



WIA TITLE I-B PROGRAM MANAGEMENT POLICIES AND PROCEDURES

MEMORANDUM #14-01

To: All WIA Title I-B Youth Program Subrecipients

Subject: Eligibility/Selection Criteria

Effective Date: September 16, 2014

A. BACKGROUND

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

Program registration is the process for collecting information for supporting a determination of eligibility for a specific program. This information may be collected through methods that include electronic data transfer, personal interview, or other means as summarized on an individual's WIA REGISTRATION FORM. 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.

Further, it is the policy of Workforce Snohomish that, in the event that there are more youth eligible for services than there are funds to serve, there are two criteria which are to be taken into consideration in selection of youth: (1) a youth's membership in a contractually designated target population and (2) a youth's relative need for service. Each subrecipient should have mechanisms in place to ensure that youth who are members of contractually designated target populations have access to program services relative to the incidence of members of that target population in the WIA I-B Youth Program-eligible population. Each subrecipient should also have mechanisms in place to ensure that youth who have relatively greater need for program services are registered for and receive services before youth who have relatively less need.

To comply with the Workforce Investment Act guidelines which notes that *“At least 30 percent of the local area’s total youth funding allocation must be used to provide*

activities to out-of-school youth (WIA Sec, 129 ©(4)(A), excluding administrative expenditures (20 CFR 667.210(as)(2)).” Workforce Snohomish is currently only enrolling new youth in the Out of School Youth funding stream.

B. REGISTRATION POLICY

WIA I-B Youth Program registration occurs at the point where there is significant staff involvement. Significant staff involvement occurs at the point where:

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 initiated which identify the need for WIA I-B dollars for implementation, and
4. A WIA REGISTRATION FORM and supporting documentation consistent with this policy have been completed and collected and the individual determined eligible for WIA Title I-B Youth Program services.
5. Consent, Complaint & Grievance, and Data Sharing forms.

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

Equal Employment Opportunity data must be collected on each individual during the registration process as documented on the WIA REGISTRATION FORM. These forms must be retained for individuals who are not registered under a WIA I-B program as well as for individuals who are. If, for any reason, a WIA REGISTRATION FORM which is started is not completed, there must be an accompanying RECORD OF ACTIONS TAKEN TO CORRECT REGISTRATION DEFICIENCIES in the applicant’s file.

C. ELIGIBILITY CRITERIA

To be eligible for WIA Title I-B Youth Program services, a participant must be:

- a. age 14 through 21 years of age, and
- b. a United States citizen or non-citizen who is authorized by the Immigration and Naturalization Service, and
- c. in compliance with the Selective Service Act, and
- d. low-income (as defined below) with one or more of the characteristics listed below, or
- e. a youth with one or more of the characteristics listed below.

No more than 5% of youth registered may be youth who meet criteria a., b., c. and e. and at least 95% of youth registered must be youth who meet criteria a., b., c., and d.

The characteristics which apply to both d. and e. above are as follows:

- (1) basic skills deficient,
- (2) offender,
- (3) involved in the juvenile justice system,
- (4) school drop out,
- (5) pregnant or parenting,
- (6) homeless or runaway,
- (7) foster child on who's behalf state or local government payments are being made,
- (8) having one or more disabilities including learning disabilities,
- (9) personal/family substance abuse,
- (10) gang involved/affiliated/affected,
- (11) enrolled in an alternative education program,
- (12) at-risk of dropping out of school,
- (13) lacking affordable housing,
- (14) victim of domestic violence/sexual or child abuse,
- (15) identified social adjustment or mental health issue(s),
- (16) lacking a significant or positive work history,
- (17) migrant family member,
- (18) not at grade parity.

D. DEFINITIONS

The definitions of the above terms are provided in the current edition of the *Workforce Investment Act Program Forms Manual*.

E. REGISTRATION SYSTEM

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.
5. 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.

F. SUBRECIPIENT ROLE

It is the subrecipient's responsibility to review and approve all registration paperwork for completeness, accuracy, and internal consistency prior to an applicant's registration. It is also the subrecipient's responsibility to identify all applicants to be registered under the 5% "window" category **prior to registration**. The subrecipient is further responsible for submitting all original documents to the designated Youth Program MIS contractor for entering the appropriate data for tracking client registration and eligibility information into SKIES using established protocols. The subrecipient must maintain a centrally controlled file for each program applicant and registrant which contains copies of all documents collected and provide any and all Federal, State, County, and WDC monitors and auditors with access to such records given reasonable notice.

