TOMPKINS COUNTY WORKFORCE DEVELOPMENT BOARD

April 28, 2020	8:30 A.M.	Zoom Platform	
PRESENT:	S. Pronti, A. Bishop, D. Burrows, J. Cometti, L. Dillon, B. Forrest, K. Franzese, A. Iles, P. Levesque, J. Matteson, H. McDaniel, J. Sammons, K. Shanks-Booth, J. Tavares		
EXCUSED:	M. Abdelrehim, J. Lance, K. Kersey, O. Montague, D. Pruitt		
EX-OFFICIO:	J. Mouillesseaux, A. Hendrix		
GUESTS:	S. Alvord, Tompkins County Youth Services; C. Harris, DOL; D. Mohlenhoff, Tompkins Cortland Community College; K. May, TCAD; C. Whitmore, Tompkins Cortland Community College; J. Nicoletti		
STAFF:	N. Branosky, D. Achilles		
CALL TO ORDER			

Chairman Pronti called the meeting to order at 8:36 a.m.

BOARD ACTION ITEMS

APPROVAL OF MINUTES – February 25, 2020

It was <u>Moved</u> by Mr. Levesque seconded by Ms. McDaniel and unanimously adopted by voice vote of members present to approve the minutes of February 25, 2020 as written.

WDB DIRECTOR UPDATE

Ms. Branosky provided an overview presentation on the impact of COVID-19 on Tompkins County economy with statistics and strategies for businesses and employees. Ms. Branosky let the board know that being 1 of 550 boards they have a voice at the National, state and regional levels.

CAREER CENTER UPDATE

Ms. Mouillesseaux provided a presentation on Office of Employment and Training and NYS Dept of Labor staff being flexible and working together remotely. Ms. Mouillesseaux presented on ways the staff are communicating with customers through Facebook, Instagram, Twitter and email.

YOUTH OVERSIGHT COMMITTEE UPDATE

Ms. Alvord reported that the Youth Oversight Committee has reviewed the WIOA Youth Program RFP and received 1 proposal from Office of Employment and Training to begin on July 1, 2020. The committee has approved OET as the contractor. Ms. Shanks-Booth reported that the Youth Objective Assessment Policy is a policy to assist the OET staff with a process that identify youths' service needs. Ms. Shanks-Booth reported that the 2020 Summer Youth Employment Program has received to bids from Office of Employment and Training and Ithaca Youth Bureau and the Youth Oversight Committee has approved the contracts. Ms. Shanks-Booth reported at this time Ithaca Youth Bureau has withdrew their bid due to the COVID-19 staff reductions.

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APPROVAL OF WIOA YOUTH PROGRAM CONTRACT

The current contract with the Office of Employment and Training to operate the Workforce Innovation and Opportunity Act Youth program ends on June 30, 2020. The WIOA Youth program must be competitively procured and it is the recommendation of the Youth Oversight Committee that a Request for Proposals for \$415,000 be issued by the Workforce Development Board for operation of the WIOA Youth program from July 1, 2020 – June 30, 2022.

It was Moved by Mr. Sammons seconded by Mr. Bishop and unanimously adopted by voice vote of members present to approve WIOA Youth Program contract in the amount of \$415,000 for Office of Employment and Training operator of the WIOA Youth program from July 1, 2020-June 30, 2022.

APPROVAL OF WIOA YOUTH OBJECTIVE ASSESSMENT POLICY

The purpose of this policy is to establish guidelines for program staff to follow for completing Objective Assessments in the Workforce Innovation and Opportunity Act (WIOA) Youth program prior to a youths' enrollment. The outlined policy provides a process that will identify youths' service needs, academic levels, goals, interests, skill levels, abilities, aptitudes, supportive service needs, and measure their barriers and strengths.

It was Moved by Mr. Sammons seconded by Mr. Bishop and unanimously adopted by voice vote of members present to approve WIOA Youth Assessment Policy.

APPROVAL OF 2020 SUMMER YOUTH EMPLOYMENT PROGRAM CONTRACTS

It was Moved by Mr. Levesque seconded by Mr. Sammons and unanimously adopted by voice vote of members present to approve SYEP contracts with Office of Employment and Training and Ithaca Youth Bureau to operate the 2020 SYEP program.

