

Effective Date: October 25, 2013

# WIA POLICY

## OLYMPIC CONSORTIUM

Revision: 3

### **WIA-POL 17 – Youth Program Eligibility**

*References: State WorkSource System Policy 1019 – Eligibility Guidelines and Documentation Requirement & Attachment A (Eligibility Policy Handbook)*

*State WorkSource System Policy 1003, Revision 1 – Data Element Validation*

*State WorkSource System Policy 1011, Revision 1 – CASAS for Basic Skills Assessments*

*State WorkSource Information Notice WIN-0041– Address Confidentiality Program*

*State WorkSource Information Notice WIN-0027, Change 2 – WIA001 Report and Disallowed Use of UI GUIDE Screen Prints*

*WIA-POL 21 – Definition of Dependent for Determining Family Size for WIA Title 1-B Youth and Adult Program Eligibility*

*WIA-POL 27 – Definition of Family for Determining Family Size for WIA Title 1-B Youth and Adult Program Eligibility*

*WIA-POL 28 – Definition of Includable and Excludable Income for Determining Family Income for WIA Title 1-B Youth and Adult Program Eligibility*

*WS-POL 1, Priority of Services for Veterans and Eligible Spouses*

*WS-PRO 1, Veteran and Eligible Spouse Priority*

The purpose of this policy revision is to:

- Update State references to the new guidance structure (WorkSource Information Notice [WINS] and WorkSource System Policies)
- Incorporate information from the State's policies into new and existing local policies

The policy of the Olympic Consortium regarding youth eligibility is to follow all federal and state requirements in determining eligibility as well as registering youth into Workforce Investment Act (WIA) youth programs. These requirements are prescribed in

the Act, appropriate federal regulations, state provisions, and Consortium plans and contracts.

The general youth program framework:

- Every service provider has the capacity to make access to all ten required services available to youth;
- All youth receive an objective assessment and an individual service strategy (ISS) that meets the requirements of WIA Sec.129(c)(1)(B), including identifying a career goal and a consideration of the assessment results for each youth; and
  - Provide preparation for post-secondary educational opportunities, employment and strong links to the labor market as dictated by the ISS.

## **Youth Eligibility Requirements**

The Services, Knowledge, and Information Exchange System (SKIES) is the designated record keeping system that will be used to ensure documentary evidence confirms the individual's eligibility. Documentary evidence must include a completed application for each applicant.

Staff is required to maintain copies of acceptable source documentation in the client's file as described in Attachment A for all eligibility, program, and data element validation.

### Eligibility:

Eligible youth is defined by the Workforce Investment Act (WIA) as an individual who:

- is not less than age 14 and not more than age 21;
- is a low-income individual<sup>1</sup>; and
- is an individual who is one or more of the following:
  - Deficient in basic literacy skills<sup>2</sup>.
  - A school dropout.
  - Homeless, a runaway, or a foster child.
  - Pregnant or a parent.
  - An offender.
  - An individual who requires additional assistance to complete an educational program, or to secure and hold employment.

<sup>1</sup>Definition for "low-income" is provided in Attachment A. For the purpose of determining WIA Title 1-B Youth and Adult Program eligibility using the low-income criteria: (1) see local policies WIA-POL 21 and WIA-POL 27 for the definitions required to determine family size; and (2) see WIA-POL 28 for the definition of includable and excludable income for determining family income.

<sup>2</sup>Definition of basic literacy skills deficiency: (1) computes or solves problems, read, writes, or speaks English at or below grade levels 8.9 on a generally accepted standardized test or a comparable score on a criterion-referenced test; or (2) unable to

compute or solve problems or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society.

Per State WorkSource System Policy 1011, Revision 1, the Comprehensive Adult Student Assessment Systems (CASAS) is the required academic basic skills assessment tool for Workforce Investment Act programs. Please see that policy for direction regarding CASAS requirements, as well as for information regarding testing accommodations for learners with disabilities.

The Consortium defines additional assistance as extra tutoring and remedial education that is more than what is required to achieve basic literacy. Additional assistance to secure and hold employment means a more intensive work habits education experience that may require one-on-one job coaching effort.

