

Approved Date:

Effective Date: July 1, 2023

Subject: Youth Program Policy

Purpose

- I. The purpose of this policy is to provide guidance on participant eligibility and participation in the Workforce Innovation and Opportunity Act (WIOA) Title I Youth Program.
- II. WIOA Title I Program is based on eligibility and is not an entitlement program. Meeting the requisite eligibility criteria for potential enrollment does not guarantee any individual to receive employment and training services. Factors such as funding availability, labor market information, and other factors will also apply.

Minimum Eligibility Requirements

- I. To be eligible to receive WIOA Title I Youth services, at the time of eligibility determination an individual must meet all the following criteria:
 - A. A citizen of the United States or U.S. Territory, a U.S. permanent resident, or an alien/refugee lawfully admitted to the U.S.
 - B. Meet Military Selective Service Act registration requirements (males 18 years and older only). If an individual who is required to register at age 18 turns 18 during his period of youth program enrollment, he must register to remain enrolled in the program. Failure to register will result in immediate termination from the youth program.
 - C. Be an out-of-school youth (OSY) or an in-school youth (ISY).

Veterans Priority of Service

- I. Youth eligibility determination must comply with the Veterans Priority of Service policy for employment and training programs, as applicable to youth aged 18 and older.

Eligibility Determination

- I. Determination of eligibility for WIOA Title I programs must be based on information gathered at, or prior to, the time of enrollment. All individuals must be determined eligible before they can participate in any Title I activities. The State Workforce Development Board is ultimately responsible for all eligibility determinations within each local area. They may delegate the execution of that responsibility to the applicable service provider.

Low-Income Defined

- I. Individuals who receive or are eligible to receive free or reduced lunch, foster youth, homeless youth, and youth living in a high-poverty area to automatically be considered low-income.

In-School Youth (ISY) Eligibility

- I. To be provided services under the youth funding stream as an in-school youth (ISY), the individual must be:
 - A. Attending school (as defined by State law)
 - B. Not younger than age 14 or (unless an individual with a disability who is attending school under State law) older than age 21
 - C. A low-income individual; and
 - D. One or more of the following:
 1. basic skills deficient
 2. English Language Learner
 3. offender
 4. homeless individual, a homeless child or youth aged 14 to 21, or a runaway
 5. individual in foster care or has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child who is likely to remain in foster care until 18 years of age, or in an out-of-home placement
 6. pregnant or parenting
 7. individual with a disability
 8. an individual who requires additional assistance to complete an educational program or to secure or hold employment
 - a) Not more than 5% of total in-school youth enrolled in the youth program can be enrolled under the “individual who requires additional assistance” component. Calculation is based on all in-school youth served within the given program year.

Out-of-School Youth (OSY) Eligibility

- I. To be provided services under the youth funding stream as an out-of-school youth (OSY) the individual must be:
 - A. Not attending any school as defined under State law. Individuals attending Adult Education provided under WIOA Title II, YouthBuild or Job Corps are also classified as out-of-school youth
 - B. Not younger than age 16 or older than age 24; and
 - C. One or more of the following:
 1. school dropout
 2. within the age of compulsory school attendance, but has not attended school for at least the most recently completed school year calendar quarter
 3. a recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is also either one of the following:
 - a) Basic Skills Deficient, or
 - b) An English Language Learner
 4. offender
 5. homeless individual, a homeless child or youth aged 16 to 24, or a runaway
 6. individual in foster care or has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship, guardianship or adoption, a child who is likely to remain in foster care until 18 years of age, or in an out-of-home placement
 7. pregnant or parenting
 8. individual with a disability
 9. low-income individual or person living in a high-poverty area, requiring additional assistance to enter or complete an educational program, or to secure or hold employment

Out-of-School Youth (OSY) Youth Funds 75% Requirement

- I. At a minimum, 75% of the WIOA Title I Youth funds available to a local area for youth programs must be used to provide services to out-of-school youth (OSY). This requirement will be considered met if at least 75% of the youth program services expenditures are for OSY.
- II. For local area funds, the administrative costs of carrying out local workforce investment activities are not subject to the OSY expenditure requirement. All other local area youth funds beyond the administrative costs are subject to the OSY expenditure requirement.

