



300 BACKGROUND AND PURPOSE

Local Workforce Development Boards (LWDBs) have responsibility to oversee the provision of services for Youth under Workforce Innovation and Opportunity Act (WIOA). This section provides policy and procedures for the Local Workforce Development Boards (LWDBs) to use in their oversight of providers of Workforce Innovation and Opportunity Act (WIOA) Title I-B Youth program services.

The youth program provides a comprehensive array of high-quality services, including career exploration and guidance, continued support of educational attainment, and training for employment within in-demand industries and occupations to In-School Youth (ISY) and Out-of-School Youth (OSY). The program's goal is for the youth to obtain employment along a career pathway, enrollment in postsecondary education or a Registered Apprenticeship (RA) program prior to the end of participation. The youth program provides services to youth with barriers to employment with a special focus on supporting the educational and career success of OSY.

References: WIOA of 2014 ([P.L 113-128](#)); Federal Register Code of Federal Regulations 20 [§ CFR 681](#); and Training and Employment Guidance Letters (TEGLs) [23-14](#), [8-15](#), [21-16](#) Change 1, and Training and Employment Notice (TEN) [22-19](#).

301 GENERAL PROGRAM REQUIREMENTS

LWDBs must ensure the youth program prepares participants to meet education and career goals. The LWDB and their youth service providers must provide:

- A. Preparation for postsecondary education and training opportunities, including Registered Apprenticeship Programs;
- B. Strong linkages between academic instruction and occupational education;
- C. Preparation for unsubsidized employment opportunities along career pathways; and

- D. Strong connections to employers including small employers, in-demand industry sectors, and occupations of the local and regional labor markets.

.01 Linkages to Community and Partners

The LWDB and youth service providers must provide linkages to community and partners to:

- A. Ensure parents, youth participants, and members of the community with experience in youth programs are involved in the design and implementation of the youth program;
- B. Make opportunities available to individuals who have successfully participated in the youth program to volunteer and assist participants in the form of mentoring, tutoring, and/or other services; and
- C. Provide appropriate connections between the youth program and the ARIZONA@WORK system that will foster participation with local youth which includes but is not limited to:
 - 1. Local area justice and law enforcement officials;
 - 2. Local public housing authorities;
 - 3. Local education agencies;
 - 4. Local human service agencies;
 - 5. WIOA Title II adult education providers;
 - 6. Local disability-servicing agencies;
 - 7. Job Corps representatives;
 - 8. Representatives of other area youth initiatives including those serving the homeless and private youth projects;
 - 9. Coordination and provision of youth services;
 - 10. Linkages to the job market and employers;
 - 11. Access to information and the services for eligible youth listed in [section 303](#) of this policy; and

12. Other activities designed to meet the purposes of the youth program and youth services.

.02 Standing Youth Committee

LWDBs may choose to establish a standing youth committee. The purpose of the committee includes providing information to assist with planning, operations, oversight, and other issues related to the provision of the youth program. If the LWDB chooses not to establish a standing youth committee, it retains the responsibility for the activities listed (in the Workforce Arizona Council Local Governance [Policy #1](#) (XI.H)).

.03 Out-of-School Priority

LWDBs must dedicate at least 75 percent of youth program funds to provide services for OSY. LWDBs youth service providers must verify the youth's dropout status at the time of youth program enrollment. A youth who is not in school at the time of enrollment, and is subsequently placed in any school, is an OSY for the purposes of the 75 percent expenditure requirement for out-of-school throughout the youth's participation in the program.

.04 Referrals

Each LWDB must ensure all youth who meet the eligibility criteria for the youth program receive information about the full array of services available through the ARIZONA@WORK Job Center and partners, and eligible youth service providers, as well as referrals to appropriate training and educational programs with the capacity to serve the applicant either on a sequential or concurrent basis. In order to meet the basic skill needs and training needs of applicants who do not meet the eligibility requirements of a particular program or cannot be served by the program, each youth service provider must ensure these youth are referred:

- A. For further assessment, as necessary; and
- B. To appropriate training and education programs, including co-enrollment with WIOA Title I adult and dislocated worker services and other ARIZONA@WORK partners as appropriate, that have the capacity to serve them either on a sequential or concurrent basis.

.05 Veterans Priority of Service Policy

LWDBs must establish a policy(ices) to ensure priority of service is being implemented for veterans and eligible spouses who meet eligibility requirements, and for when staff identifies a veteran with a barrier to employment:

1. Service provider staff must follow the Veterans' Priority of Service [Policy](#), Section 1100.
2. The appropriate referral of a veteran or eligible spouse must be reviewed, followed and documented.
3. The process must include a referral to the Jobs for Veterans State Grant (JVSG) program's Disabled Veterans' Outreach Program (DVOP) for veterans or members of a veteran population identified by the Secretary of Veterans Affairs under 38 U.S. Code § 4103A(a)(1)(C) as eligible for DVOP services with significant barriers to employment (SBE) and career services, or were discharged or released from active duty because of a service connected disability (TEGL 20-13, [Change 2](#), TEGL [19-13](#) Change [1](#) and [2](#), 38 U.S. Code § 4103A(a), and Veterans' PL No [03-19](#)).

302 PROCUREMENT REQUIREMENTS

LWDBs are responsible for identifying and selecting youth service providers best positioned to provide youth program elements resulting in strong outcomes.

- A. LWDBs may determine that the grant recipient or designated fiscal agent may provide directly some or all of the youth workforce investment activities.
- B. If the LWDB chooses to award grants or contracts to youth service providers to carry out some or all of the youth workforce investment activities, the LWDB must award the grants or contracts on a competitive basis (in compliance with the Workforce Arizona Council One Stop Operator and Service Provider Selection [Policy #4](#) (X)).

303 YOUTH SERVICES

LWDBs must provide design framework services. LWDBs must describe the design framework for youth services and how the required 14 program elements (see section [304](#) of this policy) will be provided within the design framework in

the LWDB local plan. Youth funds may be used to provide design framework services prior to an eligibility determination.

Design framework services include:

- A. Outreach and recruitment;
- B. Intake and eligibility determination; and
- C. Objective assessment.
 - 1. In order to identify appropriate services and career pathways for each participant, and to collect information for the Individual Service Strategy (ISS), LWDB or youth program provider must provide an objective assessment of the:
 - a. Academic and occupational skill levels; and
 - b. Needs and strengths of each participant.
 - 2. A new objective assessment is not required if a partner program has completed an objective assessment with the participant in the last six months and its use is deemed appropriate by the LWDB.
 - 3. The objective assessment must include a review of:
 - a. Basic Skills (see section [306.06](#) of this policy);
 - b. Occupational skills;
 - c. Prior work experience;
 - d. Employability;
 - e. Interests (including interest and aptitudes for non-traditional jobs);
 - f. Supportive service needs; and
 - g. Developmental needs.
- D. Development of an ISS

The LWDB or youth program provider must develop and sign a mutually agreed upon ISS in partnership with the youth, based on

the objective assessment that specifies which of the 14 program elements are needed to assist the participant in meeting the youths educational and career goals. The objective assessment may be directly linked to one or more performance accountability measures for youth as specified in 34 CFR § 463.155. The ISS must be directly linked to one or more WIOA indicators of performance (20 CFR § 681.420 (a)(2)).

1. The ISS must include identification of appropriate career pathways including:
 - a. Educational goals;
 - b. Employment goals, including non-traditional employment, taking into consideration career planning and the results of the objective assessment; and
 - c. Appropriate achievement objectives and services for the participant.
 - d. Career pathways are a combination of rigorous and high quality education, training, and other services that assist the youth participant in preparing for a career (WIOA [Section 3\(7\)](#)).
2. The ISS is a living document and must be updated as needed, and with each contact to reflect progress, status, and changes. The information of the ISS must not be identical among participants, as the ISS is an individualized roadmap matching the participant's unique needs, career and educational objectives. It must:
 - a. Be flexible, realistic, and broaden opportunities for the youth.
 - b. Coincide with case notes in the Arizona Job Connection (AJC) system and services.
 - c. The career planner must have monthly check-ins with the participant to review the ISS and as needed, record progress and outcomes, and note any changes in goals, plans, milestones achieved, and timetables. Check-ins should be documented in case notes.

