EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	**CLASSIFICATION** WIOA/Youth
	CORRESPONDENCE SYMBOL OWI-DYS
	DATE March 2, 2017

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER WIOA NO. 21-16
OPERATING GUIDANCE for the WORKFORCE INNOVATION AND OPPORTUNITY ACT

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE ADMINISTRATORS
STATE WORKFORCE LIAISONS
STATE AND LOCAL WORKFORCE BOARD CHAIRS AND DIRECTORS

FROM: Byron Zuidema /s/
Deputy Assistant Secretary

SUBJECT: Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance

1. **Purpose.** To provide guidance and planning information to states, local workforce areas, and other recipients of WIOA Title I youth formula funds on the activities associated with the implementation of WIOA.

   WIOA became law on July 22, 2014 and supersedes Titles I and II of the Workforce Investment Act of 1998 (WIA), and amends the Wagner-Peyser Act and the Rehabilitation Act of 1973. The Departments of Labor and Education published a set of regulations for implementing WIOA. These WIOA Final Rules were made public on July 1, 2016, and the rules covering the Title I youth formula program became effective on October 18, 2016.

2. **References.** See attachment 1.

3. **Background.** Title I of WIOA outlines a broad youth vision that supports an integrated service delivery system and provides a framework through which states and local areas can leverage other Federal, state, local, and philanthropic resources to support in-school youth (ISY) and out-of-school youth (OSY). Title I of WIOA affirms the Department of Labor's (DOL) commitment to providing high-quality services for youth, beginning with career exploration and guidance, continued support for educational attainment, opportunities for skills training, such as pre-apprenticeships or internships, for in-demand industries and occupations, and culminating with employment, enrollment in postsecondary education, or a Registered Apprenticeship.

   On March 26, 2015, DOL published Training and Employment Guidance Letter (TEGL) No. 23-14 which provided guidance on WIOA youth program transition. On November 17, 2015 DOL published TEGL No. 8-15 which provided additional WIOA youth transition guidance.

This issuance is the third TEGL that addresses key provisions in WIOA and provides guidance to assist states and local areas in implementing the WIOA youth program.

4. Eligibility.

Determining School Status

Different eligibility criteria apply to in-school youth (ISY) and out-of-school youth (OSY), and WIOA shifts the Youth formula program to focus primarily on OSY. As discussed in 20 CFR § 681.240, school status is determined at the time of program enrollment. Because the process of program enrollment can occur over a period of time, school status must be based on status at the time the eligibility determination portion of program enrollment is made. Once the school status of a youth is determined, that school status remains the same throughout the youth's participation in the WIOA youth program. This distinction is drawn for purposes of reporting against the OSY expenditure requirement.

If a youth is enrolled in the WIOA youth program during the summer and is in between school years, the youth is considered an ISY if they are enrolled to continue school in the fall. If a youth is enrolled in the WIOA youth program between high school graduation and postsecondary education, the youth is considered an ISY if they are registered for postsecondary education, even if they have not yet begun postsecondary classes at the time of WIOA youth program enrollment. However, if a youth graduates high school and registers for postsecondary education, but does not ultimately follow through with attending postsecondary education, then such a youth would be considered an OSY if the eligibility determination is made after the point that the youth decided not to attend postsecondary education.

Non-credit-bearing postsecondary classes. DOL received a number of questions related to what counts as attending postsecondary education for purposes of determining school status. If the youth participant is enrolled in any credit-bearing postsecondary education classes, including credit-bearing community college classes and credit-bearing continuing education classes, then they are considered attending postsecondary education, and, therefore, an ISY. If the youth is only enrolled in non-credit-bearing postsecondary classes, they would not be considered attending postsecondary school and, therefore, an OSY.

Individuals 22 and older attending postsecondary education. Local programs should keep in mind that ISY, including those attending postsecondary education, must be between the ages of 14 through 21. A youth attending postsecondary education who is 22 at time of eligibility determination would not be eligible for the WIOA youth program because they are in school and over the age of 21. That individual could be served through the WIOA adult program.

Exception for youth with disabilities. There is one exception to age eligibility for youth attending school. Youth with disabilities who have an Individualized Education Program (IEP) may be enrolled as ISY after the age of 21, if their state law allows youth with disabilities to be served by the K-12 public school system beyond the age of 21. Such youth may only be enrolled as ISY up to the age allowed by their state law to receive secondary education services.

High school equivalency programs and dropout re-engagement programs. In 20 CFR § 681.230, DOL uses the terms high school equivalency program and dropout re-engagement program. As stated in 20 CFR § 681.230, for purposes of WIOA, providers of adult education under Title II of WIOA, YouthBuild programs, the Job Corps program, high school equivalency programs, and dropout re-engagement programs are not considered to be schools for the purposes of determining school status. However, there is one exception. Youth attending high school equivalency (HSE) programs, including those considered to be dropout re-engagement programs, funded by the public K–12 school system that are classified by the school system as still enrolled in school are considered ISY.

An HSE program offers preparation for, and the taking of, tests which lead to a HSE degree. The "High School Equivalency: Resource Guide for the Workforce System" provides information about the options for high school equivalency and can be found at: High School Equivalency Resource Guide. A dropout re-engagement program conducts active outreach to encourage out-of-school youth to return to school and assists such youth in resuming their education and/or training to become career ready. A re-engagement program or center may provide case management and other services to support youth in overcoming barriers that prevent them from returning to school or work. To learn more about dropout re-engagement centers and programs, see "Bringing Students Back to the Center: A Resource Guide for Implementing and Enhancing Re-Engagement Centers for Out-of-School Youth" and can be found at: Re-Engagement Center Resource Guide.

