

## **WIOA Youth Program Data Entry and Documentation Procedural Guide**

**Purpose:** This Exhibit provides procedural instructions relating to content in the [WIOA Title I-B Policy and Procedure Manual](#), Section 300 - Youth Program. This guide is provided as supplemental information to the policy and not intended as a complete list of procedures associated with the WIOA Youth Program. All WIOA Youth Program data entry and documentation requirements outlined in this guide are applicable to Arizona's system of record, [Arizona Job Connection \(AJC\)](#). See the [ServiceLink User Guide](#) for additional information related to AJC.

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## Required Service Entry and Maintenance

Services are recorded in the AJC WIOA Youth Program Enrollment Service and Training (S&T) Plan

Policy Section(s)	305. Design Framework for Youth Services 306. Fourteen (14) Youth Program Elements
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The following activities must be documented on the S & T Plan in order to establish WIOA Youth Program participation:

- Eligibility determination;
- Provision of an objective assessment;
- Development of an Individual Service Strategy (ISS); and
- Participation and/or provision of at least one of the 14 Youth Program elements
  - *Refer to the Arizona Job Connection (AJC) Service Dictionary on the [WIOA Resources](#) page to identify services that fall within one of the 14 Youth program elements.*

WIOA Youth Program enrollees who do not receive all of the above services will not be considered Participants, and therefore not be included in WIOA Performance.

The WIOA Youth Program Participation date will reflect the start date of the first Youth Program element service that occurs *on or after* the start dates of all three design framework services (Eligibility Determination, Objective Assessment, and Development of an Individual Service Strategy (ISS)). If a Youth Program element service starts prior to the start date of any of the three required design framework services, WIOA Youth Program Participation *will not start*.

### Periodic and Transactional Service Data Entry

Policy Section(s)	309. Registration, Enrollment and Data Entry
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Services can be described as either periodic or transactional.

A **periodic service** is one that is ongoing in nature, with a defined, planned completion date in the future. Examples include, but are not limited to: Occupational Skills Training, Internships and Work Experience, or Apprenticeship.

A **transactional service** is completed in a given visit or interaction and may occur regularly or irregularly. Examples include, but are not limited to: Adult Mentoring, follow-up services, supportive services, job referrals, and customized resume assistance.

- Individual career planning and counseling services are considered **transactional services**. This includes, but is not limited to:
  - Development of Individual Service Strategies (ISS)
  - Career Planning (Youth)

- Ongoing supportive services, such as transportation assistance during training, should also be reported as **transactional**. Each instance of delivery of the service should be recorded on the S&T Plan (e.g., each visit to pick up a bus pass).

Policy Section(s)

313. Managing a Caseload (Exits and Exclusions from Performance); B. Program Exit Requirements

Exit dates for WIOA programs, and DOL-funded programs sharing a common exit date, are established by the final date of a service on the AJC S&T Plan - **provided that the service extends participation**. Not all services extend participation (refer to the AJC Service Dictionary on the [DES WIOA Resources](#) web page). Accurate service entry and maintenance ensures that exits occur as intended.

The Youth Program service provider staff must close services in a timely manner. The automated case closure (exit) process in the AJC system is:

1. After 90 days have passed without any participation-extending services taking place in any WIOA or DOL-funded partner programs, the system will assign an exit date reflecting the most recent of either:
  - a. The most recent actual end date of a participation-extending service; or
  - b. The most recent estimated end date of a participation-extending service when that service does not have an actual end date.
    - i. In scenario b, the system will assign the status of “Exited without completion” to the service. The Youth Program service provider staff should avoid this automated process by entering the results of services manually.

