

**Chapter 17: Youth
Co-Enrollment**

Issue Date:

Effective Date: April 1, 2002 Updated: September 8, 2011

Required Action

Action: To provide WSAs with guidance in use of co-enrollment strategies.

Who: All WSAs and youth service providers in the State of Minnesota.

Background: The Workforce Investment Act (WIA) encourages coordination of youth development services between programs and agencies serving youth through the development of working partnerships for provision of information, referral and co-enrollment.

Policies and Procedures:

WSAs are encouraged to develop cooperative service strategies that make use of co-enrollment with: other WIA Title 1B youth programs (such as Job Corps), the Minnesota Youth Program, the Minnesota Family Investment Program, Youthbuild, AmeriCorps and other non-WIA funded youth programs.

Note: The Department of Labor has determined that youth co-enrolled in WIA and Job Corps (and working on their GED) may be classified as out-of-school youth.

Older youth (ages 19 – 21 at registration) can be co-enrolled in WIA adult and/or dislocated worker programs and receive services as appropriate. However, service providers and WSAs should be aware that individuals who are co-enrolled are subject to each of the performance measures established by the WSA for that particular WIA Title I program.

Minnesota has received a waiver (effective through June 30, 2012) to use Individual Training Accounts (ITAs) for older and out-of-school youth participants without co-enrolling them in WIA adult or dislocated worker programs. This waiver will allow local areas to enhance delivery of occupational skills training and increase customer choice for the youth. (This waiver request is included in Chapter 24.)

Minnesota has also received permission from the Department of Labor to waive the statutory WIA youth performance measures for youth who are co-enrolled in WIA Youth Activities and Minnesota's TANF-funded Teen Parent Summer Youth Project only during the time period April 1, 2011 to September 30, 2011. This waiver allows the use of the Work Readiness Indicator as the only indicator of performance for youth who are co-enrolled in WIA Youth and the TANF-funded Teen Parent Summer Youth Project during the approved time frame. (Waiver attached to the end of this chapter.)

Reference Section:

Cites/References: The Workforce Investment Act of 1998, Title I, subtitle B, (Public Law 105-220) 29 U.S.C 2801 et seq.

Waiver 1: 20 CFR 661.420(c)-Waiver to use Individual Accounts (ITAs) for youth participants.

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Youth website:

http://www.positivelyminnesota.com/All_Programs_Services/Office_of_Youth_Development

**State Of Minnesota
Workforce Investment Act
Waiver Request**

Request to Waive WIA Youth Statutory Measures for Youth Co-Enrolled in Minnesota's TANF-Funded Teen Parent Summer Youth Project and the WIA Youth Program between April 1, 2011 and September 30, 2011

The Minnesota Department of Employment and Economic Development (DEED) and the Minnesota Department of Human Services (DHS) have developed an inter-agency agreement to target summer youth employment services to African American and American Indian youth in the summer of 2011.

DHS is making TANF Innovation Funds available from April 1, 2011 through September 30, 2011 for a targeted summer youth employment project to improve the outcomes of African American and American Indian teen parents who are enrolled in secondary school and receiving Minnesota Family Investment Program (MFIP) benefits. Minnesota's 2011 Teen Parent Summer Youth Project is an effort to address disparities in MFIP outcomes, particularly the Work Participation Rate (WPR), for African American and American Indian participants.

DEED requests permission from DOL/ETA to waive the statutory WIA youth performance measures for youth who are co-enrolled in WIA Youth Activities and Minnesota's Teen Parent Summer Youth Project only during the time period April 1, 2011 to September 30, 2011. This waiver would use the Work Readiness Indicator as the only indicator of performance for youth who are co-enrolled in WIA Youth and the Teen Parent Summer Youth Project.

The use of such a waiver will allow Minnesota the flexibility to design a summer project that focuses on work readiness, work experience, and preparing youth for long-term employment opportunities rather than on meeting performance measures that do not align with the purpose of a summer youth employment program.

This waiver request is written in the format identified in WIA Section 189(i)(4)(B) and in WIA Regulations 20 CFR 661.420(c).

1) Specific Statutory/Regulatory Requirement to be Waived:

Minnesota is requesting WIA Section 136(b)(2)(A) be waived to dismiss from consideration the WIA statutory performance measures and use the work readiness portion of the skill attainment rate as the only indicator of performance for youth co-enrolled in the WIA Youth Program and the 2011 Teen Parent Summer Youth Project.

2) Goals to be Achieved by the Waiver:

The goal of this waiver is to support Minnesota's efforts to improve services to the neediest youth as stated in Minnesota's Unified Plan, and evidenced by our state's longstanding participation in the federal Shared Youth Vision initiative and now the successor collaboration, the federal Interagency Working Group on Youth Programs.