- d. A new ISS is not required if a partner program has completed an ISS with the participant in the last six months and its use is deemed appropriate by the LWDB.

E. Career Planning

LWDBs or youth service providers must provide career planning for youth. Career planning uses a client-centered approach in the delivery of services designed to:

1. Prepare and coordinate the ISS for participants and ensure access to workforce development activities and supportive services;
2. Provide job and career counseling during program participation and after job placement; and
3. Provide service to participants for the time necessary to enter postsecondary education and/or unsubsidized employment. While there is no minimum or maximum time LWDBs can serve a youth under the youth program, programs must link participation to the ISS and not to the timing of the youth service provider contracts or program years.

F. Follow up Services

All youth participants must be provided a minimum of 12 months of follow up services after the completion of participation (see [section 304.09](#) of this policy).

1. When follow up services are provided to youth, the appropriate follow-up service activity must be added to the S & T plan in the AJC system.
2. Types of follow up service activities that are available to youth are included in the [AJC Service Dictionary](#).
3. The follow-up service activity needs to align with the ISS, and it must indicate follow-up activity, rather than contact attempts after exit.

4. Service provider staff must document in case notes in the AJC system when the youth participant declines follow up services or cannot be contacted or located.
- G. Under WIOA Title I-B, a youth becomes a participant, and in turn is “a reportable individual,” when they are enrolled, and all of the below applicable program requirements have been provided (20 CFR [§ 681.320](#)):
1. Eligibility determination;
 2. Provision of an objective assessment;
 3. Development of an ISS; and
 4. Have received 1 of the 14 WIOA youth program elements identified in sec. 129(c)(2) of [WIOA](#).
- H. The following services must be added to the S & T Plan in the AJC system in order to document these required services have been provided to the participant:
1. Eligibility determination;
 2. Provision of an objective assessment;
 3. Development of an ISS;
 4. Career Planning;
 5. Participation and/or provision of at least one of the 14 youth program elements; and
 6. Follow-up Services (refer to sections [303.F](#) and [304.09](#) of this policy).
- I. When service provider staff is enrolling a 24 year-old in the youth program, the service provider staff must ensure that all services listed in section [303.F. through H](#) of this policy, have been added to the S & T Plan in the AJC system prior to the youth’s 25th birthday, or the AJC system will prevent the youth’s enrollment in the program.

304 FOURTEEN (14) YOUTH PROGRAM ELEMENTS

LWDBs must make the 14 youth program elements available to participants; however, the LWDB is not required to provide all 14 program elements with Youth funds when resources are leveraged through partner programs that already provide readily available resources. LWDBs are encouraged to partner with existing local, state, or national entities that can provide the program element(s) at no cost to the LWDB, as described at 20 CFR § 681.460.

LWDBs must ensure there is an agreement in place with a partner organization to ensure a program element is offered when a specific element is not offered through Youth funds. LWDBs must also ensure the element is closely connected and coordinated with the youth program. The 14 program elements must not be provided to participants prior to eligibility determination.

.01 Program Element 1: Tutoring, Study Skills Training, Instruction, Dropout Prevention Services

Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery are strategies that lead to requirements for completion of a secondary school diploma or High School Equivalency (HSE) diploma including a certificate of attendance or similar documentation for youth with a disability, or a recognized postsecondary credential.

- A. Tutoring, study skills, and instruction that lead to a high school diploma are services reported under this element and include:
 - 1. Providing academic support;
 - 2. Helping youth identify areas of academic concern;
 - 3. Assisting overcoming learning obstacles; and
 - 4. Providing tools and resources to develop learning strategies.

- B. Secondary school dropout prevention strategies that lead to a high school diploma are also reported under this element. Services and activities are intended to keep a young person in school and engaged in a formal learning or training activity. Strategies include but are not limited to:
 - 1. Tutoring;
 - 2. Literacy development;

3. Active Learning experiences;
4. After-school opportunities; and
5. Individualized instruction.

.02 Program Element 2: Alternative Secondary School Services or Recovery Services

Alternative secondary school services and dropout recovery services are provided with the goal of helping youth to re-engage and persist in education that leads to the completion of a recognized credential.

- A. Alternative secondary school services, such as basic education skills training, individualized academic instruction, and English as a Second Language are provided to assist youth who struggled in traditional secondary education.
- B. Dropout recovery services are provided to youth who have dropped out of school services include credit recovery, counseling, and educational plan development.

.03 Program Element 3: Work Experiences

Work experiences (WEX) are planned, structured learning experiences that are assigned at a workplace for a limited period of time. It provides the youth participant an opportunity for career exploration and skill development.

- A. Work Experience Requirements
 1. WEX may:
 - a. Be paid or unpaid;
 - b. Provide youth with opportunities for career exploration and skill development; and
 - c. Take place in the private or public sector.
 2. Labor standards apply in any WEX where an employee/employer relationship exists, as defined by the Fair Labor Standards Act (FLSA) or applicable state laws.

3. WEX participants are not eligible to receive needs related payment, because WEX is not considered a training or employment service.
4. WEX must have an academic and occupational component that encompasses contextual learning and is intended to help the participant learn information necessary to work in specific industries or occupations.
 - a. The academic and educational component accompanies a work experience and it may:
 - i. Occur concurrently or sequentially with the WEX.
 - ii. Occur inside or outside of the work site.
 - iii. Be provided by the WEX provider or separately in a classroom.
 - b. LWDBs have flexibility in determining appropriate types of academic and occupational education necessary for a WEX. However, prior to initiating the WEX, the LWDB must include what the academic and educational component is and how it will be provided in the WEX contract.
 - c. Contextual learning does not include attending high school classes or their equivalent that will lead to attainment of a High School Diploma or equivalent.
 - d. Contracts are the mechanism to deliver a WEX to ISY and OSY. When the academic and educational component is not provided directly by the employer, an additional contract with the training providers is required.
5. LWDBs may provide the following types of WEX:
 - a. Transitional jobs
 - i. Is a time-limited work experience that is wage-paid, and is subsidized up to 100 percent for youth with barriers to employment who are

chronically unemployed or have inconsistent work history, as determined by the LWDB.

- ii. It may be provided in the public, private, or non-profit sectors.
- iii. It is designed to enable a youth to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment.
- iv. It takes place within the context of an employee-employer relation, in which the program provider generally acts as the employer.
- v. Employers providing transitional jobs are not required to retain the youth upon the completion of the transitional job, however retention is preferred for the benefit of the worker and the employer.
- vi. If the LWDB includes transitional jobs for youth as part of its service delivery strategy, the LWDB needs to identify the appropriate employers and must develop policies that include the following:
 - Provisions on the amount of reimbursements for the jobs (up to 100 percent of the wage);
 - The supportive services to be offered; and
 - Limits on the duration of the transitional job.
 - Definition of youth who are “chronically unemployed’ or “have an inconsistent work history.”
 - Process on how to identify chronically unemployed youth.

