



**WORKFORCE INVESTMENT ACT  
POLICY MANUAL**

**CHAPTER 2 - SECTION 300**

**SUBJECT: YOUTH PROGRAM**

### **300 BACKGROUND AND PURPOSE**

This section provides policy and procedures for the Local Workforce Investment Areas (LWIAs) to use in providing services to Workforce Investment Act (WIA) Title IB Youth Program participants, including in-school and out-of-school youth.

The WIA Title IB Youth Program provides a comprehensive array of workforce investment services that prepare youth, with special focus on low-income youth with barriers, to enter post-secondary education, training or employment. The purpose of the Youth Program is to increase the number of youth entering employment, post-secondary education or advanced training; increase the number of youth attaining a degree or certificate; and increase literacy and numeracy gains. Each LWIA must establish a Youth Council, which plays a major role in implementing quality youth programs and building a comprehensive and effective youth service delivery system. Youth Councils create linkages between businesses, parents, participants, stakeholders and the community which lead to greater results for youth.

References: Workforce Investment Act (WIA) of 1998 (P.L 102-220); Federal Register 20 CFR 652 et al.; and Training and Employment Guidance Letters 9-00, 28-11, 5-12, and 5-14.

### **301 GENERAL PROGRAM REQUIREMENTS**

LWIAs must ensure that the Youth Program prepares participants to meet education and career goals including postsecondary training and unsubsidized employment. The LWIA or Youth Program Provider must provide:

- Preparation for postsecondary education and training opportunities;
- Strong linkages between academic instruction and occupational education;
- Preparation for unsubsidized employment opportunities;
- Strong connections to employers, including small employers; in-demand industry sectors; and occupations identified in the local and regional labor markets.

### **.01 Linkages to Community and Partners**

The LWIA or Youth Program Provider must provide linkages to community and partners to:

- A. Ensure that parents, participants, and members of the community with experience in youth programs are involved in the design and implementation of the WIA Title IB Youth Program.
- B. Make available opportunities for individuals who have successfully participated in the youth program to volunteer and provide assistance to participants in the form of mentoring, tutoring and/or other services.
- C. Ensure appropriate links to entities that will foster participation with local area youth including:
  1. Local area justice and law enforcement officials;
  2. Local public housing authorities;
  3. Job Corps representatives; and
  4. Representatives of other area youth initiatives, including those that serve the homeless and private youth initiatives.
- D. Provide connections between the youth program and the One-Stop System to include those that facilitate:
  1. Coordination and provision of youth services;
  2. Linkages to the job market and employers;
  3. Access for eligible youth to information and the services listed in [Section 302](#); and
  4. Other activities designed to meet the purposes of the youth program and youth services.

### **.02 Youth Council**

- A. Each LWIA must establish a Youth Council. The purpose of the Youth Council includes providing expertise in youth policy and assisting the LWIA in:

1. Developing and recommending local youth employment and training policy, practices and service providers;
2. Broadening the youth employment and training focus in the community;
3. Establishing linkages to educational agencies and organizations serving youth in the local area; and
4. Taking into account a range of issues that can have an impact on the success of youth in the labor market.

B. Membership of the Youth Council must consist of:

1. Members from the Local Workforce Investment Boards (LWIBs) who have interest or expertise in youth policy (e.g., educators, employers and human service agencies);
2. Members who represent services agencies (e.g., juvenile justice and local law enforcement agencies);
3. Members who represent local public housing authorities;
4. Members who are parents of eligible youth seeking Title IB services;
5. Members who are former participants or representatives of organizations that have experience relating to youth activities;
6. Members who represent Job Corps if a Job Corps Center is located in the local area;
7. Other individuals whom the LWIB chair, in cooperation with the Chief Local Elected Official (CLEO), determines to be appropriate.

**.03 Out of School Priority**

LWIAs must dedicate at least 30 percent of WIA Title IB Youth Program funds to provide services for out of school youth.