Self-Attestation

- I. There are limited circumstances that may warrant self-attestation. Self-attestation should only be used in circumstances where alternative documentation is unavailable. Self-attestation occurs when a participant states their status for a particular eligibility criterion, such as pregnant or parenting youth
- II. The key elements for self-attestation are:
 - A. The participant identifying his or her status for permitted criteria, and
 - B. Signing and dating the WIOA application.
- III. Electronic signatures are allowable on the application in the data management system or may be on paper and uploaded to the data management system, as applicable.

Authorization for Program Participation of Minors

- I. For purposes of authorizing a minor to participate in the WIOA Title I youth program, the signature of a parent, guardian, or other responsible adult is required.
- II. Another responsible adult may include:
 - A. A relative with whom the individual resides,
 - B. An adult who has been delegated custodial or administrative responsibilities in writing, either temporarily or permanently, by parents or by an appropriate agency,
 - C. An agency or organization representative who is in a position to know the individual's circumstances (i.e., that they could not get a parent's or guardian's signature authorizing participation), for example, a clergy person, a schoolteacher or other school official, a probation or other officer of the court, a foster parent,
 - D. A representative of an agency which provided support services to the individual and who is aware of the individual's circumstances (i.e., that they cannot get a parent's or guardian's signature authorizing participation), for example, a social worker, a homeless shelter official, a child protective worker, a health clinic official; or
 - E. Other responsible adults to be appropriate to authorize the individual's participation, as defined in policy by the State Workforce Development Board.

- III. Eligibility documents which a minor presents on behalf of a parent or guardian (e.g., income in regard to family income) must be verified by a parent or guardian. Verification by another responsible adult would not be acceptable.

Youth Requiring Additional Assistance

- I. Youth who require additional assistance to complete an educational program or to secure or hold employment, includes:
 - A. Migrant youth
 - B. Incarcerated parent
 - C. Behavior problems at school
 - D. Family literacy problems
 - E. Domestic violence
 - F. Substance abuse
 - G. Chronic health conditions
 - H. One or more grade levels below appropriate for age
 - I. Cultural barriers that may be a hindrance to employment
 - J. American Indian, Alaska Native or Native Hawaiian
 - K. Refugee; or
 - L. Locally defined as needing “additional assistance” within local policy

Low Income Exception

- I. 5% of youth per region, may be exempted from the low-income* requirement based on the number of youths enrolled in a given program year who would ordinarily be required to meet the low-income criteria. Individuals who may go into this exception include:
 - A. All in-school youth (ISY), and
 - B. Out-of-school youth (OSY) who only meet the criteria of:
 - 1. Basic Skills Deficient
 - 2. English Language Learner, or
 - 3. Require additional assistance to complete an educational program or to secure or hold employment.
- II. This percent is calculated at the end of a program year based on new enrollees in that program year. Documentation for this exception must be maintained by the Title I Youth service provider.

Special Populations

- I. Individuals with disabilities
- II. Individuals from economically disadvantaged families, including low-income youth and adults
- III. Individuals preparing for non- traditional fields
- IV. Single parents, including single pregnant women
- V. Out-of-work-individuals
- VI. English-language learners
- VII. Homeless individuals described in section 725 of the McKinney-Vento Act
- VIII. Youth who are in, or have aged out of, the foster care system
- IX. Youth with a parent who is:
 - A. a member of the armed service
 - B. on active-duty status

Non-Eligible Individuals

- I. Any costs associated with providing WIOA Title I services to non-eligible individuals may be disallowed. If individuals are found ineligible for WIOA Title I services, a referral to another program that could assist will take place.