<b>Assessments</b>	
<b>Objective Assessment</b>	
<b>Policy Section(s)</b>	309. Registration, Enrollment and Data Entry; 03. Program Design Requirements: Objective Assessment and ISS
<p>The objective assessment must include a review of:</p> <ul style="list-style-type: none"> <li>● Basic Skills;</li> <li>● Occupational skills;</li> <li>● Prior work experience;</li> <li>● Employability;</li> <li>● Interests (including interest and aptitudes for non-traditional jobs);</li> <li>● Supportive service needs; and</li> <li>● Developmental needs.</li> </ul>	
<b>Basic Skills Assessment</b>	
<b>Policy Section(s)</b>	307. Eligibility Determination; 03. Eligibility Barrier Definitions (A, B)
<p>Local youth programs are not required to use tests approved by the National Reporting System (NRS), nor are they required to determine the youth’s grade level or Educational Functioning Level (EFL) when determining basic skills level for the objective assessment. LWDBs are not prohibited from using the following methods to measure basic skills for the objective assessment:</p> <ul style="list-style-type: none"> <li>● Other formalized testing instruments designed to measure skill-related gains which must be: <ul style="list-style-type: none"> <li>○ Valid and reliable;</li> <li>○ Appropriate for the target audience;</li> <li>○ Fair;</li> <li>○ Cost effective;</li> <li>○ Well-matched to test administrator’s qualifications; and</li> <li>○ Easy to administer.</li> </ul> </li> <li>● Less formal alternative assessment techniques such as observation, case file reviews, or interviews may be used for youth with disabilities (reasonable accommodations must be provided as needed and if necessary in the assessment process).</li> </ul>	

Information in this section does not apply to the determination of the EFL for the measurable skill gains performance accountability measure. When determining EFL scores for the purpose of recording measurable skill gains, LWDBs must use an assessment for the pre- and post-test approved by [National Reporting System \(NRS\) for Adult Education](#), and record the results in the Testing section of the client's AJC Program Details.

### Individual Service Strategy

Progress, status and changes during program participation must be documented on the Individual Service Strategy (ISS).

Policy Section(s)	309. Registration, Enrollment and Data Entry; .03 Program Design Requirements: Objective Assessment and ISS
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The career planner or other appropriate staff must at a minimum have monthly check-ins with the participant to review the ISS and update as needed, to record progress and outcomes, and note any changes in goals, plans, milestones achieved, and timetables. Check-ins must be documented in case notes.

### Document Upload

Documentation supporting eligibility and data validation must be uploaded in the system of record, AJC, or when appropriate, entered into the system directly via case notes or other data fields.

Policy Section(s)	308. Documentation for Eligibility, General Requirements
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In AJC, the "Uploaded Documentation" tab appears on a client's Case Details page. Service providers and/or appropriate staff must ensure timely uploading of documents required for eligibility determination, not to exceed 30 days from the Eligibility Date.

Staff must ensure that information contained in uploaded documents is redacted in accordance with section 308.01.D of the Youth Program Policy.

Within the Uploaded Documentation section of AJC, the following fields are displayed for each item being uploaded:

- Document Name: Give the document a title, which will display in the table on the Uploaded Documentation page

- File Description: Optional field to include detailed information about the document
- Document Item: Make a selection from the drop down that corresponds with this document
- Item Scope
  - Universal: Select if the document is to support general case management.
    - An example of a Universal document could be a job readiness certificate, or other information that would assist partner programs in delivering services to the individual - but not containing information required for eligibility or data validation
  - Enrollment: Select if the document is validating enrollment eligibility or data.
    - In general, the “Enrollment” Item Scope should be selected for documentation related to Youth Program eligibility or data validation.
- Document Type: Select the category (Eligibility or Validation) that the document is intended to support. Multiple selections are allowed in this field.
- Data Elements to be Verified: If applicable, select the program enrollment and data elements associated with the document.
  - For more information about data elements to be verified, see the following exhibits on the [Title I-B Policy and Procedure Manual web page](#):
    - Exhibit 300A - WIOA Title I-B Youth Program Eligibility Checklist
    - Exhibit 1500C - Data Validation Checklist - Youth

### Case Notes

For the purposes of Data Validation (see Policy [Section 1500 - Data Validation Policy; 1500C - Data Validation Checklist - Youth](#); [TEGL 23-19, Change 2](#)), case notes are:

- Paper or electronic statements by the case manager that identify, at a minimum, the following:
  - a participant's status for a specific data element;
  - the date on which the information was obtained; and
  - the name of the case manager who obtained the information.

