

Youth Program Questions and Answers

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Youth Program Eligibility

Who is considered a corroborating witness for the WIOA Title I-B Applicant Statement?

The parent, guardian, or responsible adult may be a corroborating witness. The WIOA Title I-B Applicant Statement ([WIO-1027A](#)) must be signed by a parent, guardian, or responsible adult if the applicant is under 18 years of age. LWDB staff or service providers are not allowed to sign as a corroborating witness.

When a youth under 18 years is in the custody of the Department of Child Safety and is living with an adult relative who is not the youth's legal guardian, who may sign the WIOA Title I-B Applicant Statement?

In this situation, the adult relative may sign the form as a corroborating witness and to grant permission for the youth to participate in the program.

Does WIOA Title I-B require individuals to provide their social security number (SSN) to receive services?

WIOA and State policy do not require that individuals provide their SSN to receive Title I-B services. Likewise, the Arizona Job Connection (AJC) system does not require that SSN be provided during the registration process. However, service providers may request the SSN and, if they do, must explain the following:

- How the participant's SSN will be used (for instance, to match wage records); and
- How the participant's SSN and other personally identifiable information (PII) and wage information will be safeguarded, as required by 20 CFR § 683.220(a) and 20 CFR 603, respectively.

If a Youth applicant resides in a high poverty area, does family income need to be calculated to determine low-income status?

No, if staff determines and has supporting documentation that the youth lives in a high-poverty area, family income does not have to be calculated. This is because per 20 CFR § 681.260, a youth who lives in a high-poverty area is automatically considered a low-income individual.

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For additional information on determining high-poverty areas for the Youth program, please refer to [directions posted on WorkforceGPS](#), as noted in [TEGL 21-16, Change 1](#).

If a Youth applicant meets multiple eligibility criteria when only one is required (e.g., an in-school youth is both basic-skills deficient and an English-language learner), is documentation necessary for each criterion?

Staff must collect or provide documentation verifying pertinent eligibility criterion that is also identified in the Arizona Job Connection (AJC) system. Having source documentation for criteria identified in AJC is especially important for data validation purposes.

When appropriate, however, the same document may be used to support different eligibility criteria. For example, a school record that has information that applies to and supports the basic skills deficient and English language learner statuses of an individual may be used as supporting documentation for both.

Staff must refer to the updated WIOA Title I-B Eligibility Checklist, Data Validation Checklist, and TEGL 23-19 for examples of acceptable source documentation.

What TABE 11/12 scores will classify an individual as basic skills deficient?

A youth who has English reading, writing, or computing skills at or below the 8th grade level meets the definition of an individual who is basic skills deficient, according to section 3 of WIOA. Service providers may refer to [The Test Benchmarks for NRS Educational Functioning Levels \(EFL\)](#) to establish the TABE 11/12 scores that correspond to reading, writing, or computing skills at or below the 8th grade level.

Are service providers required to administer TABE 11/12 again within 12 months if the youth was determined basic skills deficient (BSD) at the time of enrollment, using TABE 11/12 scores?

If the TABE 11/12 scores were used to establish that the youth met the BSD criterion as part of the eligibility determination or to review basic skills as part of the objective assessment, service providers are not required to administer TABE 11/12 again.

However, if the youth is in an education program – and if an educational functioning level (EFL) gain is an appropriate measurable skill gain (MSG) type for the youth – the

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service provider may administer TABE 11/12 again. The comparison of the initial scores (pretest) and current test scores (posttest) may be used to document EFL gain.

Note that the use of TABE 11/12 to document EFL gain is based on its inclusion in the [National Reporting System list](#).

If a Youth applicant has TABE 11/12 reading and language scores that correspond to the 10th grade level, can the youth be enrolled as an English language learner (ELL) with a self-attestation of limited ability comprehending English because the youth’s native language is not English?

Sec. 203(7) of WIOA defines English language learner as an individual “who has limited ability in reading, writing, speaking, or comprehending the English language,

and—

(A) whose native language is a language other than English; or

(B) who lives in a family or community environment where a language other than English is the dominant language.”

The youth is considered an ELL if he/she meets the definition of an ELL above.

If the youth meets the definition of an ELL, self-attestation – a signed and dated participant statement acknowledging status – is acceptable source documentation (Attachment II of TEGL 23-19).

Must service providers administer the TABE 11/12 for an in-school youth to establish that the youth meets the English language learner (ELL) eligibility criterion? Will an “observation” case note suffice?

Yes, case notes that identify the individual’s ELL status may be used to substantiate that status. Service providers may also use assessment test results, e.g., TABE 11/12 results, to establish that a youth is an ELL, as defined in Sec. 203(7) of WIOA. Either case notes or assessment test results on their own would be acceptable.

For additional information on acceptable source documentation for ELL status, please refer to Attachment II of TEGL 23-19 and the State’s Data Validation Checklist.

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Can Youth program funds be expended prior to an eligibility determination?

