

ARIZONA DEPARTMENT OF ECONOMIC SECURITY



**WORKFORCE INNOVATION AND  
OPPORTUNITY ACT POLICY  
MANUAL**

**CHAPTER 2 - SECTION 200**

**SUBJECT: YOUTH PROGRAM**

**200 BACKGROUND AND PURPOSE**

This section provides policy and procedures for the Local Workforce Development Areas (LWDAs) to use in providing services to WIOA Title I-B Youth Program participants, including In-School and Out-of-School youth.

The WIOA Title I-B Youth Program provides a comprehensive array of high-quality services, including career exploration and guidance, continued support of educational attainment, and training in in-demand industries and occupations. The program's goal is for the youth to obtain employment along a career pathway, enrollment in post-secondary education or a Registered Apprenticeship 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 out-of-school youth.

References: Workforce Innovation and Opportunity Act (WIOA) of 2014 (P.L 113-128); Federal Register 20 CFR 681; and Training and Employment Guidance Letters 9-00, 28-11, 5-12, 5-14, 23-14 and 8-15.

**201 GENERAL PROGRAM REQUIREMENTS**

LWDAs must ensure that the Youth Program prepares participants to meet education and career goals. The LWDA or program provider must provide:

- Preparation for post-secondary education and training opportunities, including Registered Apprenticeship Programs;
- Strong linkages between academic instruction and occupational education;
- Preparation for unsubsidized employment opportunities along career pathways; and
- 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 LWDA or Youth Program provider must provide linkages to community and partners to:

- A. Ensure that parents, youth participants, and members of the community with experience in youth programs are involved in the design and implementation of the WIOA Title I-B Youth Program.
- B. Make opportunities available to 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. Provide appropriate connections between the Youth Program and the One-Stop system that will foster participation with local youth and include:
  - 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 that serve the homeless and private youth initiatives;
  - 9. Coordination and provision of youth services;
  - 10. Linkages to the job market and employers;
  - 11. Access for eligible youth to information and the services listed in section 203 of the policy; and
  - 12. Other activities designed to meet the purposes of the Youth Program and youth services.

## **.02 Standing Youth Committee**

LWDAs 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 Local Workforce Development Board (LWDB) chooses not to establish a youth standing committee, the LWDB retains the responsibility for the activities listed.

- A. Under the direction of the LWDB, a standing youth committee may:
  - 1. Recommend policy direction to the local board for the design development and implementation of programs that benefit all youth;
  - 2. Recommend the design of the comprehensive community youth workforce development system to ensure a full range of services and opportunities for youth, including disconnected youth;
  - 3. Recommend ways to leverage resources and coordinate services among schools, public programs, and community-based organizations serving youth;
  - 4. Recommend ways to coordinate youth services and youth service providers;
  - 5. Provide on-going leadership and support for continuous quality improvement for local youth programs;
  - 6. Assist with the planning, operational and other matters related to youth; and
  - 7. If delegated by the LWDB after consultation with the Chief Local Elected Official, oversee eligible youth providers, as well as other youth program responsibilities.
  
- B. The standing youth committee membership must reflect the needs of the local area. The committee members are appointed based on

their expertise to help address the employment, training, education, human and supportive service needs of eligible youth.

1. When the local board chooses to have a standing youth committee, the committee must include:
    - a. A member from the LWDB, who chairs the committee;
    - b. Members of community-based organizations with a demonstrated record of success in serving eligible youth and other individuals with appropriate expertise who are not members of the local board;
  2. Additional standing youth committee members may include:
    - a. Representatives of agencies such as secondary and post-secondary education, training, health, mental health, disability, housing, public assistance and justice;
    - b. Representatives of philanthropic or economic and community development organizations;
    - c. Employers; and
    - d. Parents, participants and youth.
- C. LWDBs may designate an existing entity, such as an effective youth council, as the standing youth committee if the youth council meets WIOA requirements in this policy.

### **.03 Out-of-School Priority**

LWDAs must dedicate at least 75 percent of WIOA Title I-B Youth Program funds to provide services for Out-of-School Youth. LWDAs must verify the youth's dropout status at the time of WIOA youth program enrollment. An individual who is out-of-school at the time of enrollment, and subsequently placed in any school, is an out-of-school youth for the purposes of the 75 percent expenditure requirement for out-of-school throughout his/ her participation in the program.

