



RIVERSIDE COUNTY
WORKFORCE INVESTMENT BOARD

WIA YOUTH PROGRAM
PARTICIPANT ELIGIBILITY
POLICY & PROCEDURES

Date: September 26, 2013

Number: 19-01

PURPOSE: This policy provides Workforce Investment Act Youth Program Service Providers with the required procedures to follow for determining the eligibility of youth for program participation.

EFFECTIVE DATE: September 26, 2013

REFERENCES: [WIA Sec. 101 \(13\) A-C](#)
Part II of Department of Labor (DOL) Federal Register (August 11, 2000) Subpart B [§664.200](#), [§664.205](#), [§664.210](#), [§664.215](#), [§664.220](#), [§664.230](#), [§664.240](#), [§664.250](#).

LOCALLY IMPOSED REQUIREMENTS: Locally imposed requirements are indicated in ***bold, italic*** type.

DEFINITIONS:
Basic Skills Deficient – a youth who computes or solves problems, reads, writes, or speaks English at or below the 8th grade level on a generally accepted standardized test or a comparable score on a criterion referenced test or is unable to compute or solve problems, read, write, speak English at a level of literacy necessary to function on the job, in the individual’s family or in society (i.e., deficient in listening, speaking, problem solving, reasoning, decision making, or life skills).

School Dropout – a youth who is no longer attending any school and who has not received a secondary school diploma or its recognized equivalent. (Note: youth’s dropout status is determined at the time of application).

Offender – a youth who is or has been subject to any stage of the criminal justice process, for whose services under this Act may be beneficial, or requires assistance in overcoming barriers to employment resulting from a record of arrest or conviction.

Pregnant or Parenting – a youth (male or female) who is pregnant or providing custodial care for one or more dependents under age 18.

Out-of-School Youth – a youth who has dropped out of school or who has received a secondary school diploma or its equivalent but is basic skills deficient and unemployed or underemployed.

Underemployed – an out-of-school youth who is: Working part time but desires full time employment; Employed in a temporary position and desires permanent employment or; Employed full-time but the youth and his/her dependents still meet the WIA income eligibility requirements.

Serious Barriers to Employment – a youth who has one of the following barriers: limited English, substance abuse, gang affiliation, foster youth, at risk of dropping out of school, or is deficient in work readiness skills.

BACKGROUND:

Congress enacted the Workforce Investment Act of 1998, to provide workforce investment activities, through statewide and local workforce investment systems, that increase employment, retention, and earnings of participants, and increase occupational skill attainment by participants, and, as a result, improve the quality of the workforce and enhance the productivity and competitiveness of the Nation. The County and the Riverside County Workforce Investment Board (WIB) collaborate with private for profit, nonprofit, community-based organizations, and other agencies of the County in carrying out certain functions and programs of the Act. WIA Youth Programs serve low-income youth between the ages of 16 through 21 who possess one or more barriers. Up to five percent of the youth served under WIA do not have to meet the low-income criteria. While there are some differences in qualifying youth as eligible, the methods for determining and verifying eligibility remain the same. This Policy and Procedures sets forth the requirements for eligibility determination and verification for participation in WIA Title I Funded Youth Services.

POLICY:

Eligibility Criteria

Youth must meet the WIA Title I Youth eligibility criteria in order to receive WIA-funded program services. WIA defines an eligible youth as an individual who is age 16 through 21, is low income and is within one or more of the following categories:

- (1) Basic Skills Deficient;
- (2) School Dropout;
- (3) Homeless, a Runaway, or a Foster Child;
- (4) Pregnant or Parenting;
- (5) Offender; or
- (6) Requires additional assistance to complete an educational program or to secure and hold employment. An individual who requires additional assistance is defined as follows: special needs youth (disabled), limited English speaking; at risk of dropping out of school, substance abuse issues, affiliated with a gang, deficient in work readiness skills, or a high school graduate who is basic skills deficient, unemployed or underemployed.

