

Eric Hahn, Chair

1st Vice Chair Joyce Conner, 2<sup>nd</sup> Vice Chair Robin Baker Michelle Burreson April Gibson Darci Gibson Paul Hogoboom Mike Johnson Bruce Kendall Dale King Dave Lawson Mark Martinez Mary Matusiak Wayne Nakamura **Sharon Ness** Tim Owens Dona Ponepinto Patty Rose Sheila Ruhland Ron Thalheimer James Walker Blaine Wolfe

WorkForce Central Staff Linda Nguyen, CEO Inguyen@workforce-central.org 8. Thank You / Adjourn

Deborah, Howell, CAO <a href="mailto:dhowell@workforce-central.org">dhowell@workforce-central.org</a>

Jan Adams, Executive Assistant jadams@workforce-central.org

WorkForce Central 3650 S. Cedar St. Tacoma, WA 98409 Phone: 253.254.7335 Fax: 253.830.5226 www.workforce-central.org WDC Youth & Young Adult Services Committee Meeting
Agenda
September 22, 2015
9:30 a.m. – 11:00 a.m.
April Gibson, Chair

ResCare 4301 South Pine Street, Suite 92 Tacoma, WA

1.	Hello / Introductions	Dale King	5 min
2.	Review Prior Meeting Notes	Dale King	5 min
3.	Inventory of Workforce Related Services & Programs in Pierce County	Cheri Loiland	15 min
4.	Criteria Eligibility and Priority of Service Discussion	Brent Capatch	15 min
5.	Washington State Auditor's Office Workforce Development System Performance Audit 8/31/15	Cheri Loiland	15 min
6.	Other Business  Tour of ResCare	LaKesha Egardo-Jones	15min
7.	Next Meeting Agenda Items		

Future Meetings

October 27, 2015 9:30 – 11:00 am @ Reach Center November 24, 2015 9:30 – 11:00 am December 22, 2015 9:30 – 11:00 am

## Workforce Development Council (WDC) of Tacoma Pierce County WIOA Committee Membership Planning Document

9-09-15

#### **WDC Youth and Young Adult Services Committee**

- Committee Chair is member of WDC and appointed.
- ✓ Since all of WDC members are required to serve on a WDC Committee, approximately 4-6 members of the committee will be WDC members.
- Vice Chair selected from Committee and must be willing to also serve on Coordinating Committee.

Representation	Name, Title, Employer,	WDC
Chair of Committee	Email, Phone(s)	Member
Chair of Committee	April Gibson, Administrator	
	Puget Sound Orthopedics	
Visa Chair of Committee	a.gibson@proliancesurgeons.com	
Vice Chair of Committee	Dale King Superintendent/COO	/
	Tacoma Rail	V
	dale.king@cityoftacoma.org	
1. K-12 Representative	Brandon Ervin, Program Specialist	
	Tacoma Public Schools	
	bervin@tacoma.k12.wa.us	
2. WA State Department of Social and Health	Jarret McGill, Social Health Program Consultant	
Services	WA State Department of Social & Health Services	
	mcgiljj@dshs.wa.gov	
3. Youth Services/Community Based Organization	Nicholas Bayard, Director	
	The REACH Center	
	nbayard@reachtacoma.org	
4. Foster Care System		
5. Juvenile Detention System		
6. Business	Kathy Hall, Vice President of Program Services	
	Vadis	
	Kathy@vadis.org	
7. Business	April Gibson, Administrator	
7. Business	Puget Sound Orthopedics	<b>✓</b>
	a.gibson@proliancesurgeons.com	
8. Business	Tim Owens, Manager	
o. Business	Marshalls	<b>✓</b>
	owensbunch@comcast.net	
9. Business	Blaine Wolfe, Project Executive	
	Absher Construction Company	<b>✓</b>
	blaine.wolfe@absherco.com	
10. City of Tacoma/Tacoma Rail	Dale King Superintendent/COO	
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	dale.king@cityoftacoma.org	
11. Labor Representative or Apprentice JATC	Mark Martinez, Executive Secretary	
Representative	Pierce County Bldg & Construction Trades Council	<b>✓</b>
Representative	piercebctc@earthlink.net	*
12. Education	Kelly Goodsell, Executive Director - Special Services	
12. Education	Puget Sound Educational Services	
12 Community Depresentative	kgoodsell@psesd.org	
13. Community Representative	Isa Nichols, CEO/Executive Director	
	Maxine Mimms Academics	
14 MA State Division of Marchine I Ballabilly	isanichols@maxinemimmsacademy.org	
14. WA State Division of Vocational Rehabilitation	Kady Kilventon, Rehabilitation Counselor	
	WA State Division of Vocational Rehabilitation	
	kilvekb@dshs.wa.gov	
15. WA State Employment Security Department	Erin Blades, Supervisor	
	Employment Security Department	
	eblades <u>@esd.wa.gov</u>	

