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**TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS**

**FROM: JANE OATES /s/
Assistant Secretary**

**SUBJECT: Workforce Investment Act (WIA) Youth Program Guidance for
Program Year (PY) 2010**

1. Purpose. The purpose of this Training and Employment Guidance Letter (TEGL) is to provide guidance for use of WIA Youth formula funded activities in PY 2010 building from the experience and lessons learned during the implementation of the Youth program in the American Recovery and Reinvestment Act (Recovery Act) of 2009.

2. References.

- Workforce Investment Act of 1998 (WIA), as amended (29 U.S.C. 2801 et seq.)
- WIA Regulations at 20 CFR Part 666
- TEGL No. 03-09 Change 2, “Final Guidance to State Workforce Agencies (SWAs) and Employers for the Implementation of the Two American Recovery and Reinvestment Act (ARRA) of 2009 Work Opportunity Tax Credit (WOTC) Targeted Groups Requirements;
<http://wdr.doleta.gov/directives/attach/TEGL/TEGL3-09c2.pdf>
- TEGL No. 14-08, “Guidance for Implementation of the Workforce Investment Act and Wagner-Peyser Act Funding in the American Recovery and Reinvestment Act of 2009 and State Planning Requirements for Program Year 2009;” http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2728
- TEGL No. 17-05, “Common Measures Policy for the Employment and Training Administration’s (ETA) Performance Accountability System and Related Performance Issues;” http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2195
- TEGL 13-09, “Contracting Strategies That Facilitate Serving The Youth Most In Need;” http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2854
- Training and Employment Notice (TEN) No 33-09, “Release and Availability of Employment and Training Administration (ETA) Occasional Paper 2010-03:

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Reinvesting in America's Youth: Lessons from the 2009 Recovery Act Summer Youth Employment Initiative;

http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2872.

- Government Accountability Office (GAO) Report, "Recovery Act: Funds Continue to Provide Fiscal Relief to States and Localities, While Accountability and Reporting Challenges Need to Be Fully Addressed, September 2009;" <http://www.gao.gov/new.items/d091016.pdf>
- TEN No. 24-09, "Joint Letter from the Employment and Training Administration (ETA) and the U.S. Department of Health and Human Services Administration for Children and Families (ACF) regarding youth subsidized employment opportunities under the Temporary Assistance for Needy Families (TANF) Emergency Contingency Fund;" http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2844

3. Background. The Recovery Act, signed into law on February 17, 2009, marked the first time since the implementation of WIA that ETA has encouraged states and local workforce areas to operate expanded summer employment opportunities for youth. In TEGL14-08, ETA urged states and local workforce investment areas to use Recovery Act funds to create and expand summer employment and work experience opportunities for eligible WIA youth. Through the Recovery Act, over 325,000 youth participated in summer employment opportunities. The implementation of this large-scale effort resulted in a number of lessons learned that are relevant for the regular WIA Youth program.

PY 2010 offers an excellent opportunity for states and local areas to build on the success of the summer employment opportunities and work experiences implemented under the Recovery Act. ETA encourages states and local areas to develop strategies for incorporating the lessons learned from the Recovery Act into their youth program design.

4. Program Emphases. Summer employment opportunities and paid and unpaid work experiences are two of the ten program elements in the WIA youth program. The Recovery Act implementation demonstrated that meaningful work experiences, both during the summer and throughout the year, provides youth with invaluable opportunities to learn about career opportunities and to gain the skills necessary to succeed in the workplace. ETA encourages states and local areas to continue to focus on these two program elements during PY 2010 with the use of regular WIA Youth formula funds. (Local areas must still make services available for the other eight program elements for non-Recovery Act funded-programs. See 20 CFR 664.410 and TEGL 14-08, p.26). When using WIA Youth formula funds to provide summer employment opportunities and paid and unpaid work experiences, all regular WIA Youth performance and reporting requirements apply. If using these funds in combination with other available funding sources such as remaining WIA Youth Recovery Act funds and leveraged funding such as Temporary Assistance for Needy Families (TANF) Emergency funds, all relevant performance and reporting requirements for those funding sources apply. For WIA youth programming in PY 2010, states and local areas should consider the following:

