Ohio | Department of Job and Family Services

WIA Youth File Documentation

Office of Workforce Development

Video Conference

3/25/11

Purpose of WIA Youth Program

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

U.S. Department of Labor (DOL)

In 2010, a DOL monitoring team reviewed participant files from Ohio's Workforce Investment Areas. During their review, they noted many files that were Missing documentation,

- Contained incomplete forms, and
- Lacked supporting information.

- The Local Area must work update and enhance the skills of **case management staff** of the service providers in the system.

- Training should specifically address the regulatory requirements in the local area program design to provide an **objective assessment**, and the **development of an ISS for each youth participant.**

- **State Action: Training will be offered on file documentation, quality reviews, and maintenance of documentation.**

Purpose of the training

This training will provide guidance and suggestions for establishing processes to maintain **complete** and **compliant** WIA youth case files based on **WIA regulations.**

Single Source Documentation

- More does not necessarily mean better files!
- 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.

WIA Common Eligibility Requirements

Common Eligibility Criteria for WIA

1. Is authorized to work in the U.S.

2. Is registered for selective service (males 18 and over)

1. Citizenship - Authorization to Work

Documentation may include:

- U.S. passport, certificate of U.S. citizenship, certificate of naturalization, permanent resident card, unexpired refugee travel document
- Birth certificate
- U.S. Social Security card issued by the Social Security Administration (other than a card stating not valid for employment)
- Cross match with public assistance records via state MIS system
- Other public assistance records (CRIS-E printout)
- Self-attestation

Remember – you only need one form of documentation!

2. Requirement –Proper Selective Service Registration

All males born on or after January 1, 1960 must be registered for Selective Service as required under the Military Selective Service Act. Documentation may include:

- Selective service Card

- Verification from the Selective Service web site at https://www4.sss.gov/regver/verification1.asp.

Youth Eligibility Documentation

Youth Eligibility Requirements

a. Is 14-21 years of age
b. Is a low-income individual (except for 5% exception)
c. Is within one or more of the six defined barriers

WIA Regulations (CFR) 664.200-250

Youth Eligibility Requirements (con't)

The 6 youth barriers are:

a. Basic literacy skills deficient

b. Homeless, runaway or foster child

c. Pregnant or parenting

d. Offender

e. School dropout

f. An individual (including a youth with a disability) who requires additional assistance to complete an educational program or to secure and hold employment. (defined by local WIB)

Age (14-21)

Examples of documents

- Birth Certificate
- Baptismal Record if Date of Birth is Shown
- DD-214 Transfer or Discharge Papers
- Hospital Records 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 Records
- Tribal Records

“Low Income” Categories

Determining "Low Income" Category

95% of youth participants must be in the "Low income" category. For "low income" youth, only need to document **one** category.

Don't overburden youth during the eligibility process. Not all youth will be required to document family income in order to be eligible for WIA youth services.

Definition of Family

Family means 2 or more persons related by blood, marriage, or decree of court who are living in a single residence:

a. Husband, wife, and dependent child
b. Parent or guardian and dependent child
c. Husband and wife

Dependent Status Definition

- Applicants who fall in any one of the following categories shall be considered a dependent for eligibility purposes:
  - Under 18 years of age
  - Age 18-23 and parent(s) or guardian(s) pay(s) for more than 50% of the applicant's **support***

*Support as it relates to dependent includes financial assistance from parents or guardians to help pay for food, clothing, shelter, utilities, education, medical and dental care, recreation, transportation, and any other living expenses; as well as any government-provided cash public assistance and food assistance.

WIA PL 08.11-1 Determination of Dependent Status for Workforce Investment Act (WIA) Applicants

Dependent Status

If the client can answer yes to any of the following points he/she will not be a dependent

- Provide more than 50% of your own support
- Married
- Children who receive more than half of their support from you
- Dependents (other than your children or spouse) who live with you and who receive more than half of their support from you?
- Live in your own residence or in a residence without support from parents or guardians
- Currently serving on active duty in the U. S. armed forces for purposes other than training
- A veteran of the U. S. armed forces

“Low Income” Categories

1. Receives or is a member of a family that receives cash payment under a public assistance program (OWF, SSI, DA recipient)
2. Family Income (6 month earnings)
3. Food Stamps (recipient or determined eligible within 6 months)
4. Homeless Individual
5. Foster Child
6. Disabled Individual (plus 6 month individual income)

1. Public Assistance (OWF, SSI, DA)

Receives or is a member of a family that receives…..