Minnesota's 2011 Teen Parent Summer Youth Project is an effort to address disparities in MFIP outcomes, particularly the Work Participation Rate (WPR), for African American and American Indian participants. For the period July through September 2010, the WPR was 41.4% for all participants statewide, with the rates for particular racial groups as follows:

- White: 44%
- African American: 37.6%
- American Indian: 30.7%

For other racial and ethnic groups not listed above, the WPR ranged from 43% to 52.7%. There has been and continues to be a very large disparity in the outcomes of African American and American Indian MFIP participants as compared to the rest of the caseload.

The waiver request supports Minnesota's attempts to increase the success of African American and American Indian MFIP teen parents through participation in a structured summer youth employment program.

3) State or Local Statutory or Regulatory Barriers:

There are no existing state or local statutory or regulatory barriers to implementing this waiver. Upon notification of approval of this waiver, DEED will incorporate it into policy and distribute the new policy to WSAs/LWIBs.

4) Description of Waiver Goal and Expected Programmatic Outcomes:

The goal of this waiver is to allow Minnesota's WSAs/LWIBs to leverage TANF Innovation funds through the Minnesota Department of Human Services (DHS) to pay participant wages, fringe and direct service costs for African American and American Indian teen parents who are unlikely to be otherwise employed during the summer of 2011.

Youth participants in the 2011 Minnesota Teen Parent Summer Youth Project will gain work experience at a wage of at least \$7.25 per hour for up to 30 hours per week for up to 12 weeks. Older youth may work additional weeks or hours. It is expected that wages and fringe benefits for youth participants will be funded with TANF Innovation funds, while WIA Youth funds will be used to cover payroll processing, case management and support services for co-enrolled youth.

The youth who are served through the 2011 Teen Parent Summer Youth Employment Project will be working with MFIP Employment Services providers prior to their enrollment in the summer youth employment project and enrolled in secondary school. Following the completion of the summer project, most of these youth will continue to be engaged in secondary education and services provided through MFIP to continue to build academic skills, employability skills, and positive work habits and attitudes. For those participants who need additional services beyond what MFIP offers, service providers will be actively working to connect these youth to further education and training opportunities through WIA Youth, WIA Adult, WIA Core Services, other state-funded programs such as the Minnesota Youth Program and the Minnesota Youthbuild Program, and/or programs operated by local educational agencies as appropriate on an individual basis.

DHS plans to examine the outcomes of participants in the 2011 Teen Parent Summer Youth Project as compared to the outcomes of those African American and American Indian youth who do not receive summer youth employment services to evaluate the impact of this project on the participants' future success.

5) Individuals Impacted by the Waiver:

Youth who will be served through Minnesota's 2011 Teen Parent Summer Youth Employment Project will meet all of the following criteria:

- Age 14 through 21
- Teen parent

- Open in MFIP and referred by MFIP Employment Service Provider
- African American or American Indian
- Enrolled in secondary school
- Head of household

An estimate of the number of teen parents who will be served through the TANF-Funded Teen Parent Summer Youth Project in Minnesota: 250

An estimate of the number of youth who will be co-enrolled in the WIA Youth Program and in Teen Parent Summer Project activities during Summer 2011: 125

An estimate of the number of PY 2011 WIA Youth Program enrollees who will be co-enrolled in the Teen Parent Summer Youth Project only, and will not participate in the WIA youth program beyond summer: 100

6) Process for Monitoring Implementation of the Waiver:

DEED will take the following steps toward implementation of this waiver:

DEED will enter into an Interagency Agreement with DHS to access TANF Innovation funds as of April 1, 2011 for the Minnesota Teen Parent Summer Youth Project. Early implementation is critical to the success of this summer project.

The waiver will be incorporated into a state guideline distributed to all local areas and posted to the DEED website on a Teen Parent Summer Youth Project webpage.

State staff will review the implementation of this waiver during the annual on-site review of WIA Youth Programs. Monitoring would ensure correct documentation of the youth participants who are co-enrolled in TANF and WIA funding which will be tracked and reflected in the Individual Service Strategy and Youth Employment Plan. Information related to the implementation of this waiver will be collected in the data collected from service providers on a regular basis.

Technical assistance will be provided to all LWIBs by DEED and DHS as appropriate to ensure swift, successful implementation of the 2011 Minnesota Teen Parent Summer Youth Project.

7) Opportunity for Local Boards to Comment on the Waiver Request:

Local boards and staffs have been notified of the waiver request and are being given a thirty day direct opportunity to comment on this specific waiver. Copies of any comments received will be forwarded to the USDOL national office and Chicago regional office.

8) Public Comment on the Waiver Request:

DEED intends to place this waiver request on its website for a thirty day public comment period and send a notice to interested individuals on DEED's mailing list. Copies of any comments received will be forwarded to the USDOL national office and Chicago regional office.