- Build the capacity for local areas to expand summer employment opportunities and work experiences within a comprehensive service strategy based on lessons learned from PY 2009;
- Improve participants' employability skills through work readiness training;
- Work with the private sector, in addition to the public sector, to provide more work experience opportunities for economically disadvantaged and disconnected youth in private sector employment; and
- Strengthen activities that transition youth from subsidized work experiences into unsubsidized employment, educational pathways, occupational skills training, or co-enrollment into WIA Adult services.

5. Experiences from Summer 2009. ETA held two summits in the fall of 2009 for state and local workforce providers to share the findings and lessons learned from the local area summer youth employment initiatives. The summits were focused around three themes: a) serving and transitioning older out-of-school youth; b) accessing jobs and opportunities for youth in green and other emerging industries, including healthcare; and c) summer youth employment program design and implementation. Summit participants identified numerous effective practices for administering summer activities which are integrated throughout this advisory. Furthermore, resources and presentation materials collected from the summits can be found on Workforce3one, ETA's technical assistance platform, at: <http://economicrecovery.workforce3one.org/page/resources/1001001437571756168>.

To better understand the efforts made during the summer of 2009, ETA contracted with Mathematica Policy Research Inc. to conduct an evaluation of summer youth activities funded by the Recovery Act. In March 2010, ETA disseminated TEN 33-09 releasing the evaluation, *Reinvesting in America's Youth: Lessons from the 2009 Recovery Act Summer Youth Employment Initiative*. The evaluation focused on the design and implementation of the summer youth employment initiative (SYEI), the identification and recruitment of at-risk youth, and the provision of services and work experience opportunities. Overall, the evaluation found that while it took enormous effort to get this large initiative up and running in a short period of time, the SYEI was implemented successfully without any major problems. In addition, the evaluation found the SYEI had a threefold effect: money got into the hands of needy families; youth and their families spent the income earned through SYEI jobs in their depressed local economies; and youth gained valuable work experience, increasing their long-term job prospects. Also, youth valued the opportunity to hold a job, gain work skills, build their résumés, and valued the exposure to professional environments and mentoring from adults. Finally, employers were overwhelmingly positive about the initiative. They felt that the experience of mentoring a new employee was worth the effort and nearly all agreed that they would participate again if given the opportunity.

ETA has based this guidance on the findings and recommendations from the summits as well as those highlighted in the evaluation. Examples of the lessons learned are integrated throughout this TEGL.

6. Leveraging Resources. To sustain summer employment and work experience opportunities, states and local workforce investment boards should consider using additional sources of funding to leverage summer employment program activities. In addition to regular WIA Youth formula funds, local areas can use other resources, such as remaining WIA Youth Recovery Act funds and TANF Emergency funds. When leveraging multiple funding streams, however, states must carefully track which participants are served with which funds and utilize only the flexibilities that are available for that funding source. Program and reporting requirements are based on the funding source of the activity.

ETA encourages local areas to partner with TANF agencies in order to leverage resources to better serve low-income youth with barriers to employment. In January 2009, a joint letter from the ETA and the U.S. Department of Health and Human Service's Administration for Children and Families (ACF) was distributed to the workforce system and human services agencies that urged both systems to work together to explore all funds available for the creation and expansion of subsidized summer employment opportunities for low-income youth. ETA released TEN 24-09 to the workforce system encouraging collaboration and the leveraging of resources where possible. By leveraging resources made available by the TANF program and WIA employment and training programs, state and local TANF agencies and local workforce investment boards (LWIBs) have the potential to bring additional subsidized job opportunities to youth this summer. In order to assist states in implementing partnerships with TANF agencies, ETA will consider waivers of performance measures, for states that leverage regular WIA Youth formula funds with TANF Emergency funds, to use the work readiness indicator only and waivers of program design features in order to provide the flexibility that was allowed when implementing summer employment under the Recovery Act. See TEGL 26-09 for specific instructions on requesting such waivers.

