WCCNM requires that both the academic and occupational education components of a participant's work experience relate to the same specific

job or occupational area. While WIOA does not explicitly state this requirement, examples US Department of Labor (USDOL) provides in TEGL 21-16 (p. 16) show clear intent that the two work experience components will relate to the same specific job or occupational area.

Example: A work experience is at a hospital. The occupational education could be learning about the duties of a phlebotomist. The academic education could be learning about the different blood types and why it matters for blood transfusions. The participant might complete the academic component by reviewing an online module about blood types at home before hearing firsthand from a phlebotomist at the work site about his/her work responsibilities.

The work experience employer can provide the academic and occupational education, or it can be provided separately in the classroom or through other means. WCCNM and/or their service providers have the flexibility to decide the appropriate type of academic and occupational education necessary for a specific work experience and who provides the education.

WCCNM must spend at least 20 percent of their WIOA Youth funding on services that fall under the work experience program element. USDOL encourages local WDBs to coordinate work experiences, particularly local summer jobs programs, with other youth serving organizations and agencies, including Temporary Assistance for Needy Families, Community Services Block Grant, and Community Development Block Grant programs.

See the OP – 412 “On-the-Job Training Policy” (most recent version) for more information.

See the OP – 435 “Work Experience - Internship Policy” (most recent version) for more information.

Services under this activity are available for in-school and out-of-school youth.

Program Element 4: Youth Occupational skills training

WCOS Activity Code: #416	Form: WCCNM – Youth Service Authorization Forms WIOA 18Y and WIOA 17Y	Submit to WCCNM Fiscal Department for Payment
---------------------------------	--	--

The services under this program element involve engaging youth in an occupational skills training program. Occupational skills training is an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels.

Such training must meet all three of the following criteria:

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

Examples: Registered Apprenticeships, a Certified Nursing Assistant (CNA) certification; a commercial driver's license (CDL); a one-year Accounting Assistant technical diploma from a technical college; or a two-year Machine Tooling technical diploma from a technical college.

WCCNM may provide occupational skills training through **Individual Training Accounts (ITAs)** for OSY or ISY who are 18 or older and co-enrolled in the WIOA Adult Program.

- **Note:** The state's Eligible Training Provider List **must** be used to select ITA-funded training programs. If the training is funded through the WIOA Adult Program, the program's priority of service and training eligibility provisions apply.

Local areas must give priority consideration to training programs that lead to recognized postsecondary credentials that align with **in-demand industry sectors or occupations** in the local area. Career planners are responsible for helping youth make informed training choices.

See the OP – 419 “ITA Policy” (most recent version) for more information.

Program Element 5: Youth Pre-employment Training/Work Maturity

<p>WCOS Activity Code: #401</p>	<p>Form: WCCNM – Youth Service Authorization Forms WIOA 18c and WIOA 17Y (for ICS and/or Pre-Apprenticeships)</p> <p>(Or)</p> <p>Youth Elements form WIOA-7 (for YouthBuild, Career Pathways, GED/HSED programs)</p>	<p>Submit to WCCNM Fiscal Department for Payment</p>
--	---	---

Services within this program element reflect an integrated education and training model in which **workforce preparation activities**, basic academic skills education, and hands-on occupational skills training are taught within the same time frame and connected to **a specific occupation, occupational cluster, or career pathway**.

Example: A youth learns how to apply basic measuring concepts using a tape measure while ensuring lumber is the correct length to meet blueprint specifications for a new building.

While a local WDB may offer basic academic skills education as part of alternative secondary school services and dropout recovery services (program element 2), workforce preparation activities as part of a work experience (program element 3), and occupational skills training (program element 4) separately and at different times, this program element refers only to the **concurrent delivery** of these services within an integrated education and training model. Common examples of services that follow an integrated education and training model are

YouthBuild and Career Pathways GED/HSED programs offered by some technical colleges, in addition, non-ITAs such as Pre-Apprenticeships.

Service under this activity are available for in-school and out-of-school youth.

Program Element 6: Youth Leadership development services

WCOS Activity Code: #410	Form: WCCNM – Youth Elements Form WIOA 7	Submit to WCCNM Fiscal Department for Payment
---------------------------------	---	--

The services under this program element are focused on encouraging responsibility, confidence, employability, self-determination, and other **positive social and civic behaviors**. Services include:

- exposure to postsecondary educational possibilities;
- community and service-learning projects;
- peer-centered activities, including peer mentoring and tutoring;
- organizational and teamwork training, including team leadership training;
- training in decision-making, including determining priorities and problem solving;
- citizenship training, including life skills training such as parenting and work behavior training;
- civic engagement activities which promote the quality of life in a community; and
- other activities that place youth in a leadership role, such as serving on youth leadership committees (e.g., a Youth Standing Committee).

Services under this activity are available for in-school and out-of-school youth.