Yes. Prior to an eligibility determination, Youth funds may be expended on outreach and recruitment or assessment for eligibility determination, such as assessing basic skills level. However, before an individual is determined eligible for the Youth program, program funds may not be spent on *youth program services*, such as the 14 program elements (TEGL [21-16](#), p. 7 - Program Design).

How are fees associated with administering TABE 11/12 reimbursed if the youth does not enter the program after testing?

TABE 11/12 may be administered to assess basic skills level as part of the youth's eligibility determination. Assessment for eligibility determination is an activity that may be covered with Youth program funds prior to the youth's eligibility determination (TEGL 21-16, p. 7 - Program Design).

Service providers must refer to contracts with the LWDBs and to local policies regarding reimbursements. Generally, service providers must ensure that the youth is registered in the AJC System and must enter case notes detailing that the youth received an assessment for eligibility determination.

In-School Youth or Out-of-School Youth Classification

Is a youth who graduated from high school in spring and has registered for college classes that begin in the fall semester considered an in-school youth (ISY) or an out-of-school youth (OSY) prior to starting classes?

The youth is an ISY if registered for credit-bearing postsecondary classes. State policy clarifies that youth temporarily not attending school because the school is on break (winter, spring, or summer break), but will return to school after the break, is an ISY, even if the youth will attend a different school after the break.

Is a youth attending a high school equivalency program considered an out of school youth (OSY) if the K-12 school system verified that the youth is not enrolled in its system?

Yes, the youth is an OSY. Per 20 CFR § 681.230, for purposes of WIOA, providers of adult education under Title II of WIOA, YouthBuild programs, Job Corps program, high school equivalency programs, or dropout re-engagement programs are not considered

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“schools.” Thus, Youth participants in these programs are classified as OSY.

However, the regulations also state that if the youth is attending a high school equivalency program funded by the K-12 school system and is classified by the school system as still enrolled in school, the youth is considered an in-school youth (ISY).

Youth Program Services

Are there limitations to the length of a training program a youth may participate in or the duration of enrollment in the Youth program?

There is no limit to how long the participant may be enrolled in the Youth program. The length of service depends on the individual service strategy (ISS) and when services in the ISS are completed. The ISS must be individualized to meet the training/employment goals of the participant.

(See also 20 C.F.R. § 681.450.)

Can an in-school youth (ISY) participate in work experience during the school year?

Yes. Summer employment opportunities and *other employment opportunities available throughout the school year* are a type of work experience. Note that work experiences must include *academic and occupational education*, which may occur concurrently or sequentially with the work experience. Further academic and occupational education may occur inside or outside the work site (20 C.F.R. § 681.600).

Is Youth program element # 5 limited to participants working towards their high school diploma (or its equivalent), or does it also apply to participants who already have their high school diploma (or its equivalent)?

This program element does not apply to participants who already have their high school diploma (or its equivalent). Per 20 C.F.R. § 681.630, program element 5 (education offered concurrently with workforce preparation and training for a specific occupation) describes how workforce preparation activities, basic academic skills, and hands-on occupational skills training are to be taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway.

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TEGL 21-16 further clarifies that program element 5 refers to the concurrent delivery of services that fall under program elements 2, 3, and 4. Program element 2 services (alternative secondary school services or dropout recovery services) are “provided with the goal of helping youth...in education that leads to the completion of a recognized high school equivalent” (p. 15).

Is it allowable to use supportive services to pay for registration fees for GED test preparation classes at a community college, even if the institution is not a contracted adult basic education provider?

The local youth program may cover registration fees for GED test preparation classes as a supportive service. Supportive services enable an individual to participate in WIOA activities (section 3(59) of WIOA) and include services outlined in [20 C.F.R. § 681.570](#).

Is it allowable to use Youth funds for adult basic education and high school equivalency (HSE) instruction for out-of-school youth (OSY) needing an HSE diploma?

Yes, Youth funds may be used for adult basic education and HSE instruction for OSY needing an HSE diploma. Although co-enrollment is encouraged to leverage funds, Youth funds may be used to provide such services.

Can training services be provided to an in-school youth who started receiving follow-up services two months ago, after receiving a high school diploma?

Yes. Because 90 days had not passed since the last service date, the youth would not have been “exited” from the program and additional services may be provided as appropriate.

The youth’s individual service strategy and the Service and Training plan in the Arizona Job Connection system will have to be updated to reflect the training services.

If the youth, however, had already exited the program but needed further services beyond follow-up services, self-service, and information-only services or activities, the youth would have had to undergo eligibility determination again.

Performance Indicators

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Does a measurable skill gain (MSG) need to be “set” for each program when a participant is co-enrolled in the Youth and Adult programs?

Yes, the MSG must be “set” for both programs in the Arizona Job Connection system.

If a participant attends a cardiopulmonary resuscitation (CPR) and first aid class, passes the required tests, and receives a CPR and first aid certification, will this count as a “skills progression” type of measurable skill gains (MSG)?