Homeschooling. DOL has received a number of questions about how to classify youth who are homeschooled. State education agencies and/or local education agencies have policies regarding the classification of youth who are home-schooled. WIOA youth programs must classify homeschooled youth as ISY or OSY based on their state education agency (or local education agency, if relevant) policy.

Eligibility Barriers

To be eligible for the WIOA youth program, individuals must meet one or more conditions listed in WIOA Section 129(a)(1)(B)(iii) for OSY and (a)(1)(C)(iv) for ISY. This guidance refers to these conditions as eligibility barriers. DOL received questions regarding whether youth self-attestation of eligibility characteristics is acceptable. DOL will address self-attestation as part of data validation guidance, which is due to be published later in 2017.

Below is further explanation of some of the eligibility barriers:

English Language Learner. WIOA Section 203(7) defines the term ''English language learner'' as an individual who has limited ability in reading, writing, speaking, or comprehending the English language, and (A) whose native language is a language other than English; or (B) who lives in a family or community environment where a language other than English is the dominant language."

Dropout. A "school dropout" is defined in WIOA Section 3(54) as an individual who is no longer attending any school and who has not received a secondary school diploma or its

recognized equivalent. As discussed in TEGL 08-15, an individual who has dropped out of postsecondary education is not a "school dropout" for purposes of youth program eligibility. A youth's eligibility status is determined at the time of enrollment; therefore, if a youth has not received a high school diploma, or a recognized equivalent, AND is not attending any school, he/she is considered a dropout and is an OSY. A dropout only includes an individual who is currently a secondary school dropout and does not include a youth who previously dropped out of secondary school but subsequently returned. For example, a youth who dropped out of high school in 2015 and returned to high school in 2016 prior to enrollment in WIOA is not considered a dropout.

Age of compulsory school attendance, but not attending. In 20 CFR § 681.210(c)(2), the second eligibility barrier 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." This section of the final rule further states that a "school year calendar quarter is based on how a local school district defines its school year quarters. In cases where schools do not use quarters, local programs must use calendar year quarters."

An offender. The WIOA statute uses slightly different wording to describe the criteria for ISY and OSY who are eligible because they have been subject to any stage of the criminal justice process. For OSY, one eligibility barrier under WIOA Section 129(a)(1)(B)(iii)(IV) is that the youth is "[a]n individual who is subject to the juvenile or adult justice system." For ISY, Section 129(a)(1)(C)(iv)(III) uses the term "offender" as the relevant criteria. The term ''offender'' is defined in WIOA Section 3(38) as "an adult or juvenile (A) 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 (B) who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction." The Department concluded that the intent of the OSY eligibility criterion is not to treat youth who were subject to the juvenile or adult system differently, but rather to call attention to the fact that both the juvenile and adult justice systems may include OSY. Therefore, to be clear that the same eligibility criteria apply to both OSY and ISY, both 20 CFR § 681.210, which provides the eligibility criteria for OSY, and 20 CFR § 681.220, which provides the eligibility criteria for ISY, use the term "offender."

Homeless and foster care youth. In WIOA, an individual who is homeless is eligible under the same barrier category as an individual in the foster care system or one who has aged out of the foster care system. In order to make the regulation easier to understand, DOL separated foster care youth and homeless and runaway youth into two separate eligibility barrier categories in the Final Rule. In addition, the Final Rule also includes " an individual who has attained 16 years of age and left foster care for kinship guardianship or adoption" in the foster care eligibility barrier in 20 CFR §s 681.210 and 681.220 to encompass youth who were formerly in foster care, but may have returned to their families before turning 18.

An individual who is pregnant or parenting. An individual who is parenting can be a mother or father, custodial or non-custodial. As long as the youth is within the WIOA youth age eligibility, the age when the youth became a parent does not factor in to the definition of parenting. A pregnant individual can only be the expectant mother.

Additional assistance barrier. A state may establish definitions and eligibility documentation requirements for criteria for "an individual who requires additional assistance to enter or complete an educational program or to secure or hold employment." If the state does not establish these definitions and eligibility documentation, the local area must do so if it uses this criterion. These policies established at the state or local level should be reasonable, quantifiable, and based on evidence that the specific characteristic of the youth identified in the policy objectively requires additional assistance.

Low-Income Determination

In some regards, WIOA makes low-income determination more complex than under WIA because not all youth need to be low-income in order to qualify for the program. To determine whether a youth must be low income, first consider whether the participant is OSY or ISY. As provided in 20 CFR §s 681.210 and 681.250, if the youth is OSY, the low-income requirement applies only to the following categories of youth – (1) a recipient of a secondary school diploma or its recognized equivalent who is either basic skills deficient or an English language learner; and (2) an individual who requires additional assistance to enter or complete an educational program or to secure or hold employment. All ISY must be low income unless they are served under the five percent exception discussed below.

Low income is defined in WIOA Section 3(36) as an individual who:
(i) receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), the program of block grants to States for temporary assistance for needy families program under part A of Title IV of the Social Security Act (42 U.S.C. 601 et seq.), or the supplemental security income program established under Title XVI of the Social Security Act (42 U.S.C. 1381 et seq.), or State or local income-based public assistance;
(ii) is in a family with total family income that does not exceed the higher of—
    (I) the poverty line; or
    (II) 70 percent of the lower living standard income level;
(iii) is a homeless individual (as defined in Section 41403(6) of the Violence Against Women Act of 1994 (42 .S.C. 14043e–2(6))), or a homeless child or youth (as defined under Section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)));
(iv) receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.);
(v) is a foster child on behalf of whom State or local government payments are made; or
(vi) is an individual with a disability whose own income meets the income requirement of clause (ii), but who is a member of a family whose income does not meet this requirement.