When using Recovery Act funds to support WIA youth service activities, particularly summer employment opportunities, local workforce areas should refer to the guidelines provided in TEGL 14-08. Otherwise, ETA encourages local areas to use the approaches provided in this TEGL to launch 2010 summer employment and work experience opportunities to both in-school and out-of-school youth using regular WIA Youth formula funding.

7. Program Design Considerations. When considering expanded summer employment opportunities and work experiences throughout the year, states and local areas should consider the following design elements:

A. Ensuring Quality Enrollment

- **Focusing on Youth Most in Need.** ETA encourages states and local areas to focus services on the eligible youth most in need such as: out-of-school youth and those most at risk of dropping out; youth in and aging out of foster care; youth offenders and those at risk of court involvement; homeless and runaway

youth; children of incarcerated parents; migrant youth; Indian and Native American youth; and youth with disabilities.

The hardest to serve youth, like dropouts and out-of-school youth, require additional time and assistance to attain positive outcomes as measured by the WIA Youth common and statutory measures. Therefore, ETA encourages states and local areas to implement strategies that promote longer-term services for these youth to prepare them for post-secondary education and/or the workforce. TEGL 13-09 provides states, LWIBs, and service providers strategies and tools to develop training contracts that promote longer-term services to the youth most in need, while still achieving performance goals.

- **Focusing on Older Youth.** Regular WIA formula funds require local areas to serve youth 14 to 21 years old. Under the Recovery Act, however, local areas are allowed to serve youth up to the age of 24, making it the first time that many providers have attempted to recruit, identify and serve this expanded older youth population. The evaluation found that local areas had difficulty reaching older youth, including veterans and their spouses. The evaluation cited several strategies to improve those efforts that would require providers to:
 - think beyond “youth” when designing and promoting youth activities given that many veterans and young adults have children, household responsibilities, and significant work experience;
 - avoid alienating young adults by characterizing the summer employment as only a youth program;
 - develop new partnerships or reframe old partnerships with organizations that already serve these young adults; and
 - implement strategies to differentiate services based on the unique needs of these older participants.

ETA recommends considering these strategies when serving older youth up to age 21 in the regular WIA youth program and when serving older youth up to age 24 with remaining WIA Youth Recovery Act funds.

- **Improving Eligibility Processes.** The summer employment evaluation found that almost all of the local areas studied had challenges with determining youth eligibility due to difficulty in managing an increased volume of youth and in processing and collecting adequate documentation from youth and parents. ETA recommends that local areas consider several strategies outlined in the evaluation to improve eligibility processes, such as:
 - providing more training to less experienced staff members to prepare them for summer tasks;
 - relying more heavily on experienced staff to perform eligibility determination; and
 - examining other possible strategies to maximize staff resources such as streamlining intake procedures through prescreening applications and

coordinating with schools and social service agencies to determine youth eligibility.

- **Using Technology to Aid Program Administration and Reporting.** Where possible, states and local areas should consider utilizing creative and efficient approaches to program administration through the use of technology. During the summer of 2009, many local areas used technology to provide on-line training and webinars as a way to reinforce information provided in employer orientations and to support work readiness training offered to youth participants. In addition, local areas reported posting policies, procedures, and guidance online as well as job listings to assist in transitioning youth into unsubsidized employment. One local area used a Web site to streamline and simplify recruitment by offering online applications for both youth and potential worksites. This technology also provided real-time reporting capabilities, tracked youth participation and worksite placement efforts, and offered customizable data sorting features and online document sharing.