# Workforce Development Council (WDC) of Tacoma Pierce County WIOA Committee Membership Planning Document

9-09-15

16. Pierce County Library System		
Workforce Development Council/WorkForce Central Staff	Brent Capatch, Youth Coordinator 253.330.8128; bcapatch@workforce-centra;.org Cheri Loiland, Chief WIOA Transition Officer 253.254.7908; cloiland@workforce-central.org	
	LaKesha Egardo-Jones, Project Director ResCare Workforce Services 253.573.6682; lakesha.egardo-jones@rescare.com	
	Debbie Lean, Executive Assistant 253.414.0141; <u>dlean@workforce-central.org</u>	



# WDC Youth & Young Adult Services Committee Meeting NOTES

3650 S. Cedar St, Tacoma **WorkForce Central** 9:30 - 11:00 a.m. August 25, 2015 Classroom 1

WFC Staff: Linda Nguyen, Deborah Howell, MaryEllen Laird, Brent Capatch, LaKesha Egardo-Jones and Debbie Lean Attendees: Dale King, Erin Blades, Kathy Hall, Nick Bayard

	AGENDA	NOTES	ACTION ITEMS
i.	Welcome/Introductions • (Dale King)	Vice Chair Dale King called the meeting at 9:35 a.m. Roundtable introductions were made.	
2	Review Prior Meeting Notes • (Dale King)	Prior meeting notes were accepted as prepared.	
'n	Tomorrow's Economy Discussion (Brent Capatch)	Brent shared that Cheri handed out the draft of Tomorrow's Economy to give a snapshot of where globally and locally the economy sits and opened	
		up discussion to see if there are any points that really hit home and could drive some formative discussion and outcomes that the committee would	
		like to initiate.	
		Linda shared that this report was generated by the Workforce Training  Education & Coordinating Board. Not sure if they adopted it yet.	
		working with out of school and in school young adult there were two	
		philosophical camps to come out of it. Asked that the committee have a	
		discussion that with limited resources we all have do we want to prioritize	
		to say that all young workers matter to us because they are all are being	
		impacted by the economic downturn. Having this discussion will be	
		important when building the local plans.	
		After lengthy discussion, it was decided it could be by priority of service	
		(priority #1, #2, #3). Know that when there are times of limited resources	
		we are going to have to give special attention to people with the barriers,	
		income threshold or a certain population. It would send the message that	
		we care about everyone but we prioritize based on the funding that is	

available.	Suggestions for further discussion:
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- Income level base
- Barrier Base
- Accommodation
- Ethnic Race
- Staff can think about what the discussion has been and come up with some of those examples and then have a discussion about it at the next meeting and maybe craft something to move forward to the WDC as a recommendation.
- WIOA definition of out of school youth as 16-24 (disengaged). At the next
  meeting the committee will discuss the eligibility criteria for both in and
  out of school youth and the suggested ideas that came from this meeting.
- Once we define our young population then decide what the core fundamental services that all youth need regardless of what subcategory they hit. What do we want the system to offer and then from there what fundamental services or help can we offer to the youth with these kinds of barrier. What should those services be as we are learning what is out there currently.
- Partners may have to repurpose how they do things, if they can, or we
   need to find out where the gaps are and determine how to fill those gaps.
  - Dale would like to take a field trip to a place where the work gets done.
    - o ResCare September 22<sup>nd</sup>
      - REACH October 27<sup>th</sup>
- Debbie to reach out to TJ Bohl to see about a meeting and/or tour of Remann Hall at a future date
- Pierce County Alliance may be an option also
- Linda updated the committee with regards to the Core Leadership Team.
   Under WIOA it requires core partners that have to bring assets to the table and be measured performance wise the same under WIOA. Formed a Core Leadership Team with the heads of the core partners:
  - Employment Security Department (ESD) Wagner-Peyser labor exchange
- Division of Vocational Rehabilitation (DVR)
- Title 1-B (the three funding streams that we control: Youth/Adult/DW).

