# Youth at Work Equity Grant Program Policy

## Summary

Minnesota Statute (116L.562) authorizes the youth at work equity grant program directing DEED to “award grants to eligible organizations for the purpose of providing workforce development and training opportunities to economically disadvantaged or at-risk youth ages 14-24.”

## Relevant Laws, Rules, or Policies

Minnesota Statute 116L.562

Effective Date 7/1/2019

Last Updated 11/15/2023

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Youth at Work website: <https://mn.gov/deed/programs-services/office-youth-development/special/grants/>

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## Section 1: Program Overview and Eligibility

The Youth at Work program identifies the following priorities, impact areas, and goals for all grantees:

* Provide summer and/or year-round work experience and introduction to career pathways for economically disadvantaged or at-risk youth, ages 14 through 24 (including those who are out-of-school and/or involved in the foster care and juvenile justice systems, residing in MFIP households, youth with disabilities, and youth from communities of color who are under-represented in the workforce; homeless and/or runaways); and,
* Increase exposure to in-demand jobs important to regional economies; and,
* Introduce and promote career pathways and skill acquisition (academic and work readiness) through project-based instruction; and,
* Promote mastery of work readiness competencies and 21st Century skills, as demonstrated through workplace portfolios and other assessments; and,
* Provide high-quality worksites and overall participant and employer satisfaction.

### Example allowable activities:

* Provide youth with paid private sector work experiences (internships, pre-apprenticeship, apprenticeships) and public service employment opportunities.
* Work-based learning and Career pathways programming focused on in-demand industries such as healthcare and information technology.
* Support youth in achieving educational goals such as earning academic/service-learning credits, high school diploma, or GED.
* Support youth with exploring, applying to, and accessing post-secondary education opportunities.
* Financial literacy, mentoring, skills building activities, and virtual trainings.
* Career awareness and exploration activities like career aptitude tests, career fairs, industry tours, job shadows, career camps.
* Virtual career services and work experiences.

### Youth Eligibility:

Per Minnesota Statute ([116L.562](https://www.revisor.mn.gov/statutes/cite/116L.562)), the Youth at Work program prioritizes services to youth who are considered “at-risk” or “economically disadvantaged.”

At-risk is defined in [MS 116L.56](https://www.revisor.mn.gov/statutes/cite/116L.562). For purposes of eligibility determination, the following individuals are considered at risk:

1. a pregnant or parenting youth;
2. a youth with limited English proficiency;
3. a potential or actual school dropout;
4. a youth in an offender or diversion program;
5. a public assistance recipient or a recipient of group home services;
6. a youth with disabilities including learning disabilities;
7. a chemically dependent youth or child of drug or alcohol abusers;
8. a homeless or runaway youth;
9. a youth with basic skills deficiency;
10. a youth with an educational attainment of one or more levels below grade level appropriate to age; or
11. a foster child.

Economically disadvantaged youth - An individual who received an income, or is a member of a family that received a total family income, that, in relation to family size, does not exceed the higher of —

1. the official poverty level, for an equivalent period; or
2. 70 percent of the lower living standard income level.

Please follow this [link](https://mn.gov/deed/assets/wioa-chapter7_tcm1045-134289.docx) to DEED’s website for the current Income Eligibility Table that includes both Poverty Levels and Lower Living Standard Income Level.

### Other Methods:

1. Youth who are eligible to receive or are receiving free school lunch are considered to be economically disadvantaged.
2. Expected family contribution of “0” on the Free Application for Federal Student Aid (FAFSA) qualifies a youth as low-income.
3. Youth is receiving or is from a family receiving public assistance i.e. MFIP, TANF, SNAP, SSI, SSDI, general, refugee or medical assistance qualifies the youth as low-income.

If you have questions about a youth’s eligibility based on income, please contact the grant coordinator.