B. Ensuring Youth Preparation and Support

- **Work Readiness Training and other Non-Worksite Activities.** States and local areas are encouraged to integrate work experiences with related work readiness training, academics, occupational skills training, and/or leadership development. The evaluation revealed that youth found work readiness training to be one of the most useful aspects of the summer initiative. When implementing work readiness training, ETA encourages local areas to consider the following strategies to maximize the impact of work readiness and related training:

Training Design Components. Program models should include training design components, such as:

- Group orientations that communicate the overall benefits of a work experience, provide program expectations for work behavior, address any outstanding procedural questions from youth prior to the start of the program, and are interactive, motivational, and typically last at least a half-day;
- Work readiness training prior to worksite placement that is engaging, focuses on the foundation skills desired by employers, lasts at least one week with the length of time dependent on participants' needs, and ensures youth are adequately prepared for their work experience;
- On-site group or individual orientation by the employer on the first day of worksite placement to introduce youth to the worksite, and review expectations outlined in the worksite evaluation; and
- On-going training integrated throughout the work experience that continues a few hours each week in combination with the work experience.

Training Content Areas. Work readiness topics should focus on training content areas, such as:

- Foundation skills such as communication skills, teamwork, decision-making, problem-solving, conflict-resolution, work habits, customer service, responsibility, appearance, integrity, leadership, and time-management;
 - Job-seeking skills such as portfolio-building (resumes, cover letters, references), job applications, entrepreneurship, interviewing, networking, and transition planning into unsubsidized employment opportunities;
 - Career planning including career assessments and options for continued education;
 - Financial literacy such as budgeting, use of credit, opening of bank accounts;
 - Industry-specific training relevant to the work experience; and
 - Basic skills including math, reading and computer literacy.
- **Measuring Work Readiness.** The primary indicator for measuring youth performance under Recovery Act funding is the work readiness attainment rate, and it is the only required measure for summer youth employment funded by the Recovery Act. Pursuant to TEGL 14-08, local areas are given flexibility in designing their work readiness indicator. To enhance the effectiveness of the measure, the GAO report in September 2009 recommended that ETA “provide additional guidance on how to measure work readiness of youth, with a goal of improving the comparability and rigor of the measure.” Based on this recommendation, and on similar findings from the evaluation, local feedback, and Federal site visits, ETA will provide additional requirements for the work readiness indicator in the forthcoming TEGL 24-08, Change 1 for local areas with remaining Recovery Act funds in PY 2010. We intend that the additional requirements, with more detail to be provided in TEGL 24-08, Change 1, including an optional work readiness tool, will include the following:
 - **A worksite evaluation measuring performance in the workplace is required to assess work readiness for the work readiness indicator.** Previous feedback has demonstrated that the most effective method of assessing work readiness is to require the worksite supervisor to observe and evaluate workplace performance. Having youth complete true/false or multiple choice tests, which only measure knowledge and not behavior, is a less effective tool for measuring work readiness.
 - **This worksite evaluation will be conducted by the employer.** While the employer will be responsible for assessing performance, local area program staff should assist employers in order to make the process as

simple and seamless as possible including designing the evaluation and providing clear instructions on its use through employer orientations.

- **The tool should focus on attaining a satisfactory level of workplace proficiency as opposed to a measurable increase or gain.** The attainment of proficiency or competency in the foundation and worksite-specific skills necessary to be successful in the workplace should be determined by the employer and should be based on the attainment of work behaviors outlined in the worksite evaluation tool. This tool should clearly state the overall criteria necessary to achieve workplace proficiency. For example, worksite evaluation tools could state that work readiness proficiency can only be attained after: a) the supervisor indicates satisfactory performance; and b) a minimum numerical score for determining proficiency is achieved.
- **The tool should measure work readiness skills most desired by employers.** This includes universal foundation skills such as work habits/professionalism (i.e., attendance, punctuality, attitude), teamwork/collaboration, communication skills, and critical thinking/problem-solving. In addition, the tool should allow for flexibility to include industry or job-specific skills as determined by the employer.

More information on measuring work readiness as well as examples of evaluation tools are available on Workforce3one at;
<http://economicrecovery.workforce3one.org/view/2001007634435243374/info>.

