

Youth Program

July 2004

1) YouthWorks is the name of our internal youth case management function. We have a case manager to recruit, assess, develop a case plan, follow-up, and other case management functions. In the past this was limited to in-school youth because we had a contract for out-of-school youth through the JOG program. That contract ended 12/31/03 due to lack of funds. The Youth Case Manager completes a time study with most of the time charged to WIA; however, she also has some TANF responsibilities. Our allocation is very low; therefore, this case management function takes most if not all of our allocation, leaving very little for purchased or procured services. Nearly all of the services needed by youth are provided through various community resources at no cost; for example, schools, ABLE/GED, summer youth programs, etc. Services which do cost; for example, driver's education, are low cost and procured through obtaining quotes for comparison. My questions are:

- 1) Is this program design acceptable? Does it meet WIA requirements for procuring youth services?***
- 2) Is our internal case management function (YouthWorks), considered to be a service provider?***
- 3) Does YouthWorks need to be on the state provider listing?***

The program design framework referred to as the “program design component” is acceptable **if** the case manager is doing the activities of intake, objective assessment, and developing the individual service strategy (ISS). The framework activities are entry-level case management that includes assessing needs, preparing goals, and referring youth to the youth program elements. The framework activities do not have to be competitively procured.

After youth have been referred to a youth program element, case management should be done by the youth provider. The YouthWorks case manager may use a case management approach to determine whether youth individuals are meeting the goals of their ISS and receiving follow-up services. The case management approach used by the case manager may include reviewing evidence with the youth provider on the progress of youth meeting goals in the ISS and follow-up services given to them. It is expected ISSs are reviewed periodically.

Consideration should be given to including case management activities in competitively bid youth service providers' contracts for the ten youth elements or, procuring a single provider to do the case management activities for them.

If your case management functions are limited to entry-level case management, the YouthWorks would not need to be on the state youth provider list.

Follow-up is one of the ten youth elements that must be procured.

- 2) ***We have a youth subcontractor who wants to take their participants to Washington D.C. for a one-day field trip. Is this acceptable?***

WIA funds cannot be used in whole or in part to pay for a Washington D.C. field trip. It does not meet the necessary test established in A-87 Attachment A (C) (a). This activity is considered entertainment and is unallowable under A-87 Attachment B (18).

- 3) ***What are the occupational limitations for 14 and 15 year olds with respect to operating power equipment?***

According to the Federal Regulation: operation of lawn mowers, weed trimmers, and riding lawn mowers is prohibited (Title 29, Part 570.34 (a) (6) Code of Federal Regulations). Although lawn mowing, snow shoveling, and other related employment is permitted under state regulations, 4102:9-2-02 ORC prohibits 14 and 15 year olds from using any power driven machinery. The most stringent applies.