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I. APPLICABILITY/SCOPE

This policy applies to all Workforce Innovation and Opportunity Act (WIOA) Title I-B subrecipients and sub-awardees delivering workforce development Youth programs and services.

II. PURPOSE

This policy, based on WIOA sec. 3(18) and sec. 126-129, provides guidelines for determining eligibility and establishes criteria for the WIOA Title IB youth formula-funded programs which includes In-School Youth (ISY) and Out-of-School Youth (OSY).

III. BACKGROUND

The ARIZONA@WORK City of Phoenix Youth Workforce Program referenced in this policy as the “Youth Workforce Program” provides services to youth with barriers to employment, with a special focus on supporting the educational and career success of out-of-school youth. Additional services provided include career exploration and guidance, continued support of educational attainment, and training in in-demand industries and occupations. The goal of the program is for qualified youth to obtain employment along a career pathway, enrollment in postsecondary education or a Registered Apprenticeship prior to the end of participation. Program services are delivered by contracted youth providers, or sub-awardees, that are procured by the Human Services Department and recommended for approval by the Phoenix Business and Workforce Development Board to the Phoenix City Council. These contracted providers (sub-awardees) are referenced in this policy as “youth providers”.

IV. DEFINITIONS

Basic Skills Deficient – is defined as a youth who:


1. Performs computing or solving math skills or reading, writing, or speaking English skills at or below the 8.9 grade level on a generally accepted standardized test or:
2. Is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual’s family or in society.

Eligible Veteran

1. A person who served in the active military, naval, or air service and was discharged or released under conditions other than dishonorable.
2. Active service includes full-time duty in the National Guard or a Reserve component but does not include full-time duty for training purposes.

Eligible Spouse – is the spouse of any of the following:

1. Any veteran who died of a service-connected disability;

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2. Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - a. Missing in action;
 - b. Captured in line of duty by a hostile force; or
 - c. Forcibly detained or interned in line of duty by a foreign government or power.
3. Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
4. Any veteran who died while a disability was in existence.

In-School-Youth (ISY) - a youth who:

1. Is attending secondary or post-secondary school (as defined by state law);
 2. Is not younger than age 14 or older than age 21 at the time of enrollment.
 3. Is low income and has at least one of the barriers further described in **Section H.2.**
- Note:** The age requirement is extended to 22 for youth with disabilities under state law. Youth who are temporarily not attending school because of break (fall, winter, spring, or summer), but intends to return to school after break are considered as attending school. The same applies if a youth is planning to attend a different school after break. Youth who are attending a public, private, or chartered secondary or post-secondary school, participating in a secondary or post-secondary school on-line or homeschooled, are considered as attending school.

Out-of-School Youth (OSY) – a youth who:

1. Is not attending any school;
 2. Is not younger than age 16 or older than age 24 at the time of enrollment; and
 3. Has one or more of the barriers further described in **Section H.1.**
- Note:** Adult Education under Title II of WIOA, Job Corps, YouthBuild, high school equivalency programs, and drop-out recovery programs are not considered school.


V. POLICY

ARIZONA@WORK City of Phoenix youth providers must ensure the Youth Workforce Program prepares participants to meet education and career goals.

A. General Program Requirements

Youth providers must provide:

1. Preparation for postsecondary education and training opportunities, including Registered Apprenticeship Programs;
2. Strong linkages between academic instruction and occupational education;
3. Preparation for unsubsidized employment opportunities along career pathways; and
4. Strong connections to employers, including small employers, in-demand industry sectors, and occupations of the local and regional labor markets.

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B. Linkages to Community Partners

Youth providers must provide linkages to community partners to:


1. Ensure that parents, youth participants, and members of the community with experience in youth programs are involved in the design and implementation of the Youth Workforce Program;
2. Make opportunities available to individuals who have successfully participated in the Youth Workforce Program to volunteer and provide assistance to participants in the form of mentoring, tutoring and/or other services.
3. Provide appropriate connections between the Youth Workforce Program and the ARIZONA@WORK City of Phoenix workforce delivery system that will foster participation with local youth and include:
 - a. Local area justice and law enforcement officials;
 - b. Local public housing authorities;
 - c. Local education agencies;
 - d. Local human service agencies;
 - e. WIOA Title II adult education providers;
 - f. Local disability-servicing agencies;
 - g. Job Corps representatives;
 - h. Representatives of other area youth initiatives, including those that serve the homeless and private youth initiatives;
 - i. Coordination and provision of youth services;
 - j. Linkages to the job market and employers;
 - k. Access for eligible youth to information and the services listed in **Section F., Youth Services** of this policy; and
 - l. Other activities designed to meet the purposes of the Youth Workforce Program and youth services.

C. Out-of-School Priority

Youth providers must dedicate at least 75 percent of WIOA funds to provide services for OSY. The youth provider must verify and document the youth’s ~~dropout-school~~ status at the time of program enrollment. An individual who is ~~out-of-school~~not in school at the time of enrollment, and subsequently placed in any school, is an OSY for the purposes of the 75 percent expenditure requirement for ~~out-of-school youth~~OSY throughout their participation in the program.

D. Referrals

1. Youth providers must ensure all youth who meet the eligibility criteria for the Youth Workforce Program receive information about the full array of services available through the partner programs that comprise ARIZONA@WORK City of

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Phoenix, eligible youth providers, as well as referrals to appropriate training and educational programs with the capacity to serve the applicant either on a sequential or concurrent basis.

2. Youth Providers must utilize the ARIZONA@WORK City of Phoenix ~~Client Referral System (CRS)~~ client referral system of record to track and manage youth participant referrals to WIOA Core and System Partners. The CRS is an electronic system designed to establish a standard process for WIOA system partners to refer clients from one organization to another, and to respond to the referral for the purpose of a potential co-enrollment or wrap around services for the participant. Youth Providers are encouraged to link and share information in the CRS with other youth serving organizations and system partners, provided the appropriate releases of information have been signed.
3. In order to meet the basic skill and training needs of an applicant who does not meet the eligibility requirements or cannot be served by the program, each Youth Provider must ensure these youth are referred using the CRS:
 - a. For further assessment, as necessary, and
 - b. To appropriate training and education programs, including co-enrollment with WIOA Adult and Dislocated Worker services and other ARIZONA City of Phoenix partners as appropriate, that have the capacity to serve them, either on a sequential or concurrent basis.

E. Veterans Priority of Service

Youth providers must ensure that eligible veterans and eligible spouses, referred to as covered persons, receive priority of service which includes:


1. Receiving access to the service or resource before a non-covered person; and
2. Receiving the service or resource instead of or before a non-covered person. The veteran or spouse must meet all statutory eligibility and program requirements for participation in order to receive priority for a program or service.