- **Academic and Occupational Linkages.** Under the Recovery Act, ETA allows local areas the flexibility to determine whether it is appropriate that academic learning be directly linked to summer employment for each youth. The evaluation found that some local areas offered academics or skills training to either all or a subset of youth, either before or while participating in a work experience, ranging from occupational skills training to recovery of school credits. The most commonly targeted occupational skills training was health care, manufacturing, culinary, and construction industries as well as entrepreneurship. Less common academic programs included recovery of school credits, GED preparation programs, and remediation. When linking academic and/or occupational learning to a work experience, ETA encourages local areas to assess the academic and occupational skills needs and interests of youth and determine appropriate training, especially training leading to credential attainment, combined with a work experience placement that supports the enhancement of identified skills.
- **Supportive Services.** Under WIA, the provision of supportive services is one of the ten elements local areas must make available to eligible youth. Supportive services may include transportation, child care, dependent care, housing, and

other services that are necessary to enable an individual who is unable to obtain the services from other programs to participate in activities authorized under WIA. The evaluation found that although sites were not required to offer supportive services to participants under the Recovery Act, nearly all sites offered them to participants once they were placed on a job. The evaluation stated that many providers had extensive experience working with disadvantaged youth and recognized the need for additional support for youth to overcome their employment barriers. Staff most often reported helping youth to resolve transportation issues, to acquire appropriate work clothing and tools, and to gain access to child care. ETA encourages local areas to provide supportive services to populations in need, such as disconnected youth, in order to support their efforts to connect to and succeed in education, training and work experience opportunities.

C. Ensuring Quality Work Experiences

- **Ensuring Quality Worksites.** States and local areas should seek employers that are committed to helping participants receive high quality experience and training as well as employers that are willing to work closely with program staff. Local areas should consider recruiting employers based on local workforce investment targeted and priority industries. Employers should be flexible in working with youth who have issues that may present barriers to employment. In addition, states and local areas should consider a combination of public sector, private sector, and non-profit work experiences. The evaluation found that while not necessarily appropriate for all youth, the private sector can be a good source of high quality jobs for many participants, particularly older youth with previous work experience. Some local areas included in the evaluation felt that by placing young people in private sector worksites, there was a greater chance for the summer work experience to lead to unsubsidized employment opportunities.

ETA recommends that local areas place a strong emphasis on the orientation and preparation of worksite supervisors. Local areas are encouraged to formalize worksite agreements with worksite supervisors prior to youth beginning their work experience. Worksite supervisors should be fully trained on the program's elements, mission, and goals. The evaluation reported that some local areas found that creating comprehensive job descriptions for participants ensured that expectations were met by youth, employers and providers. In addition, having employers participate in a supervisor orientation, provide input on the development of the work experience, and serve as onsite mentors improved the experience of both employers and youth.

- **Job Matching.** States and local areas should make an effort to match worksites with participants' personal and professional interests and goals. The evaluation found that a well thought-out match can maximize the likelihood that a youth has a meaningful work experience. Local areas reported four key considerations when matching youth to worksites: the youth's personal interests expressed

through their application, orientation, or meetings with staff; direct employer feedback after a formal interview; the youth's age, experience, and skills; and transportation needs or other logistical issues. Some local areas also felt that private sector placements provided a greater opportunity to match jobs by youth interest based on the variety of jobs available in the private sector. ETA encourages local areas to consider all of these factors when developing meaningful work experiences for youth.

- **Worksite Monitoring.** Worksite monitoring is an important component of a summer employment or work experience program to ensure a meaningful work experience for young people as well as to secure a quality worksite. The evaluation reported that staff unanimously agreed that ongoing monitoring/oversight through in-person visits was essential to ensuring high-quality experiences and heading off problems between worksite supervisors and youth before they became serious. Local areas are encouraged to dedicate appropriate staff to monitor employers and worksite activities. Program monitors can work to maintain on-going contact with employers to provide support and technical assistance. In addition, monitors can work to ensure that worksite agreements are upheld, adequate supervision and quality mentoring are provided to youth, and worksites are in compliance with workplace safety and child labor laws.