## Section 2: Collaboration

Per Minnesota Statute ([116L.562](https://www.revisor.mn.gov/statutes/cite/116L.562)), if a program is not operated by a local unit of government or a workforce development board, the grant recipient **must coordinate the program with the Local Workforce Development Board**. Additionally, eligible organizations **must leverage non-state or private sector funds**. Leveraged resources may be for any amount, cash or in-kind.

Youth at Work grantees **must leverage** non-state or private sector funds. These can be cash or in-kind.

## Section 3: Earned Safe and Sick Time:

Effective January 1, 2024, required Earned Sick and Safe Time (ESST) benefits would be considered fringe benefits similar to Worker’s Compensation. Expenses related to ESST should be budgeted in the Youth Participant Wages and Fringe Benefits cost category for the Youth at Work Program. If your agency wishes to modify the Youth at Work budget to account for these additional expenses, please contact your program manager.

## Section 4: Use of Stipends and/or Incentives

Grantees are allowed to provide stipends to youth participants. Often, stipends are provided to youth while they are completing classroom training, on-the-job training, occupational training, or other training activities. Additionally, stipends may be offered to youth in place of a wage. Regardless, Youth at Work grantees need to have a stipend policy in place. Note: stipends are considered taxable income to program participants and participants must be notified of IRS implications.

Incentives may also be provided to Youth participants. In line with federal regulations, incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. The local program must have written policies and procedures in place governing the award of incentives outlined in writing before the commencement of the program that may provide incentive payments; align with the local program’s organizational policies[[1]](#footnote-1). Incentive payments must not include entertainment, such as movie, sporting events, tickets, or gift cards to movie theaters or other venues whose sole purpose is entertainment.

Incentive payment must be connected to recognition of achievement of milestones in the program tied to work experience, education, or training. Incentives provided for achievement could include the acquisition of a credential or other successful outcome.

Incentive policies must include type of achievement, paper documentation of achievement, and amount payable. For example:

| Type of Achievement  | Paper Documentation  | Amount Payable  |
| --- | --- | --- |
| Completion of GED test (incentive can be offered for **each** test completed)  | Copy of official document showing passed test  | The successful completion of each test = $20.  |

Copies of stipend and incentive policies must be sent to the grant coordinator.

Example stipend and incentive policies can be found here: <https://mn.gov/deed/programs-services/office-youth-development/resources/>

## Section 5: Data Entry and Reporting

All Youth at Work grantees are required to enter case managed youth into the State of Minnesota’s case management system Workforce One. If the program model is entirely non-case managed youth, contact the grant coordinator about receiving an exemption from this requirement.

Training is provided to organization at no-cost. Training is provided by DEED’s Workforce One team. Information about Employment and Training Programs (ETP) Workforce One training sessions can be found here: <https://www.mnworkforceone.com/ManagePrograms/SessionSearch.aspx>.

Demographic, performance, and outcome data are collected via Workforce One reports. An example of the information that is pulled from Workforce One reports can be found here for SFY22-23 Youth at Work grantees: <https://mn.gov/deed/assets/sfy-2022-2023-youth-at-work-quarterly-template_tcm1045-494792.docx>

Specific guidance on the “Attained Work Readiness or Education Goals” outcome is provided below:

### Attained Work Readiness Goal

There are several ways that organizations can count activities toward the performance outcome. Determine which of the following ways to record work readiness skill attainment and implement that to ensure the performance outcome is captured. The attained work readiness goal performance outcome is an exit-based measure in WorkforceOne.

1. **Pre- and post-assessment of work skills by worksite supervisor**
* Worksite supervisors are a critical connection between programs and employers. By having worksite supervisors assess the work readiness skills of youth participants at the beginning of the work experience and at the end of the experience, youth are able to understand how their skills have developed from the perspective of an industry professional.

#### Examples:

U.S. Department of Labor - <https://wdr.doleta.gov/directives/attach/TEGL/TEGL07-10a4.pdf>. This example provides organizations with guidance on how to design a work readiness assessment that could be completed by a worksite supervisor. This was developed for a Federal Youth Employment program but can be modified to meet the program models of Youth at Work grantees.