Selective Service registration is also required for all male youth ages 18 and older, and will be verified via the Selective Service Online Registration Verification website, and the Selective Service Number will be recorded in SKIES.

The Consortium allows for a five percent "window" of non low-income individual registrations. Five percent (5%) of WIA youth may be registered into if they fall into one or more of the following categories:

- Individuals who are school dropouts.
- Individuals who are basic skills deficient.
- Individuals with educational attainment that is one or more grade levels below the grade level appropriate to the age of the individuals.
- Individuals who are pregnant or parenting.
- Individuals with disabilities, including learning disabilities.
- Individuals who are homeless or runaway youth.
- Individuals who are offenders.
- Other eligible youth who face serious barriers to employment as identified below.

The Olympic Consortium has defined the last category listed above as:

- At-risk of dropping out of school. The following definition of "at-risk" will be used to identify these individuals. Our program operators will use linkages established with the schools to obtain necessary documentation. Documentation will be maintained in participant files. A student will be deemed at-risk if he or she:
  - is academically deficient in that he or she has not made substantial progress in mastering basic skills that are appropriate for students of his or her age, or
  - he or she performs lower than the appropriate level set by the state below which a student cannot be expected to progress adequately and complete high school successfully, i.e., failing classes and/or credit deficient, or

- using the statewide norm-referenced examinations, he or she scores lower on the examination than a standard of satisfactory performance established by the state, or
  - notwithstanding satisfactory performance on statewide examinations, he or she has failed to meet the school’s standard for promotion and has been retained, or recommended to be retained, in a grade for one or more years, or
  - he or she has at any time been a school dropout or is not attending school consistently, i.e., excessive absences, or
  - he or she has been determined to be at-risk by the school principal or other school official. The school official’s determination shall be based on an assessment by school staff familiar with the student that he or she has health, social or family problems that are impairing the student’s ability to succeed in school. Such problems may include but are not limited to evidence of abuse of the student by a family member or the student’s use of alcohol or drugs, pregnancy or parenthood, delinquent behavior, or attempted suicide.
- Youth attending alternative school or program that has exhibited one or more of the elements listed under at-risk, or
  - Member of family receiving public assistance for 30 months or more.

### Priority of Service for Veterans and Eligible Spouses

All WIA programs and service delivery must align with federal law, regulations, and guidance on Priority of Service. Priority of service entitles eligible veterans or spouses to enrollment and services before eligible non-covered persons. See local policy WS-POL 1 for pertinent information.

Additionally, all WorkSource staff is required to follow local procedure WS-PRO 1 to ensure that qualified veterans and eligible spouses are identified at the point of entry into the WorkSource system (notified of their priority status and given a “menu of services and programs” no matter if they physically or virtually access services). Staff must also provide the applicants with information pertaining to applicable eligibility requirements for those programs or services.

### Assisting victims of Human Trafficking

Per State WorkSource System Policy 1019, Attachment A (Eligibility Handbook), U.S. citizens or lawful residents who are victims of trafficking can receive the same services that are provided to the general public under WIA. In addition, under the Traffic Victims Protection Act, certain foreign nationals are also eligible for WIA Title1 services. This includes victims of a severe form of trafficking in persons and individuals granted a nonimmigrant “T” visa.

Please see Section 5.4 of Attachment A (Eligibility Policy Handbook), State WorkSource Policy 1019, for detailed information and available resources for assisting victims of human trafficking.

### Address Confidentiality Program

The Address Confidentiality Program (ACP) helps individuals attempting to escape from actual or threatened domestic violence, sexual assault, human trafficking, or stalking to interact with state and local government agencies without disclosing their address in order to prevent their assailant or probably assailants from finding them.

The Office of the Secretary of the State confirms that nothing in the ACP Law (RCW 40.24) exempts or excuses an individual from providing phone numbers, emergency contact information, email addresses, or any other information required by clients. The laws governing the ACP apply only to state and local government agencies and only to a person's home, work and/or school addresses. The intent of the ACP is to ensure that victims enrolled in the ACP can access government services like everyone else but without having to place their addresses in the view of the public.

