

## WIOA Title I Youth Program Procurement – Local Waiver

### Issue

- Workforce Innovation and Opportunity Act (WIOA) requires the competitive procurement of Title I Youth Services, unless they are being performed by the local grant recipient.
- Alexandria/Arlington Region's grant recipient, Arlington County Government, would like to continue to perform Title I Youth Services at the Alexandria Workforce Development Center and Arlington Employment Center.

### Background

The Department of Labor has issued the Final Rules to implement Title I of the Workforce Innovation and Opportunity Act (WIOA). The Final Rules provides the local grant recipient and Local Workforce Development Board (LWDB) flexibility to award grants or contracts for youth services in accordance with WIOA sec. 123.

As it relates to competitive selection requirement, 20 CFR Part 681, *Youth Activities under Title I of the Workforce Innovation and Opportunity Act*, has language that addresses questions and concerns regarding procurement of WIOA Title I Youth Program services. In particular, Subpart C – *Youth Program Design, Elements, and Parameters*, Section 681.400 language clarifies that the competitive procurement requirements in Sec. 123 of WIOA apply only if the LWDB chooses to award grants or contracts to youth service providers to provide some or all of the youth program elements.

The 14 youth program elements are:

1. Tutoring, study skills training, and instruction leading to secondary school completion, including dropout prevention strategies.
2. Alternative secondary school offerings or dropout recovery services.
3. Paid and unpaid work experiences with an academic and occupational education component.
4. Occupational skill training, with a focus on recognized postsecondary credentials and in-demand occupations.
5. Leadership development activities (e.g., community service, peer-centered activities).
6. Supportive services.
7. Adult mentoring.
8. Follow-up services for at least 12 months after program completion.
9. Comprehensive guidance and counseling, including drug and alcohol abuse counseling.
10. Integrated education and training for a specific occupation or cluster.
11. Financial literacy education.
12. Entrepreneurial skills training.
13. Services that provide labor market information about in-demand industry sectors and occupations.
14. Postsecondary preparation and transition activities.

The Alexandria Workforce Development Center and the Arlington Employment Center have been allowed to perform Title I Youth Services via a state-issued waiver under the Workforce Investment Act. Since 2011, LWDA 12's Title I Youth Program has met its annual performance goals and maintained financial integrity. Title I Youth Program Funding is \$363,449.45 for FY24/PY23.

### The Region's Youth Services Program Design

Alexandria Workforce Development Center and Arlington Employment Center perform the “framework services” for the region’s Title I Youth program. These framework services include intake, objective assessments, development of individual service strategies, case management, supportive services, and follow-up services. Both Centers partner with the following local government and nonprofit partners to provide free services to their youth customers for the 14 youth program elements:

Youth Program Element	Provider
1. Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent.	<ul style="list-style-type: none"> <li>• Sylvan Learning Center</li> <li>• Alexandria City Public School, GED Program, Adult Education High School Diploma</li> <li>• Arlington Public School, GED Program, Adult Education High School Diploma</li> </ul>
2. Alternative secondary school services, or dropout recovery services, as appropriate.	<ul style="list-style-type: none"> <li>• Alexandria City Public School, GED Program</li> <li>• Alexandria City Campaign on Adolescent Pregnancy</li> <li>• Substance Abuse Prevention Coalition of Alexandria City</li> <li>• Alexandria City Court Service Unit</li> <li>• Arlington Public School, GED Program</li> </ul>
3. Paid and unpaid work experience that have as a component academic and occupational education, which may include – <ul style="list-style-type: none"> <li>• Summer employment opportunities and other employment opportunities available throughout the school year;</li> <li>• Pre-apprenticeship programs;</li> <li>• Internships and job shadowing, and</li> <li>• On-the-job training opportunities</li> </ul>	<ul style="list-style-type: none"> <li>• Local Employer Referrals from the Centers’ Business Services Teams</li> <li>• Project Discovery: <i>Empowerment and College Preparation</i></li> </ul>
4. Occupational skills training which may include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area	<ul style="list-style-type: none"> <li>• Alexandria/Arlington Regional Workforce Council, Eligible Training Providers List</li> </ul>
5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster	<ul style="list-style-type: none"> <li>• Alexandria/Arlington Regional Workforce Council, Eligible Training Providers List</li> </ul>
6. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors during non-school hours, as appropriate.	<ul style="list-style-type: none"> <li>• Project Discovery: <i>Empowerment and College Preparation</i></li> <li>• Alexandria Mentoring Partnership</li> <li>• Alexandria Court Services Unit</li> </ul>

<p>7. Supportive Services (<i>Linkages to community services</i>)</p> <ul style="list-style-type: none"> <li>• Transportation</li> <li>• Childcare</li> <li>• Housing and Accommodation for youth with disabilities</li> <li>• Uniforms</li> <li>• Referrals to Healthcare</li> <li>• Educational Testing</li> </ul>	<ul style="list-style-type: none"> <li>• Alexandria City Department of Community and Human Services</li> <li>• Arlington Department of Human Services</li> <li>• Legal Services of Northern Virginia</li> <li>• Washington Metropolitan Area Transit Authority</li> </ul>
<p>8. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months</p>	<ul style="list-style-type: none"> <li>• Various partnerships with local and regional mentorship-focused CBOs</li> </ul>
<p>9. Follow-up services for not less than 12 months after the completion of participation, as appropriate</p>	<ul style="list-style-type: none"> <li>• Alexandria Workforce Development Center</li> <li>• Arlington Employment Center</li> </ul>
<p>10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate.</p>	<ul style="list-style-type: none"> <li>• Various partnerships with local and regional counseling-focused CBOs</li> </ul>
<p>11. Financial literacy education</p>	<ul style="list-style-type: none"> <li>• Truist Bank</li> </ul>
<p>12. Entrepreneurial skills training</p>	<ul style="list-style-type: none"> <li>• Business Development Assistant Group</li> </ul>
<p>13. 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.</p>	<ul style="list-style-type: none"> <li>• Alexandria/Arlington Regional Workforce Council</li> <li>• Virginia Employment Commission</li> </ul>
<p>14. Activities that help youth prepare for and transition to postsecondary education and training.</p>	<ul style="list-style-type: none"> <li>• Alexandria City Public Schools</li> <li>• Arlington Public Schools</li> <li>• Project Discovery: <i>Empowerment and College Preparation</i></li> <li>• Volunteer Alexandria</li> </ul>

When the Centers cannot procure free services to perform the 14 youth program elements they will follow local government procurement procedures to purchase services for their youth customers.

Action Requested

- The local grant recipient would like the Regional Workforce Council to approve a local waiver to allow Alexandria Workforce Development Center and Arlington Employment Center to continue to perform Title I Youth Services for Program Year 2023 (FY24).

Approved:

*Ellen Harpel*

[Ellen Harpel \(Jun 26, 2023 12:50 PDT\)](#)

Chair, Alexandria/Arlington Regional Workforce Council

Jun 26, 2023

Date







# WIOA Youth Waiver 070123-063024

Final Audit Report

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