Southeast Minnesota Workforce Development Inc. - <https://mn.gov/deed/assets/eval-work-maturityskills_tcm1045-134438.pdf>. This example comes from a service provider in Minnesota. This example can also be modified to meet the needs of Youth at Work programming.

### Work Readiness Curriculum

* Some Youth at Work programs incorporate work readiness curriculum into programming. Typically, the work readiness curriculum is completed by most or all youth enrolled in programming. Ideally, a goal is established in the youth services strategy or service plan.

#### Example:

City of St. Paul Right Track - <https://www.stpaul.gov/departments/parks-recreation/right-track/schoolcommunity-resources/professional-development>. The Right Track Program has a number of activities that youth complete as part of the work readiness component of their programming. Use the examples provided on the Right Track website to develop a work readiness curriculum that fits your organization’s programming.

### Program Specific Option

* For programs that can provide intensive case management services to youth may develop individual plans with youth. The work readiness skills assessment may be done by the counselor working directly with the youth. The activities that youth complete in order to attain work readiness goal may be developed locally. Your organization should ensure that proof of work readiness skill attainment is captured in participant files as well as Workforce One.

### Attained Education Goal

Much like attained work readiness goal, attained education goal is subjective and can vary depending on the program model. The key component to this outcome is that there has to demonstrate a positive change to the youth’s educational experience. For example, applying for colleges or universities would not count, but entering post-secondary education could.

### Service Strategy or Service Plan

* Youth at Work programs that utilize a service strategy when serving youth may find it advantageous to identify education goals in the strategy. These goals should be youth-driven based on the needs of the youth. These goals can take many forms. Examples can include:
* A youth with a goal to graduate high school earns their high school diploma or GED. This could count for THREE performance outcomes – attained education goal, obtained high school diploma or GED, and completed program objective.
* A youth who is on the verge of dropping out of school remains in school and completes the year of schooling. This could count for THREE performance outcomes – attained education goal, remained in school, and completed program objective.
* A youth who dropped out of school returns to school. This could count for TWO performance outcomes – attained education goal and dropout returned to school.
* A youth who is behind on credits makes up a class over a summer school session. This could count for TWO performance outcomes – attained education goal and earned academic/service-learning credit.

### Program Specific

* Many organizations have unique youth programming. There may be specific ways your organization identifies educational goal attainment based on the program model or the clientele your organization serves. For example, youth involved with the juvenile justice system or homeless youth may have specific education goals. It is up to the counselors working with the youth to identify these goals and report them appropriately in participants files and Workforce One.
* To ensure staff are identifying educational goal attainment, be sure that your organization’s approved Work Plan is made available.

## Section 6: Quarterly Reports

All Youth at Work grantees are required to submit a quarterly narrative report to the grant coordinator no later than 45 days after each quarter end. The report template can be found here: <https://mn.gov/deed/assets/sfy-2022-2023-youth-at-work-quarterly-template_tcm1045-494792.docx>

## Section 7: Grant Modifications and Extensions

Youth at Work grantees may request a grant modification if there is a need to change the program model or other programmatic changes. These requests will be handled on an individual basis. Contact the grant coordinator if a grant modification is needed.

Grant extensions are also possible. DEED expects grantees to fully expend grant funds each quarter. However, unexpected program disruptions occur, and extensions will be taken into consideration. Contact the grant coordinator if a grant extension is needed.