Income Eligibility Exception

Up to five percent of youth served may be individuals who are not low-income, provided they are within one or more of the following categories:

- (1) School dropout;

- (2) Basic skills deficient;
- (3) Are one or more grade levels below the grade level appropriate for their age;
- (4) Pregnant or parenting;
- (5) Possess one or more disabilities, including learning disabilities;
- (6) Homeless or runaway;
- (7) Offender; or
- (8) Faces serious barriers to employment

Enrollment of youth who do not meet the income eligibility criteria must be formally reviewed by the YOC Supervisor. Each file must contain the following: reasonable justification for accepting the over-income participant; documentation of the youth's barrier(s); how the youth will benefit from program participation; and the plan to assist the youth in overcoming their barrier(s). The information must be approved by the YOC Supervisor and clearly notated in Rivcojobs case notes, as well.

The number of income eligibility exceptions approved shall not exceed five percent of the total program enrollments at the time of the file review. (Example: 1 new/eligible enrollment out of every 20 new enrollments may fall under the 5% income exception guideline.)

PROCEDURES:

Documentation of Eligibility Criteria

There are four income eligibility categories for a youth to qualify as low-income. Each category requires different documentation. In an effort to simplify the process, **Eligibility Documentation Checklists** have been developed for the four income eligibility categories: TANF Eligible (YOUTH 448-23), Foster Care or Group Home (YOUTH 448-24), Special Needs Youth (YOUTH 448-26), and Income Eligible (YOUTH 448-34). Eligibility determination also includes verification of the applicant's: a) social security number; b) Riverside County residency; c) right to work; d) age; e) family size and; f) selective service registration. The Eligibility Documentation Checklists include the list of acceptable documentation that must be submitted to verify the above information.

The list of the preferred documentation for each category is included on each Eligibility Documentation Checklist. All acceptable documentation items are not included on each of the Eligibility Checklists. Please refer to the following site: http://www.edd.ca.gov/Jobs_and_Training/pubs/wiad04-18.pdf, for an inclusive list of acceptable documentation for each eligibility category when the youth is having difficulties supplying the documents on the Eligibility Documentation Checklist.

Program Providers must make reasonable and sufficient efforts to obtain the most preferred documentation. All efforts and attempts must be clearly documented in Rivcojobs case notes prior to using an applicant statement (CSU 448-28) and/or telephone verification (CSU 448-12) as documentation. The use of the applicant's statement and/or telephone verification is allowable to document those items that are not verifiable or are not readily available. Also, it is not necessary to obtain corroboration unless there is a reason not to believe the youth or the person supplying the statement.

Youth must have one or more of the barriers listed in the Eligibility Criteria section of this Policy and Procedures. Documentation of at least one barrier is a part of the eligibility process. The acceptable documentation varies and is dependent upon the barrier. A **Barriers Verification Checklist** (YOUTH 448-

21) has been developed that lists the acceptable documentation for each barrier. (Program Providers may refer to <http://rivcoworkforce.com>, Program Resources Section, to access the aforementioned Program forms.)

All males ages 18-25 must be registered for selective service. A youth who becomes 18 years of age while participating in the program must register within 30 days of his 18th birthday. Program Providers are responsible for ensuring that all enrolled, male participants register for selective service within 30 days of their 18th birthday. Therefore, Program Providers shall develop a suitable tracking system that ensures timely selective service registration for all eligible male participants.

Family of One

The Workforce Investment Act provides Local Workforce Investment Areas (LWIA) flexibility in certain areas of eligibility. A youth is considered a family of one in the following situation:

- The youth, ages 18 and above, are living with their parent(s) or guardian(s), but not enrolled full-time in a secondary school or equivalent.

This means that a youth can still be claimed as a dependent on the parent's income tax and still counted as a "Family of One" for WIA Youth Program eligibility purposes if that youth is not a full-time student in a high school or alternative school.

YOC staff must complete the Support Verification form (YOUTH 448-56), wherein the parent, guardian, or other support provider verifies the type of support that is actually provided to the youth. (Program Providers may refer to <http://rivcoworkforce.com>, Program Resources Section, to access Program forms.)

Program Providers may refer to the "Dependent Children" definition in the WIA Eligibility Technical Assistance Guide (TAG) for determining eligibility for other youth.

Orientation

Program Providers will be responsible for conducting an orientation for all potential participants. The orientation will include an in-depth overview of the program components and an explanation of the eligibility process. The orientation will also include what is expected of youth and the commitment level needed from youth for successful participation. Upon completion of the orientation, potential participants should have a clear understanding of all aspects of the program and be able to make a sound decision as to whether or not the program will meet their needs. Whenever possible, orientations should be conducted in groups, and parents or guardians should be encouraged to attend.