Beyond these requirements, case notes should:

- Clearly show the client’s progress toward career and/or educational goals

- Include information relating to the client’s eligibility (including prior to enrollment)
- Document the provision of services and client status within those services
- Include detailed but concise information gathered either directly from the client or alternative source

Case notes must be written:

- In a timely manner;
  - To ensure the timely entry of case notes, LWDBs are encouraged to develop policies or processes that identify a time frame in which case managers must enter their case notes in the system
- According to objective observation:
  - Based on facts; and
  - Using language that is not biased or judgmental;
- With clear, sufficient, and relevant details;
- With the audience in mind; and
- In a way that protects sensitive Personally Identifiable Information (PII)
  - PII related to medical information must be excluded
  - Other forms of PII should only be included when necessary to document eligibility or for data validation purposes
  - If redacting PII will not preclude service delivery, it should be excluded

### Determining Low-Income Status via Income Calculation

Policy Section(s)	307. Eligibility Determination .07 Low-Income Requirements (C.2, C.6)
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Low-income status may be established in a variety of ways, as outlined in policy section 307.07.C. When low-income status is determined via income calculation, the following steps must be taken:

1. Service providers and/or appropriate staff must use the LLSIL Matrix associated with the client’s area of residence to determine low-income status. The LLSIL Matrix is listed as Exhibit 100C (located at the [Title I-B Policy and Procedure Manual website](#), under the tab “Exhibits - Policy and Procedures”).
2. Service providers and/or appropriate staff must use the HHS Poverty guidelines column or the 70 percent LLSIL column associated with the youth client’s family size to determine threshold for low-income status.
  - a. If the youth client’s family (refer to section 307.07.E of policy for the definition of a family) income is more than **both** the amount on the HHS

Poverty guidelines column **and** the 70 percent LLSIL column for their area of residence, the youth client does not meet low-income requirements for the Youth Program.

- b. If the youth client’s family income is less than the amount on **either** the HHS Poverty guidelines column, or the 70 percent LLSIL column for their area of residence, the youth client meets low-income requirements for the Youth program.

In AJC, 6-month income calculations must be entered into the client’s “Demographic Info” page in the “Income Amounts” section. The system will assist in identifying whether calculated income is above or below HHS Poverty or 70 percent LLSIL levels associated with the area of residence. **However, low-income status is officially established in AJC in the “Low Income Information” section of the Demographic Info page. Questions in this section must correspond with the resulting calculations from the Income Tables section.**

<b>High Poverty Areas</b>	
Policy Section(s)	308. Documentation for Eligibility, General Requirements .02 High Poverty Areas
<p>WIOA defines a high poverty area as a census tract, set of continuous census tracts, an American Indian reservation, Oklahoma Tribal Statistical area (as defined by U.S. Census Bureau), Alaska Native Village or Alaska Native Regional Corporation Area, Native Hawaiian Village Homeland Area, or other tribal land as defined in guidance by the US DOL Secretary, or a county that has a poverty rate of at least 25 percent, as set every five years using the American Community Survey five-year data (<a href="#">20 CFR § 681.260</a>).</p> <p>Staff must refer to <a href="#">TEGL 21-16, Change 1</a> for the updated directions to follow for using Census data to determine if a youth resides in a high poverty area.</p>	

<b>Eligibility Barrier: In-School Youth who Require Additional Assistance (ISY 5% Limitation)</b>	
Policy Section(s)	307. Eligibility Determination .05 In-School Youth who Require Additional Assistance Criterion
From <a href="#">TEGL 09-22</a> :	



“Programs should make sure to report all eligibility barriers for youth when youth have multiple barriers, so that program staff, states, and [the U.S. Department of Labor Employment and Training Administration] have an accurate representation of the youth we serve.

**There is one exception to the reporting of all youth eligibility barriers -- in-school youth who require additional assistance to complete an education program or secure or hold employment.** For this particular barrier, it is important that local programs report it **only when it is a participant’s sole eligibility barrier.** WIOA includes a limitation where in each local area only five percent of in-school youth in a given program year can be determined eligible using the ‘youth who require additional assistance to complete an education program or secure or hold employment’ barrier.”