- Copy of authorization to receive cash public assistance
- Verification by the public assistance agency through phone, E-mail, 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, E-mail or, fax

2. Family Income (6 month)

Family 6-month income does not exceed the higher of poverty level or 70% llsil based on family size…

Documentation includes:

- Pay stubs
- Employer statement of earnings
- Compensation award letters
- Social Security retirement benefits letter
- Bank statements if income is received by direct deposit
- Self attestation only if no or very low undocumented income; should include statement of how family was supported for last six months

3. Food Stamps

Is a member of a household which receives food stamps

Or has been determined eligible within 6 months…

Documentation:

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

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 sat. 485 (1987))

4. Homeless Individual

Acceptable documentation

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

5. Foster Child

Is a foster child on whose behalf state or local government payments are made…

Acceptable Documentation

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

6. Disabled Plus Six Month Individual Income

Youth is an individual with a disability whose own 6-month income is within the income guidelines for a family of one

Must document disability AND individual six month income

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

Documenting Barriers

Barriers

With **one or more** of the following barriers:

1. Deficient in basic literacy skills
2. School dropout
3. Homeless, runaway or foster child
4. Pregnant or a parent
5. Offender
6. **Locally defined barrier** - An individual (including a youth with a disability) who requires additional assistance to complete an educational program or to secure and hold employment.

Deficient in Basic Literacy Skills

At or below 8th grade in reading or math….

Documentation may include:

- Standardized assessment test
- School records
- Case notes

School Drop-out

No longer attending school and has not received a high school diploma or equivalent

Acceptable Documentation

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

Homeless

Acceptable documentation

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

Homeless/ Runaway

Acceptable Documentation

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

Foster Child

Individual is in foster care or has been in the foster care system

Acceptable Documentation

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

Pregnant and a Parent

Is either under 22 and is pregnant or is a youth (male or female) providing custodial care for one or more dependents

Acceptable Documentation

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

Offender

Youth who has been subject to any stage of the criminal justice system or delinquent act

Acceptable Documentation

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

6th Youth Barrier

- The State of Ohio Governor's Workforce Policy Board delegates the responsibility for defining the 6th Youth Barrier to local boards.

- Local policy should provide guidance regarding the level and types of support required

5% Exception

Up to five percent (5%) of youth participants served by youth programs in a local area may be non-low income provided that they are within one or more of the previous categories.

An individual (including a youth with a disability) who requires additional assistance to complete an educational program or to secure and hold employment

Proof of Barriers
Non-Low Income Youth

Barriers to Employment – Non-low income

A non-low income youth <u>must have one or more of the following barriers to employment:</u>

- Basic skills deficient
- School dropout
- Homeless, runaway or foster child
- Behind one or more grade levels
- Individuals with disabilities
- Offender
- "Faces serious barriers to employment" (defined by local WIB)
- One barrier **MUST** be documented

Other Documentation

Additional documents that can be added based on the type of programming that the youth is involved in are:

- Referrals from/to providers
- Proof of supportive services
- I-9
- W-4
- Resume
- Emergency contact form(s)

Files

File Management

Case files provide an explanation of how planned activities address the specific strengths and barriers of the youth

They provide the detail that explains the progress of the youth through the various elements of your program.

Essentials of Common File

- Case notes
- EEO compliance
- Eligibility Documentation (the documentation that is needed in order for the youth to become a participant)
- High school diploma or General Educational Development (GED) certificate
- Individual Service Strategy (ISS)
- Objective assessment
- Parental Consent form (youth 14 through 17)
- Program exit documentation
- Pre-enrollment activities
- Supportive service documentation

As appropriate…..

- Attendance sheets and performance records
- Copies of other documentation as appropriate
- Referrals
- Self-attestations
- State or nationally recognized occupational certificates or licenses
- Test scores, class grades, certificates of completion
- Other certificates recognized by TEGL 17-05
- Minor Wage Agreement, Worksite Agreement, Summer Employment or Work Experience Agreement

Objective Assessment

The Objective Assessment identifies the academic levels, skill levels, and service needs of each WIA youth and includes a review of the basic skills, occupational skills, prior work experience, employability, interests, aptitudes (including interests and aptitudes for nontraditional jobs), supportive service needs, and developmental needs of the youth.

