



Department of
Job and Family Services

WIA Youth Eligibility

A horizontal bar composed of three segments: a dark grey segment on the left, a lime green segment in the middle, and a dark red segment on the right.

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Agenda

- Purpose of WIA Youth program
- Suitability
- Eligibility Overview
- Definitions and Documentation
- Eligibility Tips

Purpose of the WIA Youth Program





Purpose of WIA Youth Program

- The WIA youth program is intended to assist low-income youth with serious barriers to employment in becoming self-sufficient through employment and education or training.

What WIA is...and What it isn't

□ WIA is

- An employment and training program
- Targeted to a specific population
- Intended to produce specific outcomes

□ WIA is not

- An entitlement program
- A social service program
- The entire youth development program for your community
- The entire youth workforce development program for your community

WIA Section 195

General Program Requirements

- (1) Each program under this title shall provide employment and training opportunities to those who can benefit from, and who are most in need of, such opportunities. In addition, efforts shall be made to develop programs which contribute to occupational development, upward mobility, development of new careers, and opportunities for nontraditional employment.
- (12) Nothing in this title shall be construed to provide an individual with an entitlement to a service under this title.

Suitability



Who is WIA intended to serve?

- Low-income youth who face serious barriers to employment

Who is WIA intended to serve?

- Youth who can, with assistance, reasonably be expected to
 - Attain high school-level reading and math skills
 - Attain a high school diploma or its equivalent, an industry-standard certificate, or a post-secondary degree
 - Be successful in unsubsidized employment and/or post-secondary education or advanced training

Eligibility vs. Suitability

- ❑ **Eligible:** the youth meets all the criteria that allows him or her to receive WIA services (income, barriers, age, etc.)
- ❑ **Suitable:** the local WIA program offers services that meet the youth's needs and goals
- ❑ Because WIA is not an entitlement program, *a youth might be eligible for services but those services might not be appropriate for the youth based on the youth's individual goals and needs*

Suitability: How do you decide?

- Is WIA suitable for the youth, **NOT** is the youth suitable for WIA!

Suitability: How do you decide?

- Know your local WIA services, goals and outcomes:
 - What specific services do your WIA or partner programs offer?
 - Have you decided to focus on specific populations, such as older youth or dropouts?
 - Do your training programs focus on one or more specific job families, such as health care?

Suitability: How do you decide?

- During initial assessment, determine the youth's personal goals and needs **as they relate to employment and training**
 - Are the youth's goals a good match with the goals of the WIA youth program?
 - Do your services match the youth's goals?
 - Is the youth likely to benefit from the services you offer?
 - Do you have the capacity, through your program or through partner programs, to meet the youth's employment and training needs?

Suitability Policy

- Having a local suitability policy will help administrators and providers make consistent, appropriate, fair decisions
- Consider including
 - Any locally targeted populations
 - Any locally targeted training goals
 - Process for determining youth goals and needs
 - Process for determining match between youth's goals/needs and local priorities and services

Suitability Policy

- ❑ The law requires that eligible youth who do not become participants be referred to other appropriate programs.
- ❑ Local policy should address the process for referring youth and documenting referrals

Eligibility Overview



General Eligibility Requirements

- Citizenship status
 - Citizens and nationals
 - Lawfully admitted permanent resident aliens, refugees, asylees, and parolees
 - Other immigrants authorized by the Attorney General to work in the United States
- Authorization to work in the U.S.
- Selective Service Registration
 - For males over 18
- Social Security Number

WIA Youth Eligibility

- Aged 14-21
- Low Income
- With one or more of the following barriers:
 - Basic literacy skills deficient
 - School dropout
 - Homeless, runaway or foster child
 - Pregnant or parenting
 - Offender
 - Requires additional assistance to complete an educational program or to secure and hold employment (as defined by the local board)

5% low income exception

- **Up to 5%** of youth participants served by youth programs in a local area may be individuals who do not meet the income criterion for eligible youth, but who have one or more of the following barriers:
 - School dropout
 - Basic skills deficient
 - Behind one or more grade levels
 - Pregnant or parenting
 - Individual with a disability
 - Homeless or runaway
 - Offender
 - Face serious barrier(s) to employment as identified by the local board

Definitions and Documentation



Note on documentation

- ❑ Only ONE acceptable source of documentation within any category is required to prove eligibility
- ❑ Multiple sources of documentation are not required by federal or state statute, regulation, guidance, or policy
- ❑ For low-income status, documentation is required for only one category