There is one additional low-income category not included in WIOA Section 3(36) above that applies only to youth. According to Section 129(a)(2) of WIOA, for both ISY and OSY, a youth qualifies as low income if the youth lives in a high-poverty area. See Attachment II for additional information on determining if a youth is living in a high-poverty area.

In addition, as discussed above, an ISY who receives or is eligible to receive free or reduced price lunch would meet the low-income requirement. Note that some school districts subsidize all student meals from the Community Eligibility Provision (CEP) Healthy, Hunger-Free Kids Act of 2010. When a school does not use individual eligibility criteria to determine who is eligible for free or reduced price lunch, whole school receipt of free or reduced price lunch cannot be used to determine WIOA low-income status for ISY. In schools where the whole school automatically receives free or reduced price lunch, WIOA programs must base low-income status on an individual student's eligibility to receive free or reduced price lunch or on meeting one of the other low-income categories under WIOA. Local programs can check with their local school districts for determining whether individual students are eligible to receive free or reduced price lunch. While the free/reduced lunch low-income category primarily applies to ISY, there is one exception where it could apply to an OSY. If an OSY is a parent living in the same household as a child who receives or is eligible to receive free or reduced price lunch based on their income level, then such an OSY would meet the low-income criteria based on his/her child's qualification.

As described in WIOA 20 CFR § 681.250(c), WIOA allows a low-income exception where five percent of WIOA youth may be participants who ordinarily would be required to be low-income for eligibility purposes and meet all other eligibility criteria for WIOA youth except the low-income criteria. A program must calculate the five percent based on the percent of newly enrolled youth in the local area's WIOA youth program in a given program year who would ordinarily be required to meet the low-income criteria. It is not based on all youth since many of the OSY categories do not require low-income status. In fact, as discussed above, only two categories of OSY require low-income status. Because not all OSY are required to be low-income, the 5 percent low-income exception under WIOA is calculated based on the 5 percent of youth enrolled in a given program year who would ordinarily be required to meet the low-income criteria.

For example, a local area enrolled 200 youth and 100 of those youth were OSY who were not required to meet the low-income criteria, 50 were OSY who were required to meet the low-income criteria (i.e., either 20 CFR § 681.210(c)(3) or (c)(9)), and 50 were ISY. In this example the 50 OSY required to be low-income and the 50 ISY are the only youth factored into the 5 percent low-income exception calculation. Therefore, in this example, 5 of the 100 youth who ordinarily would be required to be low-income do not have to meet the low-income criteria based on the low-income exception. This percent is calculated at the end of a program year based on new enrollees in that program year.

Lower Living Standard Income Level (LLSIL). Another option for determining low-income eligibility is based on family income. A youth is considered low income if the youth is in a family with a total family income that does not exceed the higher of the poverty line or 70 percent of the LLSIL, except in cases where only the youth's income is considered as discussed below. The LLSIL is published annually by ETA at: LLSIL and includes income charts that are used by state and local workforce investment areas to determine income eligibility based on family size and income for the WIOA youth and certain adult services.

What counts as income? DOL received several questions asking about what counts as income when determining a youth's low-income status. The definition of what counts as income when determining a youth's low-income status has changed under WIOA. It is important to know that the definition of a low-income individual at Section 3(36) does not exclude unemployment compensation or child support payments from income calculations. Therefore, WIOA youth programs must include Unemployment Insurance and child support payments as income when determining a youth's eligibility based on low-income status. As discussed above in the list of low income qualifications in WIOA Section 3(36), homeless and foster youth are considered low income and do not need to meet any additional low-income criteria.

When do you consider only a youth's income? There are circumstances where only the youth's income is considered in determining whether the youth satisfies WIOA income limits for the program. 20 CFR § 681.280 provides that OSY with a disability are not required to be low-income and for ISY with a disability, the youth's own income, rather his or her family's income, must meet the low-income definition and not exceed the higher of the poverty line or 70 percent of the LLSIL.

Additionally, if an individual is not living in a single residence with other family members, that individual is not a member of a family for the purpose of WIOA income calculations. 20 CFR § 675.300 defines family as "two or more persons related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories: (1) A married couple and dependent children; (2) A parent or guardian and dependent children; or (3) A married couple."

5. Program Design.

Program Expenditures Prior to Participation

There are limited instances where WIOA youth funds may be expended on costs related to individuals who are not yet participants in the WIOA youth program. Youth funds can be expended on outreach and recruitment or assessment for eligibility determination (such as assessing basic skills level) prior to eligibility determination, but they cannot be spent on youth program services, such as the 14 program elements which are described in section 7, prior to eligibility determination.

Assessment Requirements

The WIOA youth program design requires an objective assessment of academic levels, skill levels, and service needs of each participant, which includes a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs. Assessments must also consider a youth's strengths rather than just focusing on areas that need improvement.

