Comprehensive Case Management and Employment Program ("CCMEP") Program Services Policy

for the WIOA Funding Streams Northeast Ohio Consortium Council of Governments Workforce Innovation and Opportunity Act

POLICY B-02

I. Purpose.

This policy governs the general terms and conditions associated with the provision of WIOA CCMEP program services. In addition to this policy, the Workforce Area, in procuring and contracting with its CCMEP providers, may establish additional terms and conditions in provided for within their written agreements with those providers that govern the provision of specific CCMEP programming. The terms and conditions of those written agreements shall apply as if written as part of this policy, so long as they are consistent with and not contradictory towards all applicable federal and state laws, regulations, guidance, and this policy.

In adopting this policy, the Workforce Development Board for Area 19 encourages each of the county CCMEP lead agencies to adopt this policy or one that is substantially similar, that governs the terms and conditions of the provision of CCMEP program services using TANF CCMEP funding streams.

II. Effective Date.

July 1, 2015. Revised effective July 1, 2018.

III. Background.

The goal of the WIOA CCMEP is to assist Youth in making a successful transition to employment and further education. However, the WIOA CCMEP recognizes that simply providing training is not enough to enter a specific occupation. A wide range of activities and services must be available to assist Youth, especially those who are disconnected and out-of-school, in making a successful transition to adulthood. The WIOA CCMEP program is designed to provide services, employment, and training opportunities to those who can benefit from, and who are in need of such services. Funds allocated to the Workforce Area must be used to carry out a series of appropriate services to eligible Youth.

IV. Requirements.

The Area's WIOA CCMEP program is designed to provide the following:

- Activities leading to the attainment of a secondary diploma or its recognized equivalent, or a recognized post-secondary credential.
- Preparation for postsecondary educational and training opportunities.

- Strong linkages between academic instructions and occupation education that lead to the attainment of recognized postsecondary credentials.
- Preparation for unsubsidized employment opportunities, as appropriate.
- Effective connections to employers, including small employers, in in-demand industry sectors and occupations of the local and regional labor markets.

The Area Workforce will design its Youth CCMEP program by seeking and considering input provided by parents, participants, and other members of the community with experience relating to programs for Youth.

The Area Workforce will require its Youth CCMEP providers to provide:

 Information on the full array of applicable or appropriate services which are available through the local board or other eligible providers or OhioMeansJobs center partners.

AND

• Referrals to appropriate training and educational programs that have the capacity to serve the participant either on a sequential or concurrent basis.

Per section 129 (c)(8) of WIOA, the Area Workforce Board shall approach individuals who have successfully participated in CCMEP Youth programs and present them with opportunities to volunteer assistance to Youth participants in the form of mentoring, tutoring, and other activities.

A. Procurement of Providers of Youth CCMEP Program Activities.

The Workforce Board shall award grants or contracts on a competitive basis to providers of Youth CCMEP WIOA Services, undertaking at least the minimum efforts required by federal and/or state law and policy, seeking for all Youth CCMEP Services for which proposals are sought, a minimum of two proposals/quotes. If an insufficient number of eligible providers of Youth workforce investment activities in the local area are willing to propose the offering of their services, the Workforce Board will consider awarding grants and contracts on a sole-source basis.

The only exception to the competitive procurement requirement is where the Workforce Board determines that design framework services are more appropriately provided by WIOA staff.

The Area Workforce will seek to select Youth CCMEP providers based upon their ability to provide Youth CCMEP program activities, including those that are be identified in the State Plan, as well as the ability to meet performance accountability measures.

The Workforce Board may implement at its sole discretion a pay-for-performance contract strategy for the Youth CCMEP program elements it chooses, with the pay for performance contract not exceeding ten percent (10%) percent of its total funds.

B. WIOA Youth CCMEP Elements and Activities.

WIOA Youth CCMEP Services are divided into three categories (1) Preenrollment Activities; (2) Design Framework Service; and (3) the Youth CCMEP Program Elements, of which there are fourteen (14) elements and thirty-two (32) activities.