General eligibility documentation



Age (14-21)

Acceptable Documentation

- ❑ Birth Certificate
- ❑ Baptismal Record if Date of Birth is Shown
- ❑ DD-214 Transfer or Discharge Paper
- ❑ Hospital Record of Birth
- ❑ Driver's license
- ❑ State, Federal, or Local Government ID
- ❑ Passport
- ❑ Work permit
- ❑ Cross match with public assistance records via state MIS system
- ❑ Other public assistance records (CRIS-E printout)
- ❑ School Record
- ❑ Tribal Records

Citizenship status/authorization to work in US

- ❑ U.S. passport, certificate of U.S. citizenship, certificate of naturalization, permanent resident card, unexpired refugee travel document
- ❑ U.S. Social Security card issued by the Social Security Administration (other than a card stating not valid for employment), Certificate of Birth Abroad issued by the Department of State, birth certificate issued by a state, county, municipal authority or outlying possession of the U.S., U.S. citizen ID card, ID card for use of Resident Citizens in the U.S.
- ❑ Cross match with public assistance records via state MIS system
- ❑ Other public assistance records (CRIS-E printout)
- ❑ Self-attestation

Selective service registration (Male 18+)

- ❑ Selective service card
- ❑ Verification from the Selective Service web site:
<https://www4.sss.gov/regver/verification1.asp>
- ❑ Self-attestation form if an applicant failed to register, is too old to register, and the local areas determine that the failure to register was not willful and knowing

Social Security Number

- ❑ SS card
- ❑ Photo ID with SSN
- ❑ W-2
- ❑ DD-214 Transfer or Discharge Paper
- ❑ Pay stubs
- ❑ Letter from Social Service Agency
- ❑ Cross match with public assistance records via state MIS system
- ❑ Other public assistance records (CRIS-E printout)
- ❑ Social Security Benefit Documents
- ❑ U.C. records if name and SSN is shown

Low Income Status



Low Income Status

- ❑ You must always document **low income status**
- ❑ This does not mean that you must always document **family income**

Low income status vs. family income

- ❑ **Low income status** is a criterion for eligibility
- ❑ **All youth** must demonstrate low income status to be eligible for WIA youth services
- ❑ A person has low income status if (s)he is a member of any category or group defined as "low income"
- ❑ **Family income** below 100% of poverty or %70 LLSIL a category or group within "low income status"
- ❑ **Not all youth** must be able to document family income in order to be eligible for WIA youth services

Low income status

- ❑ WIA defines 6 categories of individuals who are defined as having low income status
- ❑ Having multiple categories expands the number of youth who can be served under the low income eligibility requirement

Low Income Status Categories



Sources: ODJFS WIATL 27 and USDOL
TEN 9-06, Attachment A

Category 1: Receives cash payments

Definition

- Receives or is a member of a family that receives cash payments under a Federal, State, or local income based public assistance program
 - TANF/OWF, SSI, Refugee Assistance, Disability Assistance

Category 1: Receives cash payments

Acceptable Documentation

- ❑ Copy of authorization to receive cash public assistance
- ❑ Verification by the public assistance agency through phone, email or fax
- ❑ Copy of public assistance check
- ❑ Medical card showing cash grant status
- ❑ Cross match with public assistance records via state MIS system
- ❑ Other public assistance records (CRIS-E printout)
- ❑ Refugee assistance records
- ❑ Verification from the refugee assistance provider through phone, email or fax

Category 2: Family Income below poverty or 70% LLSIL

Definition

- Received an income, or is a member of a family that received a total family income for the 6-month period prior to application for the program that, in relation to family size, does not exceed the higher of the poverty level (for the equivalent period of time) or 70% of the lower living standard income level (LLSIL) for an equivalent period of time

Category 2: Family Income below poverty or 70% LLSIL

Acceptable Documentation

- ❑ Pay stubs
- ❑ Employer statement of earnings
- ❑ Compensation award letters
- ❑ Social Security retirement benefits letter
- ❑ Pension statement
- ❑ Bank statements if income is received by direct deposit
- ❑ Court award letter
- ❑ Family or business financial records
- ❑ Quarterly estimated tax for self-employed persons
- ❑ Alimony agreements
- ❑ Self attestation only if no or very low undocumented income; should include statement of how family was supported for last six months