As discussed in 20 CFR § 681.290, "in assessing basic skills, local programs must use assessment instruments that are valid and appropriate for the target population, and must provide reasonable accommodation in the assessment process, if necessary, for individuals

with disabilities." For purposes of the basic skills assessment portion of the objective assessment, local programs are not required to use assessments approved for use in the Department of Education's National Reporting System (NRS), nor are they required to determine an individual's grade level equivalent or educational functioning level (EFL), although use of these tools is permitted. Rather, local programs may use other formalized testing instruments designed to measure skills-related gains. It is important that, in addition to being valid and reliable, any formalized testing used be appropriate, fair, cost effective, well-matched to the test administrator's qualifications, and easy to administer and interpret results. Alternatively, skills related gains may also be determined through less formal alternative assessment techniques such as observation, folder reviews, or interviews. The latter may be particularly appropriate for youth with disabilities given accessibility issues related to formalized instruments. Local programs may use previous basic skills assessment results if such previous assessments have been conducted within the past six months.

In contrast to the initial assessment described above, if measuring EFL gains after program enrollment under the measurable skill gains indicator, local programs must use an NRS-approved assessment for both the EFL pre- and post-test to determine an individual's educational functioning level.

Career-Related Assessments

All youth, including youth with disabilities, can benefit from participation in career assessment activities, including, but not limited to, assessments of prior work experience, employability, interests, and aptitudes. Multiple assessment tools may be necessary since there is no standard approach that will work for all youth, including youth with disabilities. Career assessments help youth, including those with disabilities, understand how a variety of their personal attributes (e.g., interests, values, preferences, motivations, aptitudes, and skills) affect their potential success and satisfaction with different career options and work environments. Youth also need access to reliable information about career opportunities (based on labor market information) that provide a living wage, including information about education, entry requirements, and income potential. Youth with disabilities also may need information on benefits planning, work place supports (e.g., assistive technology), and accommodations, and also may benefit from less formalized career-related assessments such as discovery techniques. These assessments may be provided directly through WIOA youth program staff, and/or through referrals to national and community-based partners and resources.

Serving 18 to 24 year old youth

As discussed in 20 CFR § 681.430, "individuals who meet the respective program eligibility requirements may participate in WIOA Title I adult and youth programs concurrently. Such individuals must be eligible under the youth or adult eligibility criteria applicable to the services received. Local program operators may determine, for these individuals, the best mix of services under the youth and adult programs."

School status at time of enrollment may determine which program options are appropriate for this population 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.

Some 18 to 24 year olds may be ready for adult services due to life experiences such as having gained occupational skills through education or training, prior work experiences, adult schedules, family responsibilities, and the participant's needs. Others need specific youth services covered in the 14 WIOA youth program elements based on characteristics such as maturity, drug and alcohol abuse, homelessness, foster care status, family abuse/neglect, literacy challenges, pregnancy, and lack of employability skills. Assessments of their skills, career-readiness, literacy, and supportive service needs should be taken into consideration when determining the appropriate program(s) for young adults.

As discussed in 20 CFR § 681.430, if a young adult's needs can best be met by co-enrollment in the WIOA Title I youth and adult programs, "local program operators must identify and track the funding streams which pay the costs of services provided to individuals who are participating in youth and adult programs concurrently, and ensure no duplication of services."

Use of Statewide Funds

20 CFR § 681.410(a) provides that "only statewide funds spent on direct services to youth are subject to the OSY expenditure requirement. Funds spent on statewide youth activities that do not provide direct services to youth, such as many of the required statewide youth activities, are not subject to the out-of-school expenditure requirements." The following services under Section 129(b)(1) of WIOA, which lists the required statewide youth activities, are not considered direct services: conducting evaluations, disseminating a list of eligible providers of youth services, providing assistance to local areas, operating fiscal and management accountability information systems, and providing additional assistance to local areas that have high concentration of eligible youth.

DOL considers "direct services" as those services delivered by local program staff or service providers (e.g., staff-assisted services). For example, demonstration projects related to meeting the education and employment needs of eligible youth is an allowable statewide youth activity. Youth participating in such demonstration projects would be considered receiving direct services from statewide funds. When a youth accesses services through a self-service process such as job searches, career exploration, or use of career center resources, these activities are not considered direct services. If the services provided with statewide funds are "direct services", the eligibility requirements for youth are the same as those that apply to Title I Youth services provided by local areas. Youth who receive direct services funded by statewide funds are considered WIOA youth participants provided that they otherwise meet the definition of participant in 20 CFR § 677.150 and must be reported as such in the WIOA DOL-only Participant Individual Record Layout (PIRL).

Incentives

20 CFR § 681.640 states that "incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. The local program must have written policies and procedures in place governing the award of incentives and must ensure that such incentive payments are tied to the goals of the specific program; outlined in writing before the commencement of the program that may provide

incentive payments; align with the local program's organizational policies; and are in accordance with the requirements contained in 2 CFR part 200."

DOL included the reference to the Uniform Guidance at 2 CFR part 200 to emphasize that while incentive payments are allowable under WIOA, the incentives must be in compliance with the Cost Principles in 2 CFR part 200. For example, Federal funds must not be spent on entertainment costs. Therefore, incentives must not include entertainment, such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment. Additionally, there are requirements related to internal controls to safeguard cash, which also apply to safeguarding of gift cards, which are essentially cash.

While DOL recognizes that incentives could be used as motivators for various activities such as recruitment, submitting eligibility documentation, and participation in the program, incentives paid for with WIOA funds must be connected to recognition of achievement of milestones in the program tied to work experience, education, or training. Such incentives for achievement could include improvements marked by acquisition of a credential or other successful outcomes. Local areas may leverage private funds for incentives that WIOA cannot fund. Incentive payments may be provided to both ISY and OSY as long as they comply with the requirements of 20 CFR § 681.640.