More information on Veterans’ Priority of Service can be found at: [DES/WIOA Policy, Chapter 2 - Section 1100 Veterans' Priority of Service](#)

F. Youth Services

Program design is an essential element in the delivery of youth services and focus on comprehensive service strategies should be based upon individual needs. Youth providers must provide design framework services, and WIOA funds may be used to provide design framework services prior to an eligibility determination. Design framework services include:


1. Outreach and recruitment;
2. Intake and eligibility determination;
3. Objective assessment;
 - a. Youth providers must provide an objective assessment of the academic and occupational skill levels as well as needs and strengths of each

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participant to identify appropriate services and career pathways for each participant and to collect information for the Individual Service Strategy (ISS), formerly known as the College and Career Blueprint (CCB).

- b. A new objective assessment is not required if a partner program has completed an objective assessment with the participant in the last six months and its use is deemed appropriate by the Workforce Development Supervisor.
 - c. The objective assessment must include a review of:
 - i. Basic skills (see **Section M, Basic Skill Assessment for Objective Assessment**);
 - ii. Occupational skills;
 - iii. Prior work experience;
 - iv. Employability;
 - v. Interests (including interest and aptitudes for nontraditional jobs);
 - vi. Supportive service needs; and
 - vii. Developmental needs.
4. Development of an Individual Services Strategy;
Youth providers must develop an ISS (**Attachment A**), based on the objective assessment that specifies which of the 14 program elements are necessary to assist the participant in meeting their educational and career goals. The objective assessment may be directly linked to one or more performance accountability measures for youth as specified in 34 CFR 463.155.
- a. The ISS must include identification of appropriate career pathways including:
 - i. Educational goals;
 - ii. Employment goals, including non-traditional employment, taking into consideration career planning and the results of the objective assessment;
 - iii. Appropriate achievement objectives and services for the participant;
 - a) The ISS is a living document and must be updated with each contact with the participant to reflect progress, status, and changes. The ISS must coincide with case notes in Arizona Job Connection (AJC) and services.
 - b) ISS updates/revisions should not occur more than 30 days apart to ensure continued engagement of the participant.
 - iv. The ISS is to be reviewed and revisions to the service strategy must be documented in case notes during each contact with the Career Advisor (see **Section 5.d., Case Management**); and
 - ~~v. ISS must remain open in AJC until all planned services are complete.~~

5. Case Management;

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Youth providers must provide case management of youth. Case management uses a client- centered approach in the delivery of services designed to:

- a. Prepare and coordinate the ISS for participants and ensure access to workforce development activities and supportive services;
 - b. Provide job and career counseling during program participation and after job placement;
 - c. Provide service(s) to participants for the amount of time necessary to enter postsecondary education and/ or unsubsidized employment. While there is no minimum or maximum time a youth can be served in the Youth Workforce Program, programs must link participation to the ISS and not the timing of the youth service provider contracts or program years; and
 - d. Contact between provider Career Advisors and program participants is not to exceed 30 days in duration to ensure contact is maintained between the program and the participant.
6. Follow-up Services.
- a. All youth participants must be provided a minimum of 12 months of follow-up services after the completion of participation (see **Section G.9, Program Element 9: Follow-Up Services**).
7. Under WIOA Title I-B, a youth becomes a participant, and in turn is “a reportable individual” when they are enrolled, and all of the below applicable program requirements have been provided.
- a. Eligibility determination;
 - b. Provision of an objective assessment;
 - c. Development of an ISS; and
 - d. Have received 1 of the 14 WIOA youth program elements described in **Section G. Fourteen Youth Program Elements**.

In addition to these services, DES/WIOA Youth Section 300.303 requires the addition of Career Planning to the S&T plan in the AJC system

G. Fourteen Youth Program Elements

WIOA Youth service delivery is based on the provision of 14 elements. In order to support the attainment of a secondary school diploma or its recognized equivalent, or entry into post-secondary education and career readiness for participants, youth providers must make the 14 youth program elements available to participants. It is not necessary to use WIOA youth funds to provide all 14 elements when resources are leveraged through partner programs that already provide readily available resources. Youth providers are encouraged to partner with existing local, state, or national entities that can provide program element(s) at no cost, as described at 20 CFR §681.460(c).

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Youth providers must ensure there is an agreement in place with a partner organization to ensure a program element is offered when a specific element is not offered utilizing allocated WIOA funds. Youth providers must also ensure the element is closely connected and coordinated with the ARIZONA@WORK City of Phoenix Youth Workforce Program.

The 14 program elements must not be provided to participants prior to eligibility determination. Justification must be entered into case notes providing sufficient reason as to why the particular element was selected, including expected outcomes resulting from participation.


1. Program Element 1: Tutoring, Study Skills Training, Instruction, Dropout Prevention Services

Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery are strategies that lead to completion of the requirements of secondary school diploma or High School Equivalency (HSE), including certificate of attendance or similar documentation for individuals with a disability, or a recognized postsecondary credential. Tutoring, study skill can be provided to individuals who have a high school diploma or HSE and are in postsecondary education.

- a. Tutoring, study skills, instruction that leads to a high school diploma are reported under this element. These services include:
 - i. Providing academic support;
 - ii. Helping youth identify areas of academic concern;
 - iii. Assisting overcoming learning obstacles; and
 - iv. Providing tools and resources to develop learning strategies.
- b. Secondary school dropout prevention strategies that lead to a high school diploma are also reported under this element. This service is provided to individuals who are still in school. Secondary school dropout prevention strategies include services and activities that keep a young person in-school and engaged in formal learning or training activity. Strategies, include but are not limited to:
 - i. Tutoring;
 - ii. Literacy development;
 - iii. Active Learning experiences;
 - iv. After-school opportunities; and
 - v. Individualized instruction.

2. Program Element 2: Alternative Secondary School Services or Recovery Services

Alternative secondary school services and dropout recovery services are provided with the goal of helping youth to re-engage and persist in education that leads to

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the completion of a recognized credential.


- a. Alternative secondary school services, such as basic education skills training, individualized academic instruction, and English as a Second Language, are provided to assist youth who have struggled in traditional secondary education.
- b. Dropout recovery services are provided to youth who have dropped out of school: Services include credit recovery; counseling; and educational plan development.

3. Program Element 3: Work Experiences (WEX)

Work experiences (WEX) are planned, structured learning experiences that take place in a workplace for a limited period of time. A WEX provides a youth participant an opportunity for career exploration and skill development. Priority consideration is given to programs that lead to postsecondary credentials that align with the targeted industry sectors of focus as determined annually by the Phoenix Business and Workforce Development Board (PBWDB).