Also added DSHS/TANF and Pierce County Library System as they have invested so much as it relates to technology. This group is going to select a facilitator to help with conversations and be able to articulate what does it look like, who are the partners, what are each partner's role and how are

		we going to move forward. Meeting is August $31^{\rm st}$ with the facilitator (possibly Sally Perkins) and we will set up the scope of work.	
4.	Career Link Presentation (Brent Capatch)	<ul> <li>Brent gave a presentation on what Career Link Pierce County is doing right now.</li> </ul>	Debbie will send PowerPoint presentation
		<ul> <li>This presentation strategically ties to what we are doing locally- connecting education and industry to bridge the gap from those that graduating from high school and not knowing what to do or where to go at that point.</li> </ul>	to committee members unable to attend meeting
		<ul> <li>Career Link is set up with a key partnership with Tacoma Public Schools and is hoping to address challenges that employers have with really bringing about the next generation and next workforce that is going to follow those</li> </ul>	
		in place to build a robust pipeline with skilled applicants to fill those local jobs necessary.	
		Linda shared that she would like to see all committee members' businesses	
		on the Career Link Business List.	
r,	Other Business	<ul> <li>Brent shared that Jarret McGill gave a Washington Connection presentation</li> </ul>	
		at the last meeting so for anyone who was unable to make it, there were handouts available.	
6.	Next Meeting Agenda Items	September:	
		Inventory of Workforce Related Services & Programs in Pierce County	
		<ul> <li>Criteria Eligibility and Priority of Service Discussion</li> </ul>	
		Future Meeting:	
		<ul> <li>Puget Sound Educational Services Presentation (October mtg.)</li> <li>(Kelly Goodsell)</li> </ul>	
		<ul> <li>Panel of the Core Partners to speak about what they do</li> </ul>	
7.	Thank You/Adjourn	At 11:00 am	



#### Workforce Innovation and Opportunity Act (WIOA) Transition Policy

#### WFC WIOA TITLE I-B YOUTH DETERMINATION POLICY

POLICY NUMBER: WIOA-TP-Y-001

**EFFECTIVE DATE: 7-1-2015** 

**Supersedes**: This policy does not supersede a previous policy. This is a modification of the current WIA Adult, Dislocated Worker and Youth Eligibility Policy, Policy Number WFC-WIA-08-26-2013ELIG/DOC and serves as a WIA/WIOA transition policy. This policy will be revised and reissued after the WIOA final rules are issued and as further DOL/ETA guidance is received.

#### **PURPOSE**

This policy communicates key provisions and changes authorized by the Workforce Innovation and Opportunity Act (WIOA) to determine eligibility for youth seeking services funded by WIOA. The WFC WIA Adult, Dislocated Workers and Youth Eligibility & Documentation Policy Handbook, Revision 3 remains in effect except for the changes noted here until the release of the Final WFC WIOA Eligibility & Documentation Handbook

#### BACKGROUND

WIOA Section 3 (18) and 129 (a) (1)(B) and (C) describes eligibility for the WIOA Title I youth which includes in school youth (ISY) and out of school youth (OSY) program.

With few exceptions, the WIOA criteria for OSY are generally the same as those under WIA. WIOA increases the age of OSY from 21 to 24 years of age. Unlike under WIA, low income is not a requirement to meet eligibility for *most* categories of OSY under WIOA. However, low income is now a part of the criteria for youth who need additional assistance to enter or complete an educational program or to secure or hold employment. Also, WIOA has made youth with a disability a separate eligibility criterion.

In addition, WIOA includes a new criterion: a youth who is within the age of compulsory school attendance but has not attended school for at least the most recent school year calendar quarter.

WIOA clarifies that age is based on time of enrollment and as long as the individual meets the age eligibility at time of enrollment OSY can continue to receive WIOA youth services beyond the age of 24.