#### **.04 Referrals**

Each LWDA must ensure all youth who meet the eligibility criteria for the youth program receive information about the full array of services available through the LWDA, One-Stop 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 provider must ensure these youth are referred:

- A. For further assessment, as necessary, and
- B. To appropriate training and education programs that have the capacity to serve them either on a sequential or concurrent basis.

#### **202 PROCUREMENT REQUIREMENTS**

LWDAs may choose to provide directly some or all of the youth workforce activities; however, if the LWDA chooses to award grants or contracts to youth service providers to carry out some or all of the youth workforce investment activities, the LWDA must award the grants or contracts on a competitive basis.

If the LWDA chooses to award grants or contracts the requirements for procuring youth service providers include:

- A. The criteria used to identify youth providers in the local plan, including:
  - 1. The financial stability of the service provider;
  - 2. Experience in successfully providing services to disconnected youth and youth with barriers to employment, including youth with disabilities;
  - 3. Demonstrated success in serving youth, specifically youth with barriers and Out-of-School Youth;
  - 4. Length of time the youth service provider has been in business;
  - 5. Available network of business and community partners; and

6. Ability to meet the performance accountability measures based on the performance indicators for youth programs.
- B. The criteria used to identify youth training providers in the local plan include determining whether:
1. Training is related to in-demand occupations or career pathways identified in the state and local plans; and
  2. A recognized credential is awarded upon the successful completion of a training program.
- C. Conducting full and open competition to secure youth service providers according to federal procurement guidelines in Code of Federal Regulations Part 200 and 2900- Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR parts 200 and 2900). LWDA's must:
1. Use their own documented procurement procedures which reflect applicable state, local and tribal laws and regulations, provided that the procurement conforms to applicable Federal law and Federal Regulations Part 200- Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards;
  2. Award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration must be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources; and
  3. Maintain records sufficient to detail the history of procurement. These records must include, but are not necessarily limited to the following;
    - a. Rational for method of procurement;
    - b. Selection of contract type;
    - c. Contractor selection or rejection; and

- d. The Basis for contract price.
- D. Selecting eligible providers of youth services by awarding a grant or contract on a competitive basis may be assigned to the youth standing committee by the LWDA, if applicable. If a youth standing committee is not established, the responsibility of selecting youth service providers to make a recommendation belongs to the LWDB.
- E. If the LWDA determines there are an insufficient number of eligible youth providers in the local area, such as rural area, the local area may award grants or contracts on a sole source basis.
- F. LWDA's may implement a pay-for-performance contract strategy for the 14 program elements (see Section 203.02). The LWDA's must not use more than 10 percent of the total funds allocated under WIOA for pay-for-performance contracts.

## **203 YOUTH SERVICES**

LWDA's must provide Design Framework services. LWDA's must describe the design framework for youth services and how the required 14 program elements will be provided within the design framework in the LWDA plan.

### **.01 Design Framework**

Design Framework services include:

- A. Outreach and recruitment
- B. Intake and eligibility determination
- C. Objective assessment
  - 1. The LWDA or youth program provider must provide an objective assessment of the academic and occupational skill levels as well as needs and strengths of each participant to identify appropriate services and career pathways for each participant and to collect information for the individual service strategy (ISS).
  - 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 LWDA.

3. The objective assessment must include a review of:
  - a. Basic Skills (see Section 213.05);
  - 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 Individual Service Strategy

The LWDA or youth program provider must develop an Individual Service Strategy (ISS), based on the objective assessment that specifies which of the 14 program elements are needed to assist the participant in meeting his/her 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.

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.

2. The ISS is a living document and must be updated with each contact to reflect progress, status, and changes. The ISS must coincide with case notes in AJC and services.
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 LWDA.

#### E. Case Management

LWDAs or youth program providers must provide case management of youth. Case management 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 amount of time necessary to enter postsecondary education and/ or unsubsidized employment. While there is no minimum or maximum time a youth can be served in the WIOA youth program, programs must link participation to the ISS and not 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 211).

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

LWDAs must make 14 youth program elements available to participants; however the LWDA does not have to provide all 14 program elements with WIOA funds when resources are leveraged through partner programs that already provide readily available resources. LWDAs are encouraged to

partner with existing local, state, and national entities that can provide program elements at no cost to the LWDA. LWDA's 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 WIOA Title I youth funds and that the element is closely connected and coordinated with the WIOA youth program.