COMMITTEE REPORTS

EXECUTIVE COMMITTEE

Mr. Pronti reported at the Executive Committee meeting April 7, 2020, discussion was around changes and concerns of the Unemployment Insurance and moving forward with hiring a Deputy Director. Ms. Branosky reported that Deputy Director position was budgeted for 2020. At the present moment the County has a hiring freeze and all discussion are holding steady.

ONE STOP OPERATIONS COMMITTEE

Mr. Bishop reported that the March 14th One Stop Operations committee meeting was canceled. Mr. Bishop would like to extend an appreciation for staff at the Office of Employment and Training and Thank staff for patience and flexibility.

GOVERNANCE AND MEMBERSHIP COMMITTEE

Mr. Burrows reported Governance and Membership committee will have a meeting May 11th and will be discussing new members to appointed to the board.

A ZOOM THANK YOU TO OUR WORKFORCE

Mr. Pronti sent out a Thank You to Health care workers and medical staff, grocers, pharmacists, police officers, firefighters, public transit workers, childcare workers, the County's Emergency Operations Committee, and so many others. The Workforce Development Board sends out a Thank You to all these essential employees on the County and State levels. Ms. Branosky sends out a Thank You essential employees.

ADJOURNMENT

The meeting adjourned at 10:03 a.m.

Known/Anticipated SYEP 2020 Adjustments due to COVID-19

Ithaca Youth Bureau – Youth Employment Services, TSYEP

Timeline Adjustments:

- The deadline to apply and interview for the YES Program will be shifted back until at least June 4th, perhaps later. We have not made any announcements regarding this yet because we would rather only extend the deadline once, as opposed to multiple times.
- Orientation and Payroll sessions, as well as the summer training series, will all be administered through Google Classroom. The content for orientations will be published in advance, so that teens will have immediate access once they accept their jobs. It is quite possible that we will also use Google Classrooms to do remote evaluations and a certain amount of our caseworker check-ins, to reduce risk induced by traveling to sites.
- Matching sessions will likely happen on a more rolling basis as well, rather than in three bulk sessions. We've already added parameters in our collaboration tools for "soft-matching" teens to sites as we interview.
- It is possible, depending on decisions made by the State/County/City/IYB, that we will run a truncated and/or later program, with work beginning in mid-July or August. We are hopeful that we will know for sure if we are moving to this model by mid-May at the latest.

Recruitment/Outreach:

- All outreach right now is conducted online.
- We are sending materials to school guidance, career/tech teachers, LACS family groups, various contacts at BOCES and PTECH to help school staff know how to access applications.
- We are sending emails to teens who qualified for SYEP in the past to encourage them to apply, especially teens with high barriers.
- Interviews take place via Zoom or a phone call.
- Teens who need to mail paper applications may do so— we process incoming mail 2x/week. We can also mail paper applications by request.
- We will be posting information about our program via various community and neighborhood listservs, social media, and COVID-19 related groups to spread awareness.

Intentional strategies to reach hard-to-serve youth:

- Sending recruitment materials to food distribution sites during COVID.
- We have flyers directing teens on how to apply posted in the community rooms/office at West Village and Overlook apartment complexes, and are trying to do the same for other community spaces in low-income housing complexes throughout the county.
- We are trying to find listservs and social media groups specific to certain rural communities where we can send information about the program.

- We will be reaching out to Amici house to see what makes sense in terms of posting/sending materials.
- Depending on timelines/availability of resources/and demand, if we were to pursue any form of paid advertising for the program, we would use local radio.
- The nature of this health crisis will make it incredibly challenging if not impossible to reach those who are already hard to reach. I feel that it is important to acknowledge outright that no matter how many creative solutions we devise, we simply will not be able to recruit some of the teens we most want to serve. We are very open to hearing creative solutions from other service providers and the YOC as they seek to address this massive challenge.

Tompkins County Workforce NY – Job Link, SYEP

Timeline Adjustments:

- We will push for heavy recruitment, interviewing, and taking care of paperwork during the month of May (as planned in original timeline).
- We are still fully intending to stick to the remaining timeline as we would want to provide worksite and youth orientations primarily between the first and third week of June.