## Addendum – Data Definitions for Youth

### Gender

1. Male: Identifies as male
2. Female: Identifies as female

### Age (age at time of program enrollment, round down to the past birthday)

1. 14 – 15: Self-explanatory
2. 16 – 17: Self-explanatory
3. 18 Self-explanatory
4. 19 - 21: Self-explanatory
5. 22 - 24: Self-explanatory
6. Greater than 24: Self-explanatory

### Ethnicity/Race (more than one category may be selected per participant)

1. Hispanic/Latino (separate category from Race): These are individuals who classify themselves as “Mexican,” “Puerto Rican,” Cuban”, or in some other Spanish, Hispanic, or Latino category. The individual can view this origin as the heritage, nationality group, lineage, or country of birth of the individual or of the individual’s parents/ancestors before arrival in this country. Individuals who identify their origin as Hispanic/Latino can be of any race.
2. American Indian or Alaska Native: These are individuals having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment:
3. American Indian: These are individuals who identify as their races as “American Indian,” including such entities as American tribes, Canadian Indians, French – American Indians, or Spanish – American Indians.
4. Alaska Native: These are individuals who identify as their race as Eskimo, Aleuts, Alaska Indians, Arctic Slope, Inupiat, Yupik, Alutiq, Egegik, and Pribilovian.
5. Asian or Pacific Islander:
6. Asian: these are individuals having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam. It includes:
7. Asian Indian
8. Chinese
9. Filipino
10. Japanese
11. Korean
12. Vietnamese
13. Other Asian
14. Pacific Islander: these are individuals having origins in any of the original peoples of Hawaii, Guam, Samoa, or another Pacific Islands. It includes:
15. Native Hawaiian
16. Guamanian/Chamorro
17. Samoan
18. Other Pacific Islander
19. Black or African American: These are individuals having origins in any of the Black racial groups of Africa. It includes individuals who identify themselves as:
20. Black
21. African – American
22. Kenyan
23. Nigerian
24. Haitian
25. Somalian
26. White: These are individuals having origins in any of the original peoples of Europe, the Middle East, or North Africa.

### Educational Level: (The highest level of school completion at the time of program enrollment either in this country or in another country)

1. 8th grade and under: Self-explanatory
2. 9th grade – 12th grade: Does NOT include high school graduation
3. High School graduate or equivalent: Includes GED and all High School diplomas or equivalents
4. Post-Secondary Education: Includes any formal educational experience beyond high school or equivalent

### Other Demographics

1. Limited English Proficient: For people who speak a language other than English at home, the response represents the individual’s own perception of his or her ability to speak English.
2. Participants/Families Receiving Public Assistance: These are participants who receive or come from families receiving Temporary Assistance to Needy Families (TANF/MFIP) and general assistance. It does NOT include any Supplemental Security Income.
3. Foster Youth: These are youth who are or who have ever been placed in a home by legal action on whose behalf State or local government payments are or have ever been made.
4. Participants with a Disability: These are participants with a disability as defined by section 3 of the Americans with Disabilities Act of 1990.
5. High School Dropout: These are individuals who are no longer attending any school and who have not received a secondary school diploma or a recognized equivalent.
6. Youth or Adult Offender: These are participants who:
7. Have been subject to any stage of the criminal or juvenile justice process, for whom services under this program may be beneficial; or
8. Require assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.
9. Pregnant or Parenting Youth: These are youth who are pregnant or who have parental responsibilities for a minor (i.e. less than 18 years of age).
10. Basic Skills Deficient: These are participants who:
11. Compute or solve problems, read, write, or speak English at or below the 8th grade level on a generally acceptable standardized test or a comparable score on a criterion- referenced test; or
12. Are unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the family, or in society.
13. Homeless Individual or Runaway Youth: A participant is considered a homeless individual or runaway youth if the individual:
	1. Lacks a fixed, regular, and adequate nighttime residence; this includes an individual who:
14. Is sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;
15. Is living in a motel, hotel, trailer park or campground due to a lack of adequate alternative accommodations;
16. Is living in an emergency or transitional shelter;
17. Is abandoned in a hospital; or
18. Is awaiting foster care placement.
	1. Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, such as a car, park, abandoned building, bus or train station, airport, or camping ground;
	2. Is a migratory child who in the preceding 36 months was required to move from one school district to another due to changes in the parent’s or parent’s spouse’s seasonal employment in agriculture, dairy, or fishing work; or
	3. Is under 18 years of age and absents himself or herself from home or place of legal residence without the permission of his or her family (e.g. runaway youth).