The WIA youth program will accept the substitute address of an individual enrolled in the ACP and enter this address into the SKIES system. Never record the actual street address for work or home of an ACP participant in SKIES. If someone is participating in the ACP, do not require them to disclose their actual worker home address.

If an individual is enrolled in the ACP, use the ACP address as the home address in SKIES. Enter the address as it is printed on the authorization complete with the participation unique authorization code, or PMB number:

PMB# #####  
PO Box 257  
Olympia, WA 98507

### WIA001 Report and Disallowed Use of UI GUIDE Screen Prints

Per State WorkSource Information Notice WIN-0027, Change 2, UI GUIDE screen prints cannot be used for ANY purpose, including but not limited to the determination of WIA program eligibility. The state WIA001 report can be used in its place. If the report is to be filed in the participant record, it must be accompanied by the appropriate release and signed by the individual claimant.

Specific instructions on how to obtain a WIA001 report, along with current versions of all relevant forms, can be found at:

[http://www.wa.gov/esd/1stop/policies/wia001\\_report.htm](http://www.wa.gov/esd/1stop/policies/wia001_report.htm)

## Self-Attestation

The OWDC's collection and maintenance of adequate documentation is necessary to ensure the credibility of WIA Youth eligibility determinations and to minimize the risk of disallowed costs. Therefore, the Olympic WDC will allow self-attestation\* only for the following data elements when source documentation is otherwise unavailable:

- Homeless individual and/or runaway youth
- Offender
- Pregnant or parenting youth

\*Please use Attachment B (WIA Title 1-B Youth Self-Attestation Form) for documenting self-attestation. Note that an electronic version of that form is available at <http://www.wa.gov/esd/1stop/policies/systems.htm>. Click the link for WorkSource System Policy 1019, click the "handbook" link on page 2 of the policy, and follow the instructions for downloading the form on page 27 of the handbook.

## **Data Element Validation Source Documents Requirements**

As recipients of WIA Title IB funds the local Workforce Development Councils (WDCs) are required to collect and report accurate program information. The U.S. Department of Labor, Employment and Training Administration (U.S. DOL/ETA) mandates annual data element validation to maintain and demonstrate system integrity, assess the accuracy of submitted participant data, and identify and correct problems associated with reporting processes.

Data element validation should not be confused with the WIA program eligibility verification requirements. Although data element validation may verify the existence of source documentation for some WIA eligibility criteria, the process does not validate participant eligibility.

Data Element Validation is an annual activity conducted by Employment Security Department central office staff. The process involves reviewing selected samples of participant data reported on the most current annual Workforce Investment Act Standardized Record Data (WIASRD) and fiscal year Trade Act Participant Report (TAPR) against source documentation in exiter records for compliance with federal definitions.

All Olympic Consortium contractors and subcontractors must retain source documentation required to validate the DOL/ETA data validation data elements and/or provide case notes in the client's files as described in Attachment A.

See WIA and State WorkSource System Policy 1003, Revision 1 – Data Element Validation for additional information.

### Data Element Validation Items

Staff must retain acceptable source documentation and/or provide case notes in the client's files as described in Attachment A to support the following data element validation items listed below.

- Date of Birth
- Veteran's Status (Older Youth only)
- Employment Status at Participation
- Low Income
- Public Assistance Recipient
- Homeless Individual and/or Runaway Youth
- Offender
- Pregnant or Parenting Youth
- Youth who needs Additional Assistance
- School Status at Participation

- Basic Literacy Skills Deficient
- Foster Care Youth (Younger Youth only)
- Date of Exit
- Date of First Youth Service
- Other Reasons for Exit
- Enrolled in Education
- Received Educational Achievement Services
- Received Employment Services
- Received Summer Employment Opportunities
- Received Additional Support for Youth Services
- Received Leadership Development Opportunities
- Received Follow-up Services
- Type of Recognized Credential
- Attained Diploma, GED, or Certificate
- Date Attained Degree or Certificate
- School Status at Exit
- Youth Placement Information
- Youth Retention Information