- A. LWDA's must make the following 14 program elements available to participants:
1. Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements of secondary school diploma or High School Equivalency (HSE), including certificate of attendance or similar documentation for individuals with a disabilities), or a recognized post-secondary credential;
  2. Alternative high school services, or drop out services;
  3. Occupational Skills training, which includes priority consideration for training programs that lead to post-secondary credentials, align with in-demand sectors or occupations in the local area and meet the quality standards in Section 202.B(see Section 204);
  4. Paid and Unpaid work experiences that have an academic and occupational education as part of the work experience, including:
    - a. Pre-Apprenticeship programs (see Section 205);
    - b. Internships and job shadowing;
    - c. On-the-Job Training (see Section 206);
    - d. Summer Employment opportunities and other employment opportunities available throughout the school year.
  5. Education offered concurrently with, and in the same context as, workforce preparation activities, basic academic skills, and hands-on training for a specific occupation, occupational cluster, or career pathway;

6. Adult Mentoring for the period of duration of 12 months may occur during participation and during follow-up services (see Section 207);
  7. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, as well as referrals to counseling appropriate to the needs of the individual (see Section 208);
  8. Entrepreneurial Skills training (see Section 209);
  9. Financial Literacy education;
  10. Leadership development, to include community service and peer-centered activities that encourage responsibility and other positive social behaviors and civic behaviors;
  11. Supportive Services (see Section 210);
  12. Follow-up Services for not less than 12 months after completion of participation (see Section 211);
  13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration; and
  14. Activities that help youth prepare for post-secondary education and training.
- B. LWDA's are not required to provide every program service to each participant and must determine what specific program services will be provided to each youth based on the objective assessment and the ISS.

## **204 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. LWDA's must offer priority consideration to training programs that lead to post-secondary 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 sufficient 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 listed in Section 202.B.
- C. Occupational skills training must be competitively procured by contract or grant. However, Out-of-School Youth ages 16-24 may be issued an Individual Training Account (ITA) with a specified dollar amount to provide training using WIOA youth funds based on the needs identified in the ISS. D. 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. For more information on ITA requirements, see Training Services Section 504.

## **205 WORK EXPERIENCES**

Work experiences are planned, structured learning experiences that take place in a workplace for a limited period of time.

### **.01 Work Experience Requirements**

- A. Work experiences may:
  - 1. Be paid or unpaid;
  - 2. Provide youth with opportunities for career exploration and skill development; and
  - 3. Take place in the private or public sector.

- B. Labor standards apply in any work experience where an employee/ employer relationship exists, as defined by the Fair Labor Standards Act or applicable state laws.
- C. Work experiences must have an academic and occupational component, and may include the following types of work experiences:
  - 1. Summer Employment opportunities and other employment opportunities available throughout the school year.
    - a. 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.
    - b. The summer employment administrator does not have to select employers through a competitive process for summer employment opportunities.
  - 2. Pre-apprenticeship programs
    - a. A pre-apprenticeship is a program 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 that are 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.
- b. LWDA's must verify and maintain information on the type of credential offered and the pre-apprenticeship program's documented partnerships with Registered Apprenticeships.
  - c. Internships and job shadowing; and
  - d. On-the-job training opportunities (see Section 206).

## **.02 Work Experience Expenditure Requirements**

LWDA's must spend at least 20 percent of all funds allocated to the In-School Youth and Out-of-School Youth program on paid and unpaid work experiences.

1. LWDA's must track the program funds spent on paid and unpaid work experiences, 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. LWDA's must track the percentage of funds spent on work experiences by calculating the total local area youth funds expended on work experience rather than by calculating the funds expended separately for In-School Youth and Out-of-School Youth.
3. Local area administrative costs are not subject to the 20 percent minimum work experience requirement.

## **206 ON-THE-JOB TRAINING**

On-the-Job Training (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. OJT is intended to successfully prepare an individual for long-term, unsubsidized employment by providing the knowledge or skills essential to meet the full and adequate performance of the job.

### **1. Employer Reimbursements**

Employer reimbursement payments are deemed payments for taking on extraordinary costs associated with training of participants and the potentially lower productivity of the participants while in OJT. Employers are not required to document the extraordinary costs.