#### **04. Referrals**

The LWIA must:

- A. Ensure youth who meet the eligibility criteria for the Youth Program receive:
  - 1. Information about the full array of appropriate services available through the LWIA, Youth Training Provider or One-Stop; and
  - 2. Referrals to appropriate training and educational programs that have the capacity to serve the applicant either on a sequential or concurrent basis.
- B. Refer youth who do not meet eligibility criteria of a particular program or who cannot be served by the program (for example, non-low income youth as described in [Section 303.03](#)) for further assessment to appropriate training and educational programs to meet the youth's basic skills and training needs.

### **302 YOUTH SERVICES**

LWIAs must include the design framework for Youth Services and describe how the required programs elements will be provided within the design framework in the LWIA business plan.

#### **.01 Design Framework**

Design framework services include the following:

- A. Outreach and recruitment;
- B. Intake and eligibility determination;
- C. Objective assessment:
  - 1. The LWIA or youth program provider must provide an objective assessment of the academic skills, skill levels and service needs of each participant to identify appropriate services and career pathways for each participant.
  - 2. A new 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 LWIA, except for testing for basic skill deficiencies for out-of-school youth.

3. The objective assessment must include a review of:

a. Basic Skills

- i. A youth who performs any of the following below a 9.0 grade level using a State-approved standardized test is basic skills deficient:
  - Computing or solving math problems;
  - Reading English;
  - Writing English; or
  - Speaking English.
- ii. The Test of Adult Basic Education (TABE) must be used to identify that the youth is deficient in basic skills. The LWIA or Youth Service Provider may use other assessment tools as determined by the LWIA except for determining basic skills deficiencies.
- iii. Testing must be administered during the eligibility determination process or no later than the date of participation.
- iv. An out-of-school youth with basic skills deficiency must be post-tested prior to the anniversary of the participation date.

Note: For youth who are first enrolled in the Adult or Dislocated Worker Program and subsequently co-enrolled in the Youth Program, the post-test must be completed prior to the anniversary of the first youth service.
- v. The same test and version (e.g., TABE Version 9/10) must be used for both the pre- and post-tests.
- vi. When administering assessment tools, individuals with disabilities should be accommodated according to:

- Section 188 Nondiscrimination of WIA;
  - Guidelines associated with the assessment tool used to determine functioning levels; and
  - LWIA policy.
4. Occupational skills;
  5. Prior work experience;
  6. Employability;
  7. Interests (including interest and aptitudes for non-traditional jobs);
  8. Supportive service needs; and
  9. Developmental needs.

D. Development of an Individual Service Strategy

Based on the objective assessment, the LWIA or Youth Program provider must develop an Individual Service Strategy (ISS) for each participant, which specifies which program elements are needed to assist the participant in meeting his/her educational and career goals.

1. The ISS must include identification of career pathways including:
  - a. Educational goals;
  - b. Employment goals (including, in appropriate circumstances, non-traditional employment);
  - c. Appropriate achievement objectives; and
  - d. Appropriate services for the participant taking into account the participant's objective assessment.
2. The ISS is a living document, to be updated with each contact to reflect progress, status and changes. The ISS must coincide with services and the case notes in AJC and the case file.

3. 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 LWIA.

#### E. Case Management

Case management uses a client-centered approach to determine strengths and needs. This approach is used to prepare and coordinate a comprehensive plan for each participant.

### **.02 Youth Program Elements**

- A. LWIAs must make the following 10 program elements available to participants. LWIAs do not have to provide all 10 program elements with WIA funds if they are accessible for all eligible youth in the local area at no cost to the LWIA.
  1. Tutoring, study skills training, evidence-based dropout prevention and recovery strategies.
  2. Alternative high school services.
  3. Summer employment opportunities.
  4. Work experiences intended to successfully prepare the youth for long term, unsubsidized employment.
    - a. Work experiences are planned, structured learning experiences that are offered throughout the year.
    - b. They may include:
      - Pre-apprenticeship programs;
      - Internships;
      - Job shadowing; and
      - On-the-job training opportunities.
    - c. Work experiences may be paid or unpaid.
    - d. Work experiences must be limited in duration as appropriate for the participant being trained, taking into account the

content of the training, the prior work experience of the participant, and the ISS of the participant.