<b>Data Element</b>	<b>Acceptable Source Documentation for WIA Eligibility, Program, and DOL/ETA Data Element Requirements</b>
Age <i>(14 through 21 years of age at time of application)</i>	Driver's license; baptismal record; birth certificate; DD-214; Report of Transfer or Discharge paper; federal, state or local ID card; passport; hospital record of birth; public assistance/social service records; school records or ID cards; or work permit.
Citizenship or eligible non-citizen <i>(If the applicant is to be employed as an activity within WIA Youth Services, then the applicant must be legally entitled to work in the United States.)</i>	Social Security card, birth certificate, any form of documentation defined by Immigration and Naturalization Service (INS work eligibility), or other documents or procedures as established by WDC policy (US passport).
Selective Service Registration <i>(Almost all male U.S. citizens, and male aliens living in the U.S., who are 18 through 25, are required to register with Selective Service. This rule applies to applicants who are 18 through 21 years of age at the time of application)</i>	Selective service registration card, receipt of registration, online confirmation or telephonic verification with selective service.
Family Income and Family Size <i>(An applicant to a WIA Youth Program must be either in a low-income family or enrolled in the 5 percent window for exceptions)</i>	Pay Stubs, employer records, public assistance award letters, child support records.
Veteran's Status (Older Youth only)	DD214
Employment Status at Participation	Pay stub, or thorough case notes showing information collected from the participant.

Data Element	Acceptable Source Documentation for WIA Eligibility, Program, and DOL/ETA Data Element Requirements
<p>Low Income</p> <p>Washington’s Marriage Equality Act (RCW 26.60) expands the definition of a “married couple” beyond that of a male and female couple.</p>	<p>Alimony agreement, award letter from veteran’s administration, bank statements, compensation award letter, court award letter, pension statement, employer statement/contact, family or business financial records, housing authority verification, pay stubs, pension statement, public assistance records (DSHS award letter), quarterly estimated tax for self-employed persons, social security benefits, or UI documents that support that the client meets the WIA “low income” definition:</p> <p>(A) receives, or is a member of a family that receives cash payments under a Federal, State, or local income based public assistance program;</p> <p>(B) 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 involved (exclusive of unemployment compensation, child support payments, payments described in subparagraph (A), and old-age and survivors insurance benefits received under section 202 of the Social Security Act (42 U.S.C. 402)) that, in relation to family size, does not exceed the higher of—</p> <p>(i) the poverty line, for an equivalent period; or</p> <p>(ii) 70 percent of the lower living standard income level, for an equivalent period;</p> <p>(C) 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 pursuant to the Food Stamp Act of 1977 (7 U.S.C. 2011 et seq.);</p> <p>(D) qualifies as a homeless individual, as defined in subsections (a) and (c) of section 103 of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302);</p> <p>(E) is a foster child on behalf of whom State or local government payments are made; or</p> <p>(F) in cases permitted by regulations promulgated by the Secretary of Labor, is an individual with a disability whose own income meets the requirements of a program described in subparagraph (A) or of subparagraph (B), but who is a member of a family whose income does not meet such requirements.</p>