- A. Employers may be reimbursed up to 50 percent of the wage rate of OJT.
- B. The Arizona Department of Economic Security (DES) may increase the reimbursement rate for OJT contracts funded through the statewide employment and training activities. LWDAs and tribal entities may also increase the reimbursement rate for an OJT contract up to 75 percent. LWDAs and tribal entities must establish policy regarding when the wage reimbursement may be increased from 50 percent to 75 percent for on-the-job training and must take into consideration the following factors when considering an increase to the OJT reimbursement rate up to 75 percent:
  1. The characteristics of the participants by taking into consideration whether they are “individuals with barriers to employment”;
  2. The size of the employer, with emphasis on small businesses;
  3. The quality of the employer-provided training and advancement opportunities; for example, if the OJT contract is in an in-demand occupation and will lead to an industry-recognized credential; and other factors DES, LWDAs, and tribal entities determine appropriate including:
    - a. The number of employees participating;
    - b. The wage and benefit level of the employee (both at present and at completion); and

- c. The relation of the training to the competitiveness of the participant.
- C. DES, LWDA, and tribal entities must document the factors used in deciding to increase the wage reimbursement wages above 50 percent to 75 percent.

## **2. Time Limits for On-the-Job Training**

The OJT is limited in duration as appropriate to the occupation for which the WIOA participant is being trained. LWDA staff must take into account:

- A. Skill requirement of the occupation;
- B. Academic and skill level of the participant;
- C. Prior work experience; and
- D. The ISS.

## **3. On-the-Job Training for Eligible Existing Workers**

OJT contracts may be written for eligible existing workers under the following conditions:

- A. The employee is not earning a self-sufficient wage as determined by LWDA policy and listed on the Lower Living Standards Income Levels (LLSIL) for all LWDA for the program year(Exhibit 100C); and
- B. The training relates to:
  - 1. Introduction of new technologies;
  - 2. Introduction to new production or service procedures;
  - 3. Upgrading to new jobs that require additional skills such as:
    - a. Workplace literacy; or
    - b. Other appropriate purposes identified by the LWDA or tribal entity.

#### **4. On-the-Job Training and Registered Apprenticeship Programs**

OJT contracts may be written with Registered Apprenticeship programs or participating employers in the Registered Apprenticeship program to cover the on-the-job training portion; however, these contracts must be consistent with other OJT requirements in this policy, including those for existing workers in section 206.03.

ITAs can be combined with OJT contracts when placing participants into Registered Apprenticeship programs.

#### **207 ADULT MENTORING**

LWDAs must make adult mentoring available, which may include a youth being matched with an adult mentor, an employer, or an employee of an employer.

LWDAs 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 offers guidance, support, and encouragement to develop the competence and character of the participant;
2. Lasts at least 12 months and occurs during the program year and following exit from the program; and
3. Matches the youth with an individual mentor with whom the youth interacts on a face-to-face basis. In addition to the face-to-face interaction, group mentoring activities and mentoring through electronic means are allowable as part of mentoring activities.

#### **208 COMPREHENSIVE GUIDANCE AND COUNSELING**

Comprehensive guidance and counseling provides individualized counseling to participants and includes:

1. Drug and alcohol abuse counseling;
2. Mental health counseling; and
3. Referrals to partner programs, as appropriate.

When referring participants to necessary counseling that cannot be provided by the local youth program, the local youth program must coordinate with the organization it refers to in order to ensure the continuity of service.

## **209 ENTREPRENEURIAL SKILLS TRAINING**

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

- A. LWDAs must ensure that entrepreneurial skills training develops the skills associated with starting and operating a small business. Such skills 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 one's ideas.
  
- B. Among the approaches that may be used to teach youth entrepreneurial skills are the following:
  - 1. Entrepreneurial education programs that provide an introduction to the values and basics of starting and running a business, including 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 incubate and help youth develop their own businesses. Enterprise development programs go beyond entrepreneurial education by helping youth access loans or grants that are needed begin business operations and by providing more individualized attention to the development of viable business ideas.
  - 3. Experiential 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 they may facilitate placement in apprenticeship or internship positions with adult entrepreneurs in the community.

## **210 SUPPORTIVE SERVICES**

Supportive services for youth are services that enable an individual to participate in WIOA activities. For additional information, refer to Supportive Services Section 300.

## **211 FOLLOW-UP SERVICES**

The purpose of follow-up services is to ensure the youth is successful in employment and/ or post-secondary education and training after exiting from the program. Follow-up services must include more than an attempt to contact the individual or contact made only to secure documentation in order to report a performance outcome. All youth participants must be provided an opportunity to receive follow-up services for minimum of 12 months of follow-up services after the completion of participation, unless the participant declines to receive follow-up services or the participant cannot be contacted or located.