- vii. Staff must refer to section [304.03.D](#) of this chapter to review the work experience contract requirements between the employer and the LWDB, conditions and documentation.
 - viii. LWDBs who use only youth funds to support transitional jobs are not subject to the 10% limitation required for transitional jobs activities using adult and dislocated worker funds.
- b. Summer employment opportunities and other employment opportunities available throughout the school year.
- i. Summer employment opportunities must provide direct linkages to academic and occupational learning, including leadership development opportunities, tutoring, occupational skills training, etc., and may provide other elements and strategies as appropriate to serve the needs and goals of the participants.
 - ii. The summer employment administrator does not have to select employers through a competitive process for summer employment opportunities.
- c. Pre-apprenticeship programs
- A pre-apprenticeship program is designed to prepare individuals to enter and succeed in an apprenticeship program registered under the National Apprenticeship Act and includes:
- i. Training and curriculum that aligns with the skill needs of employers in Arizona or region involved;
 - ii. Access to educational and career counseling and other supportive services, directly or indirectly;

- iii. Hands-on meaningful learning activities connected to education and training activities, such as exploring career options and understanding how skills acquired through the coursework can be applied toward a future career;
 - iv. Opportunities to attain at least one industry-recognized credential; and
 - v. A partnership with at least one or more Registered Apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship in a registered apprenticeship.
 - vi. LWDBs must verify and maintain information on the type of credential offered and the pre-apprenticeship program's documented partnerships with Registered Apprenticeships.
- d. Internships and job shadowing
- Job shadowing is designed to increase career awareness, help model youth behavior through examples, and reinforce the youth and young adult link between academic learning and occupational work requirements. Youth conduct interviews with people in their prospective professions to learn more about those fields or to participate in an expanded informational interview in the workplace.
- e. On-the-job training (OJT) opportunities
- OJT is provided under a contract with an employer who is reimbursed a percentage of the wage rate of the participant being trained while engaged in productive work in a job. For more information on OJT, refer to WIOA Title I-B Training Services [Policy Section 508](#).

B. Work Experience Expenditure Requirements

LWDBs must spend at least 20 percent of all funds allocated to the ISY and OSY program on paid and unpaid WEX.

- C. Allowable WEX expenditures include the following:
1. Wages/stipends paid for participation in a WEX;
 2. Staff time assisting with WEX activities, including:
 - a. Working with employers to identify and develop the WEX;
 - b. Managing the activity and working with employers to ensure a successful WEX;
 - c. Evaluating the WEX;
 3. Participant and employer WEX orientation sessions;
 4. Classroom training or the required academic educational component directly related to the WEX;
 5. Incentive payments directly tied to the completion of the WEX; and
 6. Employability skills/ job readiness training to prepare the youth for the WEX.
- D. LWDBs must track:
1. The program funds spent on paid and unpaid WEX, including wages and staff costs for the development and management of work experiences; and report such expenditures as part of the local WIOA Youth Financial Report.
 2. The percentage of funds spent on WEX is determined by calculating the total local area youth funds expended on WEX rather than calculating the funds expended separately for ISY and OSY Youth.
- E. Local area administrative costs are not subject to the 20 percent minimum requirement.
- F. Leveraged resources must not be used to fulfill any part of the 20 percent minimum.

- G. LWDBs must ensure there is a written worksite agreement or contract between each employer offering the WEX to verify compliance with WIOA and applicable regulations.
- H. The work experience contract between the LWDB and the employer must include employer compliance with:
 - 1. Regulations under [WIOA](#) sec. 188 of the Workforce Innovation and Opportunity Act of 2014;
 - 2. 29 CFR [§ 37](#), Title VI of the Civil Rights [Act](#) of 1964;
 - 3. Age Discrimination [Act](#) of 1975;
 - 4. Sections 504 and 508 of the Rehabilitation [Act](#) of 1973;
 - 5. [Title IX](#) of the Education Amendments of 1972;
 - 6. Title II Subpart A of the American with Disabilities [Act](#) of 1990; and
 - 7. The Genetic Information Nondiscrimination [Act](#) of 2008.
 - 8. [Policy](#) on Medical/Recreational Marijuana for WEX prohibitions.
- I. The conditions of employment and training will be in full compliance with applicable federal, state, and local laws;
- J. No individual may be placed in a WIOA Title I-B employment activity if a member of the person's family is directly supervising the individual;
- K. The LWDB and worksite must comply with the Fair Labor Standards [Act](#) (FLSA) or the Arizona minimum wage [law](#), whichever is applicable;
- L. Work experience is not permitted to be carried out for the construction, operation or maintenance of any part of a facility that is used for or to be used sectarian instruction or a place of worship, etc.;
- M. The LWDB must ensure the worksite is not presently debarred, suspended, proposed for debarment, declared ineligible, or excluded by any federal department or agency;

- N. Participant must not be placed under the WEX agreement if:
1. Any other individual is laid off from the same or equivalent job;
 2. Employer has terminated any other regular, unsubsidized employee, or otherwise caused an involuntary reduction in its own workforce with intention of filling the vacancy with the WIOA Title I-B participant;
 3. The job is created in a promotional line that infringes in any way on the promotional opportunities of any current employees.
- O. The participant portion of the WEX agreement must include:
1. The duration of the WEX in hours;
 2. The participant's schedule, includes 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 310 of this policy for youth incentives and payments).
 8. Dress code if any;
 9. Grievance Process; and
 10. Consequences for non-compliance with the agreement.
- P. The case file documentation must include:
1. The WEX agreement;
 2. Activity sheets; and

3. Attendance records.

.04 Program Element 4: Occupational Skills Training

Occupational skills training is an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by a certain occupational field at entry, intermediate, or advanced levels.

- A. LWDBs must offer priority consideration to training programs that lead to postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area. Such training must:
 1. Be outcome-oriented and focused on an occupational goal specified in the ISS;
 2. Be of appropriate duration to impact the skills needed to meet the occupational goal; and
 3. Result in the attainment of a recognized postsecondary credential.
- B. The training program must meet requirements as per Section 302 of this policy.
- C. Occupational skills training that is not funded by an Individual Training Account must be competitively procured by contract or grant, unless the LWDB determines that the grant recipient or fiscal agent may provide occupational skills training.
- D. ISY and OSY may be issued an Individual Training Account (ITA) with a specified dollar amount to provide training using youth program funds based on the needs identified in the ISS.
 1. ITAs allow participants the opportunity to choose the training provider that best meets their needs.
 2. If an ITA is used to pay for the training, the training program must be listed as an approved program on the Eligible Training Provider List (ETPL).
 3. For more information on ITA requirements, see the WIOA Title I-B Training Services [Policy](#), section 504.

- E. ISY and OSY may co-enroll in the WIOA Title I-B Adult program if the youth's needs, knowledge, skills, and interests align with the WIOA Title I-B Adult program; and may receive training services through an ITA funded by the Adult program.

.05 Program Element 5: Education Offered Concurrently With Workforce Preparation and Training For a Specific Occupation

Education offered concurrently with workforce preparation and training for a specific occupation is reflective as an integrated training model. This element is also referred to as Integrated Education or Contextualized Instruction. Youth service providers must only add this program element to the S & T Plan in the AJC system when the following services are provided at the same time:

- A. Workforce participation activities;
- B. Basic academic skills; and
- C. Hands-on occupational skills training connected to a specific occupational cluster, or career pathway.

.06 Program Element 6: Leadership Development Opportunities

- A. Leadership development encourages responsibility, confidence, employability, self-determination, and other positive social behaviors such as:
 - 1. Exposure to postsecondary educational possibilities;
 - 2. Community and service-learning projects;
 - 3. Peer-centered activities, including peer mentoring and tutoring;
 - 4. Organizational and teamwork training, including team leadership training;
 - 5. Training in decision-making, including determining priorities and problem solving;
 - 6. Citizenship training, including life skills training such as parenting skills and work-behavior training;
 - 7. Civic engagement activities which promote the quality of life in a community; and

8. Other leadership activities that place the youth in a leadership position, such as serving on the standing youth committee.

B. A phone call to a youth to advise them to come into the ARIZONA@WORK Job Center or affiliate site does not meet the definition of leadership development.

.07 Program Element 7: Supportive Services

Supportive services enable a youth to participate in Youth activities. For additional information, refer to WIOA Title I-B Supportive Services [Policy](#), Section 400.