1. Pre-enrollment Activities.

There are an array of activities that must occur before enrollment into the WIOA Youth program. These "pre-enrollment" activities include:

- Recruitment
- Intake
- Initial assessment including an initial determination of barriers and appropriateness for the program
- Referrals
- Determination of WIOA Youth eligibility.

None of these activities require enrollment in the local Youth program. Pre-enrollment activities are considered to be those activities leading up to the decision to register a participant for services in the local WIOA Youth program.

In addition to the "pre-enrollment" activities listed above, informational and self-help activities provided through the OhioMeansJobs centers or through OhioMeansJobs.com are not considered registered services in the WIOA Youth program.

2. Design Framework Services.

Framework services include:

- subjective and objective assessments, including objective testing;
- the drafting of an individual service strategy (ISS):
- general case management; and
- follow-up services that lead toward successful outcomes for WIOA Youth participants.

Framework services are completed prior to participation in the WIOA Youth program.

The subjective and objective assessments and the Individual Opportunity Plan ("IOP") are integral to the WIOA Youth CCMEP, and are intended to be on-going throughout program participation. These two activities serve as the basis for which decisions are made that lead to the receipt of the array of the fourteen (14) program elements.

When completing the subjective and objective assessments and/or the IOP, a new assessment of the Youth is not required if the Youth CCMEP provider determines it is appropriate to use a recent assessment (within six (6) months) of the participant conducted pursuant to another education or training program. This may include evaluations completed by a secondary school, Vocational Rehabilitation, Adult Basic Literacy Education (ABLE), or other education or training providers.

a) Subjective and Objective Assessments, Including Objective Testing.

Per section 129 (c)(1)(A) of WIOA, Youth CCMEP Services must include both subjective and objective assessment of the academic levels, skill levels, and service needs of each Youth CCMEP participant. The purpose of the assessments is to identify the appropriate services, including the identification of career pathways, for each Youth CCMEP participant. The assessments shall include a review of all the following information:

- Basic skills;
- Occupational skills;
- Prior work experience;
- Employability;
- Interests;
- Aptitudes (including interests and aptitudes for nontraditional jobs);
- Supportive service needs; and
- Developmental needs.

The subjective part of the assessment shall gather this information through surveying the individuals (question and answer forms).

The objective part of the assessment shall include at a minimum testing of skills and aptitudes. Youth CCMEP providers will utilize one or more of the following objective assessment testing tools:

- Comprehensive Adult Student Assessment System (CASAS);
- Tests of Adult Basic Education (TABE 9/10);
- Adult Basic Learning Examination (ABLE);
- WorkKeys;
- Student Performance Level (SPL)—English as a Second Language (ESL) only;
- Basic English Skills Test (BEST)—ESL only see TEGL 17-05.

For the objective assessment and testing of the basic math, reading, and language skills of In-School Youth, the

SUBGRANTEE acknowledges that it may also use the Ohio Graduation Test so long as:

- o the test results being used are less than six months old; and
- o the test results serve to assess all of the skills that need to be assessed.
- b) Individual Opportunity Plan ("IOP") in place of the Individuals Service Strategy ("ISS").

Per section 129 (c)(1)(B) of WIOA, providers of Youth CCMEP Services must develop strategies for each participant that are directly linked to one or more performance measure and include the identification of a career pathway that includes education and employment goals, appropriate achievement objectives, and appropriate services for the participant. It is a personalized plan for each WIOA Youth participant. As such, the IOP must be completed with the Youth CCMEP participant and periodically reviewed with the participant.

3. Fourteen (14) CCMEP Program Elements.

Per section 129 (c)(2) of WIOA, in order to support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for participants, the Workforce Youth CCMEP program shall make each of the following services available to Youth CCMEP participants in all of its counties:

a) Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies.

These strategies must lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate or attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.

