

ACTION BULLETIN

TO: All Alameda County Workforce Development Board (ACWDB) Youth Career Service Providers (CSP) supported through Workforce Innovation and Opportunity Act (WIOA) Title I In-School (IS) and Out-of-School (OS) Youth Funds

DATE: January 19, 2024

SUBJECT: WIOA YOUTH PROGRAM REQUIREMENTS

PURPOSE OF THIS ACTION BULLETIN:

The purpose of this Action Bulletin is to provide guidance for ACWDB’s WIOA Title I Youth Career Service Providers (CSP) to manage service delivery in compliance with the WIOA and state and local requirements.

CITATIONS:

- WIOA (Public Law 113-128)
- Title 2 Code of Federal Regulations (CFR) Part 200: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)
- Title 20 CFR Part 681: Youth Activities Under Title I of the WIOA
- Title 20 United States Code (U.S.C.) Section 1401: Definitions
- Training and Employment Guidance Letter (TEGL) 21-16, Third WIOA Title I Youth Formula Program Guidance (March 2, 2017)
- TEGL 8-15, Second Title I WIOA Youth Program Transition Guidance (November 17, 2015)
- California Employment Development Department (EDD) Workforce Services Directive (WSD) 17-07 WIOA Youth Program Requirements (Issued 1/16/2018)

BACKGROUND:

This policy provides guidance regarding the provision of WIOA Youth services for both IS and OS youth participants.

DEFINITIONS:

For the purposes of this bulletin, the following definitions apply:

Basic Academic Skills (BAS) are skills in the subject areas of reading, spelling, written expression, and mathematics that provide the necessary foundation for mastery of more complex abilities. BAS are a required part of any work experience opportunity and include contextual learning that accompanies a work experience program as outlined in the Program Requirements section below.

Basic Skills Deficient (BSD) Status is determined by academic assessments when the results for reading/comprehension or math fall below the 9th grade level (8.9 or lower) as determined by one of the recommended academic assessments referenced in the Program Requirements section under Academic Assessments.

Career Services Providers (CSP) are organizations that have sub-contracted with ACWDB to recruit, determine WIOA eligibility, and provide career and training services to WIOA Youth participants.

Comprehensive Adult Student Assessment Systems (CASAS) is a widely used competency-based assessment system. It is designed to assess the relevant real-world basic skills of adult learners. CASAS measures basic skills and the English language and literacy skills needed to function effectively at work.

Educational Functioning Level (EFL) is a standard measurement used to record participants' abilities in either reading/comprehension or math. EFLs relate directly to grade levels as determined by cross-referencing assessment scores using the CASAS Grade Level Equivalent sheet attached to this bulletin. CASAS is the primary assessment tool for determining grade levels or EFLs for WIOA Youth participants. Attached to this bulletin, is a crosswalk chart converting CASAS actual assessment scores to EFLs. EFLs are used by the state of California to determine whether youth participants are basic skills deficient. EFLs are referenced within the CalJOBSSM system.

English Language Learners (ELL) are individuals who have limited ability to read, write, speak, or comprehend the English language; and whose native language is other than English; or who reside in a community or home where the dominant language is other than English.

In-School (IS) Youth: are participants ages 14 through 21, determined eligible for WIOA based on programmatic eligibility as defined in [ACWDB's Action Bulletin \(AB\) 17-03](#) (or any subsequent guidance issued by ACWDB). These individuals are considered IS based on their status as individuals enrolled in school on their date of application.

Job Shadowing is temporary, unpaid exposure to the workplace in an occupational area of interest to the participant and may last anywhere from a few hours to a week or more.

Occupational Information Network (O*NET) is a free online database that contains hundreds of job definitions to help students, job seekers, businesses, and workforce development professionals understand today's world of work in the United States. O*Net codes are frequently required within CalJOBSSM to offer clarification regarding employment when job titles are not self-evident.

On-the-Job Training (OJT) is training that is provided by an employer to a paid participant/employee while engaged in a job that meets the following criteria:

- Provides knowledge or skills essential to the full and adequate performance of the job.
- Is available through a program that provides reimbursement to the employer of up to 50 percent of the wage rate of the participant to cover wages through up to the first 520 hours of the participant's tenure with the company, with an overall cap of up to \$5,000 which is reimbursable directly to the employer.
- Is limited in duration considering the content of the training, the prior work experience of the participant, and local policy as developed by the ACWDB.