.08 Program Element 8: Adult Mentoring

LWDBs must make adult mentoring available which may include matching a youth with an adult mentor, an employer, or an employee of the employer.

- A. LWDBs must ensure that adult mentoring for youth:
1. Is a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentors offer guidance, support, and encouragement to develop the competence and character of the participant;
 2. Lasts at least 12 months, occurs during the program year, and following exit from the program; and
 3. Matches the youth with a mentor with whom the youth interacts in person or virtually.
- B. LWDBs must ensure appropriate policy and procedures are in place to adequately screen and select mentors.
- C. Career Planners may serve as mentors when adult mentors are sparse.

.09 Program Element 9: Follow-Up Services

The purpose of follow-up services is to ensure the youth is successful in employment and/or postsecondary education and training after exiting from the program. Follow-up services must include more than an attempt to contact the youth or contact made only to secure documentation in

order to report a performance outcome. All youth participants must be offered follow-up services for a minimum of 12 months after participation completion, unless the participant declines to receive follow-up services, or the participant cannot be contacted or located. Follow-up services may begin immediately following the last expected date of service in the youth program (and other ARIZONA@WORK partner programs in which the participant is co-enrolled when no future services are scheduled).

- A. Follow-up services may be provided beyond 12 months at the discretion of the LWDB.
- B. The type and duration of follow-up services must be determined based on the needs of the youth participant and may vary among participants.
- C. Follow-up services for youth may include:
 - 1. Supportive Services, except for needs-related payments;
 - 2. Adult mentoring;
 - 3. Financial literacy education;
 - 4. Services that provide labor market information and employment information for in-demand industry sectors or occupations available in the local area; such as career awareness, career counseling, and career exploration services;
 - 5. Services necessary to ensure the youth is successful in obtaining employment, and/or continuing postsecondary education.
- D. Follow-up services must be added promptly and accurately to the S & T Plan in the AJC system when they are provided to the youth along with the case notes to ensure expediency of services.
 - 1. Case notes must contain documentation substantiating follow-up contact with the youth, including follow-up attempts.
 - 2. This may include, but is not limited to, a letter, an e-mail message, or case notes based on an actual conversation either in person or by telephone.

3. Follow-up attempts with the participant must be made and documented in the AJC system on a monthly basis during the 12-month requirement.
- E. If it becomes necessary during the follow-up period to utilize WIOA Title I-B services beyond those available through the follow-up component. LWDBs are required to add a new service to continue to serve the participant in the WIOA Title I-B.

.10 Program Element 10: Comprehensive Guidance and Counseling

Comprehensive individualized guidance and counseling may be provided to youth participants.

- A. Comprehensive guidance and counseling include:
 1. Drug and alcohol abuse counseling;
 2. Mental health counseling; and
 3. Referrals to partner programs as appropriate.
- B. When referring participants to necessary counseling that cannot be provided by the local youth program, the local youth program must coordinate with the organization to ensure continuity of service.
- C. When funds exist with the local program or its service providers, it is allowable to provide counseling services directly to participants rather than refer the youth to partner programs.

.11 Program Element 11: Financial Literacy Activities

Financial literacy education may include the following activities:

- A. Support the ability of participants to create budgets, initial checking and savings accounts at banks, and make informed financial decisions;
- B. Support participants in learning how to effectively manage spending, credit, and debt including student loans, consumer credit, and credit cards;
- C. Teach participants about the significance of credit reports and credit scores, their rights regarding credit and financial information, how to determine accuracy of a credit report and correct

inaccuracies, and how to improve or maintain good credit to make informed financial decisions;

- D. Educate participants about understanding their rights and protections related to personal identity, and ways to protect themselves from and how to resolve cases of identity theft;
- E. Support activities that address the specific financial literacy needs of non-English speakers, including support provided through the development and distribution of multilingual financial literacy and education materials;
- F. Support activities that address the specific financial needs of youth with disabilities, including connecting them with benefits planning and work incentives counseling;
- G. Provide age-appropriate financial education that is timely and provides an opportunity to put lessons into practice, such as accessing safe and affordable financial products that enable money management and savings; and
- H. Implement other approaches to help participants gain the knowledge, skills, and confidence to make informed financial decisions enabling them to gain greater financial health and stability by using high-quality, age-appropriate, and relevant strategies and channels including where possible, time and customized information, guidance, tools, and instruction.

.12 Program Element 12: Entrepreneurial Skills Training

Entrepreneurial skills training addresses the basics of starting and operating a small business.

- A. LWDBs must ensure that entrepreneurial skills training develops the skills associated with starting and operating a small business that may include, but are not limited to, the ability to:
 - 1. Take initiative;
 - 2. Creatively seek out and identify business opportunities;
 - 3. Develop budgets and forecast resource needs;
 - 4. Understand various options for acquiring capital and trade-offs associated with each option; and

5. Communicate effectively and market oneself and ideas.
- B. Approaches that may be used to teach youth entrepreneurial skills include:
1. Entrepreneurial education programs that introduce the values and basics of starting and running a business, and guiding youth through the development of a business plan and using simulations of business start-up and operation.
 2. Enterprise development which provides support and services that encourage and help youth develop their own businesses. Enterprise development programs go beyond entrepreneurial education by helping youth access loans or grants that are needed to begin business operations and by providing more individualized attention to the development of viable business ideas.
 3. Experience-based programs that provide youth with the ability to gain experience in the day-to-day operation of a business. These programs may involve the development of a youth-run business or facilitate placement in apprenticeship or internship positions with adult entrepreneurs in the community.

.13 Program Element 13: Services That Provide Labor Market Information

LWDBs must provide services that include labor market and employment information for in-demand industry sectors or occupations in the LWDA, such as career awareness, career counseling, and career exploration services.

- A. Youth service providers must be familiar with state and federal Labor Market Information (LMI) data and tools.
- B. Career awareness begins the process of developing knowledge of a variety of careers and occupations available, skill requirements, working conditions, and training prerequisites including job opportunities across wide industry sectors.
- C. Career exploration is described as the process in which a youth chooses an educational path, training, or a job which fits their interests, skills, and abilities.

- D. Career counseling or guidance provides advice and support in making decisions about what career paths to take. Career counseling services may include:
 - 1. Providing information on or assistance with resume preparation;
 - 2. Assisting with interviewing skills;
 - 3. Finding potential opportunities for job shadowing; and
 - 4. Informing of long-term benefits from postsecondary education and training (e.g., increased earning power and career mobility).

.14 Program Element 14: Postsecondary Preparation and Transition Activities

Postsecondary preparation and transition activities prepare ISY and OSY for advancement to postsecondary education after completing a high school diploma or HSE. The services include exploring postsecondary education options, including technical training schools, community colleges, 4-year colleges, universities and registered apprenticeships. Additional services, include but are not limited to:

- A. Assisting youth prepare for the Scholastic Assessment Test (SAT)/American College Test (ACT);
- B. Assisting with college admission applications;
- C. Searching and applying for scholarships and grants’;
- D. Completing financial aid applications and following changing guidelines; and
- E. Connecting youth to postsecondary education programs.

305 ELIGIBILITY DETERMINATION

At the time of eligibility determination, service providers must determine if the youth meets the ISY or OSY criteria to participate in the youth program.