Enrollment

- I. In order for a youth to be considered a participant in the WIOA Title I Youth program, all of the following must occur:
 - A. An eligibility determination must be made,
 - B. The provision of an objective assessment,
 - C. Development of an individual service strategy, and
 - D. Participation in any of the 14 WIOA youth program elements.
- II. All information necessary to make a determination of eligibility for the services to be provided must be gathered and documented in IowaWORKS within 30 days of application.

- III. A complete enrollment must be obtained for each individual receiving WIOA Title I services within 30 days of establishing eligibility. The information required for enrollment may be collected using electronic data transfer, personal interview, or an individual application. If the enrollment steps listed above are not completed within 30 days, applicants will not be considered as a program participant and will need to re-enroll in accordance with the re-enrollment policy, if wanting to receive WIOA Title I services.

Program Participation

- I. Local youth programs must provide services to a participant for the amount of time necessary to ensure successful preparation to enter:
 - A. Postsecondary education and/or
 - B. Unsubsidized employment
- II. There is no minimum or maximum time a youth can participate in the WIOA Title I youth program. Local programs must link participation to the individual service strategy (ISS) and not to such things as the timing of youth service provider contracts or program years. For example, for participants who are in school; credential attainment must be the goal. Career planners must continue providing services until the participant has attained their credential.

Program Elements

- I. Local programs must make each of the following 14 elements available to youth participants:
 - A. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized post-secondary credential
 - B. Alternative secondary school services, or dropout recovery services, as appropriate
 - C. Experiential learning opportunities, consisting of paid and unpaid work experiences that have, as a component, academic and occupational education, which may include:
 1. summer employment opportunities and other employment opportunities available throughout the school year

2. pre-apprenticeship programs
 3. internships and job shadowing; and
 4. On-the-Job (OJT) training opportunities
- D. Occupational skills training, which shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area involved
 - E. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster
 - F. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate
 - G. Support services
 - H. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months
 - I. Follow-up services for not less than 12 months after the completion of participation, as appropriate
 - J. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate
 - K. Financial literacy education
 - L. Entrepreneurial skills training
 - M. 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 services; and
 - N. Activities that help youth prepare for and transition to postsecondary education and training.
- II. Local programs determine what services a youth participant receives based on their objective assessment results and individual service strategy. Local programs are not required to provide every element to participants and should partner with other entities to provide program elements that cannot be provided by the local program.

Support Services

- I. A support service may be provided when determined to be reasonable and necessary to address participant barriers and enable their participation in WIOA Title I or partner program career and training services. Participant barriers are identified through the Objective Assessment (OBA) process and must be outlined in the Individual Service Strategy (ISS).

- II. Support service payments are made to or on behalf of eligible participants for temporary assistance required to support the ISS. WIOA Title I funds must only support expenses incurred while a participant is enrolled in the program and actively participating in activities.
 - A. Career planners must follow up with participants to ensure the activity is progressing and ultimately completed. Support service payments may only be made for activities for which the participant participated in.
 - B. As part of the OBA process and development of the ISS, it is important to assess a participant's need for a support service. In assessing the appropriateness of a support service, career planners must utilize and refer participants to partner agencies and community resources first, as available. Documentation of referrals must be within the IowaWORKS system as a referral service and documented in case notes.
 - C. A support service must be justifiable and essential to enable a participant to take part in services and activities related to the ISS. A support service provided by Title I must not duplicate a service a participant could receive from another program.
 - D. Support services are not intended to meet every need of the participant. Rather, they provide temporary assistance. For this reason, career planners must discuss and develop a plan in coordination with the participant regarding how they will cover the supported cost once WIOA Title I funds are no longer appropriate or available. This plan must be documented in case notes and a Financial Literacy (FIN) service recorded in IowaWORKS, as applicable.
 - E. The incorporation of a Financial Literacy (FIN) service must be provided to a participant with the information needed to make informed judgments and effective decisions about the use and management of their money. FIN should be incorporated into career planning for all participants, and must be provided to participants who receive the following support services:
 - 1. Financial Assistance (FAS)
 - F. Any participant who utilizes FAS will be required to be enrolled in a financial literacy activity at the time the support service is provided. Providing FIN in relation to the support services can be determined by the career planner. For example, if a participant is participating in an Occupational Skills Training (OST) and rent is a related support service to support the participant in completing training, it may be most appropriate to provide the FIN towards the planned end of the OST service in order to assist them in exploring how they will pay rent once they are no longer in the OST and no longer receiving support services.
- III. Support service payments may be provided, when necessary, to enable a participant to participate in a WIOA Title I activity or partner activity. Support service payments may be