<b>Data Element</b>	<b>Acceptable Source Documentation for WIA Eligibility, Program, and DOL/ETA Data Element Requirements</b>
Public Assistance Recipient	Copy of authorization to receive cash public assistance (public award letter), copy of public assistance check, medical card showing cash grant status, public assistance records, or refugee assistance records.
Homeless Individual and/or Runaway Youth	Written statements from individual providing residence, shelter or social service agency, WIA intake or registration form, self-attestation (if source documents unavailable). Note: please use Attachment B if documenting by self-attestation.
Offender	Documentation from juvenile or adult criminal justice system, documented phone call with court or probation representatives, WIA intake or registration form, self-attestation (if source documents unavailable). Note: please use Attachment B if documenting by self-attestation.
Pregnant or Parenting Youth	Copy of child's birth certificate, baptismal record, observation of pregnancy status, doctor's note confirming pregnancy, self-attestation (if source documents unavailable). Note: please use Attachment B if documenting by self-attestation.
Youth who needs Additional Assistance	Individual service strategy, case notes, WIA registration form, state MIS.
School Status at Participation	Applicable records from education institution (GED certificate, diploma, attendance record, transcripts, drop out letter, school documentation), WIA registration form (accompanied by a clear case note), State MIS.
Basic literacy skills deficient	CASAS assessment test, school records, case notes.
Foster Care (Younger Youth only)	Written confirmation from social services agency, case notes.
Date of Exit	WIA status/exit forms, State MIS, case notes. Note: WIA Enrollment End Date in SKIES Seeker Programs screen must match date of exit recorded in case notes.
Date of First Youth Service	WIA intake or registration form, State MIS, case notes. Note: WIA Service Actual Start Date in SKIES Services Plan screen must match date of first youth service recorded in case notes.
Other Reasons for Exit	Reasons for WIA exit other than "Unsubsidized Employment" must be clearly stated in case notes.
Enrolled in Education	Applicable records from education institution certifying enrollment, case notes with verification from education institution or training provider that they are enrolled in education.

<b>Data Element</b>	<b>Acceptable Source Documentation for WIA Eligibility, Program, and DOL/ETA Data Element Requirements</b>
Received Educational Achievement Services	Activity sheets, sign-in sheets, attendance record, vendor contract, State MIS, case notes, WIA status form noting receipt of educational services and type of services received. Note: WIA Educational Achievement Services Actual Start Date in SKIES Services Plan screen must match the date of that service recorded in case notes.
Received Employment Services	Activity sheets, vendor contract, attendance record or roster, State MIS, case notes. Note: WIA Received Employment Services Actual Start Date in SKIES Services Plan screen must match the date of that service recorded in case notes.
Received Summer Employment Opportunities	Activity sheets, work agreement, sign-in sheets, attendance record or roster, State MIS, case notes. Note: WIA Received Summer Employment Opportunities Service Actual Start Date in SKIES Services Plan screen must match the date of that service recorded in case notes.
Received Additional Support for Youth Services	Activity sheets, pay stub, sign-in sheets, attendance record or roster, State MIS, vendor contract, case notes: Note: WIA Received Additional Support for Youth Service Actual Start Date in SKIES Services Plan screen must match the date of that service recorded in case notes.
Received Follow-up Services	Activity sheets, vendor contract, attendance record or roster, State MIS, case notes. Note: WIA Service Actual Start Date of Follow-up Service in SKIES Follow-up Plan screen must match the date of that service recorded in case notes.

## WIA Title 1-B Youth Self-Attestation Form

### Applicant Information:

<b>Last Name:</b>	<b>First Name:</b>	<b>Middle Initial:</b>	
<b>Address:</b>	<b>City:</b>	<b>State:</b>	<b>Zip:</b>

### Individuals entering WIA services may self-attest to the information below:

- |   |     |                          |    |                          |
|---|-----|--------------------------|----|--------------------------|
| 1. Are you homeless or did you run away from home?  | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| 2. Are you pregnant or currently parenting a child? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| 3. Are you an offender?                             | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |

### Self-Attestation Statement:

*I certify that the information provided on this document is true and accurate to the best of my knowledge and belief. I understand that such information is subject to verification and further understand that the above information, if misrepresented or incomplete, may be grounds for immediate termination from any WIA program and/or penalties as specified by law.*

**SIGNATURE OF PARTICIPANT**

**DATE**

**X**

### Witness Corroborating “Runaway” or “Homeless” Status Statement:

*I certify that the information provided on this document is true and accurate to the best of my knowledge and belief. I understand that such information is subject to verification and further understand that the above information, if misrepresented or incomplete, may be grounds for the participant’s immediate termination from any WIA program and/or penalties as specified by law.*

**SIGNATURE OF CORROBORATING WITNESS**

**DATE**

**X**

### Staff Verification Statement:

*I certify that the individual whose signature appears above provided the information recorded on this form.*

**SIGNATURE OF STAFF**

**DATE**

**X**