Recruitment/Outreach:

- Recruitment will be done via social media platforms, our website, over the phone, via email and mail and will also rely on assistance from our partner agencies and schools (as listed in detail in the SYEP RFP) that have established means of communicating with their customers / students / families during the pandemic.
- Application signatures, work permits, photo IDs, and payroll paperwork will need to be gathered once social distancing measures are lifted.
- Orientations, interviews, worksite interviews and most of the enrichment workshops (financial literacy, Metrix, business panels, etc) could be facilitated remotely / virtually.
- Youth access to these virtual program elements will be dependent on their access to different types of technology (phones, computers, tablets) and internet, which may be limited given that program eligibility is income based.

Intentional strategies to reach hard-to-serve youth:

- Continue to use partnerships with DSS, Mental Health agencies, school districts, Rural Youth Services, and Challenge, among others, to assist us with recruitment.
- We know that many families are being affected by the hardships of unemployment at this time and we will also utilize our partnership with NYS DOL to inform active customers about SYEP as they may have children or family members or know of others who might be eligible.

Concerns expressed by both applicants:

- potential limited job placement opportunities due to unknown economic situation, ability of organizations/businesses to take on youth employment placements; for example if local state parks, camps or other youth summer programming opportunities are unable to run or have significantly reduced staff, this would have direct impact on number of available placements for youth, limiting choices, etc.
- impact of job placements may reduce funds able to be spent on youth wage/fringe; impact on recruitment could effect # of youth proposed to be served and/or ability to serve targeted youth with higher barriers to employment
- targeted, at-risk youth population may have limited online/tech access; especially outof-school youth, who may not have benefitted from school distribution of Chrome Books
- changes to County (WFNY) or City (Ithaca Youth Bureau) budgets (as yet unknown) could have significant impact on agencies' own staffing, etc. (Hiring Freeze for both agencies does not allow WFNY to hire for the Youth Program Coordinator position, or IYB to hire a number of seasonal staff for their program)
- unknown impact to State SYEP fund allocations could also impact program as well
- delays in ability to process paperwork for payroll, background checks, etc. that may slow down anticipated program start-date

Tompkins County Workforce Development Board WIOA YOUTH Objective Assessment Policy

Purpose

The purpose of this policy is to establish guidelines for program staff to follow for completing Objective Assessments in the Workforce Innovation and Opportunity Act (WIOA) Youth program prior to a youths' enrollment. The outlined policy provides a process that will identify youths' service needs, academic levels, goals, interests, skill levels, abilities, aptitudes, supportive service needs, and measure their barriers and strengths. This process includes a review of a youth's basic and occupational skills, prior work experience, employability potential, and developmental needs. The result of completing this process is having comprehensive information to work with in establishing an appropriate Individual Service Strategy as well as providing the youth with an understanding of how a variety of their personal attributes affect their potential success and satisfaction with different career options and work environments.

Background

For a youth to be enrolled in the WIOA Youth program, Objective Assessments must first be completed. The U.S. Dept. of Labor Employment & Training Administration's (DOLETA) TEGL 21-16 states that "the WIOA youth program design <u>requires</u> an objective assessment of academic levels, skill levels, and service needs of each participant". The required Objective Assessments review includes the following areas:

- Basic Skills
- Occupational Skills
- Prior Work Experience
- Employability
- Interests
- Aptitudes
- Supportive Service Needs
- Developmental Needs
- Strengths

The DOLETA TEGL 21-16 states that the Objective Assessments must consider a youth's strengths rather than just focusing on areas that need improvement. The TEGL 21-16 further states that assessments used must be: valid and reliable; appropriate, fair and cost effective; be well-matched to the test administrator's qualifications; and be easy to administer and interpret results. Alternatively, skills-related gains may also be determined through less formal assessment techniques such as observation, folder reviews, or interview. These assessments may be provided directly through WIOA youth program staff, and/or through referrals to national and community-based partners and resources.

Policy

Prior to enrollment in the WIOA Youth program, youth must complete the following Objective Assessments. This policy defines what will be used to assess each of the required steps and how those methods will be recorded in the youths' paper files and in OSOS. All youth must complete the requirements listed below prior to being enrolled in the youth program (i.e. before first service is entered in OSOS).