5. Occupational Skills Training. A LWIA must ensure that:
  - a. Youth service providers offer priority consideration to training programs that lead to post-secondary credentials that are aligned with occupations that are in demand in the local area;
  - b. Youth program providers have the option to enroll youth in training that is listed on the Eligible Training Provider List (ETPL) without using a competitive procurement process; and
  - c. Individual Training Accounts (ITAs) are used only for individuals who are over the age of 18 and co-enrolled in the Adult or Dislocated Worker Programs.
6. Leadership Development, to include community service and peer-centered activities that encourage responsibility and other positive social behaviors during non-school hours.
  - a. Leadership development opportunities include:
    - Exposure to post-secondary educational opportunities;
    - Community and service learning projects;
    - Organization and team work training, including team leadership;
    - Training in decision making, including determining priorities; and
    - Citizenship training, including life skills training such as parenting, work behavior training and budgeting of resources.
  - b. Positive social behaviors include:
    - Positive attitudinal development;
    - Self-esteem building;

- Openness to working with individuals from diverse and ethnic backgrounds;
  - Maintaining a healthy life style, including being drug and alcohol free;
  - Maintaining positive relationship with adults and peers, and contributing to the wellbeing of the community, including voting;
  - Maintaining a commitment to learning and academic success;
  - Avoiding delinquency;
  - Postponed and responsible parenting; and
  - Positive job attitudes and work skills.
7. Supportive Services, including:
- a. Linkages to community services;
  - b. Assistance with transportation;
  - c. Assistance with child care and dependent care;
  - d. Assistance with housing;
  - e. Referrals to medical services; and
  - f. Assistance with uniforms and other work appropriate attire and work related tools.
8. Adult Mentoring for the period of participation and the follow-up period of not less than 12 months.
9. Follow-Up Services for not less than 12 months after completion of participation (see [Section 307](#)).
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling.
- B. The Youth Program Provider must determine what specific program services will be provided to each youth based on the objective assessment and the ISS.

### **.03 Procurement Requirements**

- A. LWIAs must select eligible providers of youth services by awarding a grant or contract on a competitive basis in the form of a request for proposal, unless specified below.
- B. LWIAs may provide youth program design framework services, to include outreach and recruitment, intake and eligibility determination, assessment, development of an ISS, and case management, without using a competitive selection process.
- C. The Competitive Procurement for Youth Program Elements waiver has been approved by United States Department of Labor (USDOL). While this waiver is in effect, the One-Stop and partner agencies may directly provide the following youth program elements:
  - 1. Supportive services;
  - 2. Paid and unpaid work experience; and
  - 3. Follow-up services.

### **303 ELIGIBILITY DETERMINATION**

To be eligible to participate in WIA Title IB Youth Program services during any part of a program year, the youth must be at the time of eligibility determination an out-of-school youth or an in-school youth.

#### **.01 Out-of-School Youth**

An out-of-school youth is:

- A. Not attending school, or attending post-secondary school and basic skills deficient;
- B. Between 16 and 21 years old at the time of enrollment;
- C. A low income individual (see [Section 304.02](#)); and
- D. An individual with one of more of the following barriers:
  - 1. A school dropout;

2. A youth who is required to attend school due to State compulsory education laws but has not attended school for at least the most recent complete school calendar quarter;
3. A recipient of secondary school diploma or its recognized equivalent, who is a low income individual, unemployed or underemployed, and:
  - a. is basic skills deficient; or
  - b. an English language learner;
4. A youth who is subject to juvenile or adult justice system;
5. A homeless youth who lacks a fixed, regular and adequate nighttime residence;
6. A youth who is a runaway;
7. A youth who is in foster care, has aged out of foster care, or has left foster care for kinship guardianship or adoption;
8. A youth who has been removed from his/her home and is in an out-of-home placement;
9. A youth who is pregnant or parenting;
10. A youth with a disability; or
11. A youth who requires additional assistance to enter or complete an education or to secure or hold employment, as defined by the LWIA.