Braiding funds

WIOA does not prohibit the braiding of funds. This resource allocation strategy occurs when different funding streams are used together to support different needs for the same customer while maintaining documentation to support the charging and allocation of costs to multiple separate funding streams or programs. As specified in the Uniform Guidance at 2 CFR 405(d), if a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the programs or activities based on the proportional benefit. In addition each funding stream maintains its statutory requirements, including eligibility criteria and scope of authorized activities.

Braiding funds allows a WIOA youth program to provide more comprehensive services to participants while maximizing partner resources available to assist youth. For example, the Title I WIOA Youth program and the WIOA Title II Adult Education program can provide complementary services to youth and can be used together (braided) to serve eligible youth ages 16-24 where each program's age eligibility overlaps. When used together, these two funding sources can increase the capacity of programs to help young adults meet their employment and educational goals. An organization that receives both Title I Youth funding and Title II Adult Education funding or partners with a program that receives Title II funding may braid these funds and enroll eligible youth into both programs. Title I resources can be utilized to provide youth with such services as career guidance, exploration, and planning; work experience; and leadership development; Title II resources support adult education and literacy activities, including preparation for obtaining a recognized high school equivalency, or workplace adult education and literacy activities, family literacy activities, English language acquisition activities, integrated English literacy and civics education, workforce preparation activities, or integrated education and training. WIOA sec. 203(2). Integrated education and training, a service approach that provides adult education and literacy

activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement, is particularly well-suited to a braided funding model. WIOA sec. 203(11).

6. Competitive Procurement.

One of the responsibilities of Local Workforce Development Boards (Local WDBs) includes selection of providers of youth workforce investment activities through competitive grants or contracts. Competition is expected to improve the delivery of efficient, effective youth workforce services. When a Local WDB awards grants or contracts to youth service providers to carry out youth workforce investment activities, it must identify youth service providers based on criteria established in the State Plan and take into consideration the ability of the provider to meet performance accountability measures based on the primary indicators of performance for youth programs. The Local WDB must also award such grants or contracts on a competitive basis and in accordance with the Procurement Standards found at Uniform Guidance at 2 CFR parts 200 and 2900, in addition to applicable State and local procurement laws. The Uniform Guidance at 2 CFR 200.317 requires States to adhere to the same procurement procedures it uses for non-Federal funds for procurements using Federal funds when it is responsible for conducting the procurement. There is one exception to the requirement of competitive procurement--a Local WDB may award sole-source contracts if it determines an insufficient number of providers exist in the local area (see Section 107(d)(10), 20 CFR § 679.370(l)(1), and Section 123).

The Department interprets the competitive selection provisions discussed in WIOA Section 107(d)(10) and 123 to apply only if the Local WDB provides youth services by awarding grants or contracts to youth service providers. Consistent with 20 CFR § 681.400, a Local WDB may determine that the grant recipient or designated fiscal agent may "provide directly some or all of the youth workforce investment activities." DOL intends for the flexibility provided by 20 CFR § 681.400 to allow Local WDBs to determine whether to directly provide the WIOA youth program elements that they can most efficiently and cost-effectively provide, such as labor market and employment information and services that are part of program design including assessment, supportive services and follow-up services. While this rule represents a change from WIA by providing Local WDBs with flexibility to determine how to most efficiently provide youth services, DOL expects Local WDBs to use youth service providers best positioned to provide program elements resulting in strong outcomes. DOL encourages Local WDBs to award contracts to youth service providers, using a competitive procurement process, when local areas have access to experienced and effective youth service providers.

If a State chooses to do so, it has the authority to set policy requiring Local WDBs to competitively select some or all youth services. The State as grant recipient has the ultimate accountability to DOL for the performance of the Youth program, including outcomes and fiscal integrity. States, therefore, have the authority to establish statewide policies regarding

the provision of youth activities that the State determines are likely to enhance the performance of the Youth program.

If Local WDBs decide to directly provide youth services, DOL recognizes that situations may arise where a single entity performs multiple roles, such as fiscal agent, service provider, or One-Stop operator. In such situations, 20 CFR § 679.430 requires "a written agreement with the Local WDB and Chief Elected Official (CEO) to clarify how the organization will carry out its responsibilities while demonstrating compliance with WIOA and corresponding regulations, relevant Office of Management and Budget circulars, and the State's conflict of interest policy." Furthermore, separation of roles for staff to the Local WDB and the role of the fiscal agent described in 20 CFR §s 679.400 and 679.420, respectively, provide more clarity on the distinct functions of these entities. When youth services are provided by an entity that fulfills another role in the local area, the agreement with the Local WDB and CEO must provide clarity on the expectations for those roles and clear methods of tracking effective execution and accountability for the distinct roles.

7. Program Elements.

This section contains descriptions for each of the 14 WIOA youth program elements. 20 CFR § 681.460 lists all of the program elements and provides further explanation of some of the elements, but not all of them. Additionally, there is overlap between portions of some program elements. The following discussion further clarifies the 14 program elements and explains the services to be reported under each specific program element. In addition, the table below provides an overview and easy reference for finding applicable program element citations, identifies which program elements relate to one another, and lists applicable DOL-only PIRL data elements. These clarifications will facilitate the consistent reporting of services across states and local areas and prevent duplicated reporting of the same service in multiple reporting categories.