1. Follow-up services may be provided beyond 12 months at the discretion of the LWDA.
2. The type and duration of follow-up services must be determined based on the needs of the youth participant and may vary among participants.
3. Follow-up services for youth may include:
  - a. Supportive Services, with the exception of needs-related payments;
  - b. Adult Mentoring;
  - c. Financial literacy education;
  - d. Services that provide labor market information and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling and career exploration services;
  - e. Services necessary to ensure success of the youth employment and/ or post-secondary education.

4. Follow-up services must be recorded in case notes in the Arizona Job Connection (AJC) promptly and accurately to ensure expediency of services. Case notes in AJC 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 and documented in AJC on a monthly basis during the 12-month requirement.
5. If it becomes necessary during the follow-up period to utilize WIOA services beyond those available through the follow-up component, re-enrollment into WIOA is required.

## **212 ELIGIBILITY DETERMINATION**

At the time of eligibility determination, youth must be an In-School Youth or Out-of-School Youth to participate in WIOA Title IB youth program services during any part of the program year.

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

A youth meets the definition of Out-of-School Youth if he or she is:

- A. Not attending school (Adult Education under Title II of WIOA, Job Corps, Youthbuild, high school equivalency programs, and drop out recovery programs are not considered school);
- B. Between 16 and 24 years old at the time of enrollment and one or more of the following:
  1. A school dropout;
  2. A low income individual with a secondary school diploma or its recognized equivalent and:
    - i. Basic skills deficient; or
    - ii. An English language learner;
  3. An offender;

4. Homeless, i.e. lacks a fixed, regular and adequate nighttime residence;
5. A runaway;
6. In foster care, has aged out of foster care, or has attained the age of 16 years old and 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. Pregnant or parenting;
9. An individual with a disability; or
10. A low income individual who requires additional assistance to enter or complete an education program or to secure or hold employment, as defined by the LWDA.

Participants may continue to receive services beyond the age of 24 once they are enrolled in the program.

## **.02 In-School Youth**

A youth meets the definition of In-School Youth if he or she is:

- A. Attending secondary school, including secondary and post-secondary school;
- B. Between 14 and 21 years old at the time of enrollment. 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. Youth with a disability who turn 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. A low income individual and one of the following:
  1. Basic skills deficient;
  2. An English language learner;
  3. An offender;
  4. Homeless youth, i.e. lacks a fixed, regular and adequate nighttime residence;

5. A runaway;
  6. In foster care, has aged out of foster care, or has attained 16 years old and 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. Pregnant or parenting;
  9. An individual with a disability; or
  10. Requires additional assistance to complete an educational program or to secure and hold employment, as defined by the LWDA.
- E. Youth who are temporarily not attending school because the school is on break (Winter, Spring, Fall or Summer Break) but intends to return to school after the school break are considered to be attending school. The same applies if the youth is planning to attend a different school after the break.
- F. Youth who are participating in online secondary and postsecondary school online 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.

If a youth turns 21 years old during participation, he/ she may continue to receive services.

### **.03 Needs Additional Assistance Criterion**

LWDA must ensure that not more than five percent of In-School Youth enrolled in the program year are eligible only based on the “requires additional assistance to complete an educational program or to secure and hold employment” criterion. LWDA must track the In-School Youth enrolled in the program each year to ensure that no more than five percent are enrolled using this criterion. Each LWDA must define this criterion in the local plan.

### **.04 Low-Income Requirements**

- A. All In-School Youth must be low-income unless included in the five percent low-income exception.

- B. Low-income eligibility requirements apply to Out-of-School Youth only if they are recipients of secondary school diplomas or its recognized equivalent and are 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.

#### **.05 Non-Low Income Youth**

LWDAs must not serve more than five percent of youth who do not meet low income requirements but who meet all of the other eligibility requirements. The five percent is calculated using the combined total of In-School and Out-of-School youth.

Note: The percentage of non-low income youth will be calculated based on the percent of newly enrolled youth in the local area's WIOA youth program in a given program year who would ordinarily be required to meet the low-income criteria.

### **213 DOCUMENTATION FOR ELIGIBILITY**

LWDAs must ensure timely documentation is collected in regards to eligibility determination. Attempts to secure documentation and the outcome must be recorded in the AJC case notes promptly and accurately.