.01 Out-of-School Youth

- A. An individual meets the definition of OSY (WIOA P. L. [§ 3\(46\)](#), 129(a)(1)(B) and 20 CFR [§ 681.210](#)) if the youth is:

1. Not attending school (see Section [305.04](#) of this chapter);
2. Not younger than age 16 or older than age 24 at the time of enrollment; and
3. One or more of the following:
 - a. A school dropout;
 - b. A low-income individual (refer to section [306.02](#) of this policy) with a secondary school diploma or its recognized equivalent and is either:
 - i. Basic Skill Deficient (BSD); or
 - ii. An English Language Learner (ELL).
 - c. An offender;
 - d. Homeless between 16 to 24 years old (i.e., lacks a fixed, regular and adequate nighttime residence) or a runaway;
 - i. A homeless individual meets the criteria defined in sec. 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 1403e-2(6)); or
 - ii. A homeless child or youth who meets the criteria defined in sec. 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2));
 - e. In foster care or who has aged out of the foster care system, or has attained the age of 16 years old and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
 - f. Pregnant or parenting;
 - g. An individual with a disability; or
 - h. A low income individual (as described in WIOA P. L. [§ 3\(36\)](#)), who requires additional assistance to enter or

complete an education program or to secure or hold employment as defined by the LWDB local plan and policy. (See also section [305.05](#) of this chapter).

- B. Participants who are found eligible as OSY may continue to receive services beyond the age of 24 once they are already enrolled in the youth program.

.02 In-School Youth

An individual meets the definition of ISY (WIOA P. L. [§ 3\(27\)](#), 129(a)(1)(C) and 20 CFR [§ 681.220](#)) if the youth is:

- A. Attending secondary or postsecondary school (as defined by state law);
- B. Not younger than age 14 or older than age 21 at the time of enrollment.
 - 1. The age requirement is extended for youth with disabilities because school districts must provide programs and services to eligible youth with disabilities attending secondary school until they turn 22 years old.
 - 2. A youth with a disability who turns 22 years old during the school year must continue to receive services from the school district until the end of the school year ([ARS 15-764](#)).
- C. Low Income (refer to section [306.02](#) of this policy), and at least one of the following barriers:
 - 1. Basic skills deficient;
 - 2. An English language learner;
 - 3. An offender;
 - 4. A Homeless individual, youth or child between 14 to 21 years old (i.e., lacks a fixed, regular and adequate nighttime residence:
 - a. Individual and meets the criteria defined in sec. 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 1403e-2(6));

- b. Child or youth who meets the criteria defined in sec. 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)); or
 - c. Runaway
 - 5. In foster care or who has aged out of the foster care system, or has attained the age of 16 years old and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
 - 6. Is pregnant or parenting;
 - 7. An individual with a disability; or
 - 8. Requires additional assistance to enter or complete an education program or to secure or hold employment as defined by the LWDB local plan and policy (refer to section [305.05](#) of this chapter).
- D. If a youth turns 21 years old during participation, the youth may continue to receive services.
 - E. Individuals who are 22 years of age and older who are attending postsecondary education do not meet the age requirement for ISY (14-21 years old) and do not meet the youth program eligibility requirements. These individuals may be served by the Adult Program.

.03 Eligibility Barrier Definitions

- A. A youth is basic skills deficient when one of the following definitions applies:
 - 1. The youth performs any of the following at or below an 8.9 grade level on a generally accepted standardized test:
 - a. Computing or solving math problems;
 - b. Reading English;
 - c. Writing English; or
 - d. Speaking English.

2. The youth is unable to:
 - a. Compute or solve problems;
 - b. Read, write or speak English at a level necessary to function on a job, in the youth's family, or in society, as determined in the LWDB's policies.
- B. English Language Learner (ELL) is defined under WIOA Section 203(7) as an individual who has limited ability in reading, writing, speaking, or comprehending the English language, and:
1. Whose primary language is other than English; or
 2. Who lives in a family or community environment where the dominant language is other than English.
 3. When assessing a youth for BSD as an ELL, formalized assessments, observation and interviews may be used.
 - a. These assessment instruments must be valid and appropriate.
 - b. Reasonable accommodations must be provided as needed in the assessment process and if necessary for individuals with disabilities.
 - c. The observation must be included in the objective assessment and case notes.
- C. Dropout is defined as an individual who is no longer attending school and who has not received a secondary diploma or its recognized equivalent. Individuals who have dropped out of postsecondary education are not considered "dropout" for purposes of youth program eligibility.
- D. Offender is defined as an adult or juvenile who:
1. Is or has been subject to any stage of the criminal justice process, and for whom services under this act may be beneficial; or
 2. Requires assistance overcoming barriers to employment resulting from a record of arrest or conviction.

- E. Parenting includes either a custodial or non-custodial mother or father. When a youth is within the youth program age eligibility requirements, the age the youth becomes a parent does not factor into the definition of parenting.
- F. A pregnant individual only includes the expectant mother.

.04 School Status

School status is determined at the time of enrollment. The enrollment process may occur over a period of time and as such, youth service provider staff must determine school status when the eligibility determination portion of the program enrollment is made. When the school status of the youth is determined that status remains the same throughout the youth's participation.

- A. Youth who are temporarily not attending school because the school is on break (winter, spring, fall, or summer break) but are enrolled to continue school after the break are considered to be attending school and may only be enrolled as ISY. The same applies when the youth is planning to attend a different school after the break.
- B. When a youth is in the youth program between high school graduation and postsecondary education, the youth is considered in-school if they registered for classes, even if the youth has not yet begun postsecondary classes at the time of the youth program enrollment. However, if the youth graduates from high school and registers for postsecondary education but does not ultimately follow through with attending postsecondary education, the youth would be considered an OSY.
- C. For the purposes of youth programs, providers of adult education under Title II of WIOA, YouthBuild programs, the Job Corp program, HSE programs, and dropout re-engagement programs are not considered to be schools for purposes of determining school status. However, there is one exception, youth attending HSE programs, including dropout re-engagement programs funded by the public K-12 school system, that are classified by the school system as still enrolled in school are considered ISY.
- D. Youth who are participating in online secondary and postsecondary school are considered to be attending school. Likewise, youth who are homeschooled or attending public, private, or chartered

secondary/postsecondary schools are considered to be attending school.

- E. When a youth is enrolled in any credit-bearing postsecondary education classes, including credit-bearing community college classes and continuing education classes, then the youth is considered attending postsecondary education and is an ISY. If the youth is only enrolled in non-credit-bearing postsecondary classes, he or she would not be considered to be attending postsecondary school and is an OSY.
- F. A youth who is within the age of compulsory school attendance but has not attended school for at least the most recent complete quarter or semester is an OSY. The definition of a quarter or semester is based on how a local school district defines the terms.

.05 Youth who Require Additional Assistance Criterion

LWDBs must ensure an ISY enrolled in a program year, based solely on eligibility because the youth “requires additional assistance to enter or complete an educational program or to secure and hold employment,” this criterion is limited to five percent of ISY.

- A. LWDBs and youth service providers must track ISY enrolled in the program each year to ensure that no more than five percent are enrolled using this criterion as per 20 CFR § 681.310(b);
- B. Each LWDB must define this criterion in the local plan and LWDB’s policies as per 20 CFR § 681.300, and 20 CFR § 681.310(a); and
- C. The LWDB’s policies must be reasonable, quantifiable, and based on evidence that specifies characteristics of the youth identified in policy objectively requiring additional assistance.
- D. The five percent limitation is based on new ISY enrollees in a program year, rather than all ISY served in a program year (20 CFR § 681.250(c), which is one youth for every 20 youth enrolled using the “requires additional assistance criterion.”
- E. LWDBs should focus on serving ISY who are eligible based on barrier criterion, such as homeless, foster, offender or disabled youth to eliminate exceeding the five percent limit as listed under letter D above.

.06 Low-Income Requirements

As provided in 20 CFR § 681.250 the low-income youth requirements apply as follows:

- A. All ISY must be low-income unless included in the five percent low-income exception.
- B. Low-income eligibility requirements apply to OSY only when the youth is a recipient of secondary school diplomas or its recognized equivalent. In addition to being low-income, these OSY must meet at least one of the following:
 - 1. Basic skills deficient;
 - 2. An English language learner; or
 - 3. In need of additional assistance to enter an educational program or to secure employment.
- C. If a youth meets all other eligibility criteria for WIOA Title I except the low-income criteria eligibility, the youth may be served under the five percent low-income exception (service provider staff must follow their LWDBs policy and/or process to ensure the five percent low-income enrollment limit has not been exhausted).