WIOA Youth Program Element Section 129(c)(2)	Is the element further described in Final Rule? If so, applicable citations	Relates to or overlaps with other program element[1]	Applicable PIRL Data Element Number(s)
1. Tutoring, study skills training, instruction, and dropout prevention	No	Program elements 2 and 4	1402
2. Alternative secondary school services or dropout recovery services	No	Program element 1	1403
3. Paid and unpaid work experience	Yes, 681.600, 681.590, 681.480		1205, 1405
4. Occupational skills training	Yes, 681.540, 681.550	Program element 1	1300, 1302, 1303, 1306, 1307, 1308,
5. Education offered concurrently with workforce preparation and training for a specific occupation	Yes, 681.630	Program elements 2, 3, and 4	1407
6. Leadership development opportunities	Yes, 681.520, 681.530		1408
7. Supportive services	Yes, 681.570		1409
8. Adult mentoring	Yes, 681.490		1410
9. Follow-up services	Yes, 681.580	Program elements 7, 8, 11, 13, and 14	1412
10. Comprehensive guidance and counseling	Yes, 681.510		1411
11. Financial literacy education	Yes, 681.500		1206
12. Entrepreneurial skills training	Yes, 681.560		1413
13. Services that provide labor market information	Yes, 651.10		1414
14. Postsecondary preparation and transition activities	No		1415

1 Section 7 of the TEGL describes how overlapping portions of each element should be categorized.

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

In 20 CFR § 681.460 (a)(1), this is the first program element listed and includes "tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential." This program element was not further explained in the final rule.

Tutoring, study skills training, and instruction that lead to a *high school diploma* are reported under this program element. Such services focus on providing academic support, helping a youth identify areas of academic concern, assisting with overcoming learning obstacles, and providing tools and resources to develop learning strategies. Tutoring, study skills training, and instruction can be provided one-on-one, in a group setting, through resources and workshops.

Secondary school dropout prevention strategies intended to lead to a high school diploma are also reported under this program element. Secondary school dropout prevention strategies include services and activities that keep a young person in-school and engaged in a formal learning and/or training setting. Strategies include, but are not limited to tutoring, literacy development, active learning experiences, after-school opportunities, and individualized instruction.

On the other hand, while dropout recovery strategies that lead to completion of a recognized high school equivalency are included in both this first program element and in program element 2 in 20 CFR § 681.460 (a)(2) described below, those services are not reported under this program element. For documentation purposes, those services aimed at getting a youth who has dropped out of secondary education back into a secondary school or alternative secondary school/high school equivalency program and preparing them for high school equivalency attainment, should be counted under program element 2 (20 CFR § 681.460 (a)(2)).

Furthermore, while the statutory and regulatory language for both program elements 1 and 4 (discussed below) include language discussing services leading to recognized postsecondary credentials, training services that lead to recognized postsecondary credentials should be reported under program element 4, occupational skills training to avoid duplicated reporting of services.

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

This element was not further explained in the Final Rule. Under 20 CFR § 681.460 (a)(2), alternative secondary school services, such as basic education skills training, individualized academic instruction, and English as a Second Language training, are those that assist youth who have struggled in traditional secondary education. Dropout recovery services, such as credit recovery, counseling, and educational plan development, are those that assist youth

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

Program Element 3: Paid and unpaid work experience

20 CFR § 681.600 further defines work experience as "a planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience may be paid or unpaid, as appropriate. A work experience may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists. Consistent with § 680.840 . . . , funds provided for work experiences may not be used to directly or indirectly aid in the filling of a job opening that is vacant because the former occupant is on strike, or is being locked out in the course of a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving a work stoppage. Work experiences provide the youth participant with opportunities for career exploration and skill development." Additional information on the employer/employee relationship may be found on DOL's Wage and Hour Division website.

WIOA and 20 CFR § 681.590(a) require that a minimum of 20 percent of local area funds for the Title I Youth program be spent on work experience. As explained in 20 CFR § 681.590(b), local area administrative costs are not subject to the 20 percent minimum work experience expenditure requirement. Leveraged resources cannot be used to fulfill any part of the 20 percent minimum.

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

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

Supportive services are a separate program element and cannot be counted toward the work experience expenditure requirement even if supportive services assist the youth in participating in the work experience.

Academic and occupational education component. As discussed in 20 CFR § 681.600, work experiences must include academic and occupational education. The educational component may occur concurrently or sequentially with the work experience. The academic and occupational education component may occur inside or outside the work site. The work experience employer can provide the academic and occupational component or such components may be provided separately in the classroom or through other means. States and local areas have the flexibility to decide who provides the education component.

The academic and occupational education component refers to contextual learning that accompanies a work experience. It includes the information necessary to understand and work in specific industries and/or occupations. For example, if a youth is in a work experience in a hospital, the occupational education could be learning about the duties of different types of hospital occupations such as a phlebotomist, radiology tech, or physical therapist. Whereas, the academic education could be learning some of the information individuals in those occupations need to know such as why blood type matters, the name of a specific bone in the body, or the function of a specific ligament. Local programs have the flexibility to determine the appropriate type of academic and occupational education necessary for a specific work experience.

Categories of work experience. WIOA identifies four categories of work experience: (1) summer employment opportunities and other employment opportunities available throughout the school year; (2) pre-apprenticeship programs; (3) internships and job shadowing; and (4) on-the-job training (OJT) opportunities as defined in WIOA Section 3(44) and in 20 CFR § 680.700. Two of the categories, job shadowing and pre-apprenticeship, are discussed below.