The Individual Service Strategy (ISS) will be utilized to record and document notes regarding each Objective Assessment criteria with selected strategy for working with that youth on maintaining or improving their skills in each area. Program Staff will use the ISS to document that the initial Objective Assessments have been completed prior to enrollment with date and signature of staff. Any changes to the ISS will need to be dated and signed by the youth as well. ISS documentation (paper file) will match what is input in OSOS (electronic file).

Example:

BASIC SKILLS – <u>Method of assessment used:</u> TABE test, math and reading (test date xx-xx-xx). <u>Results of assessment:</u> Youth scored at 6th grade reading level and 5th grade math level. Determined that youth is lacking basic skills in reading and math. <u>Strategy:</u> Refer youth to XX agency to provide academic support, tutoring services.

Procedure

To assess the Objective Assessment criteria, please utilize the following directives issued by the LWDB. In all pertinent circumstances, **Reasonable Accommodations** will be provided for individuals with disabilities, individuals who are English Language Learners, and individuals assessed as being Basic Skills Deficient for eligibility purposes (see LWDB Basic Skills Deficiency Policy for more information). Accommodations to include, but not be limited to: extending test taking time, distraction-free spaces, use of technology aides, paper-based exams, accessible testing stations, web-based accommodations, and other accommodations as based on the policies of the test creators. More information regarding accommodations can be found at: <u>www.ada.gov</u>.

Use of previous basic skills assessment results are permitted if the assessments were conducted within the past six (6) months.

Please keep copies of all corresponding assessments/documents (i.e. interest profilers, test scores, etc.) in the youth's paper file, along with their updated ISS form.

Basic Skills:

Option 1 – A H.S. Diploma, H.S.E., or passing report card*/transcript** dated within 6 months prior to date of enrollment identifies the youth as "<u>not</u> Basic Skills Deficient" (BSD).

*Passing report card is an overall grade of 65 or higher (less is considered BSD)

**Passing transcript is a GPA of 2.0 or higher (less is considered BSD)

Option 2 – TABE score of below 8th grade reading or math level, dated within 6 months prior to date of enrollment, identifies the youth as "Basic Skills Deficient". A score at or higher than an 8th grade level would identify the youth as "<u>not</u> BSD".

Option 3 – A "Passing Score" of 80% or higher on Metrix NY Wired Prove It Integrated Assessments (Basic Reading Comprehension, Basic Arithmetic, Math & Reasoning Skills, and/or English as a Second Language) is considered "**not BSD**"; <u>a "Failing Score" on an assessment of 79% or lower **would** be considered "BSD". Refer to the LWDB Basic Skills Deficiency Policy for a detailed description of these</u>

assessments, as well as for criteria for using Basic Skills Deficient as eligibility determinant. The LWDB approved Prove It assessments can be located at: <u>http://tompkinsskillup.metrixlearning.com/</u>

Interests:

Option 1 – O*NET Interest Profiler (available online at <u>https://www.careerzone.ny.gov/</u> - youth will be required to create a profile on Career Zone; if youth do not want to create a profile at this time, the same assessment tool can be located at: <u>https://www.mynextmove.org/explore/ip</u>) – print a summary of the results for youth's file. For youth ages 18+, it is recommended to create a profile with Job Zone (instead of Career Zone) – <u>https://www.jobzone.ny.gov</u> – the "Career Interest" profiler on Job Zone will produce similar results to the O*NET Interest Profiler.

Option 2 – Metrix NY Wired Skill Track Course Completion: "Discovering Your Strengths: Uncovering and Utilizing Your Talents and Skills" <u>http://tompkinsskillup.metrixlearning.com/</u> (Learning Objective ID: 52575; Course ID: apd_10_a01_bs_enus). This 20 minute online course covers techniques for identifying your unique capabilities, and outlines what you should include in a talent action plan to fully utilize and develop your key talents and skills. Print course completion record for youth's file.

Option 3 – If youth can already identify a specific career interest, please use the American Job Center Network's <u>https://www.myskillsmyfuture.org//Target.aspx</u> to explore that career and identify the skills and training that correspond with that career. Print record of results for youth's file.