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

- A. LWDAs must use the WIOA Eligibility and Verification Checklist (Exhibit 100A) for eligibility determinations for the WIOA Title I Youth Program and for data validation. The checklist identifies source documents, which are documents used to verify eligibility requirements. All eligibility documents may be uploaded into AJC. If the LWDAs does not upload documents into AJC, LWDAs must retain original documentation in the participant's program file.
- B. LWDAs must ensure that reasonable attempts have been made to secure source documentation as identified in the checklist.
- C. The WIOA Applicant Statement (Exhibit 100B) may be used as permitted on the WIOA Eligibility and Verification Checklist (Exhibit

100A) when the information is unverifiable or it is unreasonably difficult for the applicant to obtain.

1. For high-risk Out-of-School youth, the WIOA Applicant Statement is acceptable to allow upfront enrollment of the youth.
2. High risk Out-of-School youth means not having a high school diploma or HSE, and meeting the eligibility criteria as listed section 212.01.B 1-9.
3. An exception includes out-of-school school who meet the “Requires additional assistance to enter or complete an education program or to secure or hold employment, as defined by the LWDA” eligibility criteria, as they are not considered high risk. As such, the WIOA 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 Eligibility and Verification Checklist (Exhibit 100A) for data validation purposes, the LWDA may request the documentation from the youth after the youth has begun to receive Youth services.

D. LWDA must ensure all youth who are less than 18 years old have a WIOA Applicant Statement (Exhibit 100B) signed by the youth’s parent, guardian, or a responsible adult/ collaborating witness. By signing the form, the youth’s parent, guardian, or a responsible adult/ collaborating 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 low-income youth is an individual who:

1. Receives, 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. Receives annual 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, 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, is a member of a family that receives, or has received within the past six months, assistance through the 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.
9. Receives, or is eligible to receive, a free or reduced price 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.

### **.03 High Poverty Areas**

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 by the USDOL Secretary in guidance or county with a poverty rate of at least 25 percent, as set every five years using the American Community Survey five-year data.

LWDAs must use *Determining High Poverty Census Tracts in Arizona (Exhibit 200A)* and the *High Poverty Census Tracts Spreadsheet (Exhibit 200B)* or other tools developed by the LWDA to determine if a youth lives in a high poverty area by census tract.

### **.04 Income Verification**

LWDA staff must attempt to gather information such as other public assistance the individual may receive, such as TANF and SNAP, 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 case notes in AJC.

- A. Documentation related to income verification as outlined on the *WIOA Eligibility and Verification Checklist (Exhibit 100A)* may be collected and uploaded into AJC. If the documentation is not uploaded to AJC, the documentation must be retained in the participant's program policy
- B. Income that is being used to determine income eligibility for WIOA Title I services should be identified using the *WIOA Eligibility and Verification Checklist (Exhibit 100A)*.
- C. If a verification document cannot be obtained, the *WIOA Applicant Statement (WIA-1027A)(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 *WIOA Eligibility and Verification Checklist (Exhibit 100A)*.

**Note:** The case manager or other LWDA staff do not qualify as witnesses must not sign as the witness.

- D. If a participant is receiving child support, the witness would be the parent providing the child support or an individual that has knowledge of the applicant receiving child support. The attempts used to gather information needed for verification must be documented in the case notes in AJC.
- E. LWDA staff may verify Social Security benefits through Social Security Consent-Based SSN Verification Services. Fees associated with this verification are an allowable cost under WIOA Youth Program funds and can be paid by the LWDA. Applicants are not to be charged for this verification.
- F. Individuals who are recipients of TANF, SNAP, or SSI may automatically be income eligible and require no further income verification if the individual has provided acceptable documentation utilizing the WIOA Eligibility and Verification Checklist (Exhibit 100A).
- G. TANF documentation must be current and indicate that the individual is receiving, or is a member of a family that is receiving, or has received in the past six months, TANF assistance at the time of application to the WIOA program.
- H. SNAP documentation must be current and indicate that the individual is receiving, or is a member of a family that is receiving, or has received in the past six months, SNAP assistance at the time of application to the WIOA program.
- I. SSI/SSDI documentation must be current and indicate that payments were made to a single recipient. The individual applying to WIOA must be the recipient at the time of application to a WIOA program in order to be considered as a family of one.
- J. RCA documentation must be current and indicate that payments were made to a single recipient. The individual applying to WIOA must be the recipient at the time of application to a WIOA Program in order to be considered as receiving public assistance.

K. Individuals 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.

Individual who receive free lunch through the Summer Food Service Program (SFSP) and students that attend schools that are eligible for the Community Eligibility Provision (CEP) of the Healthy, Hunger Free Kids Act of 2012 schools are not automatically considered low income.