- b) Alternative secondary school services or dropout recovery services.
- c) Paid and unpaid work experiences. See Area Workforce WIOA Policy B-03.
- d) Occupational skills training. See Area Workforce WIOA Policies C-10 and C-11.

Occupational skills training shall include priority consideration for training programs that lead to recognized postsecondary

credentials that are aligned with state and local in-demand industry sectors or occupations. Such training must:

- Be outcome-oriented and focused on occupational goals specified in the IOP;
- Be of sufficient duration to impart the skills need to meet the occupational goal; and
- Result in the attainment of a recognized post-secondary credential.

An individual training account ("ITA") is the primary method through which training is financed and provided. ITAs are established on behalf of a WIOA participant to purchase a program of training services from eligible training providers. The use of an ITA is allowed for both in-school and out-of-school youth, in-school youth ages 16-24, using WIOA and/or TANF CCMEP funds, when appropriate.

As part of the determination of the appropriateness for occupational skills training, a review of "family self-sufficiency" must be completed for those Youth CCMEP participants whose eligibility was not based upon being a low income individual. In these cases, WIOA Youth-funded ITAs may only be approved for those who have been determined to be below a locally defined standard of "family self-sufficiency." This requirement is intended to ensure that participants whose eligibility was not based upon being a low income individual and who are seeking Youth-funded ITAs are those whose families lack or have limited ability to pay for training and supportive services needed in order to obtain or retain employment.

e) Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.

This element requires integrated education and training to occur concurrently and contextually with workforce preparation activities for the purpose of educational and career advancement.

f) Leadership development opportunities.

Leadership development opportunities include:

- (1) Exposure to post-secondary education opportunities;
- (2) Community and services learning projects;
- (3) Peer-centered activities, including peer mentoring and tutoring;
- (4) Organizational and team work training, including team leadership training;

- (5) Training in decision-making, including determining priorities and problem solving;
- (6) Citizenship training, including life skills training such as parenting and work behavior training;
- (7) Civic engagement activities which promote the quality of life in a community; and
- (8) Other leadership activities that place Youth in a leadership role such as serving on Youth leadership committees.

Positive social behaviors are outcomes of leadership opportunities. Benefits of leadership development may include:

- (1) Positive attitudinal development;
- (2) Self-esteem building;
- (3) Openness to work with individuals from diverse backgrounds;
- (4) Maintaining healthy lifestyles;
- (5) Maintaining positive social relationships with responsible adults and peers, and contributing to the well-being of one's community;
- (6) Maintaining a commitment to learning and academic success;
- (7) Avoiding delinquency;
- (8) Postponing parenting and responsible parenting;
- (9) Positive job attitudes and work skills; or
- (10) Keeping informed in community affairs.

The purpose of leadership development activities is to develop skills and attitudes that are important in all areas of life. It provides encouragement and support to Youth, developing skills, and instilling confidence as they transition to adulthood.

g) Supportive services. See Area Workforce CCMEP WIOA Policy B-04.

Supportive services may be provided to Youth both during participation and after program exit.

h) Adult mentoring for the period of participation and subsequent period, for a total of not less than 12 months.

Adult mentoring for Youth must:

- (1) Last at least 12 months and may take place both during the program and following exit from the program;
- (2) Be a formal relationship between a Youth CCMEP 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;

- (3) Include a mentor who is an adult other than the assigned Youth CCMEP case manager; and
- (4) While group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the local Youth CCMEP program must match the Youth with an individual mentor with whom the Youth interacts on a face-to-face basis.

The purpose of adult mentoring is to build positive, supportive relationships between Youth and adults and to provide positive adult role models for Youth. High-quality adult mentoring programs include an adult role model who builds a working relationship with a Youth and who fosters the development of positive life skills in Youth.

Mentoring may include may include workplace mentoring where the local program matches a Youth CCMEP participant with an employer or employee of a company.

i) Follow-up services. See Area Workforce CCMEP Policy B-06.