Note: this definition does not include an individual imprisoned or detained under an Act of Congress or State Law. An individual who may be sleeping in a temporary accommodation while away from home should not, as a result of that alone, be recorded as homeless.

1. Not Employed at Program Enrollment: These are participants who have not had a job within one week of program enrollment.
2. Veteran: These are participants who have served in the active military, naval, or air service, and who have been discharged or released from such service under conditions other than dishonorable.
3. Economically Disadvantaged: These are participants who received an income, or is a member of a family that received a total family income, that, in relation to family size, does not exceed the higher of:
4. the official poverty level, for an equivalent period; or
5. 70 percent of the lower living standard income level.

Please follow this [link](https://mn.gov/deed/assets/wioa-chapter7_tcm1045-134289.docx) to DEED’s website for the current Income Eligibility Table that includes both Poverty Levels and Lower Living Standard Income Level. Youth who are eligible to receive or are receiving free school lunch are considered to be economically disadvantaged. Youth who have an expected family contribution of “0” on the FAFSA are considered low-income. Youth receiving or youth from families receiving public assistance qualify as low-income.

### Program Services, Activities, and Other Related Assistance

* + 1. Received Education, Employment Preparation, or Job Training Activities: These are participants who are receiving formal or informal instruction in various kinds of settings. Examples include math or reading remediation, GED preparation, tutoring, ESL instruction, time management skills training, study skills training, work readiness training, On-the Job Training (OJT), vocational/occupational skills training, and pre-apprenticeship.
		2. Received Work Experience, Internship, or Apprenticeship Activities: These are participants who are involved with planned, structured learning experiences that take place in a workplace for a limited amount of time. The work experience may be paid or unpaid and may be in the private, for-profit sector; the non-profit sector or the public sector. Examples include subsidized or unsubsidized employment, internship, Job Club, job placement.
		3. Received Community Involvement and Leadership Development Activities: These are participants who are involved in activities designed to enhance responsibility and managerial skills and other positive social behaviors (e.g. building self-esteem, maintaining a healthy lifestyle including being alcohol and drug free). Examples include community service and youth advisory board/council participation.
		4. Received Post-Secondary Exploration, Career Guidance and Planning Activities: These are participants who receive preparation for post-secondary educational opportunities, receive preparation for employment, and receive information on effective connections to organizations that provide strong links to the job market and employers. Examples include college fairs and visits, assistance with college admission applications/financial applications, career counseling and workforce information services such as labor market information.
		5. Received Mentoring Activities: These are participants who receive guidance/advice from an adult for a period of at least 12 months occurring both during and after program participation. Examples include sustained relationship between mentor and participant in one-on-one group settings (formal or informal), personal or life skills counseling.
		6. Received Support Services: These are participants who receive such services as:
	1. Linkages to community services;
	2. Assistance with transportation;
	3. Assistance with child care and dependent care;
	4. Assistance with housing;
	5. Referrals to medical services;
	6. Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eye glasses and protective eye gear;
	7. Substance abuse treatment;
	8. Mental health treatment.
		1. Received Financial Literacy Education: These are participants that received education or training, either individually or in groups, related to improving financial literacy. Examples of topics include money management, budgeting, credit and banking, credit scores, and debt management.
		2. Low-performing Students that Received Academic and Behavioral Interventions: These are participants that are low-performing students, as defined by the program or school, that receive academic or behavioral interventions or support. Examples could include tutoring, homework help, attendance support, assignment tracking, outside classroom behavioral support, and alternatives to suspension.
		3. Youth that Received Intervention Activities: These are youth participants (age 14 -24) that receive intervention activities to keep them in school, in their community, and out of the juvenile justice system. Intervention strategies are diverse and can include activities such as after school programing, caring adult support, drug/alcohol use prevention, conflict resolution, and truancy interventions.