Occupational Skills & Prior Work Experience:

Note: Occupational Skills refers to **employment related skills** (i.e. money handling, lifeguard certification, using computers/programs, etc.) that relate to <u>specific job duties and responsibilities</u>.

Option 1 - Demonstrated work history via resume; record of certifications/licenses

Option 2 - Interview with youth to include description of past work experience, including volunteer work, "under the table" or gig work, subsidized and unsubsidized experiences.

Option 3 - Metrix NY Wired Skill Tracks course completion in desired career pathway (i.e. Healthcare, Manufacturing, Customer Service, etc.). Print record of course(s) completed and any corresponding badges earned for the youth's file. <u>http://tompkinsskillup.metrixlearning.com/</u>

Employability:

Note: Employability is based on **professional skills** (i.e. time management, communication, conflict resolution, etc.) to be determined by assessment, self-attestation, and/or ability to produce professional references.

To determine a youth's employability, staff must utilize one of the following options:

Option 1 – Demonstrated longevity in work history (i.e. participant has worked continuously for 6 mos.) as documented on youth's resume and/or the youth can produce a work-related professional reference.

Option 2 – Career Zone Section 05 "Job Readiness": Youth will self-attest to their skills which will generate a list of career options for their skill sets. <u>https://www.careerzone.ny.gov/</u> Youth ages 18+ can take the "Skills Survey" assessment at <u>https://www.jobzone.ny.gov</u> for a similar skills-based report.

Option 3 – Job Zone's "My Employability Score" on <u>https://www.jobzone.ny.gov/</u> - This basic employment profile collects data related to employment prospects and weighs this data based on which factors contribute more heavily to employment. The higher the Employability Score, the greater your competitive advantage in the labor market. The Employability Score is based on how well a job-seekers' employment profile matches their target occupation and labor market demand. Both positive and negative factors contributing to the Employability Score will be identified to determine what factors to target as well as potential barriers to the youth's employability that will be to be addressed.

Aptitude:

Note: Aptitude measures the technical aspects of career readiness (i.e. level of suitability and/or fitness for specific tasks).

To determine a youth's aptitude levels, staff must utilize one of the following options:

Option 1 – Record of training program completion, certification(s), license(s), or credential(s) needed for specific career pathways and/or occupations.

Option 2 – Career Zone Section 04 "Abilities" – youth will complete this self-assessment of a variety of abilities, including their Sensory Abilities, Physical Abilities, Psychomotor Abilities, and Cognitive Abilities. This tool will generate a list of career options based on the youth's self-reported strengths. This tool can be found at: <u>https://www.careerzone.ny.gov</u>. For youth ages 18+, the Job Zone "Abilities Profiler" is appropriate for this purpose. This tool can be found at: <u>https://www.jobzone.ny.gov</u>. Records of completion can be printed for youth's file.

Option 3 – Metrix NY Wired Career Pathways "Entry Level Pathway" Skills Rating: Youth will selfattest to their skill levels in required fields. If skill level is determined to have gaps needed for success, relevant Metrix NY Wired courses will be assigned. Records of completion can be printed for youth's file. <u>http://tompkinsskillup.metrixlearning.com/</u>

Supportive Service Needs:

Supportive Services include barriers such as: housing, transportation, communication, childcare, clothing, and other needs. Staff will conduct an interview with youth to identify various barriers to employment based on youth's self-attestation. Staff will use the local ISS form for recording of barriers and any supportive services provided should be documented in the youth's paper file and in OSOS following the local WDB Supportive Services Policy.

Developmental Needs:

To determine a youth's developmental needs, staff must utilize one of the following options:

Option 1 – Official documentation provided by school or medical professional (i.e. IEP documents or medical note from a licensed professional).

Option 2 – Conduct a brief mental health assessment using evidence-based assessment tools: Generalized Anxiety Disorder Survey (GAD-7) and the Depression Survey (PHQ-9). Results would determine a youth's need for supportive services, referral to counseling, and/or general work readiness. Mild results (scoring between 0-5) would indicate that there is not a mental health barrier present at this time; moderate results (scoring between 6-10 points) would demonstrate that the youth are likely suitable for work placement but may need supports (requirements would include to attend a variety of skill-building workshops, referral to external services if needed, etc.); moderately severe-severe (scoring between 11-21 points) would demonstrate that the youth is not suitable for work placement at this time and need mental health referral first. The tools can be found at: <u>https://www.torbayandsouthdevon.nhs.uk/uploads/scoresheet-gad-7-anxiety-and-phq-9-depression.pdf</u>; please maintain a record of the youths' assessment in their file.