- a. The following are required for all WEX opportunities prior to enrolling:
 - i. Staff must ensure that participants fully complete the in-person or virtual work readiness training;
 - ii. The WEX must align with outcome-oriented occupational goals specified in the ISS. Career Pathway programs are a focus for occupational trainings;
 - iii. Both the youth provider staff, and participant must mutually review and determine the feasibility and suitability of utilizing a WEX for the participant;
 - iv. The selection of a worksite for paid and/or unpaid WEX is determined by the needs of the participant and employer;
 - v. The standard maximum number of hours per participant for all work experience activities is 320 hours per program year. Additional hours for an extended WEX must be pre-approved by the Workforce Development Supervisor prior to the continuation; and
 - ~~vi. Participants cannot begin a WEX until the WEX Agreement (Attachment B) has been approved by the Youth Workforce Development Supervisor. All WEX agreements must be approved prior to reimbursement.~~

- b. Additional Work Experience Requirements
To participate, employers must agree to provide work-related activities

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for participants to develop basic work habits, learn occupational skills and gain usable working experience to promote future employment at the worksite. Work experience activities should not reduce current work hours for existing employees, displace current employees, create a lay-off to current employees, impair existing contracts or collective bargaining agreements, and/or infringe upon the promotional opportunities for current employees.


- i. WEX opportunities provided by an employer are:
 - a) Paid or unpaid;
 - b) Provide youth with opportunities for career exploration and skill development; and
 - c) Take place in the private or public sectors.
- ii. Labor standards apply in any WEX where an employee/employer relationship exists, as defined by the Fair Labor Standards Act or applicable state laws.
- iii. WEX participants are not eligible to receive needs-related payments, because WEX is not considered a training or employment service.
- iv. The WEX must be accompanied by an academic and occupational component that encompasses contextual learning and is intended to help the participant learn information necessary to work in specific industries or occupations.
 - a) The academic and educational component may occur concurrently or sequentially with the WEX.
 - b) The academic and educational component may occur inside or outside of the work site.
 - c) The academic and educational component may be provided by the WEX provider or may be provided separately in a classroom.
 - d) Providers have flexibility in determining appropriate types of academic and occupational education necessary for a WEX. However, prior to initiating the WEX, the Career Advisor must document what the academic and educational component is and how it will be provided in the WEX contract.
 - e) Contextual learning does not include attending high school classes or their equivalent that will lead to attainment of a High School Diploma or equivalent.
 - f) Contracts are the mechanism to deliver a WEX to ISY and

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OSY. When the academic and educational component is not provided directly by the employer, an additional contract with the training provider is required.

- v. Youth providers also agree to ensure the following occur:
 - a) Supply the Employer with the required forms, procedures for maintaining work experience trainee(s)' records, and instructions of required reporting information;
 - b) Provide a counselor to assist the Employer in the resolution of training, employment, and personal problems that may affect performance;
 - c) Provide tools, work clothing/shoes, and supportive services as maybe required by each work experience trainee, if applicable; and
 - d) Provide monetary training payments to work experience trainee(s) as needed or required.

- c. The following types of WEX may be provided to participants:
 - i. Summer employment opportunities and other employment opportunities available throughout the school year.
 - a) Summer employment opportunities must provide direct linkages to academic and occupational learning, including leadership development opportunities, tutoring, occupational skills training, etc., and may provide other elements and strategies as appropriate to serve the needs and goals of the participants.
 - b) The summer employment administrator does not have to select employers through a competitive process for summer employment opportunities.
 - ii. Pre-apprenticeship programs
 - a) A pre-apprenticeship program is designed to prepare individuals to enter and succeed in an apprenticeship program registered under the National Apprenticeship Act and includes:
 - i. Training and curriculum that aligns with the skill needs of employers in Arizona or region involved;
 - ii. Access to educational and career counseling and other supportive services,


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directly or indirectly;

- iii. Hands-on meaningful learning activities that are connected to education and training activities such as exploring career options and understanding how skills acquired through the coursework can be applied toward a future career;
 - iv. Opportunities to attain at least one industry recognized credential; and
 - v. A partnership with at least one or more Registered Apprenticeship programs that assist in placing individuals who complete the pre-apprenticeship in a registered apprenticeship program.
 - b) Youth Program providers must verify and maintain information on the type of credential offered and the pre-apprenticeship program’s documented partnerships with registered apprenticeship programs.
 - iii. Internships and job shadowing
 - a) Job shadowing is designed to increase career awareness, help model youth behavior through examples, and reinforce the youth and young adult link between academic learning and occupational work requirements. It includes the youth conducting interviews with people in their prospective professions to learn more about those fields or participating in an expanded informational interview in the workplace.
 - b) An internship is temporary; may be paid or unpaid, as appropriate; and is consistent with other laws, such as Fair Labor Standard Act (FLSA).
 - a)c) A job shadow experience is a temporary work exposure, where the participant is not paid a wage, and which may last a few hours, days, weeks, or longer.
 - iv. On-the-job training (OJT) opportunities
 - a) OJT is provided under a contract with an employer who is reimbursed a percentage of the wage rate of the participant being trained while engaged in productive work in a job. For more information on OJT, refer to policy 600.605 On-the-Job Training.
- d. Work Experience Expenditure Requirements

Youth providers must spend at least 20 percent of all funds allocated to the Youth Workforce Program on paid and unpaid WEX. Allowable WEX expenditures include:

 - i. Wages/stipends paid for participation in a WEX;

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a) Wages must, at minimum, meet the higher of State or federal minimum wage requirements;

b) Ensure wages are comparable to other employees with comparable skills and job duties; and

a)c) Wages are subject to FLSA rules.

ii. Staff time working to identify and develop a work experience opportunity, including staff time spend working with employers to identify and development the WEX;

iii. Staff time working with employers to ensure a successful WEX, including staff time managing the WEX;

iv. Staff time spent evaluating the WEX;

v. Participant and employer WEX orientation sessions;


vi. Classroom training or the required academic educational component directly related to the WEX;

vii. Incentive payments directly tied to the completion of the WEX (see 300.311 Youth Incentive Policy); and

viii. Employability skills/ job readiness training to prepare the youth for the WEX.


ix. Supportive services that enable a WIOA youth participant to participate in work experience.

- e. Youth providers are required track the program funds spent on paid and unpaid WEX, including wages and staff costs for the development and management of work experiences, and report such expenditures to the Youth Workforce Development Supervisor. In addition, youth providers must track the percentage of funds spent on WEXs by calculating the total ARIZONA@WORK City of Phoenix youth program funds expended on WEXs, not by calculating the funds expended separately for ISY and OSY.
- f. Youth providers must ensure there is a written Work Experience Agreement (**Attachment B**) between each employer offering the WEX to ensure compliance with WIOA and applicable regulations.
- g. The work experience contract between the youth provider and the employer must include employer compliance with:
 - i. Regulations under WIOA sec. 188 (nondiscrimination);
 - ii. 29 CFR Section 37, Title VI of the Civil Rights Act of 1964'
 - iii. Age Discrimination Act of 1975;
 - iv. Sections 504 and 508 of the Rehabilitation Act of 1973;
 - v. Title IX of the Education Amendments of 1972;
 - vi. Title II Subpart A of the American with Disabilities Act of 1990;
 - vii. The Genetic Information Nondiscrimination Act of 2008; and
 - viii. Policy on Medical/Recreational Marijuana for WEX prohibitions.
- h. The conditions of employment and training will be in full compliance with applicable federal, state, and local laws;