Category 3: Receives food stamps

Definition

- ❑ Is a member of a household that receives (or has been determined within the 6-month period prior to application for the program involved to be eligible to receive) food stamps

Category 3: Receives food stamps

Acceptable Documentation

- ❑ Verification by the public assistance agency through phone, email or fax
- ❑ Cross match with public assistance records via state MIS system
- ❑ Other public assistance records (CRIS-E printout)

Category 4: Homeless Individual

Definition

The Federal definition of a homeless person is: An individual who (1) lacks a fixed, regular, and adequate nighttime residence and (2) has a primary nighttime residence that is (a) a supervised, publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill), (b) an institution that provides a temporary residence for individuals intended to be institutionalized, or (c) a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings. (McKinney Act (P.L. 100-77, sec 103(2)(1), 101 stat. 485 (1987)))

Category 4: Homeless Individual

Acceptable documentation

- ❑ Verification from a shelter or social services agency
- ❑ Self attestation
- ❑ Written statement from individual providing residence

Category 5: Foster child

Definition

An individual who is or who has, at any time, been a foster child on behalf of whom State or local government payments are made

Category 5: Foster child

Acceptable Documentation

- ❑ Court documentation
- ❑ Verification from a social services agency
- ❑ Case notes

Category 6: Disabled individual whose income meets the criteria of categories 1 or 2

Definition

- An individual with a disability whose own income meets the income requirements described in Category 1 (cash assistance) or 2 (low family income) for a family size of one but who is a member of a family whose income does not meet such requirements

Category 6: Disabled individual whose income meets the criteria of categories 1 or 2

Documentation of Disability (includes learning disability)

- ❑ Letter from drug or alcohol rehabilitation agency
- ❑ Medical records
- ❑ Physician's statement
- ❑ Case notes regarding observable conditions
- ❑ Psychologist diagnosis
- ❑ Social security disability records
- ❑ School record of disability determination
- ❑ Social services records
- ❑ Veterans administration letter
- ❑ Vocational rehabilitation letter
- ❑ Worker's compensation record
- ❑ Self attestation

Category 6: Disabled individual whose income meets the criteria of categories 1 or 2

Documentation of Income

- ❑ Pay stubs
- ❑ Employer statement of earnings
- ❑ Compensation award letters
- ❑ Social security retirement benefits letter
- ❑ Pension statement
- ❑ Bank statements if income is received by direct deposit
- ❑ Court award letter
- ❑ Family or business financial records
- ❑ Quarterly estimated tax for self employed persons
- ❑ Alimony agreements
- ❑ Copy of authorization to receive cash public assistance
- ❑ Verification by the public assistance agency through phone, email or fax.
- ❑ Copy of public assistance check
- ❑ Medical card showing cash grant status
- ❑ Cross match with public assistance records via state MIS system
- ❑ Refugee assistance records
- ❑ Verification from the refugee assistance provider through phone, email or fax.

Barriers to Employment



Barriers to employment

- ❑ In addition to being low income, a youth must have one or more of the following barriers to employment
- ❑ One barrier **MUST** be documented and entered into SCOTI
- ❑ It is good practice to enter all barriers into SCOTI

Basic Literacy Skills Deficient

Definition

- An individual who computes or solves problems, read, writes, or speaks English at or below the 8th grade level or is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society

Basic Literacy Skills Deficient

Acceptable documentation

- ❑ Standardized assessment test
- ❑ School records
- ❑ Case notes

Basic Literacy Skills Deficient

- **Testing and Documentation of Barrier**
 - Do not give a formal basic skills assessment (TABE, CASAS, other DOL approved assessment) to determine eligibility
 - Administering a formal assessment is a service and can initiate participation if the youth meets other eligibility criteria
 - Use other sources (school records, initial assessment case notes) to document barrier
FOR ELIGIBILITY PURPOSES
 - Once eligibility and suitability are determined, then give an approved formal assessment, not before

School dropout

Definition

- ❑ An individual who is no longer attending school and has not received a secondary school diploma or its recognized equivalent
- ❑ Includes youth who have been expelled or who are habitually truant

School Dropout

Acceptable Documentation

- ❑ School board verification of drop out status or habitual truancy
- ❑ Dropout letter
- ❑ Self-attestation