.07 Non-Low Income Youth

LWDBs must not serve more than five percent of youth who do not meet low-income requirements but who meet all other eligibility requirements.

- A. The five percent is calculated using the combined total of ISY and OSY.
- B. The percentage of non-low-income youth will be calculated based on the percent of newly enrolled youth in the LWDB's WIOA Title I-B Youth program in a given program year who would ordinarily be required to meet the low-income criteria (20 CFR § 681.310.b).

306 DOCUMENTATION FOR ELIGIBILITY

Youth service providers must ensure timely documentation is collected regarding eligibility determination. Attempts to secure documentation and the outcome must be recorded promptly and accurately in the AJC system case notes.

.01 General Requirements

- A. Youth service providers must use the WIOA Title I-B Youth Eligibility Checklist ([Exhibit 300A](#)) to determine eligibility for the youth program:
 - 1. The checklist identifies source documents which are used to verify eligibility requirements.
 - 2. All eligibility documents must be uploaded into the AJC system.
 - 3. LWDBs must require youth service providers to upload documents into the AJC system except for medical documentation or information regarding participants in the Arizona Address Confidentiality Program (ACP) staff need to refer to B below and [section 312](#) of this policy for the Arizona ACP participants.

- B. Documents required for eligibility and data validation must be uploaded to the AJC system:
 - 1. If the document contains Personal Identifiable Information (PII) that is not needed for eligibility or data validation, the PII must be redacted before uploading.
 - 2. Documents that contain medical information must NOT be uploaded and must be maintained in a separate, secure file.

- C. The WIOA Title I-B Applicant Statement ([Exhibit 100B](#)) may be used as permitted on the WIOA Title I-B Youth Eligibility Checklist ([Exhibit 300A](#)) when the information is unverifiable or it is unreasonably difficult for the applicant to obtain, and as permitted under the Data Validation Checklist ([Exhibit 1500B](#)).
 - 1. For high-risk OSY, the WIOA Applicant Statement ([Exhibit 100B](#)) is acceptable to allow upfront enrollment of the youth.
 - 2. High-risk OSY means not having a high school diploma or HSE and meeting the eligibility criteria as listed in [section 305.01.C 1-9](#) of this policy).
 - 3. An exception includes OSY who meet the “Requires additional assistance to enter or complete an education program or to secure or hold employment, as defined by the

LWDB eligibility criteria, as they are not considered high-risk. As such, the WIOA Title I-B applicant statement may not be used for upfront enrollment for youth that meet this eligibility criteria.

4. If additional documentation is required on the WIOA Title I-B Youth Eligibility Checklist ([Exhibit 300A](#)) for data validation purposes as per the Data Validation Checklist ([Exhibit 1500B](#)), the youth service provider may request documentation from the youth after the youth has begun to receive youth services.

- D. Youth service providers must ensure all youth who are less than 18 years old have a WIOA Applicant Statement ([Exhibit 100B](#)) signed by their parent, guardian, or a responsible adult/corroborating witness. By signing the form, the youth's parent, guardian, or a responsible adult/corroborating witness gives permission for the youth to participate in the program and verifies the information on the form is accurate.

.02 Determining Low-Income Status

- A. A low-income youth is an individual who:
 1. Receives or has received, or is a member of a family that receives – or has received in the past six months – cash payments under a federal, state, or local income-based public assistance program, e.g., Temporary Assistance to Needy Families (TANF);
 2. Income in relation to family size that does not exceed the higher of the federal poverty guidelines or 70 percent of the United States Department of Labor (USDOL) Lower Living Standard Income Level (LLSIL) for each program year;
 3. Receives or is a member of a family that receives – or has received in the past six months – assistance through the Supplemental Nutrition Assistance Program (SNAP);
 4. Qualifies as a homeless individual who lacks a fixed, regular and adequate nighttime residence;
 5. Is a foster child for whom state or local government payments are made;

6. Is a member of a family whose income does not meet low-income requirements but is an individual with a disability, and therefore, can be counted as a family of one so that individual income meets the low-income requirement;
 7. Receives Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI);
 8. Receives or is a member of a family that receives – or has received within the past six months – assistance through the Refugee Cash Assistance (RCA); which is a federally-funded need-based cash benefit for refugees and other eligible beneficiaries who are not eligible for other cash assistance programs such as TANF;
 9. Receives or is eligible to receive a free or reduced lunch under the Richard B. Russell National School Lunch Act (NSLA); or
 10. Is a youth who lives in a high poverty area, as determined by the American Community Survey (refer to [section 306.03](#) of this chapter).
- B. For youth required to be low income (see [section 305.06](#) of this policy), the youth service provider must use the [LLSIL Matrix](#) to determine low income status when low income status cannot be documented using methods of verification in [section 306.02](#) of this chapter.
1. Youth service provider staff must use the HHS Poverty guidelines column or the 70 percent LLSIL column for the youth's family size to determine low-income status.
 2. If the youth's income is more than the amount on the HHS Poverty guidelines column, or the 70 percent LLSIL column, the youth does not meet low-income requirements for the youth program and must not be enrolled.
 3. If the youth's family income is less than the amount on either the HHS Poverty guidelines column, or the 70 percent LLSIL column, the youth does meet low-income requirements for the youth program and may be enrolled.
- C. Income Included/Excluded in the Calculation

For types of income that must be included or excluded from the income calculations when determining low-income status, refer to [Exhibit 100.2](#).

Exclusions are based on WIOA Title I-B definitions, and/or exclusions listed in the U.S. Department of Human Health Services Poverty Income Level and United States Department of Labor (USDOL) 70% LLSIL.

- D. Family is defined as two or more individuals related by blood, marriage, or decree of court who are living in a single residence and are included in one or more of the following categories:
 - 1. A married couple and dependent children;
 - 2. A parent or guardian and dependent children; or
 - 3. A married couple (20 CFR [§](#) 675.300).
- E. When a youth is not living in a single residence with other family members the youth is not considered a member of the family for the purpose of WIOA Title I-B income calculation.
- F. For the definition of family:

A dependent is defined as a child who is age 18 and under:

 - 1. At the end of the previous calendar year; or
 - 2. At the end of the previous calendar year and who was a student.

.03 High Poverty Areas

- A. Youth living in high poverty areas are automatically considered low-income individuals. 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 USDOL 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 (WIOA 20 CFR [§](#) 681.260).

- B. LWDBs and service provider staff, must refer to TEGL 21-16 [change 1](#) for the updated directions to follow for using Census data to determine if a youth resides in a high poverty area (to access the steps in the TEGL, click on the link listed under the “Action Requested” and follow the steps as directed).

.04 Income Verification

Youth service provider staff must attempt to gather information – such as other public assistance the youth may receive, including TANF and SNAP benefits and verify if the youth receives monetary support. Attempts include calls to the participant, letters, e-mail messages, etc. Low-income verification attempts must be documented in the AJC system under case notes.

- A. Documentation related to income verification, as outlined on the WIOA Title I-B Youth Eligibility Checklist ([Exhibit 300A](#)), must be collected and uploaded into AJC. Income used to determine income eligibility for WIOA Title I-B Youth services should be identified using the WIOA Title I-B Youth Eligibility Checklist ([Exhibit 300A](#)).
- B. When a verification document cannot be obtained, the Applicant Statement form WIO-1027A ([Exhibit 100B](#)), may be accepted as a last resort if listed as an acceptable source under the WIOA Title I-B Youth Eligibility Checklist ([Exhibit 300A](#)). It must contain the youth’s signature, and a corroborating witness who has knowledge of the information provided. The career planner, youth service provider or other ARIZONA@WORK staff do not qualify as corroborating witnesses and must not sign as the witness.
- C. When a participant is receiving child support, the corroborating witness would be the parent providing the child support or an individual with knowledge of the applicant receiving child support. The attempts used to gather information needed for verification must be documented in AJC case notes.
- D. Youth service provider staff may verify Social Security benefits through Social Security Consent-Based Social Security Number (SSN) Verification Services. Fees associated with this verification are an allowable cost under youth program funds and can be paid by the LWDB. Applicants must not be charged for this verification.