As noted above, the subrecipient is to maintain separate files for applicant paperwork begun, but never completed, which does not result in a client registration into the WIA I-B system. Additionally, the subrecipient is responsible for assuring additional confidentiality of files for applicants and registrants who do not sign the CONSENT FORM documenting approval of data sharing and consistent with GENERAL PROGRAM MANAGEMENT POLICIES AND PROCEDURES Memorandum #04-12, *Data and Information Collection and Maintenance*.

**WIA Title I-B Youth Program
Acceptable Documentation for Determining Eligibility Under Section C.**

Eligibility Criteria	Conditions	Acceptable Documentation
a. Age	All registrants must be between 14 and 21 years of age, inclusive.	<ul style="list-style-type: none"> ▪ Birth certificate or hospital record of birth ▪ Driver's license or state identification card ▪ Baptismal certificate ▪ DD Form 214 (Report of transfer or discharge) ▪ Alien registration card ▪ Food stamp records or medical coupons ▪ School enrollment documents ▪ Naturalization certificate ▪ Public assistance records ▪ United States(U.S.) passport ▪ Native American tribal document(s)
b. Citizen or eligible non-citizen	All registrants must be legally entitled to employment within the United States (U.S.) and territories	<ul style="list-style-type: none"> ▪ Documentation sufficient to meet Employer Eligibility Verification requirements established by the United States Department of Justice Immigration and Naturalization Service (I-9 requirements)
c. Selective Service Registration	With very few exceptions, all male registrants who were born on or after January 1, 1960 and were in the U.S. before their 26 th birthday are required to register for Selective Service	<ul style="list-style-type: none"> ▪ Selective Service registration card ▪ Receipt of registration ▪ On-line confirmation or telephonic verification with Selective Service ▪ DD Form 214 (Report of Transfer or Discharge) ▪ Copy of registration form

<p>d. Low-Income</p>	<p>To be eligible to receive services, 95% of all registrants must meet low-income requirements.</p>	<ul style="list-style-type: none"> ▪ Proof of cash public assistance ▪ Proof of eligibility for or receipt of food stamps for the month of intake ▪ Proof of homelessness ▪ Proof of state supported foster child (only for applicants less than 18 years old at time of application) ▪ Family size verification form or other proof of family size with proof of includable income for the six months prior to the date of intake ▪ Proof of disability plus proof of the applicant's includable income for the six months prior to the date of intake ▪ Applicant statement form in the absence of other documentation
<p>e. Other Criteria</p>	<p>To be eligible to receive services, all registrants must meet one or more of the following criteria:</p> <ul style="list-style-type: none"> ◆ basic skills deficient ◆ offender ◆ involved in juvenile justice system ◆ school drop out ◆ pregnant or parenting ◆ homeless or runaway ◆ foster child ◆ having a disability ◆ personal/family substance abuse ◆ gang involved/affiliated/affected ◆ enrolled in an alternative education program ◆ at-risk of dropping out of school ◆ lacking affordable housing ◆ victim of domestic violence/sexual or child abuse ◆ social adjustment or mental health issues ◆ lacking a significant or positive work history ◆ migrant family member ◆ not at grade parity 	<ul style="list-style-type: none"> ▪ Test scores or Individual Education Plan (IEP) ▪ Justice system records ▪ Justice system records ▪ School district records ▪ Medical records or family size verification form or other proof of family size ▪ Statement from responsible adult or applicant ▪ DSHS records of foster parent statement ▪ Medical records or IEP ▪ Treatment records or statement from responsible adult or applicant ▪ Justice system records or statement from responsible adult or applicant ▪ School district records ▪ School district records ▪ Public housing authority records or statement from responsible adult or applicant ▪ Medical or school records or statement from responsible adult or applicant ▪ Medical or school records or statement from responsible adult or applicant ▪ Work history of less than 6 months or work history of 6 or more months with involuntary termination ▪ School records or statement from responsible adult or applicant ▪ School records