**.02 In-School Youth**

An in-school youth is

- A. Attending secondary school;
- B. Between 14 and 21 years old at the time of enrollment;
- C. A low income individual; and

- D. An individual with one of following barriers:
1. Basic skills deficient;
  2. An English language learner;
  3. An offender;
  4. A homeless youth who lacks a fixed, regular and adequate nighttime residence;
  5. A youth who is a runaway;
  6. A youth who is in foster care, has aged out of foster care, or has left foster care for kinship guardianship or adoption;
  7. A youth who has been removed from his/her home and is in an out-of-home placement;
  8. A youth who is pregnant or parenting;
  9. A youth with a disability; or
  10. A youth who requires additional assistance to complete an educational program or to secure and hold employment, as defined by the LWIA.

**.03 Non-Low Income Youth**

The LWIA must not serve more than five percent of youth participants who do not meet the income criteria but have one or more of the following barriers:

- A. School dropout;
- B. Basic skills deficient;
- C. One or more grade levels below the grade level appropriate for the individual's age;
- D. Pregnant or parenting;
- E. Possess one or more disabilities, including learning disabilities;

- F. Homeless or runaway;
- G. Offender; or
- H. Facing serious barriers to employment as identified by the LWIA.

NOTE: Non-low income youth participants will be counted in the five percent window category at the end of each month of enrollment, and continuing each month and each year until they are exited from the program.

### **304 DOCUMENTATION FOR ELIGIBILITY**

#### **.01 General Requirements**

- A. LWIAs must use the WIA Eligibility and Verification Checklist ([Exhibit 100A](#)) for eligibility determinations for the WIA Title IB Youth Program and for data validation. The checklist identifies source documents, which are documents used to verify eligibility requirements.
- B. LWIAs must ensure that reasonable attempts have been made to secure source documentation as identified in the checklist.
- C. The WIA Applicant Statement ([Exhibit 100B](#)) may be used as permitted on the WIA Eligibility and Verification Checklist ([Exhibit 100A](#)) when the information is unverifiable or it is unreasonably difficult for the applicant to obtain.
- D. LWIAs must ensure all youth who have not completed their 18th birthdate complete the WIA Applicant Statement ([Exhibit 100B](#)). This form must be signed by the youth's parent, guardian, or a responsible adult/ collaborating witness.
- E. Attempts to secure documentation and the outcome must be thoroughly documented in case notes and placed in the participant's case file as well as the AZ Job Connection (AJC) case note section(s) within 15 business days from the date services are provided.
- F. LWIAs must ensure that youth barriers are documented in the case notes and in AJC.

**.02 Low-Income Status**

- A. LWIAs use the USDOL Lower Living Standard Income Level (LLSIL) ([Exhibit 100C](#)) and the federal poverty guidelines to establish low-income status for WIA Title IB programs each program year.
- B. A low-income youth is an individual who:
1. Receives or is a member of a family that receives, or has been determined within the six-month period prior to application for the program involved to be eligible to receive, cash payments under a federal, state, or local income-based public assistance program, such as Temporary Assistance to Needy Families (TANF);
  2. Receives annual income in relation to family size that does not exceed the higher of the federal poverty guidelines or 70 percent of the Lower Living Standard Income Level (LLSIL) ([Exhibit 100C](#));
  3. Is a member of a household that receives (or has been determined within the six-month period prior to application for the program involved to be eligible to receive) the Supplemental Nutrition Assistance Program (SNAP, formerly known as Food Stamps);
  4. Qualifies as a homeless individual who lacks a fixed, regular and adequate nighttime residence;
  5. Has a disability and an income that meets the requirements of the program, but who is a member of a family whose income does not meet low-income requirements;
  6. Receives Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI); or
  7. Receives, or has been determined within the six-month period prior to application for the involved program to be eligible to receive Refugee Cash Assistance (RCA), 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.