made to youth participants during the provision of follow-up services based upon their needs.

IV. Following are the allowable types of support service payments and a description of each. Payments may be made directly to vendors on behalf of a participant, or as a reimbursement to the individual unless otherwise noted below.

A. Clothing (CHG)

1. Payments for items such as clothes and shoes (uniforms, safety equipment, etc.) that are necessary for participation in WIOA Title I activities, including interviewing, employment, or work experience are allowable.
2. Itemized invoice or receipt is required.
3. Maximum expenditure is \$300.00 per participant per program year.

B. Dependent Care (DPC)

1. The costs of dependent care from licensed daycare providers or from private sources agreed upon by the participant are an allowable expense.
2. Dependent care assistance may be provided to eligible participants who require such assistance in order to participate in a WIOA activity and whose need has been linked to an activity.
3. Dependent care includes child or adult care for which the participant would normally be responsible.
4. If an unemployed parent of the child resides in the home, no childcare support will be provided.
5. DPC payments are paid directly to the participant after verification by the career planner.
6. The career planner will verify:
 - a) the childcare provider form identifying the person(s) for whom they are providing care
 - b) the provider is not being paid by other sources (or verification of participant co-pay)
 - c) documentation of the days/hours the care is provided, and the attendance/progress form from the training provider verifying that the childcare is necessary.
7. Dependent care support should only be used when the participant is not eligible for, or is pending approval of, childcare assistance through HHS/PROMISE JOBS.
8. Any participant who utilizes Dependent Care, will be required to be enrolled in a financial literacy activity.

9. Maximum of \$50.00 per day for one dependent.
10. Maximum of \$100.00 per day for two or more dependents.
11. Maximum of \$500.00 per week for two or more dependents.
12. Maximum of \$1,500.00 per participant per program year.

C. Educational Assistance (EST)

1. Assistance with books, fees, school supplies, laptops, internet access, tools, equipment, and other necessary items for students enrolled in high school, alternative high school, high school equivalent, or postsecondary education classes are allowable.
2. Participants that need laptops, internet service, and other support services must provide written documentation from the training site indicating the need for these services.
3. The laptop may be retained by the participant after the completion of training and will only be provided one time per participant per program enrollment. If participant does not complete the training, the laptop must be returned.
4. Services for internet are limited to the time that the individual is in a training activity.
5. Itemized invoice/receipt, or syllabus is required. Documentation from the instructor is required from training site for laptop and/or internet access.
6. The participant must submit documentation that the employer or training provider requires the participant to have specific tools or equipment to perform job duties or complete training.
7. The tools and equipment may be retained by the participant after the completion of training and will only be provided one time per participant per program enrollment. If participant does not complete the training, the tools and equipment must be returned.
8. Maximum of \$2,500.00 per participant per program year.

D. Educational Testing (EDT)

1. Assistance with educational testing required for participation in WIOA Title I activities is allowable.
2. Some examples of educational testing include, but are not limited to, high school equivalency testing and vocational testing.