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- i. No individual may be placed in a WIOA Title I-B employment activity if a member of the person’s family is directly supervising the individual;
- j. The youth provider and worksite must comply with the Fair Labor Standards Act or the Arizona minimum wage law, whichever is applicable;
- k. Work experience is not permitted to be carried out for the construction, operation, or maintenance of any part of a facility that is used for, or to be used, sectarian instruction or a place of worship;
- l. The youth provider must ensure the worksite is not presently debarred, suspended, proposed for debarment, declared ineligible, or excluded by any federal department or agency;
- m. Participant must not be placed under the WEX agreement if:
 - i. Any other individual is laid off from the same or equivalent job;
 - ii. Employer has terminated any other regular, unsubsidized employee, or otherwise caused an involuntary reduction in its own workforce with intention of filling the vacancy with the WIOA Title I-B participant;
 - iii. The job is created in a promotional line that infringes in any way on the promotional opportunities of any current employees.
- n. The participant portion of the WEX agreement must include:
 - i. The duration of the WEX in hours;
 - ii. The participant’s schedule, to include the days and hours the participant will work;
 - iii. The scope of work;
 - iv. Worksite agreement signed by the service provider, the employer, and the participant;
 - v. Health and safety standards;
 - vi. Identification of academic and educational component and how it will be provided;
 - vii. Conditions, requirements, and amounts of incentives;
 - viii. Dress code, if any;
 - ix. Grievance process; and
 - x. Consequences for non-compliance with the agreement.

The case file documentation must include the WEX agreement, activity sheets, and attendance records.

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4. Program Element 4: Occupational Skills Training


Occupational skills training is an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by a certain occupational field at entry, intermediate or advanced levels.

Participants are required to complete a two-day work readiness training prior to enrolling into occupational skills training. Both days of work readiness training must be attended for the training to be considered complete. Youth providers are permitted to waive this requirement in situations where there the youth has already completed a similar training or other reasons that indicate the training is either duplicative or will provide minimal or no benefit to the youth. Case notes must explain the rationale for waiving the sessions.

- a. Youth providers must offer priority consideration to training programs that offer postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area. Such training must:
 - i. Be outcome oriented and focused on an occupational goal specified in the ISS;
 - ii. Be of sufficient duration to impact the skills needed to meet the occupational goal and;
 - iii. Result in the attainment of a recognized postsecondary credential.
- b. The training program must meet requirements listed in policy [600.602 Training Services – Occupational Skills](#).
- c. Occupational skills training not funded by an Occupational Training Account (OTA) must be competitively procured by contract or grant.
- d. ~~However,~~ OSY and ISY may be issued an OTA with a specified dollar amount to provide training using WIOA funds based on the needs identified in the ISS.

Note: For Program Years 2020 to 2022, Arizona has been granted a [waiver from](#) the United States Department of Labor (DOL) of the requirement (20 CFR § 681.550) that OTAs are only available to OSY enrolled in the Youth Workforce Program.

- i. OTAs allow participants the opportunity to choose the training provider that best meets their needs.
- ii. If an OTA is used to pay for the training, the training program must be listed as an approved program on the Eligible Training Provider List (ETPL). For more information on OTA requirements, see policy [600.601 Training Services Eligibility](#).

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- e. OSY and ISY between the ages of 18 and 21 may also co-enroll in the WIOA ARIZONA@WORK City of Phoenix Adult Program if the youth’s needs, knowledge, skills and interests align with the Adult Program and may receive training services through an OTA funded by the Adult Program.

5. Program Element 5: Education Offered Concurrently with Workforce Preparation and Training for a Specific Occupation

- a. Education offered concurrently with workforce preparation and training for a specific occupation is reflective as an integrated training model. This element is also referred to as Integrated Education or Contextualized Instruction. Youth providers must ensure the service is only added to the Service and Training (S&T) plan in AJC when the following services are provided at the same time:
 - i. Workforce participation activities;
 - ii. Basic academic skills; and
 - iii. Hands-on occupational skills training connected to a specific occupational cluster, or career pathway.

6. Program Element 6: Leadership Development Opportunities


Leadership development encourages responsibility, confidence, employability, self- determination, and other positive social behaviors. Participants must be engaged in the activity to count it as an activity required for enrollment, such as:

- a. Exposure to postsecondary educational possibilities;
- b. Community and service-learning projects;
- c. Peer-centered activities, including peer mentoring and tutoring;
- d. Organizational and teamwork training, including team leadership training;
- e. Training in decision-making, including determining priorities and problem solving;
- f. Citizenship training, including life skills training such as parenting skills and work- behavior training;
- g. Civic engagement activities, which promote the quality of life in a community; and
- h. Other leadership activities that place the youth in a leadership position such as serving on the standing youth committee.

Note: Calling a youth to advise them to come into the youth provider office or other ARIZONA@WORK City of Phoenix job center or affiliate site does not meet the definition of leadership development.

7. Program Element 7: Supportive Services

Supportive services for youth are services that enable an individual to

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participate in WIOA activities. For additional information, refer to policies [500.501 Supportive Services Eligibility](#) and [500.502 Supportive Services Categories](#).

8. Program Element 8: Adult Mentoring


Youth providers must make adult mentoring available, which may include a youth being matched with an adult mentor, an employer, or an employee of an employer.

- a. Youth providers must ensure that adult mentoring for youth:
 - i. Is a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentors offer guidance, support, and encouragement to develop the competence and character of the participant;
 - ii. Lasts at least 12 months and occurs during the program year and following exit from the program; and
 - iii. Matches the youth with an individual mentor with whom the youth interacts in person and virtually.
- b. Providers must ensure appropriate policy and procedures are in place to adequately screen and select mentors.
- c. Attempts to find a suitable mentor in the community who is not a Career Advisor must be documented in the participant’s case notes. If a suitable community-based mentor cannot be found, a provider’s Career Advisor may serve a mentor when adult mentors are not available in the community.

9. Program Element 9: Follow-Up Services

The purpose of follow-up services is to ensure the youth is successful in employment and/or postsecondary education and training after exiting from the program. Follow-up services must include more than an attempt to contact the individual or contact made only to secure documentation in order to report a performance outcome. All youth participants must be provided an opportunity to receive follow-up services for minimum of 12 months after the completion of participation, unless the participant declines to receive follow-up services, or the participant cannot be contacted or located. Follow-up service may begin immediately following the last expected date of service in the Youth program (and other ARIZONA@WORK partner program in which the participant is co-enrolled) when no futures services are scheduled.

- a. Follow-up services may be provided beyond 12 months at the discretion of the youth provider. This does not preclude individuals from accessing ARIZONA@WORK City of Phoenix services for which they are determined

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eligible.