### **.03 Income Verification**

- A. Documentation related to income verification as outlined on the WIA Eligibility and Verification Checklist ([Exhibit 100A](#)) must be collected and placed in the participant's case file.
- B. Income that is being used to determine income eligibility for WIA Title IB services should be identified using the list of Included and Excluded Income for Eligibility Determination ([Exhibit 100D](#)).
- C. LWIA staff must attempt to gather information such as other public assistance the individual may receive (i.e., TANF, SNAP, etc.), and verify if the individual receives monetary support. Attempts include calls to the participant, letters, e-mail messages, etc. Low income verification attempts must be documented in the AJC case notes and in the case file.
- D. If a verification document cannot be obtained, the WIA Applicant Statement ([Exhibit 100B](#)) with signatures by the individual and a witness who has knowledge of the information provided may be accepted as a last resort as permitted by the WIA Eligibility and Verification Checklist ([Exhibit 100A](#)). If a participant is receiving child support the witness would be the absent parent providing the child support or an individual that has knowledge of the applicant receiving child support and can be a witness. The attempts used to gather information needed for verification must be documented in the case notes in AJC and in the participant's case file.

NOTE: The case manager or other LWIA staff cannot sign as the witness.

- E. LWIA staff may verify Social Security benefits through Social Security Consent-Based SSN Verification Services. Fees associated with this verification are an allowable cost under WIA Adult Program funds and can be paid by the LWIA. Applicants are not to be charged for this verification.
- F. Individuals who are recipients of TANF, SNAP, SSI, or RCA, may automatically be income eligible and require no further income verification if the individual has provided acceptable documentation utilizing the WIA Eligibility and Verification Checklist ([Exhibit 100A](#)).

1. SNAP documentation must be current and indicate that the individual is receiving, or is a member of a family that is receiving, SNAP payments at the time of application to the WIA program.
2. Cash public assistance (TANF) documentation must be current and indicate that the individual is receiving, or is a member of a family that is receiving, TANF payments at the time of application to a WIA program.
3. SSI/SSDI documentation must be current and indicate that payments were made to a single recipient. The individual applying to WIA must be the recipient at the time of application to a WIA program in order to be considered as a family of one.
4. RCA documentation must be current and indicate that payments were made to a single recipient. The individual applying to WIA must be the recipient at the time of application to a WIA Program in order to be considered as receiving public assistance.

#### **.04 Selective Service Requirements**

- A. Upon application for WIA Youth Program eligibility, each male applicant who is age 18 years or older (born after January 1, 1960) must present proof of registration for Selective Service. If an applicant is not registered, he must register at this time (see <https://www.sss.gov>).
- B. Male youth participants who turn 18 years old while enrolled in the program must complete a Selective Service Registration within 30 days of their 18th birthday. If an applicant does not register for Selective Service within 30 days of his 18th birthday, he is no longer eligible to receive WIA services.
- C. WIA case files must contain copies of the Selective Service registration card or a printout of documentation that serves as proof of Selective Service status. Non-citizens may be required to provide documents that indicate when they entered the United States.

### **.05 Timely Data Entry**

To ensure timely and accurate reporting, transactions relating to WIA Title IB Youth Program provided services must be entered or updated in AJC within 15 business days from the date services are provided.

- A. Pending enrollments must be approved no later than 30 business days from the eligibility determination date. A pending enrollment approved on or after 45 business days will be considered untimely.
- B. Pending enrollments not approved within 45 business days are considered not enrolled, and LWIAs must re-determine eligibility with new/updated information. It is highly recommended that the LWIA run the WIA No Participation report to monitor the timeliness of the pending client record.
- C. It is recommended that LWIA staff run/review reports on a monthly basis to ensure timely follow-ups and accurate data recording.

## **305 REGISTRATION/ENROLLMENT**

### **.01 Registration**

In order to receive Youth Program services, all applicants must be registered in AJC.

- A. Registration occurs when an individual creates an account with complete data demographics and work history in Arizona's comprehensive workforce case management and reporting system.
- B. An individual is considered enrolled in the WIA Youth Program when a determination is made that the individual requires services beyond those that are self-service or simply informational and WIA Title IB formula funds are expended.