3. If required for employment, the costs for licenses and application fees are allowable, examples include nursing boards.
 4. Itemized invoice or receipt is required.
 5. Maximum of \$1,000.00 per participant per program enrollment.
- E. Health Care (HLC)
1. Health care assistance can be made available to participants when lack of assistance will affect their ability to obtain or maintain employment, or if it is a requirement of an educational program.
 2. Allowable expenses include but are not limited to:
 - a) physical exams,
 - b) eye exams,
 - c) counseling,
 - d) drug tests.
 3. This support service should be used only when there are no other resources available to the participant.
 4. Itemized invoice or receipt is required.
 5. Maximum expenditure is \$300.00 per participant per program year.
- F. Services for Individuals with Disabilities (SID)
1. The costs of special services, supplies, equipment, and tools necessary to enable a participant with a disability to participate in an education or employment related activity are allowable.
 2. It is not an allowable use of WIOA Title I funds to make capital Improvements to a training or work site for general compliance with the Americans with Disabilities Act requirements. Itemized invoice or receipt is required.
 3. Maximum of \$500.00 per participant per program year.

G. Transportation (TRN)

1. The cost of transportation necessary to participate in WIOA Title I activities and services, including job searching and job interviews, is allowable.
2. Assistance can consist of:
 - a) Per mile reimbursement,
 - b) ride share services, like Uber and Lyft for example,
 - c) bus and/or taxi passes.
 - d) Bicycle and safety equipment purchases capped at \$500
3. Bus passes must not be provided for more than 30 days in advance, 1-day bus passes are also allowable.
4. Mileage will be reimbursed at the Federal rate.
5. Mileage expenses must be supported with a map from a web mapping service.
6. Itemized receipts/invoices are required for other transportation.
7. Maximum of \$2,500.00 per participant per program year.

H. Financial Assistance (FAS)

1. The purpose of a Financial Assistance payment (FAS) is to make a payment to a service provider or vendor on behalf of a participant. This payment is used to cover an emergency financial need that, if unmet, would prevent the participant from participating in WIOA Title I activities. FAS may be used for such things as: housing assistance, auto repair, eyewear repair, and other critical participant needs. FAS may not be used to pay any type of fines or penalties imposed because of failure to comply with any federal, state, local law or statute. Any participant who utilizes FAS will be required to be enrolled in a financial literacy activity at the time the support service is provided.
 - a) Housing/Rent
 - (1) The participant must indicate a need and sign an applicant statement requesting the assistance.
 - (2) Deposits are not allowable since the amount may be reimbursed to a participant at a later date.
 - (3) Payment of late fees or interest fees or charges associated with payments not made on time are not allowable.
 - (4) Required documentation for payment includes a copy of a signed lease with the participant's signature and monthly amount due or proof of a mortgage in the participant's name.

- (5) If the lease is not in the participant's name, an applicant statement must be made explaining the relationship between the participant and person named in the lease.
- (6) Payments will be based on actual rent expense minus any subsidies.
- (7) Rent or mortgage assistance is limited to one time per household per program enrollment.
 - (a) Maximum for rent \$850.00, maximum for mortgage \$1,000.00.
- (8) Utilities are allowed up to \$500.00 per program year and must be supported by actual bills.

b) Car Repairs/Insurance

- (1) Vehicle repair costs may be provided but must be directly linked to an allowable activity.
- (2) Required documentation includes:
 - (a) copy of title or registration showing the client or their spouse, parent/guardian legally owns the vehicle
 - (b) proof of car insurance.
- (3) No cosmetic repairs will be paid using WIOA Title I funds.
- (4) Vehicle insurance premiums for up to 6 months are also an allowable expense and is a one-time only payment. Two quote for repairs are required unless the vehicle must be towed.
- (5) The participant cannot receive mileage reimbursement and vehicle repairs during the same week. If vehicle repairs are paid, no transportation will be paid.
- (6) Maximum per participant is \$500.00 per program year.