- b. The type and duration of follow-up services must be determined based on the needs of the youth participant and may vary among participants.
- c. Follow-up services for youth may include:
 - i. Supportive services, except for needs-related payments;
 - ii. Adult mentoring;
 - iii. Financial literacy education;
 - iv. Services that provide labor market information 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
 - v. Services necessary to ensure success of the youth employment and/or post-secondary education.
- d. Follow-up services must be recorded in case notes in AJC promptly and accurately to ensure expediency of services. Case notes in AJC must contain documentation substantiating follow-up contact with the youth, including follow-up attempts. This may include, but is not limited to:
 - i. A letter;
 - ii. An e-mail message; or
 - iii. Case notes based on an actual conversation, either in person or by telephone. Follow-up attempts with the participant must be made and documented in AJC on a monthly basis during the 12-month requirement.
- e. If it becomes necessary during the follow-up period to utilize WIOA services beyond those available through the follow-up component, re-enrollment into WIOA is required.

10. Program Element 10: Comprehensive Guidance and Counseling

Comprehensive guidance and counseling provide individualized counseling to participants to help alleviate additional barriers to education and work.

- a. Comprehensive guidance and counseling include:
 - i. Drug and alcohol abuse counseling;
 - ii. Mental health counseling; and
 - iii. Referrals to partner programs, as appropriate.
- b. When referring participants to necessary counseling that cannot be provided by the youth provider, the youth provider must coordinate with the organization it refers to in order to ensure continuity of service.
- c. When funds exist with the youth, it is allowable to provide counseling services directly to participants rather than referring the youth to partner programs.
- d. ~~When funds exist with the youth, it is allowable to provide counseling services directly to participants rather refer the youth to partner programs.~~ To ensure that confidential information is protected, any medical information/records must be protected. For additional

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[information, refer to the WIOA Youth Program Data Entry and Documentation Procedural Guide Exhibit 200B located on the Title I-B Policy and Procedure Manual webpage.](#)

11. Program Element 11: Financial Literacy Activities


Financial literacy education may include the following activities:

- a. Support the ability of participants to create budgets, initial checking and saving accounts at banks, and make informed financial decisions;
- b. Support participants in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards;
- c. Teach participants about the significance of credit reports and credit scores; what their rights are regarding their credit and financial information; how to determine accuracy of a credit report, how to correct inaccuracies and how to improve or maintain good credit to make informed financial decisions;
- d. Support the participant’s ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions;
- e. Educate participants about identity theft, ways to protect themselves from identity theft; how to resolve cases of identity theft and in other ways; understand their rights and protections related to personal identity;
- f. Support activities that address the particular financial literacy needs of non-English speakers, including providing support through the development of and distribution of multilingual financial literacy and education materials;
- g. Support activities that address the particular financial needs of youth with disabilities, including connecting them with benefits planning and work incentives counseling;
- h. Provide financial education that is age appropriate, timely and provides an opportunity to put lessons into practice, such as access to safe and affordable financial products that enable money management and savings; and
- i. Implement other approaches to help participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high-quality age-appropriate, and relevant strategies and channels, including where possible, time and customized information, guidance, tools, and instruction.

12. Program Element 12: Entrepreneurial Skills Training

Entrepreneurial skills training (see [600.603 Entrepreneurial Training Services policy](#)) addresses the basics of starting and operating a small business.

- a. Youth providers must ensure that entrepreneurial skills training develops the skills associated with starting and operating a small business. Such

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skills may include, but are not limited to, the ability to:

- i. Take initiative;
 - ii. Creatively seek out and identify business opportunities;
 - iii. Develop budgets and forecast resource needs;
 - iv. Understand various options for acquiring capital and tradeoffs associated with each option; and
 - v. Communicate effectively and market oneself and one’s ideas.
- b. Among the approaches that may be used to teach youth entrepreneurial skills are the following:
- i. Entrepreneurial education programs that introduce the values and basics of starting and running a business, including guiding youth through the development of a business plan and using simulations of business start-up and operation.
 - ii. Enterprise development which provides support and services that incubate and help youth develop their own businesses.
 - iii. Enterprise development programs go beyond entrepreneurial education by helping youth access loans or grants that are needed begin business operations and by providing more individualized attention to the development of viable business ideas.
 - iv. Experiential programs that provide youth with the ability to gain experience in the day-to-day operation of a business. These programs may involve the development of a youth-run business, or they may facilitate placement in apprenticeship or internship positions with adult entrepreneurs in the community.

13. Program Element 13: Services that Provide Labor Market Information

Youth providers must provide services that make available labor market and employment information about in-demand industry sectors or occupations in the City of Phoenix, such as career awareness, career counseling, and career exploration services.

- a. Youth provider Career Advisors must be familiar with state and federal Labor Market Information (LMI) data and tools.
- b. Career awareness begins the process of developing knowledge of a variety of careers and occupations available, their skill requirements, working conditions and training prerequisites; and job opportunities across a wide industry sectors.
- c. Career exploration is described as the process in which a youth choose an educational path, training or a job which fits their interests, skills, and abilities.
- d. Career counseling or guidance provides advice and support in making

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decisions about what career paths to take. Career counseling services may include:

- i. Providing information on resume preparation;
- ii. Interviewing skills;
- iii. Potential opportunities for job shadowing; and
- iv. Long-term benefits of postsecondary education and training (e.g., increased earning power and career mobility).

14. Program Element 14: Postsecondary Preparation and Transition Activities

Postsecondary preparation and transition activities prepare ISY and OSY for advancement to postsecondary education after attaining a high school diploma or HSE. The services include exploring postsecondary education options including technical training schools, community colleges, 4-year colleges, universities, and registered apprenticeships. Additional services, include but are not limited to:

- a. Assisting youth prepare of SAT/ ACT testing;
- b. Assisting with college admission applications;
- c. Searching and applying for scholarships and grants’;
- d. Filling out Financial Aid applications and adhering to changing guidelines; and
- e. Connecting youth to postsecondary education programs.


H. Eligibility Determination

At the time of eligibility determination, youth providers must determine if the youth meets the ISY or OSY criteria to participate in Youth workforce program services during any part of the program year.

1. Out-of-School Youth

A young person meets the definition of OSY if a participant is:

- a. Not attending school (**see Section H.4, School Status**);
- b. Not younger than 16 or older than 24 at the time of enrollment and one or more of the following:
- c. Has one of the following barriers:
 - i. A school dropout;
 - ii. A low-income individual with a secondary school diploma or its recognized equivalent and:
 - a) Basic skills deficient; or
 - b) An English language learner;
 - iii. An offender;
 - iv. Homeless, i.e., lacks a fixed, regular, and adequate nighttime residence:
 - a) Individual and meets the criteria defined in sec. 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 1403e-2));
 - b) Child or youth who meets the criteria defined in sec. 725(2) of

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the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11341(2)); or


- c) Runaway.
- v. In foster care, has aged out of foster care, or has attained the age of 16 years old and left foster care for kinship, guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act ([42 U.S.C. 677](#)), or in an out-of-home placement;
- vi. Pregnant or parenting;
- vii. An individual with a disability; or
- viii. A low-income individual who requires additional assistance to enter or complete an education program or to secure or hold employment (**see Section M., Needs Additional Assistance Criterion**).