For ISY, eligibility criteria is essentially the same as under WIA but the disability criterion has been separated from the "needs additional assistance" criterion. As with OSY, age is based on time of enrollment and as long as the individual meets the age eligibility at time of enrollment, they can continue to receive WIOA youth services beyond the age of 21.

WIOA includes a youth as low-income if he or she receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.).

WIOA clarifies that there is no self-service concept for the WIOA youth program and every individual receiving services under WIOA youth must meet ISY or OSY eligibility criteria and be formally enrolled in the program.

#### POLICY

Youth eligible for services must meet the following criteria:

- U.S. citizen or otherwise legally entitled to work in the U.S.
- Registered for the Selective Service, if applicable

Out-of-School Youth must be aged 16-24, not attending any school, and meet one or more of the following:

- A school dropout (no High School degree, GED or equivalent)
- Within the age of compulsory school attendance (up to age 17 RCW 28A.225 ) but has not attended school for at least the most recent complete school year calendar quarter
- An individual in the adult or juvenile justice system
- Homeless, a runaway, in or aged out of foster care
- Pregnant or parenting
- Disabled
- Has a High School degree or its equivalent, is low income and is basic skills deficient, or an English language learner
- Low-income and requires additional assistance to enter or complete an educational program or to secure or hold employment. (Refer to the WIA Adult, Dislocated Worker & Youth Eligibility & Documentation Handbook, and Revision 3 for additional assistance criteria)

In School Youth must be aged 14-21, attending school (as defined by State law which includes eligible students enrolled in a dropout reengagement program under RCW 28A.175.100, 28A.175.105 as in school), low income and meet one or more of the following:

- Basic skills deficient (WIOA Sec 3 (5))
- English language learner
- An offender
- Homeless, runaway, in foster care or has aged out of the foster care system
- Pregnant or parenting
- Disabled
- Requires additional assistance to complete an educational program or to secure or hold employment (Refer to the WIA Adult, Dislocated Worker & Youth Eligibility & Documentation Handbook, Revision 3 for criteria)

Current WIA participants must be grandfathered into WIOA, even if the participant would not otherwise be eligible for services under WIOA. Additional reassessments are not required to be completed for participants already determined eligible and enrolled under WIA. Furthermore, these participants must be allowed to complete the WIA services specified in their individual service strategy and individual employment plan, even if the services are no longer allowable under WIOA. (TEGL 30-14)

For the following additional eligibility requirements, refer to the WIA Adult, Dislocated Worker & Youth Eligibility & Documentation Handbook, Revision 3:

#### 5% WINDOW

- PARTICIPANT FILE DOCUMENTATION
- SKIES DATA ENTRY DEADLINES
- CONCURRENT ENROLLMENT
- FOLLOW-UP
- EXCEPTIONS TO FOLLOW-UP
- FOLLOW-UP DOCUMENTATION
- LOW INCOME (For WIOA, low income also includes receiving or is eligible to receive a free or reduced price lunch)

#### **INQUIRIES**

Direct Inquiries To:
WorkForce Central
3650 South Cedar Street
Tacoma, WA 98409-5714
(253) 472-8094 or 1-800-999-8168

**APPROVED** 

Linda Nguyen, WFC @EO

Date:

APPROVED BY WDC

Data

### WIOA YOUTH ELIGIBILITY, PROGRAM DESIGN & PERFORMANCE

#### WIOA Youth Eligibility (681.200-.310):

In-school Youth: In-school youth must meet the following eligibility guidelines:

- U.S. citizen or otherwise legally entitled to work in the U.S.; and
- Attending school as defined by State law; and
- Age 14-21; and
- Pierce County resident; and
- Selective Service Registration (if applicable); and
- Low income individual; AND
- One or more of the following:
  - o Basic skills deficient
  - An English language learner
  - o An individual who is subject to the juvenile or adult justice system (offender or ex-offender)
  - A homeless individual, or runaway, or in foster care or has aged out of foster care system
  - Pregnant or parenting
  - o An individual with a disability
  - An individual who requires additional assistance\* to complete an educational program or to secure and hold employment and meets one or more of the following categories:
    - At risk of dropping out of school;
    - Involved with drug and/or alcohol (personally or live with a family member with this issue);
    - Reside in a household with abuse issues;
    - Is a victim of domestic violence or sexual child abuse;
    - Is gang affiliated;
    - Is in a grade level one or more below what is appropriate for the youth's age;
    - Has significant geographical barriers to accessing youth development services;
    - Is a member of a migrant family; or
    - Lacks significant work maturity and/or lacks a history of work.
    - \*NOTE: In any single program year, no more than 5% of a Pierce County's total In-school Youth participants can be those who require additional assistance to complete an educational program or to secure or hold employment [WIOA sec. 129(a)(3)(B)].