Out-of-School (OS) Youth: are participants ages 16 through 24, determined eligible for WIOA based on programmatic eligibility as defined in [ACWDB's Action Bulletin \(AB\) 17-03](#) (or any subsequent guidance issued by ACWDB). These individuals are considered OS based on their status as individuals who are NOT enrolled in school on their date of application.

Pre-Apprenticeship is a program designed to prepare individuals to enter and succeed in an apprenticeship program. Pre-apprenticeship programs include the following elements:

- Training and curriculum that align with the skill needs of employers.
- Access to educational and career counseling and other supportive services.
- Hands-on, meaningful learning activities that are connected to education and training activities.
- Opportunities to attain at least one industry-recognized credential.
- A partnership with one or more registered apprenticeship programs that assist in placing individuals who complete the pre-apprenticeship program into the registered apprenticeship.

Tests of Adult Basic Education (TABE) is a comprehensive and reliable academic assessment product in adult basic education. Educators use TABE testing to provide a solid foundation for effectively assessing the skills and knowledge of adult learners.

PROGRAM REQUIREMENTS:

IS and OS Youth Eligibility: must be determined prior to the provision of any WIOA-funded services. Documentation that supports the individual's eligibility for WIOA services must be collected prior to a determination of eligibility and must be maintained either through hard-copy documentation or by uploading documents into the Document Management Module within the CalJOBSSM system. Other systems may be used to store electronic documentation, but the storage must be determined safe and appropriate for storage of participant's Personal Identifiable Information (PII) in alignment with ACWDB's Action Bulletin (AB) regarding the protection of an individual's PII. The AB is presently in development and will be available on the [ACWDB website, Program Policies Page](#). Until the bulletin is published and available on the website, please reference guidance from the Department of Labor, Training and Employment Guidance Letter ([TEGL](#)) [39-11](#) Guidance on the Handling and Protection of PII.

Objective Assessments (OA): are used to determine the participant's level of:

- Academic achievement/skill
- Occupational/workplace experience

- Employability
- Interests, aptitudes, and strengths
- Need for career services, supportive services, and academic remediation.

Barriers or deficiencies identified through these assessments should be addressed in the Individual Services Strategy (ISS). ISS Program Requirements are outlined below.

OAs may be used to identify a participant's needs outside of the services available through the WIOA-funded provider. In these instances, referrals to outside organizations for wrap-around services may be appropriate – and should be established as goals within the ISS. Participant benefits and outcomes received through these referrals should be tracked in CalJOBSSM either through enrollment activity codes or through case notes or both.

OAs are a required element of WIOA Youth services and must be documented through a hard-copy assessment form or in the CalJOBSSM system – and there must be an enrollment activity code 412 entered into CalJOBSSM to reflect provision of this element of service. The assessment date and the Actual Begin Date of the enrollment activity in CalJOBSSM must match.

Any OA (whether paper/hard-copy or electronic), must be dated to match the enrollment date of the 412 Activity Code in CalJOBSSM.

There are skills/interest assessments widely available to aid career coaches in assessing an individual's interests and aptitudes. Some examples are The [O*Net Interest Profiler](#); [Skills Matcher on Careeronestop.org](#); and [MyNextMove.org](#).

Individual Services Strategies (ISS): must be developed by CSP staff for every WIOA Youth participant – and should include strategies to address barriers, challenges, and deficiencies that have been identified through the OA. The ISS identifies the plan, including objectives and goals, for the youth participant to overcome barriers while improving skills, abilities, and employability.

The ISS is a living document. As goals and objectives are attained, they may be closed, and new goals may be added.

Prior to engaging the participant in any other services and in alignment with WIOA, Youth participants must receive:

- An OA service (CalJOBSSM Activity Code 412); and
- Assistance with development of an Individual Services Strategy (ISS) (CalJOBSSM Activity Code 413).

Any ISS (whether paper/hard-copy or electronic), must be dated to match the enrollment date of the 413 Activity Code in CalJOBSSM and must contain the signature of the participant and the career coach.

Within the CalJOBSSM system, youth services are initially limited to the 412 and 413 activity codes. Once those two activities have been entered, then the CSP may provide other services and enter additional enrollment activity codes into CalJOBSSM. Individuals are not considered WIOA Youth participants until they have the 412, the 413, and one additional, clock-restarting

activity/service code entered into CalJOBSSM. The third enrollment activity code must be 1 of the 14 required services as listed below – and until the third service code is entered, the individual will NOT count as a WIOA participant toward service provider enrollment goals.