I. Employment Related Expenses

- 1. Employment related expenses include various fees not covered in other categories that are related to education and/or employment, including licensing, bonding, background checks for work-based learning, and application fees.
- 2. The cost of required identification documents for education or employment is allowed.
- 3. The cost of a laptop for a participant doing a remote work- based learning activity is allowed.

4. The maximum amount per participant is \$500.00 per program year.

J. Supported Employment and Training (SET)

1. Supported Employment and Training payments are allowable to provide individuals requiring individualized assistance with the one-to-one instruction and with the support necessary to enable them to complete occupational skill training and/or obtain and retain competitive employment.
2. SET may only be used in training situations that are designed to prepare the participant for continuing non-supported competitive employment. An example of SET use in conjunction with an occupational skills training would be hiring a tutor to assist with classes.
3. SET may be conducted in conjunction with experiential learning activities. An example of SET use in this situation would be the hiring of a job coach to assist an individual who has been placed in competitive employment.
4. The length of a Supported Employment and Training contract may not exceed six months per enrollment.
5. The service provider must have an established rate for the service and charges must be in the same manner and at the same rate as other entities purchasing similar services.
6. Itemized invoice or receipt is required.
7. The maximum amount per participant is \$500.00 per program year.

K. Needs Related Payments (NRP)

1. Needs Related Payments (NRP) are not authorized in Iowa Plains.

L. Youth Incentive Payments (YIP)

1. YIP must be tied to the goals of the specific program. The career planner must outline in writing before the commencement of the program, that there may be an opportunity to provide incentive payments. Examples of appropriate YIPs are attendance or achievement of basic education skills; pre-employment/work maturity skills; occupational skills as identified in the Individual Service Strategy (ISS) for the participant, or Incentive payments directly tied to the completion of experiential learning activities.

2. The YIP payment must be a lump sum based on achievement/attendance, For a specific time frame and may not be based on an hourly rate. The YIP policy may be based on a combination of attendance and achievement or one or the other.
 - a) High school diploma attainment - \$100.00
 - b) HiSED attainment - \$100.00
 - c) Achievement of Basic Skills or Benchmark goal as identified on the ISS (per goal) - \$50.00
 - d) Completion of 30 hours leadership activity - \$100.00
 - e) Completion of a Workplace Readiness curriculum - \$100.00
 - f) Achievement of a recognized post-secondary credential in a high demand industry - \$100.00
 - g) One or two-year diploma through post-secondary education in a high demand industry - \$250.00
 - h) Employed at the 2nd quarter after exit - \$100.00
 - i) Employed at the 4th quarter after exit - \$100.00
- M. The following items are prohibited to be purchased with WIOA Title I support service funds. All costs will be considered to be disallowed and WIOA Title I funds utilized to purchase these items must be returned to the funding grant:
 1. Support services purchased prior to the participant's program enrollment.
 2. Fines and penalties such as traffic violations, late fees, and interest payments.
 3. Entertainment, including tips.
 4. Contributions or donations.
 5. Vehicle payments.
 6. Refundable deposits.
 7. Alcohol, tobacco, or marijuana products.
 8. Food (meals, groceries)
 9. Items for family members or friends.
 10. Out-of-state job search and relocation expenses that are paid for by the prospective employer.
 11. Needs Related Payments are not authorized.
 12. Any other item that is not required for the participant to successfully complete their training and employment goals.

N. Approval of Support Payments

1. The Title I Manager and a Title I Program Coordinator will be responsible for reviewing and approving support payment request for WIOA Adults, Dislocated Workers, and Youth to ensure all WIOA Title I requirements have been met, and the request is appropriate and to ensure sufficient funds are available.
2. In the event that any support service not previously outlined in this policy is requested or requires more than the allowable maximum amount or cap, as stated in policy a waiver may be submitted to the AJC Division Administrator. In consultation with the appropriate committee chairs and authorization to exceed the maximum will be awarded on a case-by-case basis. Proper justification must be outlined on the waiver. Written justification from the customer is required prior to making the payment.
3. Related Information
 - a) N/A