An copy of an Objective Assessment should be **signed** and placed in the file of each youth.

Assessment

- Completed assessment results must be included in each file.

Copies of commonly used assessments can be obtained at:

http://jfs.ohio.gov/owd/WorkforceProf/Youth/Docs/infobrief24-AssessmentinWIA.pdf

Service Plan (ISS)

- A Service Plan must be developed for each youth, and should focus on identifying an employment goal, an educational goal, appropriate achievement objectives, and appropriate services for the youth.
- The service plan should be reviewed and updated when goals are met and must be signed by the youth and case manager.
- Copies of each plan should be placed into the case file.

Equal Employment Opportunity (EEO)

- Prohibits discrimination, and equal assess to WIA funded programs

- Your file should contain a signed EEO form in the file that each youth is aware of his/her rights to fair treatment.

Parental Consent Documentation

A signed consent form will be the basis of understanding between the youth and/or parent/guardian regarding their interaction within the approved WIA funded program.

It details the expectations and perspective outcomes.

As appropriate for youth ages 14-17

Case Notes

Case Notes

For WIA youths, case notes should provide any information not included in forms in the youth's case file, including:

- History and details of the youth's situation, including both strengths and barriers
- WIA activities planned or provided
- Appropriate reference to other case documents, including the Individual Employment Plans
- A description of how the youth will benefit from WIA activities

Case Notes – Suggested Practices

- Record facts only – behaviors you observed and statements you heard; don't make a diagnosis. Record facts accurately and completely.
- ***Never*** include judgmental opinions, stereotypical comments, or any offensive statements.
- Don't make any comment you couldn't defend in a court of law. If you must state an opinion relevant to the youths participation and progress, be sure to label your statement as an opinion.
- Use clear, simple, concise language, including professional terminology if appropriate. Don't use slang or street language, clichés, or jargon.
- Avoid metaphors or similes; just say what you mean directly.
- Don't comment on details that are not relevant to the youths activities.

File Monitoring

Case File Monitoring

A internal review of case notes and youth files is critical for maintaining quality youth case files.

Monitoring Schedule

Quality assurance reviews ensure continuous improvement and compliance. These reviews should be conducted on a **regularly scheduled basis.**

File Monitoring – Peer Review

Regularly scheduled review meetings should involve a team of case managers collectively reviewing accumulated files detailing services provided and proactively giving a critique that includes following up to address challenges and highlighting success.

File Monitoring – Peer Review

This approach allows a team/peer review process which produces better records by tapping to the “collective wisdom” of the case management team..

Peer Review teams can offer:

- Testing form formats and identifying enhancements
- Consistency of case notes
- Uniform completion of forms

Supervisor's Role

The Workforce Development Supervisor (or equivalent) or a designee conducts the review and gives the case manager a report on the case files in terms of:

- ❑ Required forms included and completed
- ❑ Files contained required file templates
- ❑ Quality of case notes
- ❑ Were the sequence of services documented?

These case file review reports should be kept on file to document your efforts.

Tips

- Do not leave blanks-instead use “N/A” for not applicable.
- Use standardized forms for self-attestation
- Perform quality checks on data (files and Scoti)
- Adapt forms to meet your needs (with approval).
- Research best practices.
- Network with others for enhancements to your file processes.

Other Youth Eligibility References

Please reference Focused Futures Pre-Enrollment Activities, Framework Activities, and Case Management at

http://jfs.ohio.gov/owd/WorkforceProf/Youth/Docs/PreEnrollmentActivities.pdf

Workforce Investment Act Policy Letter (WIAPL) 3-2000 at http://jfs.ohio.gov/owd/WorkforceProf/wia_policy_3_2000.stm

Workforce Investment Act Transmittal Letter (WIATL) 27 at http://jfs.ohio.gov/owd/WorkforceProf/Docs/SourceDocumentationforWIAEligibility.pdf.

Income Eligibility References

See Focused Futures Pre enrollment Activities at http://jfs.ohio.gov/owd/WorkforceProf/Youth/Docs/PreEnrollmentActivities.pdf.

Workforce Investment Act Guidance Letter (WIAGL) 6-2000 at http://jfs.ohio.gov/owd/WorkforceProf/Docs/WIAGL6-2000.pdf

See WIATL 27 at http://jfs.ohio.gov/owd/WorkforceProf/Docs/SourceDocumentationforWIAEligibility.pdf.

Questions?