L. High poverty area verification must include case notes in AJC that indicate the name of the high poverty areas (county) or census tract number that was used on making the determination that youth lives in a high poverty area. The poverty rate for a high poverty area must also be included in case notes in AJC.

#### **.05 Basic Skills Testing**

A youth is basic skills deficient when one of the following definitions applies:

A. The youth performs any of the following at or below an 8.9 grade level:

1. Compute or solve math problems;
2. Read English;
3. Write English; or
4. Speak English.

B. The youth is unable to:

1. Compute or solve problems,
2. Read, write or speak English at a level necessary to function on a job, in the individual's family, or in society, as determined in local policy.

- C. An increase in educational functioning level is an educational achievement that counts towards the Measurable Skill Gain performance measure. To determine if a youth increased his/ her educational functioning level the youth must be pre and post-tested. The Test of Adult Basic Education (TABE) Version 9/10 must be used to determine whether the youth is basic skills deficient. The same test and version (e.g. TABE Version 9/10) must be used for both the pre- and post-test.

The LWDA or Youth Service Provider may use other assessment tools appropriate to the target population as determined by the LWDA except for determining basic skills deficiencies.

LWDAs may use results from a TABE Version 9/10 that was taken within the past six months, if a partner program has provided the youth's test results.

1. Testing must be administered during after enrollment and no later than the date of participation, i.e. the date of the first service.
2. Out-of-School Youth who are basic skills deficient must be post-tested prior to the one-year anniversary of the participation date.
3. 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.
4. When administering assessments, individuals with disabilities should be provided appropriate accommodations according to the guidelines associated with the assessment tools used to determine functioning levels, Section 188 of WIOA, and LWDA policy.

## **.06 Selective Service Requirements**

Each LWDA 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, born on or after January 1, 1960, unless exempt, is required to register with the Selective Service System (SSS) between their 18<sup>th</sup> and 26<sup>th</sup> birthdays. Registration with SSS can occur within 30 days of a male's 18<sup>th</sup> birthday and prior to attaining his 26<sup>th</sup> birthday.
- 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 18<sup>th</sup> birthday. If a participant does not register for Selective Services within 30 days of his 18<sup>th</sup> birthday, he is no longer eligible to receive WIOA services. Youth denied services must be advised of available WIOA grievance procedures.
- C. A detailed list of Selective Service registration requirements may be found online at <https://www.sss.gov/Registration-Info/Who-Registration>.
- D. Selective Service registration can be verified online at <https://www.sss.gov/Home/Verification>. The applicant's name, date of birth, and social security number is needed to verify registration.

## **214 REGISTRATION, ENROLLMENT AND DATA ENTRY**

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

### **.01 Registration, Enrollment and Data Entry Requirements**

- A. Registration in AJC occurs when an 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 AJC must occur when a youth has taken action that demonstrates an intent to use program services and who meets specific reporting criteria for the program including youth who:
  - 1. Provide identifying information;
  
  - 2. Use the self-service system;
    - a. Self-service system includes the youth independently access any workforce development system program's information either in a physical location, such as a One-stop resource room or partner agency or remotely via use of electronic technologies.
  
    - b. Virtual services that provide a level of service beyond independent job search or information seeking on the part of a youth would qualify as not self-service.
  
  - 3. Receive information-only services or activities;  
  
Informational-only services are activities or services that are readily available information that does not require assessment by a staff member of the individual's skills, education, and career objective. Examples of informational services include providing:
    - 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 referrals to employment.

- C. Enrollment must occur when a youth requires services beyond self-service, or informational-only services and activities. The program enrollment will depend on the participant's eligibility (see Section 212). Examples of services that require significant staff involvement include the staff member's assessment of the youth's skills, education, or career objectives in order to achieve any of following;
1. Assisting the youth in deciding appropriate next steps in the search for employment, training, and related services, including job referral;
  2. Assisting the youth in assessing barriers to employment; or
  3. Assisting the youth in accessing other related services necessary to enhance their employability and individual employment needs.
- D. Enrollment into the Youth Program includes:
1. The collection of documentation to support eligibility determination;
  2. The provision of an objective assessment;
  3. Development of an individual service strategy; and
  4. Participation in any of the 14 WIOA Youth program elements.
- E. Enrollments are pending in AJC until they are approved by designated LWDA staff. Pending enrollments must be approved promptly and accurately to ensure expediency of services.
- F. If pending enrollments are not approved within 30 calendar days, the AJC system requires that the youth's eligibility be re-determined. This includes collecting new/updated verification

documentation for eligibility determination. LWDA's must develop local policies that address timely entry of enrollments and run the WIA No Participation report to monitor the timeliness of the pending client record.