- E. Youth who are recipients of TANF, SNAP, or SSI benefits may automatically be income-eligible and require no further income verification if the youth has provided acceptable documentation utilizing the WIOA Title I-B Youth Eligibility Checklist ([Exhibit 300A](#)).
- F. At the time of application to the youth program, documentation regarding TANF and/or SNAP benefits must be current and indicate whether the youth is receiving or has received or is a member of a family that is receiving or has received TANF benefits in the past six months.
- G. At the time of application to the youth program, documentation regarding SNAP benefits documentation must be current and indicate that the youth is receiving or has received – or is a member of a family that is receiving or has received – SNAP benefits in the past six months, SNAP assistance at the time of application to the youth program.
- H. SSI/SSDI documentation must be current and indicate payments were made to a single recipient. The individual applying for the youth program must be receiving SSI/SSDI benefits at the time of application to the youth program to be considered as a family of one.
- I. RCA documentation must be current and indicate payments were made to a single recipient. The individual applying to WIOA must be receiving RCA benefits at the time of application to the youth program to be considered as receiving public assistance.
- J. Youths who receive or are eligible to receive free or reduced lunch through the Richard B. Russell National School Lunch Program must provide:
 - 1. School documentation of a free or reduced lunch;
 - 2. A letter from TANF documenting approval; or
 - 3. A letter from SNAP that documents approval.
- K. Youths who receive free lunch through the Summer Food Service Program (SFSP), and students who attend schools that are eligible for the Community Eligibility Provision (CEP) of the Healthy, Hunger-Free Kids Act of 2012 are not automatically considered low-income.

- L. High-poverty area verification must be included in the AJC system case notes indicating the name of the high-poverty areas (county) or census tract number used in determining the youth lives in a high-poverty area. The rate for a high-poverty area must also be included in the AJC system case notes (as described in [section 306.03](#) of this chapter).

.05 Selective Service Requirements

Each LWDB is responsible for determining the Selective Service status of male youth prior to program enrollment.

- A. 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 18th and 26th birthdays. Registration with SSS can occur within 30 days of a male's 18th birthday and prior to his 26th birthday.
- B. 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 18th birthday. If a male participant does not register for Selective Services within 30 days of his 18th 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.
- C. A detailed list of Selective Service registration requirements can be found online at Selective Service System or by clicking [here](#).
- D. Selective Service registration can be verified online at the Selective Service System by clicking [here](#). The applicant's name, date of birth, and social security number are required to verify registration.

.06 Basic Skill Assessment for Objective Assessment

LWDBs 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 for the objective assessment. LWDBs are not prohibited from using these tools (see WIOA Title I-B Training Services [Policy](#), Section 500) and may use the following methods to measure basic skills for the objective assessment:

- A. Other formalized testing instruments designed to measure skill-related gains which must be:
 - 1. Valid and reliable;
 - 2. Appropriate for the target audience;
 - 3. Fair;
 - 4. Cost effective;
 - 5. Well-matched to test administrator's qualifications; and
 - 6. Easy to administer.
- B. Less formal alternative assessment techniques such as observation, folder reviews, or interviews may be used for youth with disabilities.
- C. Youth service providers may use previous basic skills assessment results if such previous assessments were conducted within the past 6 months.
- D. Information in this section does not apply to determination of the educational functioning level for the measurable skill gains performance accountability measure.

307 REGISTRATION, ENROLLMENT AND DATA ENTRY

WIOA addresses an important distinction between registration in the AJC system and enrollment into the youth program, which includes the circumstances when a youth must be registered in the AJC system and enrolled in the youth program.

.01 Registration, Enrollment and Data Entry Requirements

- A. Registration in the AJC system occurs when a youth creates an account that includes a complete data demographics and work history. However, documentation or verification of income is not required.
- B. Registration in the AJC system must occur when a youth has taken action that demonstrates an intent to use program services and meets specific reporting criteria for the program, including youth who:
 - 1. Provide identifying information;

2. Use the self-service system;
 - a. The self-service system includes independently accessing any workforce development program's information either in a physical location, such as an ARIZONA@WORK Job Center resource room or partner agency, or remotely using electronic technologies.
 - b. Virtual services that provide a level of service beyond independent job search or seeking information on behalf of a youth would not qualify as self-service.
 3. Receive information-only services or activities;
 4. Information-only services or activities include readily available information that does not require staff-member assessment of the youth's skills, education, and career objective. Examples of information only services and activities provided include:
 - a. Labor market information;
 - b. The unemployment rate;
 - c. Information on businesses that are hiring or reducing their workforce;
 - d. Information on high-growth industries; and
 - e. Referrals other than those to employment.
- C. Enrollment must occur when a youth requires services beyond self-service or information-only services and activities. The program enrollment will depend on the participant's eligibility (see [section 305](#) of this policy). Examples of services that require significant staff involvement include the staff member's assessment of the youth's skills, education, or career objectives to achieve any of following by assisting the youth in:
1. Deciding on the appropriate next steps in the search for employment, training, and related services, including job referrals;
 2. Assessing barriers to employment; or

3. Accessing other related services necessary to enhance employability and individual employment needs.
- D. Enrollment in the youth program includes the collection of documentation to support eligibility determination and services listed under [section 303.G](#) of this policy.
 - E. All of the services under [section 303.G](#) of this policy, must be added to the S & T Plan in the AJC system for the youth to be considered enrolled in the youth program.
 1. Enrollments are pending in the AJC system until approved by the designated youth service provider staff.
 2. Pending enrollments must be approved promptly and accurately.
 - F. When pending enrollments are not approved within 30 calendar days, the AJC system requires redetermination of the youth's eligibility which includes collection of new/updated verification documentation for eligibility determination. LWDBs must develop local policies that address timely entry of enrollments in the AJC system.
 - G. Transactions relating to youth program-provided activities and services must be entered or updated in the AJC system promptly and accurately.
 - H. The LWDB's designated youth service provider staff must run the appropriate AJC report monthly to ensure timely follow-ups and accurate data recording.

.02 Co-Enrollment

Co-enrollment means enrollment in more than one program at a time. Therefore, the LWDB must be receptive to the needs of these programs and their customer groups. Co-enrollment allows additional resources for training and financial support, enhanced service delivery, and increased customer support which results in greater participant outcomes.

- A. Youth who are age 18 and/or older, may be co-enrolled in the WIOA Title I-B Adult program. There is no requirement that the youth must be 18 years old for co-enrollment in the Dislocated Worker (DW) Program. LWDBs must:

1. Ensure the youth meets eligibility criteria for both the youth and Adult program or the youth and DW program to co-enroll participants;
 2. Determine the appropriate level of service and combination of youth, Adult, DW, and other 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;
 3. Identify and track the funding streams for youth who are enrolled concurrently in the youth/Adult program or the youth/DW program;
 4. Ensure services are not duplicated; and
 5. Ensure previous foster care youth, 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 program services and do not require redetermination of eligibility.
- B. WIOA Title I-B youth participants may be co-enrolled with the following partner programs:
1. Adult Education and Literacy Programs;
 2. Employment Service (ES)/Wagner-Peyser Program, including those Title III participants who are receiving RESEA services;
 3. Migrant Seasonal Farm Workers (MSFW) Program at the point of entry to the ARIZONA@WORK system to assure equity of services is provided;
 4. Vocational Rehabilitation Services;
 5. TANF Jobs Program;
 6. YouthBuild;
 7. Job Corps;

8. Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T);
 9. Indian and Native American Programs (WIOA Section 166);
 10. Trade Adjustment Assistance (TAA) Program; or
 11. Other ARIZONA@WORK Partner Programs.
- C. When youth are co-enrolled, services provided by partner programs must be added under the Partner Provider Services section in the AJC system if WIOA funds are also used for the service. When a service is provided by a partner that uses the AJC system that are not funded by WIOA (such as ES or TAA), the services do not need to be added to Partner-Provided Services because the AJC system automatically considers the youth co-enrolled when the youth is receiving services from more than one program that uses the AJC system.