### Indicators of Performance

* + 1. Attained Work Readiness Goals: The identified work readiness goals have been met for these participants. This could include career planning, job search goals, living skills such as budgeting, opening a bank account, and using public transportation. It also includes goals related to positive work habits such as punctuality, regular attendance, and assuming the responsibilities involved in maintaining a job.
		2. Attained Education Goals: The identified education goals have been met for these participants.
		3. Received Academic or Service Learning Credit:
1. Academic Credit: Verification of an achievement of competency in a formal course of study by one or more of the following:
2. A local/state educational agency or a state agency responsible for administering vocational and technical education within a state;
3. An institution of higher education described in Section 102 of the Higher Education Act (HEA) that is qualified to participate in the student financial assistance programs authorized by HEA Title IV (e.g. community colleges, proprietary schools, technical colleges, etc).
4. Service-Learning Credit: Verification of an achievement of competency because of a work experience as demonstrated by objective testing. Such verification can be done by one or more of the following:
5. A local/state educational agency or a state agency responsible for administering vocational and technical education within a state;
6. An institution of higher education described in Section 102 of the Higher Education Act (HEA) that is qualified to participate in the student financial assistance programs authorized by HEA Title IV (e.g. community colleges, proprietary schools, technical colleges, etc).
	* 1. Obtained High School Diploma, GED, or Remained in School, Obtained a Certificate or Degree, or Drop-out Returned to School:
7. Obtained High School Diploma, GED: These are participants who successfully graduate from state accredited high schools or obtain a GED by passing the requisite tests.
8. Remained in School: These are participants who are at risk of dropping out from school but instead remain in school.
9. Obtained a Certificate or Degree: These are participants who successfully complete a program of study conducted by an institution of higher education described in Section 102 of the Higher Education Act (HEA) that is qualified to participate in the student financial assistance programs authorized by HEA Title IV (e.g. community colleges, proprietary schools, technical colleges, etc).
10. Dropout Returned to School: These are participants classified as high school dropouts (definition is above) who return to school to complete a course of study.
	* 1. Entered Post-Secondary Education, Vocational/Occupation Skills Training, Apprenticeship, or Military
11. Entered Post-Secondary Education: These are participants who are engaged in a program of study conducted by an institution of higher education described in Section 102 of the Higher Education Act (HEA) that is qualified to participate in the student financial assistance programs authorized by HEA Title IV (e.g. community colleges, proprietary schools, technical colleges, etc).
12. Vocational/Occupational Skills Training: These participants are engaged in a program of study leading to the acquisition of job ready skills.
13. Apprenticeship: These participants are engaged in a program of study and on-the-job training that is registered with either or both the U.S. Department of Labor and/or the Minnesota Department of Labor and Industry.
14. Military: These participants have entered the Armed Services (Regular, Reserves or the National Guard)
	* 1. Entered Employment: These participants have secured unsubsidized employment.
		2. Retained employment, increased wages, or advanced career: The number of participants who have retained unsubsidized employment, increased their wage, or advanced their career such as a promotion, or new job/position better aligned with career goals.

### Customer Satisfaction (using a standardized rating sheet)

1. Number of Participants Rating Their Experience as “Excellent:” These are participants who are rating their program experience as “Excellent.”
2. Number of Participants Rating Their Experience as “Very Good:” These are participants who are rating their program experience as “Very Good.”
3. Number of Participants Rating Their Experience as “Average:” These are participants who are rating their program experience as “Average.”
4. Number of Participants Rating Their Experience as “Below Average:” These are participants who are rating their program experience as “Below Average.”
5. Number of Participants Rating Their Experience as “Poor:” These are participants who are rating their program experience as “Poor.”
6. Total Number of Surveys Completed: Sum of A through E.
1. Workforce Innovation and Opportunity Act (WIOA) 20 CFR § 681.640. [↑](#footnote-ref-1)