- G. Transactions relating to WIOA Youth program-provided activities and services must be entered or updated in AJC promptly and accurately to ensure expediency of services.
- H. LWDA's must run the AJC Report 8 on a monthly basis to ensure timely follow-ups and accurate data recording.

## **.02 Co-Enrollment**

Co-enrollment means enrollment in more than one program at a time. As a result, the LWDA 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 WIOA Adult or Dislocated Worker Programs.
  - 1. LWDA's 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. For youth age 18-24, the LWDA must determine the appropriate level of service and combination of Youth, Adult, Dislocated Worker and other services that will be provided based on the service needs of the participant and if the participant is career-ready based on the objective assessment of the occupational skills, prior work experience, employability and participant's needs;
  - 3. LWDA's must identify and track the funding streams for youth who are enrolled concurrently in the Youth/ Adult Program or the Youth/ Dislocated Worker Program;
  - 4. LWDA's must ensure services are not duplicated; and
  - 5. LWDA's must ensure previous foster care youth who have been co-enrolled in WIOA Title I-B Youth Program and Adult/Dislocated Worker Program and are now adults

continue to remain eligible for both the Youth Program and Adult Program services and do not require re-determination of eligibility.

- B. WIOA youth participants may also have co-enrollment with the following partner programs:
  - 1. Adult Education and Literacy Programs;
  - 2. Migrant Seasonal Farm Workers Program (MFSWs) at the point of entry to the One-Stop system to assure equity of services is provided;
  - 3. Jobs Program (TANF Work Program);
  - 4. YouthBuild;
  - 5. Job Corps;
  - 6. Supplemental Nutrition Assistant Employment and Training (SNA E&T); or
  - 7. Other employment related programs.

## **215 INCENTIVE PAYMENTS**

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

- A. The policies and procedures must ensure incentive payments are tied to the goals of a specific program and are outlined in writing before the commencement of the program that may provide incentive payments.
- B. Each LWDA's policies and procedures that govern the awarding of incentive payment must align with the local program's organization policies, as well as Code of Federal Regulations Part 200 and 2900-Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR parts 200), and WIOA Fiscal Policies (Chapter 3, Section 100).

## **216 PROGRAM EXITS**

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

### **A. Program Exit Requirements**

The date of exit is the last date a service was provided to a participant. Case notes in AJC must include for reason for exit and documentation may be uploaded into AJC. If the documentation is not uploaded into AJC, the documentation must be retained in the participant's program file.

1. The participant will not be counted in performance if they exit the program for any of the following reasons:
  - a. Deceased – participant died during participation in a WIOA program;
  - b. Institutionalized – participant is residing in an institution or facility providing 24-hour support, such as a prison or hospital, and is expected to remain institutionalized for at least 90 calendar days;
  - c. Health/Medical – participant is receiving medical treatment that precludes entry into unsubsidized employment or continued participation in a WIOA program. *This does not include temporary conditions expected to last for less than 90 calendar days.*
  - d. Entered into Active Military duty-participant who is a reservist and has been called to active duty or participant enlists and reports for active duty which prevents participation in WIOA Title I-B Youth program.
  - e. Found Ineligible After Registration – participant is determined ineligible to participate in a WIOA program.
  - f. Foster Care; and
  - g. Retirement

2. When a participant receives services from multiple programs, the most recent service end date is the date of exit. Follow-up services provided to youth do not extend the exit date.

B. 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 greater than 90 consecutive calendar days. The gap in service will provide time for youth to address barriers to continued participation without exiting the program. Eligibility does not need to be re-determined at the end of the gap in service.

1. A gap in service extends a participant's exit date for 90 calendar days from the time he or she is placed into the gap. The gap in service must be related to:
  - a. A delay before the beginning of training;
  - b. A health/medical condition, or providing care for a family member with a health/medical condition; or
  - c. A temporary move from the area that prevents the individual from participation in services, including National Guard or other related military service.
2. A gap in service may be extended for an additional 90 consecutive calendar days (for a total of 180 consecutive calendar days) to resolve the issue that is preventing a participant from completing program services. The extended gap in service must be related to:
  - a. A health/medical condition, or providing care for a family member with a health/medical condition; or
  - b. A temporary move from the area that prevents the individual from participation in services, including National Guard or other related military service.
3. All gaps in service must be referenced in case notes detailing the reason for the gap in service.