Where possible, dedicating a staff person to monitor and work with youth can be valuable in assessing the quality of the work experience and measuring youth progress throughout the subsidized placement. Program staff may work to ensure youth are receiving mentoring, are safe and productive, and are achieving success in their placement. Proper and on-going monitoring can ensure that if problems exist or if the worksite is not a good match for the youth or the employer, local areas will have time to effectively address the issue or place the participant in an alternative worksite activity, if appropriate.

- **Incorporating Green Work Experiences.** In TEGL 14-08, ETA encouraged local areas to expand opportunities for youth in the emerging green industry. In summer 2009 under the Recovery Act, local areas responded by developing a variety of opportunities that exposed youth to green jobs. These included: offering opportunities for youth to receive industry-recognized certifications, occupational skills training in green technology, materials and building techniques, and training courses on green career paths provided by local community colleges. Other local areas developed conservation corps, partnered with the public housing authority to do energy audits, and provided opportunities to receive college credits for exploration of water quality jobs. These and other summer youth employment program examples focused on green jobs have been collected and archived on Workforce3One and are available at: <http://economicrecovery.workforce3one.org/page/resources/10009265459411215> 82 and

<http://economicrecovery.workforce3one.org/page/resources/1001002730515252581>.

To further expand the knowledge and improve the practices related to green jobs, the Department has engaged in several efforts that aim to assist the workforce system in this emerging field. ETA supported an Occupational Information Network (O*NET) project, that resulted in a report titled, “Greening of the World of Work: Implications for O*NET-SOC and New and Emerging Occupations” that aimed to define the types of occupations that fall into this new green economy and determine the level of demand as well as the change in skills and education required for the occupation. This research can be used as a starting point for identifying green industries and occupations and informing the development of training and job placement programs. The report can be found at: http://www.onetcenter.org/dl_files/Green.pdf.

Most recently, Labor’s Bureau of Labor Statistics (BLS) published a notice in the Federal Register that presents definitions BLS will use in measuring green jobs, describes in general how BLS plans to collect data on green jobs and solicits comments from the public on the definition and specific questions concerning the definition. The Notice as well as additional information on BLS’ efforts around defining and reporting data on green jobs can be found at: <http://www.bls.gov/green/>.

ETA has also created a new Green Community of Practice (CoP) offering an interactive platform for technical assistance related to building a green economy through webinars, discussion boards, blogs and other online resources to workforce professionals, particularly those at the state and Workforce Investment Board levels as well as green jobs grantees. The Green CoP is available at: <http://greenjobs.workforce3one.org/>.

In addition, ETA awarded nearly \$500 million for grants for green job training under five separate competitions in late 2009 and early 2010. The purpose of these grants is to provide preparation to workers for careers in energy efficiency and renewable sectors of high growth and emerging industries. Fact sheets are available for each of the grants awarded and can offer valuable information to states and local areas working to develop green jobs opportunities for youth during summer and year-round employment programs. Fact sheets can be found on the Green Capacity Building Grants at:

<http://www.doleta.gov/pdf/GreenJobs.pdf>, the State Labor Market Information Improvements Grants at:

http://www.doleta.gov/pdf/LMI_Grant_Summaries_02052010.pdf, the Energy Training Partnership Grants at:

http://www.doleta.gov/pdf/ETP_SGA_Award_Summaries_120409.pdf, the Pathways Out of Poverty Grants at:

http://www.doleta.gov/pdf/Pathways_Poverty_grants.pdf; and the State Energy

Sector Partnership and Training Grants for Green Jobs at:
http://www.doleta.gov/pdf/SESP_Summaries.pdf.