Follow-up services are critical services provided following a Youth's exit from the program to help ensure the Youth is successful in employment and/or post-secondary education and training.

Follow-up services may include:

- (1) Leadership development and supportive service activities;
- (2) Regular contact with a Youth participant's employer, including assistance in addressing work-related problems that arise:
- (3) Assistance in securing better paying jobs, career pathway development and further education or training;
- (4) Work-related peer support groups;
- (5) Adult mentoring; and/or
- (6) Services necessary to ensure the success of Youth participants in employment and/or post-secondary education.

The types of services provided and the duration of services must be determined based on the needs of the Youth and therefore, the type and intensity of follow-up services may differ for each participant. However, follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome. All Youth CCMEP participants must receive some form of follow-up services for a minimum duration of twelve (12) months, and at the discretion of the Youth CCMEP provider for up to eighteen (18) months.

After eighteen (18) months, follow-up services may only be provided by the Youth CCMEP provider if the Youth is employed and not self-sufficient, unemployed, receiving public assistance, or is in jeopardy of achieving any such status.

j) Comprehensive guidance and counseling.

Comprehensive guidance and counseling provides individualized counseling to participants. This includes career and academic counseling, drug and alcohol counseling, mental health counseling, and referral to partner programs.

The purpose of comprehensive guidance and counseling is to promote growth in each Youth's educational, personal, social, and employability skills. Comprehensive guidance and counseling programs impart through counselor-directed learning opportunities that help Youth achieve the success through academic, career, personal, and social development.

When referring participants to necessary counseling that cannot be provided by the Youth CCMEP program or its service providers, the local Youth CCMEP program must coordinate, including obtaining releases of information to obtain information regarding appropriateness of WIOA services, with the organization it refers to in order to ensure continuity of service.

k) Financial literacy education.

Financial literacy includes activities which:

- (1) Support the ability of Youth participants to create household budgets, initiate savings plans, and make informed financial decisions about education, retirement, home ownership, wealth building, or other savings goals;
- (2) Support participants in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards;
- (3) 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;
- (4) Support a participant's ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed decisions;
- (5) Educate participants about identity theft, ways to protect themselves from identity theft, and how to resolve cases of identity theft and in other ways under their rights and

- protection related to personal identity and financial data; and
- (6) 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.
- (7) 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; and
- (8) 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 instructions.
- 1) Entrepreneurial skills training.

Entrepreneurial skills training must develop skills associated with entrepreneurship. Such skills include, but are not limited to the ability to:

- (1) Take initiative;
- (2) Creatively seek out and identify business opportunities;
- (3) Develop budgets and forecast resource needs;
- (4) Understand various options for acquiring capital and the trade-offs associated with each option; and
- (5) Communicate effectively and market oneself and one's ideas.

Approaches to teaching Youth entrepreneurial skills include, but are not limited to, the following:

- (1) Entrepreneurship education that provides an introduction to the values and basics of starting and running a business;
- (2) Enterprise development which provides supports and services that incubate and help Youth development their own business; and
- (3) Experiential programs that provide Youth with experience in the day-to-day operation of a business.
- m) 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.
- n) Activities that help Youth prepare for and transition to postsecondary education and training.

