



## **YOUTH ELIGIBILITY DETERMINATION & REGISTRATION**

Workforce Investment Act Policies and Procedures

### **POLICY #W700**

Effective Date: September 1, 2009

#### **BACKGROUND:**

Consistent with the Workforce Investment Act, the Washington State Strategic and Operations Plans for workforce development, and the Spokane Area Workforce Development Council Strategic and Operations Plans, it is the policy of the Spokane Area Workforce Development Council that every youth who receives WIA Title I-B Youth Program funded services must be eligible for and registered to receive those services.

#### **ELIGIBILITY**

To be eligible for WIA Title I-B Youth Program services, a participant must meet all of the following criteria:

- Ages 14 to 21;
- A United States citizen or non-citizen who is authorized by the Immigration and Naturalization Service to legally work in the United States;
- In compliance with the Selective Service Act;

#### ***and either:***

- Low-income, as defined in WIA section 101(25), with one or more of the characteristics listed below; **or**
- Non-low-income, with one or more of the eligibility barriers listed below. (The number of non-low-income youth cannot exceed 5% of all registered youth in a local area.)

The characteristics which apply to low-income youth whether they are in-school or out-of-school are as follows:

1. Basic literacy skills deficient
2. School dropout
3. Homeless or runaway
4. Pregnant or parenting
5. Offender (and/or involved in the juvenile/adult justice system)
6. Foster child
7. An individual, including a youth with a disability, who requires "Additional Assistance" to complete an educational program, or to secure and hold employment, locally defined as:
  - a. Having one or more disabilities, including learning disabilities
  - b. Personal/family substance abuse
  - c. Gang involved/affiliated/affected
  - d. Lacking affordable housing
  - e. Victim of domestic violence/sexual or child abuse
  - f. Identified social adjustment or mental health issue(s)
  - g. Lacking a significant or positive work history
  - h. Individual or member of a family that recently exhausted TANF benefits
  - i. "At-risk of dropping out of school" defined as:
    - i. One or more grade levels below the age-appropriate grade;
    - ii. Academically deficient and/or is not making substantial progress in mastering basic skills that are appropriate for students of the same age;
    - iii. Has at any time been a school dropout or is not attending school consistently; or

- iv. Determined to be at-risk by school staff based on an assessment that health, social or family problems are impairing the student's ability to succeed in school.
- j. OTHER additional assistance for education or employment not listed can be submitted to the Spokane Area Workforce Development Council (SAWDC) for consideration of approval prior to program participation.

The characteristics which apply to non-low-income youth whether they are in-school or out-of-school are as follows:

1. School dropout
2. Basic skills deficient
3. One or more grade levels below the grade level appropriate to the individual's age
4. Pregnant or parenting
5. Possess one or more disabilities, including learning disabilities
6. Homeless or runaway
7. Offender (and/or involved in the juvenile/adult justice system)
8. Face serious barriers to employment, locally defined as:
  - a. Personal/family substance abuse
  - b. Gang involved/affiliated/affected
  - c. Victim of domestic violence/sexual or child abuse
  - d. Identified social adjustment or mental health issue(s)
  - e. At-risk of dropping out of school defined as:
    - i. Academically deficient and/or is not making substantial progress in mastering basic skills that are appropriate for students of the same age;
    - ii. Has at any time been a school dropout or is not attending school consistently; or
    - iii. Determined to be at-risk by school staff based on an assessment that health, social or family problems are impairing the student's ability to succeed in school.
  - f. OTHER serious barriers to employment not listed can be submitted to the SAWDC for consideration of approval prior to program participation.

The above characteristics are not listed in priority order; each should receive equal weight during the eligibility determination process

#### Serving Veterans Under WIA Youth Title 1-B

Covered persons under the Jobs for Veterans Act shall receive first priority for enrollment in WIA Title 1-B Youth programs as long as they meet the eligibility requirements cited above.

A "covered person" is one of the following:

- An individual who served in the active military, naval, or air service, and who was discharged or released from such service under conditions other than dishonorable; or
- A recently separated veteran who applies for participation under this title within 48 months after the discharge or release from active military, naval, or air service; or
- The spouse of :
  - A veteran who died of a service connected disability;
  - A member on active duty who (at time of spouse's application) is listed as missing in action, captured in the line of duty, or forcibly detained; or
  - A veteran with a total disability from a service-connected disability or one who died while being evaluated for it.