Incorporating Health Care Work Experiences. Health care is one of the fastest growing industry sectors in the nation. In December, 2009, BLS predicted that of the 30 fastest-growing occupations between 2008 to 2018, 17 will be in health care or medical research and that employment in health care is projected to increase by 21 percent or 1.6 million jobs. Acute workforce shortages and projected growth exist for allied health occupations in particular, such as medical assistants, respiratory therapists, pharmacy technicians, diagnostic medical sonographers, paramedics, and radiological and other technicians. BLS projects that by 2016 medical assistant occupations are expected to grow by 35 percent, paramedic occupations are expected to grow by 19 percent and radiological technicians by 15 percent. As such, ETA encourages local areas to provide opportunities for youth to connect to educational and career pathways in the health care and allied health industries. Local areas are encouraged to provide youth with exposure to the field, work experience and opportunities to earn credentials. Upon completion of the work experience, local areas should facilitate the transition of youth into entry-level health care employment opportunities or into related education and training programs, when appropriate.

During summer 2009 under the Recovery Act, local areas provided youth with opportunities in career exploration and mentorship, job shadowing, and hands-on work experiences within the health care industry. In addition, young people were provided with opportunities to complete industry specific training, such as in medical terminology, Health Insurance Portability and Accountability Act and health information technology as well as to earn industry recognized certifications, such as Cardio-Pulmonary Resuscitation – Health Provider, First Aid, Blood Borne Pathogens and Automatic External Defibrillator. These and other examples of summer youth employment initiatives focused on health care and allied health occupations can be found on Workforce3one at:
<http://economicrecovery.workforce3one.org/page/resources/1001002735143339093>.

D. Ensuring Transitional Opportunities beyond Work Experience

- **Transitioning Older Out-of-School Youth beyond Work Experience.** For older and out-of-school youth who are not returning to school following a subsidized work experience, states and local areas should work to transition youth into unsubsidized employment, education, training opportunities, or co-enroll them into WIA Adult services. Additionally, states and local areas may test transitional job models that combine short-term subsidized work experience with support services and career counseling using Statewide Youth Activities funds or other resources to pilot and support new and innovative strategies for out-of-school youth.

Examples of transition strategies reported by local areas include: forming work experience partnerships with business, education, and training institutions that can continue to assist young adults beyond the work experience; hiring program staff who are specifically assigned to connect young adults to transitional opportunities based on their individual interests and needs; allocating time in weekly work readiness workshops to promote speakers from local business and educational institutions; and holding career transition conferences or related work fairs following the conclusion of the summer. ETA encourages states and local areas to develop planning strategies that can be integrated before, during, and/or after a work experience that transition youth into one of the following:

- **Unsubsidized Employment.** Many youth, particularly older out-of-school youth, aim to directly transition from subsidized to unsubsidized employment. Prior to a youth completing a work experience, local areas should identify employers with greater potential to hire youth into unsubsidized employment; utilizing local labor market information to inform the process. The evaluation found that a number of local areas reported that private sector employers were more likely to hire youth into unsubsidized positions and that private sector employers can offer high-quality jobs, particularly for older youth with greater work experience. Therefore, ETA encourages local areas to expand engagement efforts to private sector employers, thereby increasing unsubsidized employment opportunities.
- **Education.** For out-of-school youth, a work experience can provide a potential bridge back to education. Through work experiences as well as career mentoring provided by employers, youth are exposed to the skills and education needed to achieve their career goals. This often reinforces the importance of earning secondary and post-secondary credentials. Local areas are encouraged to link work experiences with opportunities that expose youth to educational pathways. In 2009, many local areas partnered with community colleges to provide integrated work and training experiences that increased the exposure of youth to higher education including the opportunity to earn college credits. Also, many local areas used academic training to address basic skill deficiencies or stationed staff at partner schools to help promote the return of out-of-school youth.
- **Occupational Skills Training.** Moving from a work experience to occupational skills training can be a natural transition for youth. ETA encourages local areas to partner with regional occupational training programs, adult education programs, and community colleges to enroll older youth in programs that have successful completion and high placement rates for serving this population of youth. Training areas can include, but are not limited to: allied health, solar installation, aviation mechanics, customer service, welding and diesel mechanics, information technology, and topics related to science, technology,

engineering, and math occupations. Occupational skills training should result in the attainment of employer/industry-recognized credentials that promote career pathways.