Program Element 7: Supportive services

WCOS Activity Code: #455 Transportation Funded	Form: WCCNM – Youth Program Supportive Services Request Form WIOA 4	Submit to Youth Development Fiscal Department for Payment
WCOS Activity Code: #454 Child/Dependent Care Funded #456 Medical Funded #457 Temporary Shelter Funded	Form: WCCNM – Youth Program Supportive Services Request Form WIOA 4	Submit to WCCNM Fiscal Department for Payment
#458 – Other Funded	Form: WCCNM – WIOA Special Support Services	Submit to WCCNM Fiscal Department for Payment

	Authorization Form WIOA 6	
--	--------------------------------------	--

The purpose of the services under this program element is to enable individuals to participate in WIOA activities. Consistent with USDOL's requirements for the Adult and Dislocated Worker Programs, NMWDS requires WCCNM to have a supportive services policy for their Youth Program. Supportive services include, but are not limited to:

- referrals to community programs/services and to state and federal **public assistance** programs;
- transportation assistance;
- child care and dependent care assistance;
- housing assistance;
- needs-related payments;
- assistance with educational testing;
- reasonable accommodations for youth with disabilities;
- services provided by legal aid organizations;
- health care referrals;
- uniforms, work attire, and work-related equipment/tools (e.g., eyeglasses and protective eye gear);
- books, fees, school supplies for postsecondary education; and
- payments/fees for employment and training-related applications, tests, certifications and licenses.

See the OP – 410 “Supportive Service Policy” (most recent version) for more information.

Services under this activity are available for in-school and out-of-school youth.

Program Element 8: Youth Adult mentoring

WCOS Activity Code: #411	Form: WCCNM – Youth Elements Form WIOA 7	Submit to WCCNM Fiscal Department for Payment
---------------------------------	---	--

This program element involves a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to help develop the youth's competence and character. While group mentoring activities and mentoring through electronic means are allowable services under this element, the youth must be matched with an individual mentor who provides some face-to-face interaction. This element may include workplace mentoring where the youth is matched with an employer or employee of a company.

The mentoring services must last at least 12 months and may occur both during participation and as a follow-up service after program exit. To document mentoring services provided after a participant exits the program, the Youth Provider staff must close the mentoring services activity in WCOS and add mentoring services in the Follow-ups screen.

The Youth Service Provider are responsible for having appropriate processes in place to adequately screen and select mentors.

While USDOL strongly prefers that Youth Service Provider staff not serve as mentors, they may in areas where adult mentors are scarce.

Services under this activity are available for in-school and out-of-school youth.

Program Element 9 : Follow-up services

WCOS Activity Code: #428	Form: WCCNM – Youth Elements Form WIOA 7	Submit to WCCNM Fiscal Department for Payment
---------------------------------	---	--

Services under this program element are provided after program exit to help ensure the youth is successful in employment and/or postsecondary education and training. Some follow-up services may include other program elements; to count as follow-up services, they must occur after the participant's exit date. Follow-up services include:

- supportive services;
- adult mentoring;
- financial literacy education;
- career awareness, exploration, and counseling services;
- postsecondary education preparation and transition activities; and
- contact with the 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 (and any other program in which the participant is co-enrolled) when no future services are scheduled. Follow-up services do not cause a participant's exit date to change or trigger re-enrollment in the WIOA Youth Program.

Youth Provider must report follow-up services in a manner that clearly differentiates them from those services provided prior to exit. To accomplish this, follow-up services must be reported in the "Follow-ups" screen in WCOS.

Youth Provider must offer all youth participants the opportunity to receive follow-up services that align with their individual service strategy. Youth Provider must provide follow-up services for a minimum of 12 months, unless participants decline to receive follow-up services or cannot be located or contacted. Youth Provider must have procedure in place to establish when a participant cannot be located or contacted and included in their Operational Procedures.

Follow-up services may be provided beyond 12 months at the discretion of WCCNM. The types of services provided, and the duration of services must be determined based on the needs of the individual and therefore, the type and intensity of follow-up services may differ for each participant. Unsuccessful attempts to contact a participant or contacts made simply to secure documentation for program performance indicators do not count as follow-up services.

See the OP – 416 “Follow Up Services Policy” (most recent version) for more information.

Services under this activity are available for in-school and out-of-school youth.

Program Element 10 : Comprehensive guidance and counseling

WCOS Activity Code: #417	Form: WCCNM – Youth Elements Form WIOA 7	Submit to WCCNM Fiscal Department for Payment
---------------------------------	---	--

Services under this program element are focused on individualized counseling for participants and include:

- drug and alcohol abuse counseling; and
- mental health counseling.

Services may be provided by partner programs when the resources needed do not exist within the local program. If the local program refers participants to outside counseling services, it must coordinate with the referral organization to ensure continuity of service.

Services under this activity are available for in-school and out-of-school youth.