- 4. Thirty-two (32) CCMEP Program Activities.
 - (1) Unsubsidized employment.
 - (2) Subsidized employment.
 - (3) Work experience.
 - (4) On-the-job training.
 - (5) Job search.
 - (6) Community service.
 - (7) Vocational education training.
 - (8) Job skills training directly related to employment.
 - (9) Education directly related to employment in the case of a recipient who has not received a high school diploma or a certificate of high school equivalence.
 - (10) Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate.
 - (11) Internships.
 - (12) Summer employment.
 - (13) Job shadowing.
 - (14) Pre-apprenticeship opportunities which include programs or a set of strategies designed to prepare individuals to enter and succeed in registered apprenticeship programs and have a documented partnership with at least one, if not more, registered apprenticeship programs.
 - (15) Career counseling which includes a facilitated exploration of occupational and industry information that will lead to a first, new, or better job for the program participant.
 - (16) Adult mentoring.
 - (17) Entrepreneurial skills training.
 - (18) Tutoring, study skills training.
 - (19) Job readiness training.
 - (20) Parenting classes.
 - (21) Life skills classes.
 - (22) Participation in an alcohol or drug addiction program certified by the department of mental health and addiction services under section 5119.36 of the Revised Code.
 - (23) Finding a home in the case of a homeless assistance group;
 - (24) Residing in, or attempting to get admission into, a domestic violence shelter, receiving counseling services, or treatment related to the domestic violence or participating in criminal justice or civil legal activities against the domestic violence offender.
 - (25) Attending English as a second language course.
 - (26) Mental health treatment.
 - (27) Rehabilitation activities.
 - (28) Financial literacy education.
 - (29) Other workforce activities.

- (30) Activities within OhioMeansJobs.com.
- (31) The learning, earning and parenting (LEAP) program for individuals required to participate in accordance with rule <u>5101:1-</u>23-50 of the Administrative Code
- (32) For veterans with a significant barrier to employment, a referral to the disabled veterans outreach program (DVOP) specialist as part of the jobs for veterans state grant.

The lead agencies/providers must make all these program elements available to Youth CCMEP participants. This does not mean, however, that every Youth CCMEP participant must receive services from all program elements. Lead agencies and the providers have the discretion to determine what specific program elements will be provided to a Youth CCMEP participant, based on each participant's objective assessment and IOP.

Although the fourteen (14) program elements and thirty-two (32) activities must be provided and/or made available to WIOA eligible Youth CCMEP participants in each local area, they are not the sole array of services that made up the local Youth CCMEP programs.

In addition to using WIOA Youth CCMEP funds for each of the program elements, Youth CCMEP providers may leverage OMJ Center partner resources to provide some of the readily available program elements.

V. Reporting Requirements.

There is no self-service concept for the WIOA Youth CCMEP program and every individual receiving services under WIOA must meet eligibility criteria and be formally enrolled in the Youth CCMEP program by the Youth CCMEP provider(s).

Program participation begins when the Youth is determined eligible and receives an independent objective assessment test, has an ISS drafted, and receives a program element. Therefore, at the point of participation, a Youth CCMEP participant will be enrolled in the Youth CCMEP program and reported in the Ohio Workforce Case Management System (OWCMS). All Youth CCMEP participants will be counted in the WIOA Youth CCMEP performance measure calculations.

VI. Definitions.

Adult mentoring: one-to-one supportive relationship between an adult and a Youth that is based on trust.

Alternative school: schools which offer specialized, structured curriculum inside or outside of the public school system which may provide work/study and/or academic intervention for students with behavior problems, physical/mental disabilities, who are atrisk of dropping out, who are institutionalized or adjudicated Youth and/or Youth who

are in the legal custody of the Ohio Department of Youth Services and are residing in an institution. An alternative school must be approved by the local education agency.

<u>Career pathway</u>: a combination of rigorous and high-quality education, training, and other services that:

- Aligns with the skill needs of industries in the economy of the State or regional economy involved;
- Prepares an individual to be successful in any of the full range of secondary and postsecondary education options, including apprenticeships;
- Includes counseling to support an individual in achieving the individual's education and career goals;
- Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the education and career advancement of the individual to the extent practicable;
- Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
- Helps an individual enter or advance within a specific occupation or occupational cluster.

Comprehensive guidance and counseling: a process of helping Youth make and implement informed education, occupation, and life choices.

<u>Disconnected Youth</u>: Youth ages 18 through 24 years of age who have no connection to the workforce and secondary, postsecondary, or vocational education and training systems.

<u>Enrollment</u>: the collection of information to support eligibility determination and participation in any one of the 14 program elements.