#### Out-of-school Youth: Out-of-school Youth must meet the following eligibility guidelines:

- U.S. citizen or otherwise legally entitled to work in the U.S.; and
- Not attending school as defined by State law<sup>1</sup>; and
- Age 16-24; and
- Selective Service Registration (if applicable), <u>AND</u>

<sup>&</sup>lt;sup>1</sup> The State's **dropout reengagement program** authorized under RCW 28A.175.100 (a.k.a., 1418 or Open Doors) provides educational opportunities and access to services to older youth ages 16-21 who have dropped out of high school or are not accumulating sufficient credits to reasonably complete a high school diploma in a public school before the age of 21 and are *unlikely to re-engage in education by re-enrolling in a traditional or alternative high school.* While related RCW 28A.175.110 states that youth in this program are regularly enrolled students of the school district in which they are enrolled, the State finds that the intent of enrollment was to allow schools with dropout reengagement programs authorized under RCW 28A.175.100 to use basic education funds to serve dropouts and that <u>youth in this program are not attending school</u> as defined under State law <u>for the purposes of WIOA eligibility determinations.</u>

- One or more of the following:
  - o A school dropout (no high school degree, GED or equivalent)
  - A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school calendar quarter.
  - A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is basic skills deficient or an English language learner.
  - o An individual who is subject to the juvenile or adult justice system (offender or ex-offender)
  - o A homeless individual, or
  - o A runaway, or
  - o In foster care or has aged out of foster care system
  - Pregnant or parenting
  - o A youth who is an individual with a disability
  - A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment <u>and</u> meets one or more of the following categories:
    - At risk of dropping out of school;
    - Involved with drug and/or alcohol (personally or live with a family member with this issue);
    - Reside in a household with abuse issues;
    - Is a victim of domestic violence or sexual child abuse;
    - Is gang affiliated;
    - Is in a grade level one or more below what is appropriate for the youth's age;
    - Has significant geographical barriers to accessing youth development services;
    - Is a member of a migrant family; or
    - Lacks significant work maturity and/or lacks a history of work.

#### **WIOA Low Income Guidelines**

WIOA Youth Program Who Meet The Following Criteria:

- An out-of-school youth who is a recipient of a secondary school diploma or its recognized equivalent who is either basic skills deficient or an English language learner; or
- An out-of-school youth who requires additional assistance to enter or complete an educational program or to secure or hold employment; and
- All in-school youth.

Family Size	Annual Income Level
*1	\$11,770
	(\$5,885 for 6-months prior to enrollment)
**2	\$18,557
	(\$9,278.50 for 6-months prior to enrollment)
**3	\$25,478
	(\$12,739 for 6-months prior to enrollment)
**4	\$31,450
	(\$15,725 for 6-months prior to enrollment)
**5	\$37,114
	(\$18,557 for 6-months prior to enrollment)
**6	\$43,403
	(\$21,701.50 for 6-months prior to enrollment)
**Families of 7	Add \$6,289 for each additional family member
or more	•