Job shadowing is a work experience option where youth learn about a job by walking through the work day as a shadow to a competent worker. The job shadowing work experience is a temporary, unpaid exposure to the workplace in an occupational area of interest to the participant. Youth witness firsthand the work environment, employability and occupational skills in practice, the value of professional training, and potential career options. A job-shadowing experience can be anywhere from a few hours, to a day, to a week or more.

Job shadowing is designed to increase career awareness, help model youth behavior through examples, and reinforce in the youth and young adult the link between academic classroom learning and occupational work requirements. It provides an opportunity for youth to conduct short interviews with people in their prospective professions to learn more about those fields. Job shadowing can be thought of as an expanded informational interview. By experiencing a workplace first-hand, youth can learn a great deal more about a career than through research in print publications and on the Internet.

As discussed in 20 CFR § 681.480, pre-apprenticeship is a program designed to prepare individuals to enter and succeed in an apprenticeship program registered under the Act of August 16, 1937 (commonly known as the National Apprenticeship Act. . . [and] referred to ... as a registered apprenticeship or registered apprenticeship program) and includes the following elements: (a) training and curriculum that aligns with the skill needs of employers

in the economy of the State or region involved; (b) access to educational and career counseling and other supportive services, directly or indirectly; (c) 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; (d) opportunities to attain at least one industry-recognized credential; and (e) 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.

Program Element 4: Occupational skills training

As stated in 20 CFR § 681.540 of the final rule, 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. 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. Such training must:

(1) be outcome-oriented and focused on an occupational goal specified in the individual service strategy;

(2) be of sufficient duration to impart the skills needed to meet the occupational goal; and

(3) lead to the attainment of a recognized postsecondary credential.

In addition, the chosen occupational skills training must meet the quality standards in WIOA Section 123.

As discussed in 20 CFR § 681.550 "in order to enhance individual participant choice in education and training plans and provide flexibility to service providers, the Department allows WIOA Individual Training Accounts (ITAs) for OSY, ages 16 to 24, using WIOA youth funds, when appropriate." ITAs allow participants the opportunity to choose the training provider that best meets their needs. To receive funds from an ITA, the training provider must be on the Eligible Training Provider List as outlined in § 680.400 and 680.410.

ISY cannot use youth program-funded ITAs. However, ISY between the ages of 18 and 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.

Program Element 5: Education offered concurrently with workforce preparation and training for a specific occupation

20 CFR § 681.630 states that this program element reflects an integrated education and training model and describes how workforce preparation activities, basic academic skills, and hands-on occupational skills training are to be taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway. While programs developing basic academic skills, which are included as part of alternative secondary school services and dropout recovery services (program element 2), workforce preparation activities that occur as part of a work experience (program element 3), and occupational skills training (program element 4) can all occur separately and at different

times (and thus are counted under separate program elements), this program element refers to the concurrent delivery of these services which make up an integrated education and training model.

Program Element 6: Leadership development opportunities

20 CFR § 681.520 defines this program element as opportunities that encourage responsibility, confidence, employability, self-determination, and other positive social behaviors such as: (a) exposure to postsecondary educational possibilities; (b) community and service learning projects; (c) peer-centered activities, including peer mentoring and tutoring; (d) organizational and team work training, including team leadership training; (e) training in decision-making, including determining priorities and problem solving; (f) citizenship training, including life skills training such as parenting and work behavior training; (g) civic engagement activities which promote the quality of life in a community; and (h) other leadership activities that place youth in a leadership role such as serving on youth leadership committees, such as a Standing Youth Committee.

Program Element 7: Supportive services

20 CFR § 681.570 describes supportive services for youth as defined in WIOA Sec. 3(59), are services that enable an individual to participate in WIOA activities. These services include, but are not limited to, the following: (a) linkages to community services; (b) assistance with transportation; (c) assistance with child care and dependent care; (d) assistance with housing; (e) needs-related payments; (f) assistance with educational testing; (g) reasonable accommodations for youth with disabilities; (h) legal aid services; (i) referrals to health care; (j) assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear; (k) assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; and (l) payments and fees for employment and training-related applications, tests, and certifications.

Program Element 8: Adult mentoring

20 CFR § 681.490 states that adult mentoring must last at least 12 months and may take place both during the program and following exit from the program and be a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee. The final rule also states that while group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the local youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis. Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company. Local programs should ensure appropriate processes are in place to adequately screen and select mentors.

DOL acknowledges that in a few areas of the country finding mentors may present a burden to a program. While DOL strongly prefers that case managers not serve as mentors, the final rule allows case managers to serve as mentors in areas where adult mentors are sparse.

Program Element 9: 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 (and any other DOL program in which the participant is co-enrolled if the state is using a common exit policy as discussed in TEGL No. 10-16) 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.

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, has elapsed 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 of the 12-month follow-up requirement. The 12-month follow-up requirement is completed upon one year from the date of exit.

The final rule also states that follow-up services for youth also may include the following program elements: (1) supportive services; (2) adult mentoring; (3) financial literacy education; (4) services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and (5) activities that help youth prepare for and transition to postsecondary education and training. Provision of these program elements must occur after the exit date in order to count as follow-up services. DOL recommends that when these services are provided as follow-up services they are coded as follow-up services in state/local management information systems as opposed to program services provided prior to program exit so that management information systems clearly differentiate follow-up services from those services provided prior to exit. In addition, such follow-up services should be documented in the case file that they were provided as follow-up services post exit.