- **Registered Apprenticeship.** Pre-apprenticeship programs can include summer employment opportunities and work experiences that provide an introduction to the skills and knowledge required to be eligible for registered apprenticeships. Local areas are encouraged to develop and implement pre-apprenticeship training programs as well as develop strategies that transition youth from pre-apprenticeship programs into registered apprenticeships. Through partnerships with schools, employers, labor organizations, registered apprenticeship program sponsors and state apprenticeship offices, local areas should work collaboratively to determine how best to coordinate these efforts.
- **Co-Enrollment in WIA Adult Services:** Older youth who meet the eligibility criteria for WIA Adult services can co-enroll in both the WIA Youth and Adult programs (including both WIA-funded services, where the maximum “youth” age is 21 and Recovery Act-funded services, where the maximum “youth” age is 24). WIA regulations at 20 CFR 664.500 (b) state that individuals who meet the respective eligibility requirements may participate in adult and youth programs concurrently. This would allow youth who are co-enrolled to access advanced occupational training.

Additional strategies on transitioning older out-of-school youth beyond work experience can be found on Workforce3One at <http://www.workforce3one.org/view/5000920957388172820/info>.

- **Work Opportunity Tax Credit adds Transition Incentive for Disconnected Youth:** The Work Opportunity Tax Credit (WOTC) is a Federal credit available to private for-profit employers who hire eligible participants from particular target groups into unsubsidized employment. In 2009, the Recovery Act expanded WOTC eligibility to include two new groups that begin working for an employer in 2009 or 2010: unemployed veterans and disconnected youth. Disconnected youth is defined as youth ages 16-24 who are not regularly attending school or employed, and are not readily employable due to a lack of basic skills. For disconnected youth the credit is available for up to \$2400 for private-for-profit employers who hire disconnected youth, that could include eligible WIA youth participants, into unsubsidized employment. The WOTC is a potential incentive for employers to hire youth into unsubsidized, permanent employment following the completion of a work experience or summer job. To facilitate timely certifications for the disconnected youth category, ETA has issued a national Youth Self Attestation Form. This form and additional clarification around the WOTC eligibility criteria for “disconnected youth” can be found in TEGL No. 03-09 Change 2. States and local areas are encouraged to promote the awareness,

benefits, and execution of the WOTC through multiple strategies that may include the use of promotional materials, employer outreach, and administrative assistance to employers with the WOTC application process. For more information on other eligible groups, eligibility criteria, and application procedures see the following link:

<http://www.doleta.gov/business/Incentives/opptax/>.

E. Tools and Resources. ETA has gathered a clearinghouse of tools and resources from around the country that may be helpful to local areas in implementing summer employment and work experiences throughout the year. The tools and resources include summer youth program examples, worksite agreements, work readiness measurement methodologies, training materials for staff and worksite supervisors, guidance for monitoring worksites, green and health care industry materials, past technical assistance materials developed under the Job Training Partnership Act summer employment program as well as more recent resource materials gathered from the 2009 summer youth employment initiatives implemented under the Recovery Act. The tools and resources for summer youth, as well as for reemployment, can be found on

<http://economicrecovery.workforce3one.org/>.

8. Performance Accountability. To ensure ETA is able to describe the successes achieved through the implementation of these youth program strategies, the collection of accurate, quality data is instrumental to analyzing the outcomes of the various programs and services offered by the workforce system, including the WIA Youth program. There are three performance reports that must be completed on a monthly or quarterly basis: (1) the ETA 9090, WIA Quarterly Report, (2) the Workforce Investment Act Standardized Record Data (WIASRD), submitted quarterly on all participants and exiters, and (3) the ETA 9149, WIA Youth Monthly Report. Additionally, on an annual basis, states must submit the ETA 9091, WIA Annual Performance Report.

9. Inquiries. Questions regarding this guidance should be directed to the appropriate ETA Regional Office.