Program Element 11 : Financial literacy education

WCOS Activity Code: #442	Form: WCCNM – Youth Elements Form WIOA 7	Submit to WCCNM Fiscal Department for Payment
---------------------------------	---	--

Services under this program element are intended to help youth acquire the knowledge, skills, and confidence to make informed and effective decisions with their financial resources. The goal is to help youth attain greater financial health and stability by providing high quality, age-appropriate, relevant, and where possible, customized services. Services include:

- helping participants create budgets and open checking and savings accounts;
- helping participants learn how to effectively manage spending, credit, and debt, including student loans and consumer credit;
- teaching participants the significance of credit reports and scores, their rights regarding credit and financial information, how to assure accuracy of a credit report and correct inaccuracies, and how to improve or maintain good credit;
- helping participants understand, evaluate, and compare financial products, services, and opportunities;
- educating participants about identity theft, ways they can protect themselves from identity theft and resolve cases of it, and their rights and protections related to personal and financial data;
- benefits planning and work incentives benefits counseling for youth with disabilities; and

- providing age appropriate and timely financial education that presents opportunities to put lessons into practice, such as by access to safe and affordable financial products that enable money management and savings.

USDOL provides a link to "[Incorporating Financial Capability into Youth Employment Programs](#)," a resource guide in TEGL 21-16 for ideas about how local WDBs can partner with local financial institutions to support the financial literacy of Youth Program participants.

Services under this activity are available for in-school and out-of-school youth.

Program Element 12 : Youth Entrepreneurial training

<p>WCOS Activity Code:</p> <p>#436 Youth Entrepreneurial training</p> <p>#452 Youth Entrepreneurial training - Funded</p>	<p>Form: WCCNM – Youth Elements Form WIOA 7</p>	<p>Submit to WCCNM Fiscal Department for Payment</p>
---	--	---

Services under this program element provide the basics of starting and operating a small business to develop the skills associated with entrepreneurship. Services include developing the ability to:

- take initiative;
- creatively seek out and identify business opportunities;
- develop budgets and forecast resource needs;
- understand various options for acquiring capital and the trade-offs associated with each option; and
- communicate effectively and market oneself and one's ideas.

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

- entrepreneurship education that introduces the youth to the values and basics of starting and running a business. Entrepreneurship education programs often guide youth through the development of a business plan and may include simulations of business start-up and operation.
- enterprise development to help youth develop their own businesses by developing viable business ideas and accessing small loans or grants that are needed to begin business operation.
- 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 program participants work in and manage.

Entrepreneurial skills training, like all other program elements, is available to participants regardless of age but must align with their individual service strategy goals.

Services under this activity are available for in-school and out-of-school youth.

Program Element 13 : Integrated education and training for a specific occupation or cluster

WCOS Activity Code: #441 Integrated education and training for a specific occupation or cluster #443 Services that provide LMI about in-demand industries sectors and occupations	Form: WCCNM – Youth Elements Form WIOA 7	Submit to WCCNM Fiscal Department for Payment
--	---	--

Services under this program element (Career Awareness, Exploration, and Counseling) help youth make appropriate decisions about education/training and careers by providing them with information, advice, and support. Examples of services include, but are not limited to:

- providing labor market information (LMI) and employment information about in-demand industry sectors or occupations in the local area;
- helping participants use different tools and applications to gather LMI and career information;
- providing access to skill, ability, and/or interest inventories;
- discussing state and local LMI with participants;
- providing information about résumé preparation and/or assisting youth with résumé preparation;
- assisting with interview skills;
- discussing opportunities for work experience; and
- discussing the long-term benefits of postsecondary education, such as increased earning power and career mobility.

Services under this activity are available for in-school and out-of-school youth.

Program Element 14 : Postsecondary preparation and transition activities

WCOS Activity Code: #444	Form: WCCNM – Youth Elements Form WIOA 7	Submit to WCCNM Fiscal Department for Payment
---------------------------------	---	--

Services under this program element prepare ISY and OSY for advancement to postsecondary education and training after attaining a high school diploma or its recognized equivalent. Examples of services include helping youth:

- explore postsecondary education options including technical training schools, technical colleges, 4-year colleges and universities, and registered apprenticeship;
- prepare for SAT/ACT testing;
- connect to postsecondary education programs;
- navigate admissions processes;
- search and apply for scholarships and grants; and
- accurately complete the proper financial aid applications.

Services under this activity are available for in-school and out-of-school youth.

WAIVERS AND OTHER FLEXIBILITIES

WCCNM may immediately implement any such “Waivers and Other Flexibilities” as approved or defined by NMDWS that are applicable to all 14 Elements and serve to fulfill unmet areas of opportunity.

If implemented, specific NMDWS Guidance and affiliated references will be included in the Operational Procedures as approved by the AE.

LOCAL PROCEDURES

Local Operational Procedures will be developed separate by the Youth Service Provider for this policy and approved/maintained by the WCCNM Administrative Entity.

INQUIRIES:

WIOA Manager 505-724-3629

This Policy has received approval by the Workforce Connection of Central New Mexico Board and rescinds any policy previously in effect (if applicable).

WCCNM Board Chair