Option 3 – Conduct a thorough evaluation of the youth's developmental needs using the Casey Life Skills Assessment tool. This tool will assess the youth's skills in the following areas: daily living, self-care, relationships and communication, housing and money management, work and study life, career and education planning, and looking forward. Youths' responses to the questions in this survey will identify areas of need for assignment to relevant workshop offerings, training and/or external referral services. This assessment tool can be found at: <u>http://www.casey.org/media/CLS_assessments_LifeSkills.pdf;</u> please maintain a record of the youth's assessment in their file.

Strengths:

Determination of the youth's strengths should be summarized from the completion of the above objective assessments. Staff should review the summary with the youth and add any additional comments the youth may wish to contribute. Staff observations may be recorded in the Strengths section of the local ISS but should be recorded as such (i.e. Staff observes that this youth demonstrates patience and perseverance in completion of online assessments.). Staff observations must be objective in nature and supported by youth approval (signature/date).

Individual Service Strategy Plan: Upon completion of all Objective Assessments, staff will be prompted on their form to complete an Individual Service Strategy Plan, which summarizes all of the "next steps" outlined from the Objective Assessments. Youth will complete a Certification to attest that the information provided is accurate to the best of their ability and that they agree to the steps outlined by the staff person in the ISS Plan.

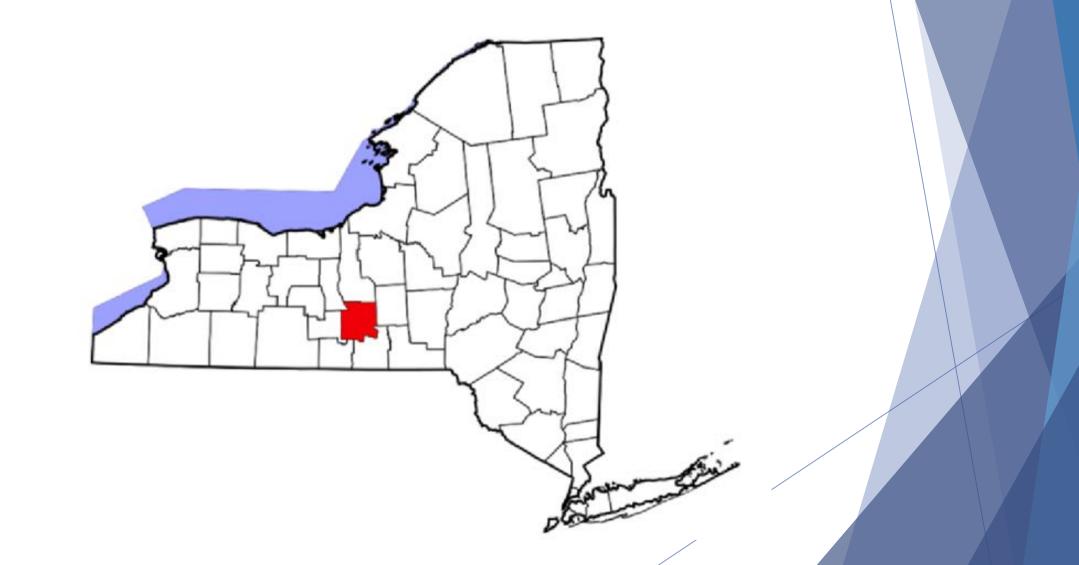
Tompkins County

Workforce Development Board and Office of Employment and Training

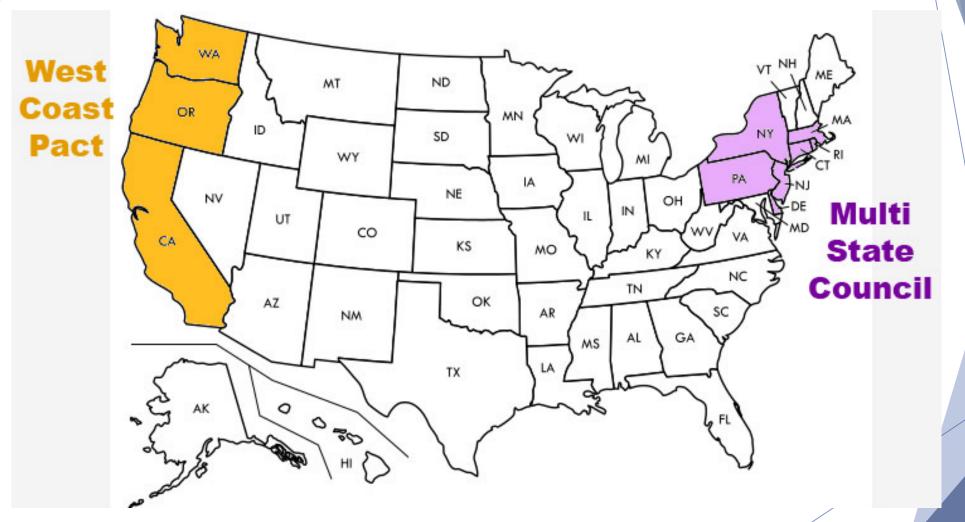


Natalie Branosky

Director, Workforce Development Board









Our Statistics

- Executive Orders: "...all non-essential businesses statewide must close inoffice personnel functions effective at 8pm on Sunday, March 22"
- Empire State
 Development's decisions
- Initial Unemployment Claims

WEEK	CLAIMS
March 21	263
March 28	1,486
April 4	1,075
April 11	974
April 18	496
TOTAL	4,294

Strategies for Businesses

- The Shared Work Program* of New York State
- Call 518-549-0496 (information) or 518-457-2635 (determination). Email <u>sharedworkinfo@labor.ny.gov</u>