## **WIA/WIOA Youth Programs Performance Measures**

WIA	WIOA
(Effective through June 30, 2015)	(Effective July 1, 2016)
1. Placement in Employment or Education -1 <sup>st</sup> quarter after exit	1. Placement in Employment or Education -2 <sup>nd</sup> quarter after exit
-Of those who are not in post-secondary education or employment (including the military) at the date of participant:  The number of participants who are in employment (including the	-Percentage of participants who are in education or training activities, or in unsubsidized employment, during the second quarter after exit from the program.
military) or enrolled in post-secondary education and/or advanced training/occupational skills training in the first quarter after the exit quarter divided by the number of youth participants who exit during the quarter.	quartor area one norman program
2. Attainment of a Degree or Certificate -3 <sup>rd</sup> quarter after exit	2. Placement in Employment or Education -4 <sup>th</sup> quarter after exit
-Of those enrolled in education (at the date of participation or at any point during the program):	-Percentage of participants who are in education or training activities, or in unsubsidized employment, during the fourth
The number of youth participants who attain a diploma, GED, or certificate by the end of the third quarter after the exit quarter divided by the number of youth participants who exit during the quarter.	quarter after exit from the program.
3. Literacy and Numeracy Gains	3. Median Earnings
-During program participation; Out-of-School Youth Only	-2 <sup>nd</sup> quarter after exit
-Of those out-of-school youth who are basic skills deficient:	-Median earnings of participants who are in unsubsidized
The number of youth participants who increase one or more	employment during the second quarter after exit from the program.
educational functioning levels divided by the number of participants who have completed a year in the youth program (i.e., one year from	Median= middle value in a data set with equal set of numbers below and above
the date of first youth programs service) plus the number of participants who exit before completing a year in the youth program.	Average=total of numbers divided by number of items in the set
participants who exit before completing a year in the youth program.	4. Credential Rate
	-During program participation <u>or</u> within 1 year of exit
	-The percentage of participants who obtained a recognized post- secondary credential or a secondary school diploma*, or its recognized equivalent, during participation or up to 1 year after exit.
	*A participant who has obtained a secondary school diploma or equivalent is <b>only included in this measure</b> if the participant is <b>also employed or</b> is <b>enrolled in an education or training</b>
	program leading to a recognized post-secondary credential within 1 year from exit.
	5. In-program Skill Gains
	-During program participation
	-Percentage of participants who, during a program year, are in
	education or training programs that lead to a recognized post- secondary credential <u>or</u> employment <u>and</u> who are achieving
	measurable skill gains, defined as documented academic,
	technical, occupational or other forms of progress towards such a credential or employment.
	6. Employer Effectiveness
	-TRD-

-TBD-

#### **WIOA Program Design** (681.400-.660):

- 75% of WIOA youth funds must be spent on out-of-school youth.
- Local youth programs must:
  - Provide for an **objective assessment** of each youth that includes a review of the academic and occupational skill levels and service needs for the purpose of identifying appropriate services and career pathways for participants and informing the ISS;
  - Develop and update the ISS that is directly linked to one or more performance indicators and identifies
    appropriate career pathways that include education and employment goals, that considers career
    planning and the results of the objective assessment and that prescribes achievement objectives and
    services for the participant; and
  - Provides case management and follow-up services;
  - Meet the following referral requirements in WIOA sec. 129(c)(3)(A):
    - Provide participants with information about the full array of applicable services available through other eligible providers or one-stop partners;
    - Refer participants to appropriate training and educational programs;
    - If youth applicant does not qualify or cannot be served by the program, the provider must ensure that the youth is referred for further assessment if necessary or referred to appropriate programs to meet the skills and training needs of the youth.
- Youth age 18 or older may be co-enrolled into the WIOA Adult or Dislocated Worker programs as long as the
  youth meets program eligibility criteria and co-enrollment is justified (as documented in the participant file).
   Providers must identify and track the separate funding streams and ensure no duplication of services.
- Providers must make each of the following 14 services available to youth participants:
  - 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 or for a recognized post-secondary credential;
  - 2. Alternative secondary school services, or dropout recovery services as appropriate;
  - 3. Paid and unpaid work experiences that have academic and occupational education as a component of the work experience;
  - 4. Occupational skill training that leads to a recognized post-secondary credentials in in-demand occupations;
  - 5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation;
  - 6. Leadership development opportunities;
  - 7. Supportive services;
  - 8. Adult mentoring for no less than 12 months;
  - 9. Follow-up services for no less than 12 months after participation;
  - 10. Comprehensive guidance and counseling;
  - 11. Financial literacy education;
  - 12. Entrepreneurial skills training;
  - 13. Labor market and employment information/career awareness, career counseling and career exploration services; and
  - 14. Activities that help youth prepare for and transition to post-secondary education and training.
- ITAs are permitted for youth ages 18-24.