It depends. If the CPR/first aid is *required for a particular occupation* and is a component of the training program which includes the participant in the MSG measure (for example, if the participant is enrolled in an emergency medical technician program), the passing test scores or the CPR/first aid certificate itself may be used to document an exam passage or “skills progression” type of MSG.

Does passing one GED test count as an Educational Functional Level (EFL) gain?

No, it does not. EFL gain may be measured by:

- A participant’s exit from instruction below the postsecondary level and enrollment in postsecondary education/training; or
- Comparing the participant’s initial EFL and current EFL based on a test that is used in the National Reporting System for Adult Education (e.g., TABE 11/12, CASAS, etc.).

Attainment of secondary school diploma or equivalent – one of the five types of MSG — may be recorded for a participant who has received a high school equivalency diploma after passing all four GED subject exams and the AZ Civics test.

If the TABE 11/12 posttest score shows an increase from the pretest score, does the increase count as an educational functioning level (EFL) gain?

It depends. If the test score shows an achievement of at least one EFL – that is, the posttest score places the participant at least one EFL up from the current EFL, then an EFL gain may be recorded.

(See also [Test Benchmarks for NRS Educational Functioning Levels \(EFL\).](#))

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Is a youth included in the credential attainment indicator if the youth obtains a credential from a training program that is not in the eligible training provider list (ETPL) and was paid for by the youth?

It depends. First, the youth would have to be included in the denominator for calculating the credential attainment rate. The youth would be included if the youth is --

- An in-school youth; or
- An out-of-school youth in occupational skills training, secondary education (9th grade and above), postsecondary education, Title II-funded adult education (9th grade or above), YouthBuild, and Job Corps.

The youth then would be included in the numerator (successful outcome) if the youth --

- Attains a secondary diploma/equivalent and is employed or enrolled in an education/training program leading to a recognized postsecondary credential within one year following exit; or
- Attains a recognized postsecondary credential during participation or within one year after exit from the program.

Federal guidance does not state that the recognized postsecondary credential that would place the youth in the numerator (successful outcome) had to be paid by the Youth program nor that the training program had to be in the ETPL.

For example: the youth was placed in a teacher's aide training (occupational skills training) by the Youth program, exits the Youth program, then attends a self-paid certified nursing assistant program and obtains a nursing assistant certificate within one year after exit from the Youth program. In this scenario, the youth would be included in the denominator and the numerator (successful outcome) in the calculation of the credential attainment rate.

Are supplemental wage records, such as pay stub copies, sufficient documentation for employment-related performance indicators, if the participant did not provide a social security number to match wage records?

Yes, supplemental wage records may be used to determine, and as supporting documentation to, a participant's employment status and earnings. Please refer to [TEGL 26-16](#) for additional information.

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How is income documented when a youth is self-employed? What types of documentation are acceptable?

To document a participant's self-employment, service providers may collect copies of tax payment forms or self-employment worksheets signed and attested to by the participant. Please refer to TEGL 26-16 and TEGL 23-19 for additional information.

Program Exit

Is there a way to keep a youth from exiting the program when the youth is still engaged with the program?

If the participant has not received a service funded by the WIOA Title I-B Youth program for 90 consecutive calendar days and no additional services are scheduled, the system will retroactively "exit" the participant on the last date of service. The service referred to in the preceding statement does not include follow-up services, self-service, and information-only services or activities (TEGL 21-16).

Please note that follow-up services are provided to Youth program participants for at least 12 months after the completion of participation or exit date. Follow-up services may include the following program elements:

- Supportive services;
- Adult mentoring;
- Financial literacy education;
- Services that provide labor market and employment information; and
- Activities help youth prepare for transition to postsecondary education and training

The five program elements mentioned above will not extend the program exit date if provided as follow-up services and are coded in the system (Arizona Job Connection) as such. Case notes must also reflect that the services were provided as follow-up services.

If the youth has exited the program but needs further services beyond follow-up

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services, self-service, and information-only services or activities, the youth must undergo eligibility determination again.

May a college printout of a student schedule be used as documentation for school status at exit?

Yes, college printout of a student schedule may be used as documentation for school status at exit. The dates of the student schedule must correspond to the participant's exit date for the program.

May a college printout of a student schedule be used to document in the 2nd and 4th quarter status after exit?

Yes, the student schedule may be used to document that the participant is enrolled in education or training for employment in the 2nd and 4th quarter after exit performance accountability measures for the Youth program. The service provider must verify that the dates on the student schedule fall in the 2nd or 4th quarter after exit. The student's school status and information must be recorded in AJC: Outcomes page, 2nd and 4th Quarter after Exit tabs.

How are local areas to do a follow-up for a youth who is incarcerated or institutionalized?

If a youth exited the program because of being incarcerated or institutionalized, follow-up services will not be required. The youth will be excluded from any performance measures as well. Case notes must include the reason for exit and that follow-up services will not be provided.

(See also Attachment 2 of TEGL 10-16, Change 1.)