- Payments based on 1st day of certification, approved within 1 week. *Note: Ask to be expedited
- Payments INCLUDE \$600 additional weekly "booster" for these workers

ADVISING: Keep your workforce connected to health insurance and retirement plans.

Strategies for Employees

- Unemployment Insurance (UI)
- Pandemic Unemployment Assistance (PUA) for selfemployed and gig workers
- \$600 weekly "booster": This goes to ALL recipients of UI and PUA, whether unemployed, in Shared Work, partially unemployed, temporary layoff, permanent layoff
- Federal + State-funded workforce programs: we continue to deliver some training components virtually, so please inquire!
- Call the Career Center at (607) 272-7570. Listen to the greeting, leave a message, you'll receive a callback within 1 hour.

Strategies for Both



- tompkinscountyny.gov/wfny
- 150 Tompkins County businesses have posted 400 positions
- Message to "newly available" workers: Get in there!

Recommendations

 FEDERAL: NYATEP, urge your US House Members + US Senators to make workforce development a priority in the next Federal Stimulus package.

Our line:

"Workforce Development is central to Economic Recovery."

 STATE + SOUTHERN TIER: Design a County-wide reemployment strategy for those at risk of becoming longterm unemployed, drawing on WPA (Work Progress Administration) architecture for a modern, post-COVID economy. Natalie Branosky, Director Email: <u>nbranosky@tompkins-co.org</u> Phone: 202 868 0975





Jackie Mouillesseaux-Grube

Career Center Manager Update: COVID-19



TWFNY Overall Picture

- Ever-changing circumstances and needs
- Office of Employment + Training (OET) Staff; NYS Dept of Labor (DOL) Staff
- Remote Work
- Unemployment Insurance (UI) / DOL Support

TWFNY Communication

- FB, Instagram, Twitter, Email
- Tompkins ReDirect
- Summer Youth Employment Program (SYEP) Promotion

WIOA Adult + Dislocated Worker

- Wkly customer check-ins
- Outreach to workforce agencies
- Remote tools and processes
- Five virtual workshops wkly for public

Adults with Disabilities

- Wkly check ins with current customers
- Benefits Advisement possibly in "Chat" feature during specific hours

DEI – Youth with Disabilities

- Pilot Project
- Communication; Best Practices

WIOA & SYEP Youth Programs

- Youth support
- Virtual Life Skill workshops
- Partnered with FLReUse
- Summer Youth Employment Program (SYEP) Prep