Academic Assessments: are tests/assessments that measure the academic grade levels of participants in both reading/comprehension and math. The assessments must comply with state standards and must have a scoring system that results in EFL or grade level measurements in either Reading/Comprehension or Mathematics (or both). The state-approved assessments recommended by ACWDB are CASAS and TABE.

Academic Assessments are required for all OSY participants and must be administered either:

- Within six months prior to enrollment into a WIOA program; or
- Within 60 days after enrollment into a WIOA program.

OSY participants whose assessment results reflect BSD status (see definition above), must have a remediation plan as part of their ISS – and must have a post-test administered to reflect their increased scores. Increases in the participant’s EFL or grade level as determined through improved assessment scores must be recorded in CalJOBSSM as a Measurable Skill Gain (MSG).

For assistance obtaining access to either the CASAS or TABE assessments, please reach out to the ACWDB Youth Program Liaison and/or the assigned Workforce Technician.

14 Required Program Elements: are a list of services that must be offered to WIOA Youth participants. Every individual enrolled in a WIOA Youth program must be provided at least 1 of the following 14 services to count as a WIOA participant:

#	REQUIRED PROGRAM ELEMENT
1	Tutoring, study skills, training, drop-out prevention, education recovery
2	Alternative secondary school services
3	Paid/unpaid work experience, pre-apprenticeship, internship, job shadowing, on-the-job training
4	Occupational skills training
5	Education AND workforce preparation activities
6	Leadership Development
7	Supportive Services
8	One-year (+) adult mentoring
9	Follow up services
10	Comprehensive guidance counseling
11	Financial literacy education
12	Entrepreneurial skills training
13	Labor market information, career awareness/exploration/counseling
14	Transition to post-secondary education and training

The Program Elements listed above may be delivered by the WIOA service provider or may be offered through referral to a partner organization. Case notes should be included to reference any such referral for services – and the outcomes from those referrals.

Active Services: are services provided to participants that are consistent with WIOA requirements and demonstrate a benefit to the participant. These active services may be tracked using WIOA enrollment activity codes available within CalJOBSSM. Case notes may also be used to track services provided to WIOA participants. Entering WIOA enrollment activity codes is the best way to ensure that direct, active services are being provided in compliance with WIOA required timelines. However, case notes are also valuable in recording the details of encounters with participants. Ideally, some combination of enrollment activity codes and case notes should paint a thorough and complete picture of an individual's engagement with the local workforce system – including outcomes.

Active Services must be provided to any WIOA participant at intervals of less than 90-days. Any participant that does not have an enrollment activity service code entered into CalJOBSSM within that 90-day interval will have their WIOA case system-closed due to inactivity. Once a case is system-closed; ACWDB staff must submit a Data Change Request (DCR) to the state asking for the case to be reopened. The state does not always honor such requests. Additional WIOA services may not be provided when a case has been closed – unless those additional services are in compliance with the F codes as referenced in the EDD's [Workforce Services Directive \(WSD\) 19-06 CalJOBSSM Activity Codes](#).

Work Experience: is a WIOA service that offers a youth participant an opportunity to engage in a planned, structured learning experience that takes place in a private, for-profit, nonprofit, or public sector workplace for a limited period. The experience should include such elements as: employability skills; workplace skills; exposure to various aspects of an industry or occupation; progressively more complex tasks; and the integration of basic academic skills into work experience activities.

WIOA enrollment activity codes that count as Work Experience opportunities include:

- 400-Youth Summer Employment
- 408-Youth Internship (Unpaid)
- 409-Youth Job Shadowing
- 425-Work Experience (Paid)
- 426-Work Experience (Unpaid)
- 427-Internship (Paid)
- 428-Youth On-the-Job Training
- 431-Pre-Apprenticeship Training
- 432-Apprenticeship Training

Local Areas must spend at least 20 percent of their WIOA Youth formula allocation on work experience activities. Leveraged resources may NOT be used to fulfill this 20 percent requirement. Work Experience activities:

- May be offered/provided to both IS and OS Youth
- Must include academic and occupational education (provided either concurrently or sequentially)
- May include summer employment opportunities
- May include apprenticeship or pre-apprenticeship programs
- May include Internships or job shadowing
- May include OJT opportunities.

Local Areas have the flexibility to determine the appropriate type of academic and occupational education necessary for a specific work experience component. Local Areas may decide who provides the academic and occupational educational component. The academic component may take place inside or outside of the work site, and the work experience employer may provide the academic and occupational education component, or such components may be provided separately in a classroom or through other means.

