



Oklahoma Office of Workforce Development  
900 N. Portland Ave.  
Oklahoma City, OK 73107

## TECHNICAL ASSISTANCE - #TA-01-2016

**DATE:** July 15, 2016

**RE:** Technical Assistance and Written Explanations on OWDI #02-2016 WIOA Youth Title I Program

**Q: What is the timeframe or effective date for the electronic scanning and uploading of participant records to develop a virtual case file?**

A: Effective March 5, 2014, all youth clients enrolled were required to be enrolled virtually. Any documentation processed after the effective date, must be scanned and entered virtually. OWDI #02-2014 released March 5, 2014 provided staff with specific guidelines and policy on eligibility/data element validation (DEV) and subsequent documentation requirements for the Workforce Investment Act (WIA) Youth Program.

**Q: What is the timeframe/effective date for “Funds spent on work experience must be tracked and reported on a monthly basis beginning with PY15?”**

A: Since July 2014, work experience funds have been tracked at the state and fiscal levels utilizing the expenditure report, which was also revised in July 2014. The only new requirement in that specific part of the policy is that 20% of your program funds must now be spent on work experience, effective the date of the policy.

**Q: What services fall under work experience activities?**

A: In addition to the work experience activities listed in the policy (paid and unpaid work experience, summer employment opportunities, job shadowing, on-the-job training, internships, and pre-apprenticeships), activities include industry exposure, employability skills training, work adjustment and other transition activities, service learning and entrepreneurship skill-building. OOWD staff may provide further technical assistance regarding work experience activities on a case-by-case basis.

**Q: What documents can be used to validate High Poverty Areas and how do we use these for determining eligibility?**

A: High poverty areas are determined using the most recent American Community Survey 5-Year data, located at <https://www.census.gov/acs/www/data/data-tables-and-tools/data-profiles>. A youth who lives in a high poverty area is considered low income.

Until final regulations are published, the state will consider Indian Reservations and all Tribal Lands to be High Poverty areas for the purpose of determining low income youth eligibility.



**Q: How do you define “with” on In School Youth Eligibility?**

A: The term “with” is in reference to an eligible youth *living* with a parent or a legal guardian who meets one of the listed criteria. That is, the low income youth *lives with* a parent or legal guardian who is currently or previously incarcerated or, a low income youth who *lives with* a legal guardian who lacks a high school diploma or GED.

**Q: Is telephone verification an efficient form of validation? What about self-attestation?**

A: To document parent or legal guardian status, you may use the Telephone Verification Form, Attachment D. To determine whether the youth attends a chronically underperforming or Focused Designation School, please refer to the State Department of Education website <http://www.ok.gov/sde/priority-schools> or obtain school records verifying previous attendance at a chronically underperforming or Focused Designation School.

Documentation sources for offender status include:

- Court Documents
- Letter of Parole
- Letter from Probation Officer
- Police Records
- Telephone Verification documenting offender status (Attachment D) by a parent or legal guardian, or Criminal Justice System Official

The validation instructions located in Appendix A offer multiple forms of acceptable source documentation. OOWD requires the most reliable form of documentation available to be used. For example, records from an educational institution are a more reliable source than participant self-attestation. As such, self-attestation can only be used after all reasonable attempts to secure other documentation have failed.

**Q: What tools are acceptable for measuring criteria listed in the Objective Assessment section?**

A: The objective assessment should be conducted using tools or procedures that have been vetted to measure/review academic levels, skills levels and service needs of the individual. The tools and procedures used may vary based on local policy and the needs of the participant.

**Q: For an Individual Service Strategy, must the identification of education and employment be completed if the client does not need a career pathway that includes education?**

A: Federal law directly states “identify career pathways that include education and employment...” Similarly, the State’s Governor’s Council for Workforce and Economic Development has indicated the priorities of career pathways for all and a need for increased educational attainment in order to achieve wealth generation for all Oklahomans. Thus, to be in full compliance with WIOA and the State, career pathways should always include guidance to the next level of educational attainment needed to progress within a career or transition to a higher-paying career.

**Q: Regarding the entry of ISS: why is it necessary to close out goals of the same type before entering another goal?**

A: OOWD is reviewing the procedures of entry of ISS and will provide technical assistance at a later date.

**Q: Does the statement on page 6 number 4 mean that a participant does not have to attend OST in an in-demand occupation but can attend OST in a program that fits within the in-demand industry sector?**

A: Priority must be given to training programs that lead to a postsecondary credential that aligns with an in-demand occupation in the workforce area.

**Q: If a participant does not complete the activities planned in the ISS and is no longer participating in the program, do they still enter follow-up services?**

A: All youth must be provided follow-up services. OOWD will issue a follow-up policy outlining procedures on youth who are no longer participating in the program or who have refused follow-up services.

**Q: With regards to follow-up services, how can we expend funds on and what services can be given to exited clients?**

A: Under WIOA, it is allowable to provide follow-up after completion of participation based on individual needs. Training and work experience are included in WIOA follow-up for youth.

**Q: Can you further define case management purpose?**

A: For further definition, please refer to Memo M-01-2016, Title I Glossary issued April 6, 2016, and located at <http://oklahomaworks.gov/policy-center/oklahoma-workforce-issuances-and-memos/>.

**Q: How is “measurable skills gains” measured with regards to employment and credentials?**

A: The State is awaiting guidance from the US Department of Labor on definition of “measurable gain.” OOWD will release further guidance at a later date.

**Q: What is the OSL trigger for performance?**

A: Program enrollment is the point at which information used for determining performance is collected.

**Q: Can you further define “some program services” on page 9, number 2?**

A: Some program services are defined in Appendix A. Further clarification may be provided by OOWD on a case-by-case basis.

**Q: Can you rework the income calculation worksheet to include actual income because of work history and other issues?**

A: OOWD received suggestions on the income calculation methodology and is reviewing existing federal guidelines, and awaiting USDOL guidance to determine what is allowable. OOWD will provide a response at a later date.

**Q: How can youth be determined Basic Skills Deficient prior to enrollment?**

A: As part of eligibility determination, applicants may be tested utilizing tools outlined in the earlier OOWD response.

**Q: For Runaway youth, can a document from OJA or law enforcement be used?**

A: Yes, the Office of Juvenile Affairs and law enforcement agencies may be used as sources for documentation.

**Q: How should youth who dropped out of middle/junior high be enrolled?**

A: If the youth is younger than 16, the youth is required by Oklahoma law to be in school, thus they must be enrolled as an in-school youth.

**Q: Is the poverty line the Health and Human Services Poverty Guideline that is listed in the state guidance each year?**

A: Yes. This is also indicated in OSL.

**Q: What criteria is used for “other Public Assistance/General Assistance?”**

A: In this instance, the criterion is used for verifying public assistance use, not for verifying low income.

**Q: What services keep the participant from exiting the OSL/Youth Program?**

A: The receipt of documented service by the youth program or any partner program will prevent the youth from exiting.

**Q: What is the timeframe/effective date of Attachment B?**

A: The form is effective on the date of the policy April 15, 2016, and is not retroactive.

**Q: Regarding Attachment E, what can be done to address that there is not enough room to adequately document the frequency of pay?**

A: Please attach additional documentation as needed if space