In AJC, this barrier is identified in the client’s Demographic Info, Needs and Barriers section. The two pertinent questions are:

- Do you need help to complete your education?
- Do you need help to find and keep a job?

The response to these questions, **for in-school youth only**, should only be “Yes” if no other eligibility barriers are reported for the individual.

### 5% Low-Income Exception

Policy Section(s)	307. Eligibility Determination .08 Low-Income Exception
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As outlined in policy, WIOA contains a low-income exception for 5% of newly enrolled youth who would normally be required to be low-income for eligibility purposes.

In AJC, individuals being enrolled using this exception must answer “Yes” to the following question under the “Low Income Information” section of the “Demographic Info” page:

- Are you served by local youth programs even though you don't meet the low income eligibility level?

<b>Selective Service Requirements</b>	
Policy Section(s)	308. Documentation for Eligibility General Requirements .03 Selective Service Requirements
<ul style="list-style-type: none"> <li>● Every male citizen or any male residing in the United States who was born on or after January 1, 1960, unless exempt, is required to register with the Selective Service System (SSS) between their 18<sup>th</sup> and 26<sup>th</sup> birthdays. Registration with SSS can occur within 30 days of a male’s 18<sup>th</sup> birthday and prior to his 26<sup>th</sup> birthday.</li> <li>● Male youth participants who reach 18 years of age while enrolled in the program must complete a Selective Service Registration within 30 days of their 18<sup>th</sup> birthday. If a male participant does not register for Selective Services within 30 days of his 18<sup>th</sup> birthday, he is no longer eligible to receive WIOA Title I-B services. Youth who are denied services must be advised of available WIOA Title I-B grievance procedures.</li> <li>● A detailed list of Selective Service registration requirements can be found online at <a href="#">Selective Service System</a>.</li> <li>● Selective Service registration can be verified online at the <a href="#">Selective Service System</a>. The applicant’s name, date of birth, and social security number are required to verify registration.</li> <li>● Documentation of Selective Service compliance must be uploaded into the AJC system.</li> </ul>	

<b>Work Authorization Verification Requirements</b>	
Policy Section(s)	308. Documentation for Eligibility General Requirements .04 Work Authorization Verification Requirements
<p>Per TEGL 10-23, an individual’s legal authorization to work in the USA must be verified before they receive certain WIOA services. This verification is required prior to participation in the following service categories:</p> <ul style="list-style-type: none"> <li>● Job Placement;</li> <li>● Occupational Post-Secondary Training;</li> <li>● Work Experience; or</li> <li>● Supportive services that represent a direct financial benefit such as a voucher or reimbursement, relocation expenses, or needs-related payments.</li> </ul>	

In the event that an individual's authorization to work expires during participation, the client may continue to receive services and the case may remain open. However, only services other than those in the categories listed above may be provided.

**Work Experience Agreements - Participant Documentation**

Policy Section(s)	306. Fourteen (14) Youth Elements; .03 Program Element 3: Work Experiences
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The participant portion of the Work Experience agreement must include:

1. The duration of the Work Experience in hours;
2. The participant's schedule, including the days and hours the participant will work;
3. The scope of work;
4. Worksite agreement signed by the service provider, the employer, and the participant;
5. Health and safety standards;
6. Identification of the academic and educational component and how it will be provided;
7. Conditions, requirements, and amounts for incentives (staff must refer to Section 312 the policy for youth incentives and payments);
8. Dress code (if any);
9. Grievance Process; and
10. Consequences for non-compliance with the agreement.

The case file documentation must include:

1. The Work Experience agreement;
2. Activity sheets; and
3. Attendance records.

**Youth Program Completion Date**

A Completion Date must be entered for WIOA Youth Program Participants in the AJC Enrollment Details page, within the "Enrollment Info" section.

