

WorkSource Information Notice (WIN)

Employment System Administration and Policy

☐ Policy-related | ☐ Fiscal | ☒ Performance | ☐ Q&A | ☐ Other

Number: WIN 0092

Date: August 3, 2018

Expiration Date: N/A

TO: Workforce Development System Partners

FROM: Gary Kamimura, Policy Manager

SUBJECT: Requirement to Record a WIOA Title I Youth Program Element to Trigger Participation

Purpose:

To remind system partners of the requirement that WIOA Title I youth program enrollees receive at least one of the 14 recognized WIOA Title I youth program elements in order to trigger program participation.

Action Required:

Local Workforce Development Boards and their contractors, as well as Employment Security Regional Directors, must distribute this guidance broadly throughout the system to ensure that WorkSource System staff are familiar with its content and requirements.

Content:

Section 8 of Training and Employment Guidance Letter (TEGL) 10-16, Change 1, states that a WIOA Title I youth program enrollee transitions from a reportable individual to a participant only after having “satisfied all applicable program requirements for the provision of services, including eligibility determination, an objective assessment, development of an individual service strategy, and **received one or more of the 14 WIOA Youth program elements** identified in Section 129(c)(2) of WIOA.”

Consistent with Section 8 of TEGL 10-16, Change 1, the U.S. Department of Labor (DOL) has implemented a new edit check for the Participant Individual Record Layout (PIRL) that rejects any Title I youth records that show an enrollment into the program, but no affiliated record of at least one recognized WIOA youth program element.

For Washington, that edit check revealed numerous Title I youth records in which enrolled youth received services, but none in the form of the 14 WIOA youth program elements.

For example, *Development of Individual Employment Plan (2.0)*, a Title I service for adults and dislocated workers, was recorded for many Title I youth enrollees. It appears that Title I youth case managers are taking this service after completing individual service strategies. Because individual service strategies are a required pre-participation activity, they are not recognized as one of the 14 WIOA youth program elements. These records in Washington’s PIRL were rejected by DOL.

In other examples, job search related activities, which can be provided to adults or youth, were the only services recorded for several Title I youth enrollees. Such activities included *Employment Referral (2.0)*, *Deskside Job Seeker Assistance*, *Resume Review*, *Job Development*, and *Job Club*. As DOL has recently clarified that services intended to assist youth with finding employment will be categorized under program

The WorkSource System is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Language assistance services for limited English proficient individuals are available free of charge.

element 13, Labor Market Information, the State categorized those services as WIOA youth program elements for purposes of the PIRL. **However, going forward, it is the State's expectation that Title I Youth case managers take only *Labor Market Information Services (Youth Only)* to represent either job search or labor market-related activities.**

In yet other examples, activities designed for Wagner-Peyser job seekers and Title I adults and dislocated workers that closely resemble WIOA youth program elements were the only service recorded for numerous Title I youth enrollees (e.g., *Career and Vocational Counseling*, *Career Guidance Services (2.0)*, *Career/Vocational Planning*, and *Career Guidance Services*). In these cases, the State categorized those services as WIOA youth program elements for purposes of the PIRL. **However, going forward, it is the State's expectation that Title I youth case managers will take like services from among the 14 WIOA youth program elements instead of adult services.**

It is the State's intent to design the WAWIN system to only allow the selection of services that are among the 14 WIOA youth program elements. The current ETO system, however, allows the selection of all services that trigger participation – even if they are not WIOA youth program elements. They are treated as triggering participation for Title I youth and submitted to DOL before DOL's edit check rejects them.

Until the new WAWIN system goes live, the State directs Title I youth case managers to ensure that Title I youth receive at least one WIOA youth program element and that the service(s) are recorded in the system to ensure those youth become participants. Subsequent to the recording of a WIOA youth program element, Title I youth case managers can provide other qualified services either individually or in collaboration with other programs like the WIOA Title III Wagner-Peyser Employment Service or WIOA Title I adult program.

[Attachment A](#) provides the list of services from the WorkSource Services Catalog that must be delivered to trigger WIOA Title I youth program participation in the 14 youth program elements. As the State has reviewed existing youth records and categorized services taken to date for purposes of the PIRL, staff do not need to review and update services if they did not originally select any of the services listed in Attachment A.

The State will be revising and expanding the WorkSource Services Catalog's youth program services to directly align with youth program element definitions and descriptions as provided in DOL guidance.

References:

- [P.L. 113-128, Workforce Innovation and Opportunity Act of 2014, Section 129\(c\)\(2\)](#)
- [Training and Employment Guidance Letter \(TEGL\) 10-16, Change 1, Section 8 and Attachments 1 and 7](#)
- [Training and Employment Guidance Letter \(TEGL\) 21-16, Section 7](#)
- [WorkSource Information Notice \(WIN\) 0077, Change 3 – WorkSource Services Catalog](#)

Website:

<https://wpc.wa.gov/adm/policy/state/guidance>

Direct Inquiries To:

Employment System Administration and Policy
Employment System Policy Division
Employment Security Department
P.O. Box 9046
Olympia, WA 98506-9046
SystemPolicy@esd.wa.gov

Attachments:

[Attachment A](#) - Services that must be delivered to trigger WIOA Title I youth program participation

Attachment A

Services that must be delivered to trigger WIOA Title I youth program participation

At least one of the 14 WIOA youth program elements identified in TEGL 21-16, shown in column one, must be delivered in order to trigger WIOA Title I youth program participation. Column two denotes the service or services in the WorkSource Services Catalog that correspond to each of the 14 youth program elements. In other words, any one of the services in column two will trigger WIOA Title I youth program participation.

TEGL 21-16	WorkSource Services Catalog
1. Tutoring, study skills training, instruction, and dropout prevention	<ul style="list-style-type: none"> • Educational achievement services (youth only)
2. Alternative secondary school services or dropout recovery services	<ul style="list-style-type: none"> • Educational achievement services (youth only)
3. Paid and unpaid work experience	<ul style="list-style-type: none"> • Paid and unpaid work experience with academic/education component (youth only)
4. Occupational skills training	<ul style="list-style-type: none"> • Occupational skills training
5. Education offered concurrently with workforce preparation and training for a specific occupation	<ul style="list-style-type: none"> • Education offered with workforce preparation activities and occupational training (youth only)
6. Leadership development opportunities	<ul style="list-style-type: none"> • Youth leadership development opportunities 2.0 (youth only) • Youth community service (youth only)
7. Supportive services	<ul style="list-style-type: none"> • Support services (youth only) • Needs related payments 2.0
8. Adult mentoring	<ul style="list-style-type: none"> • Mentoring (youth only)
9. Follow-up services	<ul style="list-style-type: none"> • Financial literacy in follow-up (youth only) • Labor market information services in follow-up (youth only) • Mentoring in follow-up (youth only) • Other follow-up assistance with work-related problems (youth only) • Post-secondary preparation and transition activities in follow-up (youth only) • Support services in follow-up (youth only)
10. Comprehensive guidance and counseling	<ul style="list-style-type: none"> • Youth guidance and counseling (youth only)
11. Financial literacy education	<ul style="list-style-type: none"> • Financial literacy
12. Entrepreneurial skills training	<ul style="list-style-type: none"> • Entrepreneurial training
13. Services that provide labor market information	<ul style="list-style-type: none"> • Labor market information services (youth only)
14. Postsecondary preparation and transition activities	<ul style="list-style-type: none"> • Post-secondary preparation and transition activities (youth only)