308 TRANSFERRING OF A PARTICIPANT TO ANOTHER LWDB

When a participant requests to be transferred to another LWDB's WIOA Title I-B Adult, DW or Youth program, due to relocation or any other reason, service provider staff from both areas (transferring and receiving) must exercise due diligence to assist the participant and follow the steps listed under [Exhibit 100.5](#).

309 SERVING YOUTH OUTSIDE THE LWDA

There are no geographical boundaries in providing services to individuals in any WIOA Title I-B program regardless of the individual's address. Individuals may apply for services at any ARIZONA@WORK Job Center in Arizona.

- A. LWDBs must not create policies that prohibit serving individuals who live outside their Local Workforce Development Area (LWDA). Individuals interested in WIOA Title I-B can apply at any ARIZONA@WORK office regardless of zip code, and/or residence.
- B. The LWDB will utilize the LLSIL levels assigned for the local area where the applicant is applying to determine eligibility (refer to [Exhibit 100C](#) for the LLSIL) and refer to the WIOA Title I-B Youth Eligibility Checklist ([Exhibit 300A](#)) for eligibility documentation.

310 INCENTIVE PAYMENTS

LWDBs may use incentive payments for recognition and achievements directly related to training activities and work experiences. Each LWDB must have written policies and procedures governing the awarding of incentive payments.

- A. LWDB policies and procedures must ensure incentive payments are directly tied to work experience, education or training and are outlined in writing before the commencement of the program that may provide incentive payments.
- B. Each LWDB's policies and procedures that govern awarding of incentive payments must align with the local program's organizational policies and CFR Parts 200 and 2900 – Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR parts 200), and WIOA Fiscal [Policy](#) (Chapter 3, Section 100).

311 MANAGING A CASELOAD (EXITS AND EXCLUSIONS FROM PERFORMANCE)

Youth who have not received a qualifying participant level service funded by the Youth program for 90 consecutive calendar days and are not scheduled for future services will have exited the program. Once a participant has exited, eligibility must be redetermined to receive WIOA youth services.

- A. General Exit Policies
 - 1. The date of exit is the last day a qualifying participant level service was provided to a participant. The date of exit is set by the AJC system retroactive back to the last qualifying participant level service - retroactive after the 90 days and is an auto exit by the AJC system as the system auto calculates this.
 - 2. There is no minimum or maximum time a youth can participate in the WIOA youth program. Participants must not be exited based on arbitrarily imposed criteria (e.g. the end of the program year). Instead, LWDBs must ensure that services are provided to a participant for the amount of time necessary based on the ISS to ensure successful preparation to enter postsecondary education and/or unsubsidized employment and link the participation to the ISS (20 CFR [§](#) 681.450).

B. Program Exit Requirements

LWDB service provider staff must close services in a timely manner. If services have not been closed manually, the AJC system closes cases as follows:

1. For services that have an actual end date entered by staff, 90 days after the actual end date for all services, the AJC system will exit the enrollment(s) and the exit date will reflect the last actual end date entered by staff.
2. If there are services from any youth or partner program that do not have an actual end date, the estimated end date is used. 90 days after the estimated end date the AJC system will exit the enrollments if no service is open or provided by the 90th day.
3. When a participant is no longer receiving a service, service providers must add the actual end date of the service to the S & T plan in the AJC system in a timely manner.

C. Exclusionary Exits

The participant will not be counted in performance if they exit the youth program for any of the following reasons:

1. Deceased – Participant died during participation;
2. Institutionalized – Participant becomes incarcerated in a correctional institution or has become a resident of a facility providing 24-hour support, such as a hospital or treatment center during the course of receiving services as a participant;
3. Health/Medical – Participant is receiving medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the WIOA program.
4. Entered into Active Military Duty – Participant exits the program because the participant is a member of the National Guard or other reserve military unit of the armed forces and is called to active duty for at least 90 days.

5. In the foster care system as defined in 45 CFR § 1355.20(a) and the participant has moved from the LWDA as part of such a program or system.

312 ARIZONA ADDRESS CONFIDENTIAL PROGRAM (ACP) PARTICIPANTS

Service providers must accept and use the substitute address in the AJC system, and in all other documents that contain the [ACP](#) participants address. The Secretary of State's [ACP](#) is a program that helps victims of domestic violence, sexual offenses, and/or stalking by:

- A. Issuing a substitute address to be used instead of the person's home, work, and school address.
- B. Accepts all first class, registered and election mail for the participant and forwards to her/ his real address at no cost. Service providers must verify the individuals [ACP](#) participation by:
 1. Contacting the Secretary of State's [ACP](#) office; or
 2. Viewing the ACP authorization card. When possible, the service provider must make a copy of the ACP authorization card for the WIOA Title I-B participant's file.
- C. Participation in ACP may only be discontinued if:
 1. The ACP participant, or the ACP participant's parent or legal guardian if the participant is a minor or incapacitated adult, requests DES cease providing ACP protection.
 2. Mail sent to the participant's substitute address is returned as undeliverable.

313 COMPLAINT RESOLUTION/APPEAL

- A. The participant record in the AJC system, must include an acknowledgement of Equal Employment and Non-Discrimination Requirements. The AJC system contains fields needed for the participant to acknowledge understanding of the Equal Opportunity & Nondiscrimination [Policy](#), Section 700, and is not required for uploading.
- B. The participant record in the AJC system, must include an acknowledgement of Non-Equal Opportunity Complaint and Appeal Process. Service providers must ensure local non-equal

opportunity complaint resolution/appeal policy and procedures are signed by the participant and are uploaded into the AJC system. LWDB staff and service provider staff must refer to the Grievances, Complaints and Appeals [Policy](#) Sec. 1400 for general issues alleging violations of WIOA Title I-B.

314 SUPPLEMENTAL WAGE INFORMATION

.01 Using Supplemental Wage Information to Report Employment-Based Performance Measures

The WIOA Title I-B youth program is required to report the participants employment status in the second and fourth quarter after exit; and Median earning in the second quarter after exit. Matching a participant's Social Security Number (SSN) against quarterly Unemployment Insurance (UI) Wages is the most effective means for determining employment status and earnings for a program participant. However, quarterly UI wage records will not result in a match in all circumstances. Service providers may use supplemental wage information when:

- A. The participant has not provided his/her SSN;
- B. UI wage records are not available for the participant; or
- C. The individual is self-employed.
- D. Calculating employment-based performance measures for individuals who participate in entrepreneurial training.

.02 Supplemental Wage Information Follow-Up Procedures

LWDBs must have written procedures to collect data in a valid and reliable manner. LWDBs must also train staff on the implementation of follow-up procedures, including what to say to former participants or their employers to encourage cooperation, and voluntary and truthful wage disclosure. The written procedures must:

- A. Inform participants at program entry about the supplemental wage information follow-up process and collect extensive contact information about them, such as addresses, and phone numbers of relatives and others who may know the participant's whereabouts over time and employment;
- B. 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;

- C. 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](#) under section II for the timeline on commencing data collection for employment-based performance measures;
- D. 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;
- E. Identify the local resources available to conduct follow-up; and
- F. Identify if the follow-up will be conducted more frequently than quarterly, continuous, or monthly basis.

.03 Acceptable Forms of Supplemental Wage Data

Service providers must refer to [Exhibit 100.4](#) to view the acceptable forms that can be used to collect supplemental wage data.