Participants may continue to receive services beyond the age of 24 once they are enrolled in the program.

2. In-School-Youth

A youth meets the definition of ISY if a participant is:

- a. Attending secondary school, including secondary and postsecondary school (as defined by Arizona law);
- b. Not younger than age 14 or older than 21 years old at the time of enrollment. The age requirement is extended to 22 for youth with disabilities because school districts must provide programs and services to eligible youth with disabilities attending secondary school until they turn 22 years old. Youth with a disability who turn 22 years old during the school year must continue to receive services from the school district until the end of the school year (ARS 15-764);
- c. Low-income and **at least one of the following barriers**:
 - i. Basic skills deficient;
 - ii. An English language learner;
 - iii. An offender;
 - iv. Homeless youth between 16-24 years old, i.e., lacks a fixed, regular, and adequate nighttime residence:
 - a) Individual and meets the criteria defined in sec. 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 1403e-2));
 - b) Child or youth who meets the criteria defined in sec. 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11341(2)); or
 - c) Runaway.
- v. In foster care, has aged out of foster care, or has attained the age of 16 years old and left foster care for kinship, guardianship or adoption, a child eligible for assistance

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under sec. 477 of the Social Security Act ([42 U.S.C. 677](#)), or
in an out-of-home placement;

- vi. Is pregnant or parenting;
 - vii. An individual with a disability; or
 - viii. Requires additional assistance to complete an educational program or to secure and hold employment (See Section M. Needs Additional Assistance Criterion)
- d. If a youth turns 21 years old during participation, there may continue to receive services.

Note: Individuals who are 22 years and older attending postsecondary education do not meet the age requirement for ISY (14-21 years old) and do not meet the Youth Workforce Program eligibility requirements. These individuals may be served by the ARIZONA@WORK City of Phoenix Adult or Dislocated Worker Program, whichever one is applicable.

3. Eligibility Barrier Definitions

- a. A youth is **basic skills deficient** when one of the following definitions applies:
 - i. The youth performs any of the following at or below an 8.9 grade level:
 - a) Computing or solving math problems;
 - b) Reading English;
 - c) Writing English; or
 - d) Speaking English.
 - ii. The youth is unable to:
 - a) Compute or solve problems;
 - b) Read, write, or speak English at a level necessary to function on a job, in the youth’s family, or in society.
 - iii. Case notes must clearly document the assessment tool used to determine basic skills deficiency. Documented evidence including version of assessment and date completed must be included in the notes.
- b. **English Language Learner (ELL)** is defined as an individual who has limited ability in reading, writing, speaking or comprehending the English Language, and:
 - i. Whose primary language is other than English; or
 - ii. Who lives in a family or community environment where the dominant language is other than English.
 - iii. When assessing a youth for BSD as an ELL, formalized assessments, observation and interviews may be used.
 - a) These assessment instruments must be valid and appropriate.
 - b) Reasonable accommodations must be provided as needed in the assessment process and if necessary, for individuals with disabilities.

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- c) The observation must be included in the objective assessment and case notes.
- c. **Dropout** is defined as an individual who is no longer attending school and who has not received a secondary diploma or its recognized equivalent. Individuals who have dropped out of postsecondary education are not considered “drop out” for purposes of Youth Workforce Program eligibility.

Note: For the definition of OSY, youth who have dropped out of school must not be required to wait until they have not attended school for at least the most recent complete school calendar quarter or calendar quarter to be enrolled in the Youth Workforce Program.
- d. **Offender** is defined as an adult or juvenile who:
 - i. Is or has been subject to any stage of the criminal justice process, and for whom services under this act may be beneficial; or
 - ii. Requires assistance overcoming artificial barriers to employment resulting from a record of arrest or conviction.
- e. **Parenting** includes either a custodial or non-custodial mother or father. When a youth is within the Youth Workforce Program age eligibility requirements, the age the youth who became a parent does not factor into the definition of parenting.
- f. **A pregnant individual** only includes the expectant mother.
- g. Homeless or runaway youth are defined as individuals between the ages of 14 to 24, who lack a fixed, regular, and adequate nighttime residence.
 - i. Meets the criteria defined in Section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)); or
 - ii. Meets the criteria defined in Section 725(2) of McKinney-Vento Homeless Assistance Act (42 U.S.C 11435a(2)).

4. School Status

School status is determined at the time of enrollment. The enrollment process may occur over a period of time, as such, Career Advisors must determine school status during the time the eligibility determination portion of the program enrollment is made. Once the school status of the youth is determined that status remains the same throughout the youth’s participation.

- a. Youth who are temporarily not attending school because the school is on break (Winter, Spring, Fall or Summer Break) but are enrolled to continue school after the school break are considered to be attending school and may only be enrolled as ISY. The same applies if the youth is planning to attend a different school after the break.
- b. When a youth is in the Youth Workforce Program between high school graduation and postsecondary education, the youth is considered in-school if they have registered for classes, even if the youth has not yet begun postsecondary classes at the time of the Youth Workforce Program


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enrollment. However, if the youth graduates from high school and registers for postsecondary education but does not ultimately follow through with attending postsecondary education, then such a youth would be considered an OSY.

- c. For purposes of ARIZONA@WORK City of Phoenix (WIOA Title IB), the following are not considered schools for purposes of determining school status:
 - i. Providers of adult education under Title II of WIOA;
 - ii. Job Corp program;
 - iii. HSE programs; and
 - iv. Dropout re-engagement programs.


Note: An exception exists for youth attending HSE programs, including dropout re-engagement programs funded by the public K-12 school system that are classified by the school system as still enrolled in school; they are considered ISY.

- d. Youth who are participating in online secondary and postsecondary school are considered to be attending school. Likewise, youth who are homeschooled, or attending public, private or chartered secondary/postsecondary schools are considered to be attending school.
 - e. When a youth is enrolled in any credit-bearing postsecondary education classes including credit-bearing community college classes and credit-bearing continuing education classes, then they are considered attending postsecondary education and therefore, an ISY. If the youth is only enrolled in non-credit bearing postsecondary classes, they would not be considered attending postsecondary school, and therefore is an OSY.
 - f. A youth who is within the age of compulsory school attendance but has not attended school for at least the most recent complete quarter or semester is an OSY. The definition of a quarter or semester is based on how a local school district defines the terms.
5. Needs Additional Assistance Criterion
Youth providers must ensure that an ISY enrolled in a program year based solely on eligibility because he or she “requires additional assistance to enter or complete an educational program or to secure and hold employment” criterion is limited to five percent of ISY. Providers must track ISY enrolled in the program each year to ensure that no more than five percent are enrolled using this criterion. Youth that qualify under “requires additional assistance include both