Homeless or runaway

Definition

□ *Homeless*

- Same as definition for low income status
- Includes youth who are sharing housing because of economic crisis, living in campgrounds, hotels, shelters, pre-institutionalization facilities, or places not designated or ordinarily used as a regular sleeping accommodation by human beings

□ *Runaway*

- A person under 18 years of age who absents himself or herself from home or place of legal residence without the permission of his or her family

Homeless or runaway

Acceptable Documentation

- ❑ Verification from a shelter or social services agency
- ❑ Self-attestation
- ❑ Written statement from individual providing residence

Foster child

Definition

- An individual who is **in** foster care or **has been** in the foster care system

Foster child

Acceptable Documentation

- ❑ Court documentation
- ❑ Verification from a social services agency

Pregnant or parenting

Definition

- An individual who is either under 22 years of age and who is pregnant, or an individual (male or female) who is providing custodial care for one or more dependents under the age of 18

Pregnant or Parenting

Acceptable Documentation

- ❑ Physician's statement
- ❑ Child's birth certificate if parenting
- ❑ Baptismal record
- ❑ Verification with social service agency
- ❑ Self-attestation

Offender

Definition

- An individual who is or has been subject to any stage of the criminal justice process for committing a status offense or delinquent act or someone who requires assistance in overcoming barriers to employment resulting from a record of arrest or conviction for committing delinquent acts, such as crimes against persons, property, status offenses, or other crimes

Offender

Acceptable Documentation

- ❑ Court records
- ❑ Halfway house resident
- ❑ Letter of parole
- ❑ Letter from probation officer
- ❑ Police records
- ❑ Self-attestation

Youth Who Needs Additional Assistance (includes Youth with a disability)

Definition

- ❑ A person who is between the ages of 14 and 21 who requires additional assistance to complete an educational program, or to secure and hold employment **as defined by the local board**
- ❑ There must be written local policy that defines this barrier

Youth Who Needs Additional Assistance (includes Youth with a disability)

Acceptable Documentation

- ❑ This is a locally defined criteria. Local area provides appropriate documentation based on the local definition.
- ❑ There must be written local policy that defines acceptable documentation.

5% exception: Behind One or More Grade Levels

Definition

- An individual with educational attainment that is one or more grade levels below the grade appropriate to the age of the individual

5% exception: Behind One or More Grade Levels

Acceptable Documentation

- School records

5% exception: Disability (including learning disability)

Definition

- An individual with a physical or mental impairment that substantially limits one or more of the person's major life activities

5% exception: Disability (including learning disability)

Acceptable Documentation

- ❑ Letter from drug or alcohol rehabilitation agency
- ❑ Medical records
- ❑ Physician's statement
- ❑ Case notes regarding observable conditions
- ❑ Psychologist diagnosis
- ❑ Social security disability records
- ❑ School record of disability determination
- ❑ Social services records
- ❑ Veterans administration letter
- ❑ Vocational rehabilitation letter
- ❑ Worker's compensation record
- ❑ Self attestation

5% exception: Faces Serious Barrier(s) to Employment

Definition

- ❑ An individual between the ages of 14 and 21 who faces serious barriers to employment as defined by the local board
- ❑ There must be written local policy that defines this barrier

5% exception: Faces Serious Barrier(s) to Employment

Acceptable Documentation

- ❑ This is a locally defined criteria. Local area provides appropriate documentation based on the local definition.
- ❑ There must be written local policy that defines acceptable documentation.

Eligibility Tips



Tips

- Don't create policy (written or unwritten) that makes documenting eligibility more difficult than what is required
 - E.g. requiring multiple sources of documentation, always requiring verification of family income

Tips

- When determining and documenting low income status, first determine if a youth falls into a category that does **not** require verification of income, such as receives cash assistance or food stamps or is homeless or a foster child, before requiring the youth to provide verification of family income

Tips

- If a youth can document a disability, verify the youth's income as a "family of one"; you do not need to verify family income first

Tips

- Review local policy
 - Are the “locally defined barriers” explicitly defined in written local policy?
 - Is documentation for locally defined barriers explicitly defined in written local policy?
 - Are there any unnecessary local requirements that make eligibility determination and documentation more difficult or time-consuming?
 - Is local written policy consistent with federal and state statute, regulation, guidance, and policy?
 - Does written local policy reinforce the requirement to fully and accurately document all participant data in SCOTI?



Questions?