20 CFR § 681.580 states that all youth participants must be offered an opportunity to receive follow-up services that align with their individual service strategies. Furthermore, follow-up services must be provided to all participants for a minimum of 12 months unless the participant declines to receive follow-up services or the participant cannot be located or contacted. Follow-up services may be provided beyond 12 months at the State or Local WDB's discretion. The types of services provided and the duration of services must be determined based on the needs of the individual and therefore, the type and intensity of follow-up services may differ for each participant. Follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome.

DOL recognizes the concerns that some youth may not be responsive to attempted contacts for follow-up, and other youth may be difficult to locate making it impossible to provide follow-up services for such individuals. Local programs should have policies in place to establish how to document and record when a participant cannot be located or contacted. At the time of enrollment, youth must be informed that follow-up services will be provided for 12 months following exit. If at any point in time during the program or during the 12 months following exit the youth requests to opt out of follow-up services, they may do so. In this case, the request to opt out or discontinue follow-up services made by the youth must be documented in the case file.

Program Element 10: Comprehensive guidance and counseling

20 CFR § 681.510 states that comprehensive guidance and counseling provides individualized counseling to participants. This includes drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate. When referring participants to necessary counseling that cannot be provided by the local youth program or its service providers, the local youth program must 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 refer youth to partner programs.

Program Element 11: Financial literacy education

20 CFR § 681.500 states that this program element may include the following activities:

- 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 the support through the development and distribution of multilingual financial literacy and education materials
- support activities that address the particular financial literacy needs of youth with disabilities, including connecting them to benefits planning and work incentives counseling
- 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 and stability by using high quality, age-appropriate, and relevant strategies and channels, including, where possible, timely and customized information, guidance, tools, and instruction.

In November of 2016, the Financial Literacy Education Commission released a guide, "Incorporating Financial Capability into Youth Employment Programs," aimed at financial institutions interested in enhancing youth financial capability by partnering with youth employment programs. It maps how and why financial institutions engage in helping young people achieve greater financial well-being and employment success and can be found at: Financial Literacy Guide.

Program Element 12: Entrepreneurial skills training

20 CFR § 681.560 states this program element provides the basics of starting and operating a small business. Such training must develop the skills associated with entrepreneurship. Such skills may include, but are not limited to, the ability to:

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

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

(1) 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 also may include simulations of business start-up and operation.

(2) 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.

(3) 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.

Program Element 13: Services that provide labor market information

Under 20 CFR § 681.460 (a)(13), this element includes "services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services." This element is not further described in the Youth section of the final rule; however, the Wagner-Peyser regulation at 20 CFR § 651.10 provides additional information about this element under the definition of workforce and labor market information. That section defines workforce and labor market information as "the body of knowledge that describes the

relationship between labor demand and supply." Numerous tools and applications that are user-friendly exist, which can be used to provide labor market and career information, as appropriate to each youth. These labor market information (LMI) tools can be used to help youth and young adults to make appropriate decisions about education and careers. LMI identifies in-demand industries and occupations and employment opportunities; and, provides knowledge of job market expectations including education and skills requirements and potential earnings. LMI tools also can aid in facilitating youth awareness of the career fields that are likely to provide long-term employment and earnings in local labor markets.

WIOA youth programs and providers should become familiar with state and federal LMI data and LMI tools, which are provided for free by agencies, in order to share relevant LMI with youth. Providing such readily available online services can be accomplished by connecting the youth with American Job Centers and other entities that have career exploration tools, ability and interest inventories, and provide related employment services. DOL electronic tools particularly relevant to youth include My Next Move and Get My Future. In addition to connecting youth to self-service LMI tools, it is important for youth providers to share and discuss state and local LMI with youth participants.

In general, career awareness begins the process of developing knowledge of the variety of careers and occupations available, their skill requirements, working conditions and training prerequisites, and job opportunities across a wide range of industry sectors. The process in which youth choose an educational path and training or a job which fits their interests, skills and abilities can be described as career exploration. Career counseling or guidance provides advice and support in making decisions about what career paths to take. Career counseling services may include providing information about resume preparation, interview skills, potential opportunities for job shadowing, and the long-term benefits of postsecondary education and training (e.g., increased earning power and career mobility).

Program Element 14: Postsecondary preparation and transition activities

In 20 CFR § 681.460 (a)(14), the final program element is activities that help youth prepare for and transition to postsecondary education and training. This element is not further described in the final rule. Postsecondary preparation and transition activities and services prepare ISY and OSY for advancement to postsecondary education after attaining a high school diploma or its recognized equivalent. These services include exploring postsecondary education options including technical training schools, community colleges, 4-year colleges and universities, and registered apprenticeship. Additional services include, but are not limited to, assisting youth to prepare for SAT/ACT testing; assisting with college admission applications; searching and applying for scholarships and grants; filling out the proper Financial Aid applications and adhering to changing guidelines; and connecting youth to postsecondary education programs.

Additional Notes on Documenting and Reporting Program Elements

Documenting receipt of program elements is critical to ensure that youth who are actively participating in programs do not get unintentionally exited due to 90 days of no service. All 14 WIOA youth program elements are contained in the PIRL and local youth programs should ensure that services received are reported in the applicable program element in the PIRL.

In addition, note that case management is the act of connecting youth to appropriate services and not a program element. Case managers providing case management should not be reported as one of the 14 youth program elements in the PIRL.

8. **Inquiries.** All inquiries should be directed to the appropriate ETA regional office.

9. **Attachments.** References and Determining Whether Youth are Living in a High Poverty Area.