For purposes of this policy, the term "veterans priority of service" means that a covered person shall be given priority over non-veterans for the receipt of employment, training, and placement services provided under that program, notwithstanding any other provision of law. Veterans and other covered persons must first meet the program's eligibility requirements.

### Eligibility Determination

The process of eligibility determination must ensure accurate information is provided at the time of application. Each criterion used to establish eligibility must be supported by a verifying document. Examples of documents which can be used to support eligibility for each criterion are provided in Attachment A.

The verification of eligibility information shall be maintained in client file and include the following:

1. Use of a completed and signed application form to generate all information necessary to determine eligibility and meet reporting requirements;
2. A completed Youth Eligibility and Verification Form (Attachment A) that includes the signature and date of the employment specialist who conducted the intake as well the staff designated to verify eligibility;
3. Original of any self-certification documents; and
4. Maintenance of adequate documentation to ensure the credibility of the eligibility determination.

### **REGISTRATION**

WIA I-B Youth Program registration occurs at the point where eligibility has been determined and there is significant staff involvement. (Note: This includes objective assessments and Individual Services Strategy initiation).

Each of the following conditions must be met before an individual may be registered and before any services other than self-service or informational services may be provided:

1. An objective assessment has been completed;
2. A planned intervention of WIA I-B services occurs;
3. An Objective Assessment and an Individual Service Strategy (ISS) are completed which identify the need for WIA I-B dollars; and
4. A WIA Registration Form and supporting documentation consistent with this policy have been completed and collected.

The objective assessment must meet the requirements of WIA section 129(c)(1)(A) and include a review of the following:

- a. Basic and academic skills
- b. Occupational skills
- c. An educational goal
- d. Interests and aptitudes
- e. An employment goal
- f. Appropriate achievement objectives

Registration shall be documented in individual participant files and in the Washington State Management Information System (MIS), known as Services, Knowledge and Information Exchange System (SKIES), for WIA Title I-B Programs.

Consistent with the Act, the registration system will include:

1. The use of the WIA Registration Form to generate all information necessary to determine eligibility and meet reporting requirements; and
2. The applicant signature and date, as well as the signature and date of the applicant's parent, guardian, or responsible adult in instances where the applicant is under the age of 18, on the WIA Registration Form attesting that the information on the form is true to the best of the applicant's and adult's, if applicable, knowledge; and
3. The subrecipient representative signature and date on the form; and
4. The maintenance of adequate documentation to ensure the credibility of the eligibility determination, which shall at a minimum consist of:
  - a) A completed WIA Registration Form for each applicant; and
  - b) Copies of documents used to determine and verify eligibility.

Verification of the information provided on the WIA Registration Form shall be maintained as part of each applicant's/registrant's file.

Each criterion used to establish eligibility must be supported by a verifying document. Examples of documents which can be used to support eligibility for each criterion are provided in Attachment A. This list is not intended to exclude other forms of reasonable verification which the applicant can provide as determined by the subrecipient and approved by the WDC.

#### Program Operator's Responsibility

- Review and approve all registration paperwork for completeness, accuracy, and internal consistency prior to an applicant's registration, and ensure there is a completed SKIES Registration Form that is signed and dated;
- Identify all applicants to be registered under the 5% not-low-income category **prior to registration**.
- Ensure the appropriate data for tracking client registration and eligibility information is entered into SKIES.
- Maintain a centrally controlled file for each program applicant and registrant containing copies of all documents collected and provide access to any and all Federal, State, County, and WDC monitors and auditors given reasonable notice.
- Maintain separate files for applicant paperwork which did not result in a client registration into the WIA I-B system. For each applicant that does not get registered into the WIA Youth Program, a reason for lack of registration must be recorded on the application.
- Ensure each applicant who qualifies for the WIA 1-B services who is not registered is given an appropriate referral.

#### **ATTACHMENTS:**

Attachment A – Eligibility Documentation Sources – Rev. 9/1/09

Attachment B – Eligibility Verification Form (required in each client record)

#### **REFERENCE:**

- Workforce Investment Act (WIA) of 1998
- Washington State Policy No. 3638 Sec. D: WIA Title 1-B Youth Eligibility & Application
- Washington State Policy No. 3641 Sec. C: WIA Title 1-B Jobs for Veterans Act Priority of Service
- Training and Employment Guidance Letter No. 15-03
- Jobs for Veterans Act – Public Law 107-288
- Final Rule 20 CFR Part 664