Workforce Membership Profile

As part of the orientation process, youth will be required to complete the Workforce Membership Profile (YOUTH 448-50). The Workforce Membership Profile serves multiple purposes: 1) Contact information provided on the Workforce Membership Profile will enable Program Providers to follow up with youth during the eligibility process; 2) The Workforce Membership Profile provides information to assist Program Providers with making an initial identification of the barrier(s) youth may possess; 3) The Workforce Membership Profile will be used as a pre-assessment tool for Work Readiness skills; and 4) It serves as the verification document for self-reporting barrier(s). Please note that a participant's lack of income may also be documented using the Workforce Membership Profile in conjunction with an Applicant Statement and clear Rivcojobs case note documentation to that effect. (Please refer to the

Initial Eligibility Determination section, page 6, for additional guidance on how a youth's lack of income must be documented.) Thus, **youth must complete the Workforce Membership Profile during the orientation and without assistance.** (Program Providers may refer to <http://rivcworkforce.com>, Program Resources Section, to access Program forms.)

Pre-Eligibility Counseling Session

Following the group orientation, Program Providers will meet one-on-one with the youth to reiterate the program participation requirements and to review the application to ensure the information provided by the youth is accurate. The Program Provider will also explain the eligibility documents needed to determine eligibility and provide the youth with the appropriate Eligibility Documentation Checklist. Information provided by the youth on the Workforce Membership Profile will assist with determining the appropriate Eligibility Documentation Checklist to use. The Program Provider will also review the Equal Opportunity and Non-Discrimination Notification (SPDU 448-01) & Formal Grievance Notification (SPDU 448-05) and provide the youth with copies of both forms. An eligibility interview date and time will be set for the youth to return with the necessary documents for eligibility determination. **Parent, guardian or responsible adult of youth 17 years of age and younger must attend the eligibility interview.**

Initial Eligibility Determination

Program Providers are responsible for gathering and reviewing eligibility documents and making an initial determination of eligibility during the eligibility interview. As part of the process, the Program Provider will complete the right-hand column of the Eligibility Documentation Checklist, checking off the eligibility documents received and the date of receipt. A copy of the checklist and the eligibility documents submitted will be maintained by the Program Provider until all necessary documents to determine eligibility are received. In addition to completing the Eligibility Documentation Checklist, the Program Provider will also complete the Barriers Verification Checklist. The Program Provider will check the appropriate barrier(s) and the document used to support verification of the barrier(s).

The Program Provider will administer the CASAS basic skills assessment to determine whether one of the youth's barriers is basic skills deficiency. The Program Provider will administer additional assessment instruments only when it is necessary to identify a barrier for eligibility purposes. However, youth who are officially certified as eligible must receive a comprehensive assessment and be enrolled into the program no later than 15 working days from the date of eligibility determination. *(This is the date the YOC Supervisor approves the paperwork, by signing off on the respective documentation checklist. Refer to the Eligibility Determination section for additional guidance.)*

The Program Provider will make an initial income eligibility determination for youth who are not TANF recipients, Foster Care or Special Needs. Section 127 (page H.R. 1385-40) C i-ii of the Workforce Investment Act requires the use of one of two sets of data to determine an individual's family income for the six-month period immediately preceding the Workforce Membership Profile to qualify the individual as low income. The measure used is the highest of either the Poverty Guidelines, published by the Department of Health and Human Services, or 70 percent of the Lower Living Standard Income Levels (LLSIL), determined by the Secretary of Labor. The current LLSIL and Poverty Guideline tables may be accessed at the following site: http://www.edd.ca.gov/Jobs_and_Training/Active_Directives.htm.

Determining gross family income is required as part of the eligibility process. Family income means the

total gross income received by all members in the family unit for the six-month period prior to the date of the Workforce Membership Profile form. Family income includes total cash receipts before taxes from all sources, with some exceptions. Please refer to the following site: http://www.edd.ca.gov/Jobs_and_Training/pubs/wiad04-18.pdf, in order to access additional guidance on what income must be included in the calculation and what income is excluded from the calculation. The aforementioned site may also be accessed for additional guidance on the methods for calculating income. Program Providers will use the Youth Applicant Income Worksheet (YOUTH 448-28) to calculate the total gross income of the family unit for the six-month period. The Youth Applicant Income Worksheet must be maintained in the youth's file. (Program Providers may refer to <http://rivcoworkforce.com>, Program Resources Section, to access Program forms.)