WIOA Youth Program follow-up services must be offered to all participants, and may begin immediately following the last expected date of service in the Youth Program. If the Participant is co-enrolled in a program which shares a common exit (e.g., Employment Service), it is possible that the last date of Youth Program services is not the common program exit date.

The “Set Completion Date” field exists in AJC to properly document the completion of Youth Program participation, regardless of program exit date.

To Set Completion Date:

1. Navigate to the AJC WIOA Youth Enrollment Details page
2. Click the link, “Enrollment Info”
3. Click the link, “Set Completion Date”
4. In the field, “Date of Completion of Job Service Services,” enter the date that aligns with the last date of Youth Program services.

### Exit Questions; Exclusionary Exits

The Exit Questions section of AJC, within WIOA Program Details, must be completed upon completion of participation. Exclusionary exits are recorded in the Exit Questions section.

Policy Section(s)	313. Managing a Caseload (Exits and Exclusions from Performance); C. Exclusionary Exits
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To record an exclusionary exit:

1. Navigate to the AJC WIOA Program Details page
2. Click the link, “Exit Questions”
3. In the field, “Other reasons for exit,” select the appropriate response

Performance exclusions apply to all WIOA Performance Indicators. In order for an exclusion to be applied, data entry in the “Other reasons for exit” field must be completed prior to the final WIOA Annual submission for any given program year.

Performance exclusions should only be recorded when they are the reason for program exit.

### Follow-up Services

Attempts to deliver follow-up services must be documented in case notes.

Policy Section(s)	305. Design Framework for Youth Services; F. Follow-up Services
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During intake and pre-exit interviews, service providers and/or appropriate staff should explain the benefits and value of follow-up services prior to participants opting out.

- Case notes must document follow-up contact with the youth, including follow-up attempts.
- This may include, but is not limited to, a letter, an e-mail message or other electronic means, or a conversation in person, virtually or via telephone.
- Follow-up attempts with the participant must be made and documented in the system of record monthly during the minimum 12-month requirement.

**Co-enrollment (Title I-B programs)**

Policy Section(s)	309. Registration, Enrollment and Data Entry .04 Co-Enrollment (A)
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When co-enrolling a Youth participant into either the WIOA Title I-B Adult or Dislocated Worker (DW) program, LWDBs must:

- Ensure the client meets eligibility criteria for both the Youth and Adult program or the Youth and DW program to co-enroll participants;
- Determine the appropriate level of service and combination of Youth, Adult, DW, and other program services that will be provided based on the service needs of the participant, and whether the participant is career-ready based on the objective assessment of the occupational skills, prior work experience, and employability;
- Identify and track the funding streams for youth who are enrolled concurrently in the Youth/Adult program or the Youth/DW program;
- Ensure services are not duplicated; and
- Ensure youth clients, who were co-enrolled in WIOA Title I-B Youth Program and Adult/DW program and are now adults, continue to remain eligible for both the Youth and Adult/DW program services and do not require redetermination of eligibility.

## Supplemental Wage Information Procedures

Policy Section(s)

316. Supplemental Wage Information  
.02 Supplemental Wage Information Procedures

LWDBs must have written procedures to collect data in a valid and reliable manner. The written procedures must:

- Inform participants at program entry about the supplemental wage information follow-up process and encourage collection of additional contact information, such as addresses, and phone numbers of relatives and others who may know the participant's whereabouts over time and employment;
- Encourage participants to provide new addresses and phone numbers when they move, and implement procedures to update participant information periodically while the participant is enrolled in the program;
- Conduct follow-up as close to the reference quarter in the employment-based performance measure as possible. Service providers must refer to Exhibit 100.4 (located at the [Title I-B Policy and Procedure Manual website](#), under the tab "Exhibits – Policy and Procedures") under section II for the timeline on commencing data collection for employment-based performance measures;
- Identify the appropriate information to collect from the participant to assist in and during follow-up, such as the participant's SSN (if available), contact information, and supplemental wage information related to all of the employment-based performance measures;
- Identify the local resources available to conduct follow-up; and
- Identify if the follow-up will be conducted more frequently than quarterly, continuous, or monthly basis.

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