

<p><b>WIOA Task Force/Subcommittee</b></p>	<ul style="list-style-type: none"> <li>• <b>Subcommittee Education and Career Pathways through Integrated Service Delivery</b></li> <li>• <b>WIOA Youth Services Task Force</b></li> </ul>
<p><b>Recommendation</b></p>	<ul style="list-style-type: none"> <li>• <i>While the intent of continued enrollment of Open Doors youth in a school district is to allow these districts with dropout reengagement programs such as Open Doors to use basic education funds to serve dropouts, <u>youth in these programs are not attending school as defined under state law for purposes of WIOA eligibility determinations, regardless of whether a district claims them as an enrolled student.</u></i></li> <li>• <i>The Youth Services TF recommends treating any student in a GED program, including Open Doors 1418 GED programs, as an out-of-school youth for the purposes of WIOA eligibility determinations.</i></li> </ul>
<p><b>Background</b></p>	<p>A key requirement for WIOA Title I Youth funds is that 75 percent of those funds must be spent on “out-of-school” youth, defined as:</p> <ol style="list-style-type: none"> <li>1. <i>Not attending</i> any school for at least the most recent complete school calendar;</li> <li>2. Between 16-24 years old; AND</li> <li>3. One or more of the following: a dropout; subject to the adult or juvenile justice system; homeless; a foster youth; pregnant or parenting; disabled; low-income; <i>or</i> secondary school diploma holders who are basic skills deficient or English language learners.</li> </ol> <p>The Washington Legislature created the Open Doors Program in 2010 as a complement to the state’s strategy for dropout reengagement. School districts were authorized to enter into interlocal agreements with community and technical colleges, community-based organizations, educational service districts, and other public entities—including local workforce development councils (WDCs)—to operate dropout reengagement programs with Open Doors funds.</p> <p>Per the enacting legislation’s intent section, the Open Doors program was created for youth who are “unlikely to reengage in education by reenrolling in a traditional or even alternative high school.” However, Open Doors students are claimed by their resident school district as an enrolled student for the purpose of receiving a basic education allocation; districts use that allocation to fund the Open Doors program they contract with a third-party operator.</p> <p>Because Open Doors youth are <i>enrolled</i> by a school district and the district claims a basic education allocation for the student, the question arose whether Open Doors youth would be considered</p>

	<p><i>attending</i> a school in the last calendar quarter, which would disqualify them as out-of-school youth under WIOA. Because WIOA places an emphasis on serving out-of-school youth, local WDCs operating Open Doors programs expressed concern that they would need to suspend future enrollment to ensure compliance with the 75 percent out-of-school youth expenditure threshold.</p>
<p><b>Who was engaged in this process?</b> <i>(Please provide a list of subcommittee or task force members and who they represent)</i></p>	<ul style="list-style-type: none"> <li>• Jim Kenney (DSHS/AL TSA)</li> <li>• Chantelle Petrone (ESD/PacMtn)</li> <li>• Joyce Beebe (Commerce)</li> <li>• Diana Dollar (The Prosperity Agenda)</li> <li>• Chloe Kachscovsky (The Prosperity Agenda)</li> <li>• Lee Lambert (Washington STEM)</li> <li>• Lyle Hildahl (Washington Rest. Assn. Edu. Fdn.)</li> <li>• Lisa Pan (DSHS/ORIA)</li> <li>• Louisa Erickson (DSHS)</li> <li>• Kathy Cooper (SBCTC)</li> <li>• Dawn Karber (Spokane WDC)</li> <li>• Jessica Cato (Spokane WDC)</li> <li>• Eric Wolf (Workforce Board)</li> <li>• Amanda Dell (Workforce Board)</li> <li>• Marie Bruin (SBCTC)</li> <li>• Kathy Kinard (Commerce)</li> <li>• Troy Goracke (SBCTC)</li> <li>• Jaime Prothro (PCLS)</li> <li>• Kendall Brookhart (PCLS)</li> <li>• Cindy Blue (DSHS/RA)</li> <li>• Haley Lowe (DSHS/DBHR)</li> <li>• Rhett Nelson (OSPI)</li> <li>• Raquel Ferrell-Crowley (CHA)</li> <li>• Danielle Wallace (Seattle/King County WDC)</li> <li>• Michael MacKillop (DSB)</li> </ul>
<p><b>What, if any, is the minority recommendation?</b></p>	<p>n/a</p>
<p><b>Are there any unresolved issues?</b></p>	<ul style="list-style-type: none"> <li>• Some concerns have been expressed by members of SBCTC and the Basic Education for Adults community that federal guidance defining out-of-school youth funds eligibility could conflict with this recommendation.</li> </ul>