Entrepreneurial skills training: training which provides the basics of starting and operating a small business.

<u>Follow-up services</u>: activities after completion of participation to monitor Youths' success during their transition to employment and further education and to provide assistance as needed for a successful transition.

<u>In-demand occupation</u>: an occupation that currently has or is projected to have a number of positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector so as to have a significant impact on the State, regional, or local economy as determined by the State and local boards.

<u>In-demand industry sector</u>: an industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the State, regional, and local economy, as appropriate, and that

contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors as determined by the State and local boards.

<u>Leadership development opportunities</u>: opportunities that encourage responsibility, confidence, employability, self-determination and other positive social behaviors.

Occupational skill training: an organized program of study that provides specific vocational skills that lead to proficiency in performing actual task and technical functions required by certain occupational fields at entry, intermediate, or advance levels and results in attainment of a certificate.

On-the-job training (OJT): training by an employer that is provided to a paid participant while engaged in productive work in a job that:

- Provides knowledge or skills essential to the full and adequate performance of the job;
- Is made available through a program that provides reimbursement to the employer of a percentage of the wage rate of the participant; and
- Is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, prior work experience of the participant, and the service strategy for the participant.

<u>Participation</u>: the point at which the individual has been determined eligible for Youth program services, has received an assessment, and has received or is receiving at least one program element and is the point at which the individual is to be included in calculations for performance measures.

<u>Pay-for-performance contracts</u>: a procurement strategy that uses pay-for performance contracts which specifies a fixed amount that will be paid to an eligible service provider based on achievement of specified levels of performance on the primary indicators of performance for target populations as identified by the local board within a defined timetable, and which may provide for bonus incentives to such service provider to expand capacity.

<u>Postsecondary school</u>: any schooling that follows graduation from high school or completion of high school equivalency, including community colleges, four-year colleges and universities, and technical and trade schools.

<u>Pre-apprenticeship programs</u>: programs or set of strategies designed to prepare individuals to enter and succeed in Registered Apprenticeship programs and have a documented partnership with at least one, if not more, Registered Apprenticeship programs.

Recognized postsecondary credential: a credential consisting of an industry recognized certificate or certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree.

<u>Secondary school</u>: a nonprofit institutional day or residential school, including a public secondary charter school, that provides secondary education as determined under State law, except that the term does not include any education beyond grade 12.

<u>Supportive services</u>: services such as transportation, child care, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under WIOA.

<u>Work experience</u>: a planned, structured learning experience that takes place in a workplace for a limited period of time. Work experiences may be paid or unpaid.

VII. Monitoring.

The Area will conduct oversight and monitoring of the implementation of all WIOA CCMEP services programming by all sub-grantees and/or contractors pursuant to Area Workforce Policy D-3. Any issues discovered will be handled through the area's monitoring resolution process.

VIII. Technical Assistance.

To get questions answered and technical assistance regarding this policy or issues regarding administration of WIOA, you are urged to contact the Executive Director of the Area Workforce at craigsernik@neohio.twcbc.com.

The question/issue will be researched, analyzed, and a formal written response will be provided. If a second opinion is required, the director is not available, or there is no clear answer to the question/issue, either the Executive Director or any OMJ Center or provider staff may seek additional guidance by submitting the same to the Office of Workforce Development: WIOAQNA@jfs.ohio.gov.; and by copying your request to the Executive Director of the NOC COG.

IX. References.

- Workforce Innovation and Opportunity Act, Pub. L. 113-128.
- 20 C.F.R. 603 et seq.
- 29 U.S.C. 3101 et seq.
- Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) No. 14-XX, Work Experience for Youth.
- Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) No. 14-XX, Use of Individual Training Accounts.

X. Signatures.

Richard Jackson

Area 19 WDB Chairperson

Date

915/18

Casey R. Kozlowski

Ashtabula County Commissioner

Northeast Ohio Consortium Council of Governments,

Chief Elected Official

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