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ISY and OSY who meet at least one of the following:

- a. Educational Barriers
 - i. In school (secondary or postsecondary) with a Grade Point Average of less than 2.0;
 - ii. Has quit secondary or postsecondary program without attaining a recognized credential;
 - iii. Has repeated at least one secondary grade level;
 - iv. Is deemed at risk of dropping out of school by a school official;
 - v. Placed on probation, suspended from school, or expelled from school one or more times during the past two years.
 - b. Employment Barriers
 - i. Has never held a job (applies to OSY only);
 - ii. Has been fired from a job within the 12 months prior to program participation (applies to OSY only);
 - iii. Has never held a full-time job for more than 13 consecutive weeks (applies to OSY only);
 - iv. Has a family history of chronic unemployment, including long-term public assistance.
 - c. Other Barriers/Characteristics
 - i. Emancipated youth;
 - ii. Has one or more parents or legal guardian currently incarcerated;
 - iii. Has been referred to, or is being treated by, an agency for a substance abuse related problem;
 - iv. Has experienced traumatic events, is a victim of abuse, or resides in an abusive environment as documented by a school official or professional.
6. Low-Income Requirements
- a. All ISY must be low-income unless included in the five percent low-income exception.
 - b. Low-income eligibility requirements apply to OSY only if they are recipients of secondary school diplomas or its recognized equivalent and are at least one of the following:
 - i. Basic skills deficient;
 - ii. An English language learner; or
 - iii. In need of additional assistance to enter an educational program or to secure employment ((see **Section H.5., Needs Additional Assistance Criterion**)).
 - c. If a youth meets all other eligibility criteria for WIOA Title I except the low-income criteria eligibility, the youth may be served under the five percent low-income exception pursuant to the five percent guidelines.

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7. Non-Low-Income Youth

Youth providers **must not** serve more than five percent of youth who do not meet low-income requirements but who meet all the other eligibility requirements. The five percent is calculated using the combined total of ISY and OSY.


The percentage of non-low-income youth will be calculated based on the percent of newly enrolled youth in the Youth Workforce Program in a given program year who would ordinarily be required to meet the low-income criteria.

I. **Documentation for Eligibility**

Youth providers must ensure timely documentation is collected in regard to eligibility determination. Attempts to secure documentation and the outcome must be recorded in AJC case notes promptly and accurately.

1. General Requirements

- a. Youth providers must use the [WIOA Title I-B Youth Program Eligibility Checklist \(Attachment C\)](#)
- b. To determine for the youth program:
 - i. The checklist identifies source documents, which are documents used to verify eligibility requirements.
 - ii. All eligibility and data validation documents must uploaded into AJC except for medical documentation or information regarding participant in the Arizona Address Confidentiality Program (ACP). ~~Section ### further describes Arizona ACP participants~~
 - iii. The youth program provider must ensure that reasonable attempts have been made to secure source documentation as identified in the checklist.
- c. The [WIOA Title I-B Applicant Statement \(Attachment D\)](#) may be used as permitted on the *WIOA Title I-B Youth Program Eligibility Checklist* when the information is unverifiable, or it is unreasonably difficult for the applicant to obtain, and as permitted under the [Data Validation Checklist](#).
 - i. For high-risk OSY, the *WIOA Title I-B Applicant Statement* is acceptable to allow up front enrollment of the youth.
 - ii. High risk OSY means not having a high school diploma or HSE and meeting the eligibility criteria as listed **Section H.1., Out-of-School Youth**.


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Note: An exception includes OSY who meet the “requires additional assistance” to enter or complete an education program or to secure or hold employment eligibility criteria (**see Section H.5.**), as they are not considered high risk. As such, the *WIOA Title I-B Applicant Statement* may not be used for upfront enrollment for youth that meet this eligibility criteria.

- iii. If additional documentation is required on the *WIOA Title I-B Youth Program Eligibility Checklist* for data validation purposes, the career advisor may request the documentation from the youth after the youth has begun to receive youth services.
- iv. Youth providers must ensure all youth who are less than 18 years old have a *WIOA Title I-B Applicant Statement* signed by the youth’s parent, guardian, or a responsible adult/collaborating witness. By signing the form, the youth’s parent, guardian, or a responsible adult/collaborating witness gives permission for the youth to participate in the program and verifies the information on the form is accurate.


2. Determining Low-Income Status

- a. A low-income youth is an individual who:
 - i. Receives, is a member of a family that receives, or has received in the past six months, cash payments under a federal, state, or local income-based public assistance program (e.g., Temporary Assistance to Needy Families (TANF));
 - ii. Receives annual income in relation to family size that does not exceed the higher of the federal poverty guidelines or 70 percent of the DOL Lower Living Standard Income Level (LLSIL) for each program year (see **Attachment E**);
 - iii. Receives, is a member of a family that receives, or has received in the past six months, assistance through the Supplemental Nutrition Assistance Program (SNAP);
 - iv. Qualifies as a homeless individual who lacks a fixed, regular and adequate nighttime residence;
 - v. Is a foster child for whom state or local government payments are made;
 - vi. Is a member of a family whose income does not meet low-income requirements, but is an individual with a disability, and therefore can be counted as a family of one so that

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- individual income meets the low-income requirement;
 - vii. Receives Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI);
 - viii. Receives, is a member of a family that receives, or has received within the past six months, assistance through the Refugee Cash Assistance (RCA), a federally funded need-based cash benefit for refugees and other eligible beneficiaries, who are not eligible for other cash assistance programs, such as TANF;
 - ix. Receives, or is eligible to receive, a free or reduced-priced lunch under the Richard B. Russell National School Lunch Act (NSLA); or
 - x. Is a youth who lives in a high poverty area, as determined by the American Community Survey.
- b. For youth required to be low income, the youth provider must use the LLSIL Matrix to determine low-income status when low income status cannot be documented using methods of verification as noted above.
 - i. Youth provider staff must use the HHS Poverty guidelines or the 70 percent LLSIL column for the youth’s family size to determine low-income status.
 - ii. If the youth’s family income is more than the amount on either the HHS Poverty guidelines or 70 percent LLSIL column, the youth does not meet low-income requirements for the youth program and must not be enrolled.
 - iii. If the youth’s family income is less than the amount on either the HHS Poverty guidelines or 70 percent LLSIL column, the youth does meet low-income requirements for the youth program and may be enrolled.
- c. Income Included/Excluded in the Calculation - For types of income that must be included or is excluded from the income calculations when determining low-income status, refer to **Attachment F**.
- d. Family is defined as two or more related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories:
 - i. A married couple and dependent children;
 - ii. A parent or guardian and dependent children; or
 - iii. A married couple (20 CFR 675.300).

Note: When an individual is not living in a single residence with other

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family members, the individual is not considered a member of the family for the purpose of Youth Workforce Program income calculation.

- e. For the definition of family, a dependent is defined as a child who is age 18 and under:
 - i. At the end of the previous calendar year; or
 - ii. At the end of the previous calendar year and who was a student.