WIOA funds used to pay for staff time toward any of these activities may also count toward the 20% requirement.

Measurable Skill Gains (MSG): are a method for tracking participant progress through educational or training activities that will eventually lead to a recognized credential. MSG attainments include:

- Acquiring educational credits or units toward a diploma, degree, or occupational credential
- Accomplishment of training milestones for individuals enrolled in On-the-Job or apprenticeship training programs
- Successfully completed exam or benchmark toward proficiency in a particular occupational field
- Improved test scores or increased EFL for individuals who were determined to be ELL or BSD.

MSGs must be recorded in CalJOBSSM for every participant who has been enrolled into any training activity that leads to a diploma, degree, or credential. MSG goals are part of CSP's contractual compliance and contract performance.

Training activities that will trigger the requirement for an MSG are:

- 415 – Enrolled in Alternative Secondary Education
- 416 – Occupational Skills Training (Approved ETPL Provider)
- 418 – Adult Education (GED)
- 421 – Enrolled in Post-Secondary Education
- 429 – Enrolled in Secondary Education Program
- 430 – Youth Occupational Skills Training (Statewide Youth Provider List)
- 432 – Enrolled in Apprenticeship Training
- 437 – Pre-Apprenticeship Program with Occupational Skills Training (ITA); and
- 438 – Occupational Skills Training (non-WIOA Funds)

Incentive Payments: are a one-time allowable payment to a WIOA Youth participant in recognition of achievement of performance outcomes linked to training, education, work experience, or attainment of unsubsidized employment. Incentive Payments are offered at the discretion of the Local Board. Youth Incentive Payments must be based on an incentive contract between the youth participant and the CSP/Local Board. Incentives differ from supportive services in that the latter may only be provided when deemed necessary for a participant to engage in program services. Incentive payments provided to WIOA Youth participants must comply with ACWDB's Action Bulletin [\(AB\) 19-03](#) or the most current ACWDB published guidance.

Case Notes: are a useful tool for recording the details of interactions with WIOA participants. In some instances, case notes may be used as verification of compliance with WIOA requirements. Case notes should be detailed and include language reflecting that an “active service” has been provided to the participant. Active services are defined as benefits offered to participants through engagement with the WIOA system. If a case note states that a participant called to report their job search activities, that is NOT an active service. The case note should reference any advice offered by the Career Coach to aid in participant’s development of interviewing techniques, or suggestions toward improvement of the individual’s resume for example.

Case notes used to record job placement information should include all employment details, (the employer name and location, the job title and corresponding O’Net code, the rate of pay and scheduled hours per week, etc.).

Follow-Up: begins immediately after a participant exits from WIOA services and expands throughout the four quarters post-exit. As outlined within CSP contracts, program staff must continue to maintain contact with exited WIOA participants throughout the follow-up period – recording employment and credential attainment outcomes at least quarterly through the Follow-Up section within CalJOBSSM. Additionally, unsuccessful attempts to contact former WIOA participants should be recorded as “Unable to Locate” within the Follow-Up section in CalJOBSSM.

During the four quarters post-exit, WIOA services may be provided (but must be offered) and recorded in the CalJOBSSM system – as long as the services provided correspond to the F service codes found in the [WIOA Activity Codes Dictionary WSD 19-06](#).

File Retention Expectations: Case files for WIOA applicants **and** participants should be maintained for at least three program years beyond the exit date for that participant. [Example: If a WIOA participant exits WIOA program services during the first quarter of the PY (July, August, September of 2023), then the file should be maintained at least through the end of the third program year after the PY of exit (through at least July, 2027). However, each service provider may implement practices that call for a longer period of retention.

Any discrepancies arising between this policy/procedure and federal or state provisions (due to future revisions) will default to the current minimum federal and state regulations and guidance available. This bulletin represents the most current information available at the time it was published. As policies or regulations are updated, the most current versions of bulletins will appear on our website at www.acwdb.org.

INFORMATION AND INQUIRIES:

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ATTACHMENTS:

Attachment 1: CASAS EFLs and Grade Level Equivalents



Comprehensive Adult Student Assessment Systems

For WIOA Title I Funded Agencies and Youth Providers

CASAS recommends agencies use grade level information *only* for administrative purposes when state or federal regulations call for a grade level.