Note: Youth's lack of income, for the six months prior, can only be self-reported on the Workforce Membership Profile if it is used in conjunction with an Applicant Statement AND with clear case note documentation in Rivcojobs, of Staff's reasonable and sufficient efforts made to obtain verification of lack of income.

Additional efforts may include obtaining Unemployment Insurance (UI) wage records. If, however, UI wage information is not available, because the youth has not worked in the last six (6) months, this must also be clearly documented in Rivcojobs case notes.

Case notes should include the following: applicant statement is being used as a last source document; applicant statement is being used in conjunction with the Workforce Membership Profile, which also states that the youth did not work nor earn income in the last six (6) months; and that there is no other way to document youth's lack of income for the last six (6) months.

Youth ages 16-17 must be accompanied at the eligibility interview by a parent, legal guardian or other responsible adult to sign program documents. The definition of "other responsible adult" includes:

- A relative with whom the individual resides.
- An adult who has been delegated custodial or administrative responsibilities in writing, either temporarily or permanently, by parents or by an appropriate agency.
- An agency or organization representative who is in a position to know the individual's circumstances (i.e., that they cannot get a parent's or guardian's signature authorizing participation), for example, a clergy person, a school teacher or other school official, a probation or other officer of the court, a foster parent.
- A representative of an agency which is providing 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.

Program Providers will have 45 calendar days from the date of the Workforce Membership Profile to collect all necessary eligibility documents. Youth who do not complete the eligibility process within the 45-day period must complete a new Workforce Membership Profile and the Program Provider will be responsible for collecting updated documentation for income eligibility, residency and any other general eligibility criteria that changed since completion of the first Workforce Membership Profile. The Program Provider will, again, have 45 calendar days from the date of the second Workforce Membership Profile to collect the updated eligibility documentation.

Program Providers are to provide youth with as much assistance and guidance as possible with submitting all of the necessary eligibility documents. The number of interview appointments scheduled beyond the first appointment will be left to the discretion of the Program Provider. Program Providers must take into consideration the effort and motivation of the youth and the challenges the youth faces with obtaining the information. Program Providers must also be conscious of the time limitations for completing the eligibility process.

File Maintenance and Completion of Forms

Program Providers will maintain files with the Workforce Membership Profile and any documentation collected for ineligible youth for record keeping purposes only. The Workforce Membership Profile, the Release of Information Authorization (YOUTH 448-27), the Nepotism form (YOUTH 448-55), the Youth Emergency form (YOUTH 448-31), the Media Photo Release form (YOUTH 448-42), the WIA UI Data Consent Authorization form, and when applicable, the Support Verification form (YOUTH 448-56) must be completed and signed by youth who are determined eligible for program services. (Program Providers may refer to <http://rivcoworkforce.com>, Program Resources Section, to access the aforementioned Program forms.) *The Workforce Membership Profile form, the Release of Information Authorization, the Media/Photo Release and the Youth Emergency form must also be signed by the parent or legal guardian of youth ages 16-17.*

Eligibility Determination for Certification

Program Providers must ensure that youth meet the WIA eligibility requirements prior to youth being enrolled in the program. To that end, YOC Supervisor must conduct a formal review of files, including documents collected by the Program Provider to verify eligibility. The information must be approved by the YOC Supervisor, and evidenced by a signature on the respective Eligibility Documentation Checklist for each file. The determination must also be clearly annotated in Rivcojobs case notes, as well.

Referrals for Ineligible Youth

The Program Provider will be responsible for providing ineligible youth with information on other resources and making appropriate referrals to other programs and services. Program Providers will maintain data on all referrals and the results of such referrals.

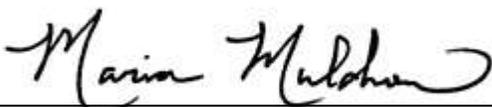
INQUIRIES:

Please direct any questions or concerns regarding this Policy and Procedures to EDA Workforce Development Division's Operations Unit.

REVISION HISTORY:

Revision Dates: 08/02/10, 05/06/10, 03/29/04

Original Policy Date: 10/23/01



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