### **.02 Co-Enrollment**

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

- A. Youth age 18 and older may be co-enrolled in the Adult Program. Youth may be co-enrolled in the Dislocated Worker Program without age limitations.
  - 1. LWIAs must ensure the youth meets eligibility criteria for both the Youth and Adult Program or the Youth and Dislocated Worker Program to co-enroll participants.
  - 2. The LWIA must:
    - a. Determine the age group, the appropriate level of service and the balance of service under the Youth, Adult, Dislocated Worker and other services;
    - b. Identify and track the funding streams for youth who are enrolled concurrently in the Youth/ Adult Program or the Youth/ Dislocated Worker Program;
    - c. Ensure services are not duplicated; and
    - d. Ensure that previous foster care youths who have continued to be co-enrolled in WIA Title IB programs and are now adults shall remain eligible for WIA Program services and do not require re-determination of eligibility.
- B. When LWIA adult funds are limited (see [Section 104](#)), public assistance recipients and low-income individuals must receive priority of service for intensive and training services. Priority of service for Adult Program services also applies to veterans or eligible spouses of veterans that meet federal veteran priority of service regulations.
- C. WIA youth participants could also have co-enrollment with the following partner programs:
  - 1. Migrant Seasonal Farm Workers (MFSWs) at the point of entry to the One-Stop system to assure equity of services is provided;
  - 2. Jobs Program (TANF Work Program);
  - 3. Supplemental Nutrition Assistance Employment and Training (SNA E&T); or
  - 4. Other employment related programs.

## **306 EXITS**

### **.01 Program Exit Requirements**

A Youth Program participant who has not received a service funded by the program or funded by a partner program for 90 consecutive calendar days and is not scheduled for future services is considered to have exited from the program.

- A. The date of exit is the last date of service provision.
- B. A participant may be exited sooner than 90 days if it is known that s/he will not be receiving any additional active services funded by the program or a partner program.
- C. If a participant receives services from multiple programs, the most recent service end date is the date of exit.
- D. Employment follow-ups provided to youth participants do not extend the exit date.

### **.02 Gaps in Service**

A youth participant may be placed in a gap in service when a situation arises that will temporarily prevent program participation for longer than 90 consecutive calendar days. This allows time for youth participants to address barriers to continued participation without exiting the program.

- A. A gap in service may be granted for 90 calendar days from the time the participant is placed into the gap and must be related to one of the three circumstances identified below:
  - 1. Delay before the beginning of training;
  - 2. Health/medical condition or providing for a family member with a health/medical condition; or
  - 3. Temporary move from the area that prevents the youth from participation in services, including National Guard or other related military service.
- B. A gap in service may be extended an additional 90 days, up to a total of 180 consecutive calendar days, to resolve the issue that prevents

the youth participant from completing program services. The extended gap in service must be related to one of the two circumstances identified below:

1. Health/medical condition or providing for a family member with a health/medical condition; or
2. Temporary move from the area that prevents the individual from participation in services, including National Guard or other related military service.

### **307 FOLLOW-UP**

All youth participants must be provided a minimum of 12 months of follow-up services after the completion of participation.

- A. Follow-up services may be provided beyond 12 months at the discretion of the LWIA.
- B. The type and duration 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. Leadership development and supportive services activities;
  2. Regular contact with the youth's employer, including assistance with work related problems that may arise;
  3. Assistance in securing better paying jobs, career development and further education;
  4. Work-related peer support groups;
  5. Adult mentoring; and
  6. Tracking of process of youth in employment after training.
- D. The scope of the follow-up services may be less intensive for youth who have only participated in summer youth employment opportunities.
- E. Follow-up services must be recorded in case notes and in AJC within 15 business days from the date services are provided.

- F. If it becomes necessary during the follow-up period to utilize WIA services beyond those available through the follow-up component, re-enrollment into WIA is required.
- G. Financial assistance such as needs-related payments is not an allowable follow-up service.
- H. The youth participant's file case notes must contain documentation substantiating follow-up contact with the youth, including follow up attempts. This may include, but is not limited to, a letter, an e-mail message or case notes based on an actual conversation, either in person or by telephone. Follow up attempts with the participant must be made monthly during the 12-month requirement and documented.