CASAS ABE Reading Scores by EFLs and Grade Level Equivalents (GLEs) for WIOA Title I

NRS Levels	Reading ABE/ASE EFLs		Reading GOALS Score Ranges	Grade Level
1	Beginning ABE Literacy	Basic Skills Deficient	193 and below 194 - 203	K 1
2	Beginning Basic		204 – 210 211 - 216	2 3
3	Low Intermediate		217 – 222 223 – 227	4 5
4	High Intermediate		228 – 230 231 – 234 235 – 238	6 7 8
5	Low Adult Secondary	Not Basic Skills Deficient	239 – 243 244 – 248	9 10
6	High Adult Secondary		249 – 253 254 and above	11 12

CASAS ABE Math Scores by EFLs and Grade Level Equivalents (GLEs) for WIOA Title I

NRS Levels	Mathematics ABE/ASE EFLs		Math GOALS Score Ranges	Math GOALS 2 Score Ranges	Grade Level
1	Beginning ABE Literacy	Basic Skills Deficient	184 and below 185 – 193	183 and below 184 – 192	K 1
2	Beginning Basic		194 – 198 199 – 203	193 – 198 199 – 203	2 3
3	Low Intermediate		204 – 209 210 – 214	204 – 208 209 – 213	4 5
4	Middle Intermediate		215 – 221 222 – 225	214 – 220 221 – 224	6 7
5	High Intermediate	Not Basic Skills Deficient	226 – 228 229 – 235	225 – 228 229 – 235	7 8
6	Adult Secondary		236 – 240	236 – 240	9
			241 – 244	241 – 244	10
			245 – 248	245 – 248	11
		249 and above	249 and above	12	

CASAS ESL Reading Scores by EFLs and Grade Level Equivalents (GLEs) for WIOA Title I

NRS Levels	Reading ESL EFLs		Reading STEPS Score Ranges	Grade Level
7	Beginning ESL Literacy	Basic Skills Deficient	183 and below	K
8	Low Beginning ESL		184 – 189	K
			190 – 196	1
9	High Beginning ESL		197 – 206	1
10	Low Intermediate ESL		207 – 211	2
			212 – 216	3
11	High Intermediate ESL		217 – 222	4
			223 – 227	5
12	Advanced ESL		228 – 230	6
			231 – 234	7
			235 – 238	8
	Exit Advanced ESL	Not Basic Skills Deficient	239 and above	9+

CASAS ESL Listening Scores by EFLs and Grade Level Equivalents (GLEs) for WIOA Title I

NRS Levels	Reading ESL EFLs		Listening STEPS Score Ranges	Grade Level
7	Beginning ESL Literacy	Basic Skills Deficient	181 and below	K
8	Low Beginning ESL		182 – 186	K
			187 – 191	1
9	High Beginning ESL		192 – 201	1
10	Low Intermediate ESL		202 – 206	2
			207 – 211	3
11	High Intermediate ESL		212 – 216	4
			217 – 221	5
12	Advanced ESL		222 – 224	6
			225 – 227	7
			228 – 231	8
	Exit Advanced ESL	Not Basic Skills Deficient	232 and above	9+

CASAS ESL Reading Scores by EFLs and Grade Level Equivalent (GLEs) for WIOA Title I

NRS Levels	Reading ESL EFLs		Reading Life and Work Score Ranges	Grade Level
7	Beginning ESL Literacy	Basic Skills Deficient	180 and below	1
8	Low Beginning ESL		181 - 190	1
9	High Beginning ESL		191 – 200	1
10	Low Intermediate ESL		201 – 205 206 – 210	2 3
11	High Intermediate ESL		211 – 215 216 – 220	4 5
12	Advanced ESL		221 – 225 226 – 230 231 – 235	6 7 8
	Exit Advanced ESL	Not Basic Skills Deficient	236 and above	9+

CASAS ESL Listening Scores by EFLs and Grade Level Equivalent (GLEs) for WIOA Title I

NRS Levels	Listening ESL EFLs		Listening Life and Work Score Ranges	Grade Level
7	Beginning ESL Literacy	Basic Skills Deficient	180 and below	1
8	Low Beginning ESL		181 - 189	1
9	High Beginning ESL		190 – 199	1
10	Low Intermediate ESL		200 – 204 205 – 209	2 3
11	High Intermediate ESL		210 – 214 215 – 218	4 5
12	Advanced ESL		219 – 221 222 – 224 225 – 227	6 7 8
	Exit Advanced ESL	Not Basic Skills Deficient	228 and above	9+