J. High Poverty Areas

Youth living in high poverty areas are automatically considered low-income individuals.


- 1. WIOA defines a high poverty area as:
 - a. A census tract;
 - b. Set of continuous census tracts;
 - c. An American Indian reservation;
 - d. Oklahoma Tribal Statistical area (as defined by U.S. Census Bureau);
 - e. Alaska Native Village, or Alaska Native Regional Corporation Area;
 - f. Native Hawaiian Village Homeland Area; or
 - g. Other tribal land as defined by the USDOL Secretary in guidance or;
 - h. A county with a poverty rate of at least 25 percent, as set every five years using the American Community Survey five-year data.

- 2. Youth providers must use either the [Maricopa Associations of Government](#) or [U.S. Department of Housing and Urban Development Office of Policy Development and Research](#) to determine if a youth lives in a high poverty area by census tract.

K. Income Verification

Youth provider staff must attempt to gather information, such as other public assistance the individual may receive, (e.g., TANF and SNAP), and verify if the individual receives monetary support. Attempts include calls to the participant, letters, e-mail messages, etc. Low-income verification attempts must be documented in case notes in AJC.


- 1. Documentation related to income verification as outlined on the [WIOA Title I-B Youth Program Eligibility Checklist](#) must be collected and uploaded into AJC. Income that is being used to determine income eligibility should be identified using the *WIOA Title I-B Youth Program Eligibility Checklist*.
- 2. When a verification document cannot be obtained, the [WIOA Title I-B Applicant Statement](#) with signatures by the youth and a witness who has knowledge of the information provided, may be accepted as a last resort as permitted by the

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WIOA Youth Program Eligibility Checklist.

Note: The youth provider Career Advisor or other ARIZONA@WORK City of Phoenix program/partner staff do not qualify as witnesses and must not sign as the witness.

3. When a participant is receiving child support, the witness is the parent providing the child support or an individual that has knowledge of the applicant receiving child support. The attempts used to gather information needed for verification must be documented in AJC case notes.
4. Youth provider staff may verify Social Security benefits through Social Security Consent-Based SSN Verification Services. Fees associated with this verification are an allowable cost under Youth Workforce Program funds. Applicants are not to be charged for this verification.
5. Youth who are recipients of TANF, SNAP, or SSI may automatically be income eligible and require no further income verification if the individual has provided acceptable documentation utilizing the *WIOA Title I-B Youth Program Eligibility Checklist*.
6. At the time of application to the youth program, documentation regarding TANF and/or SNAP benefits must be current and indicate that the individual is receiving or has received or is a member of a family that is receiving or has received TANF benefits in the past six months.
7. At the time of application to the youth program, documentation regarding SNAP benefits must be current and indicate that the individual is receiving or has received or is a member of a family that is receiving, or has received in the past six months.
8. SSI/SSDI documentation must be current and indicate that payments were made to a single recipient. The individual applying to the Youth Workforce Program must be the recipient at the time of application to a in order to be considered as a family of one.
9. Refugee Cash Assistance documentation must be current and indicate that payments were made to a single recipient. The individual applying to the Youth Workforce Program must be the recipient at the time of application in order to be considered as receiving public assistance.
10. Individuals who received or are eligible to receive free or reduced lunch through the Richard B. Russell National School Lunch Program must provide:
 - a. School documentation of a free or reduced lunch;
 - b. A letter from TANF documenting approval; or
 - c. A letter from SNAP that documents approval.
11. Youth who receive free lunch through the Summer Food Service Program (SFSP) and students that attend schools that are eligible for the Community Eligibility Provision (CEP) of the Healthy, Hunger Free Kids Act of 2012 schools

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are not automatically considered low income.

12. High poverty area verification must be included in case notes in AJC that indicate the name of the high poverty areas (county) or census tract number that was used on making the determination that the youth lives in a high poverty area. The rate for the high-poverty area must also be included in AJC case notes.
13. Youth who receive free lunch through the Summer Food Service Program (SFSP) and students that attend schools that are eligible for the Community Eligibility Provision (CEP) of the Healthy, Hunger Free Kids Act of 2012 schools are not automatically considered low income.

L. Selective Service Requirements


Determination of Selective Service status of male youth must be conducted prior to program enrollment.

1. Every male citizen, or any male residing in the United States, born on or after January 1, 1960, unless exempt, is required to register with the Selective Service System (SSS) between their 18th and 26th birthdays. Registration with SSS can occur within 30 days of a male’s 18th birthday and prior to attaining his 26th birthday.
2. Male youth participants who turn 18 years old while enrolled in the program must complete a Selective Service Registration within 30 days of their 18th birthday. If a participant does not register for Selective Services within 30 days of his 18th birthday, he is no longer eligible to receive WIOA services. Youth denied services must be advised of available WIOA grievance procedures.
3. A detailed list of Selective Service registration requirements may be found online at <https://www.sss.gov/register/who-needs-to-register/>.
4. Selective Service registration can be verified online at <https://www.sss.gov/verify/>. The applicant’s name, date of birth, and social security number is needed to verify registration.

M. Basic Skill Assessment for Objective Assessment

Youth Providers are responsible for providing an objective assessment of the academic and occupational skill levels as well as needs and strengths of each participant to identify appropriate services and career pathways for each participant and to collect information for the ISS. Although not required, Youth Providers may use any of the assessments approved by the Arizona Department of Economic Security’s Division of Employment & Rehabilitation Services in [Informational Broadcast \(IB\) 20-014 Basic Skills Assessments Updates](#). The following methods may also be used to measure basic skills for the objective assessment:

1. Other formalized testing instruments designed to measure skill-related gains which must be:


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- a. Valid and reliable;
 - b. Appropriate for the target audience;
 - c. Fair;
 - d. Cost effective
 - e. Well-matched to test administrator’s qualifications; and
 - f. Easy to administer.
2. Less formal alternative assessment techniques such as observation, folder reviews, or interviews may be used for youth with disabilities.
 3. Youth providers may use previous skills assessment results if such previous assessments were conducted within the past 6 months.
 4. Information in this section does NOT apply to determination of the educational functioning level for the measurable skills gains performance measure.
 5. Youth Providers must provide eligible youth who do not enroll in WIOA programs with information regarding other applicable and appropriate services available through other local programs that have capacity to serve them. In addition, Youth Providers must provide eligible youth with referrals for further assessment if determined appropriate.

N. Registrations, Enrollment and Data Entry


WIOA addresses an important distinction between registration in AJC and enrollment into the Youth Workforce Program, which includes the circumstances when a youth must be registered in AJC and when youth must be enrolled in the Youth Workforce Program.

1. Registrations, Enrollments and Data Entry Requirements
 - a. Registration in AJC occurs when a youth creates an account that includes a complete data demographics and work history. However, documentation or verification of income is not required at the time of registration.
 - b. Registration in AJC must occur when a youth has taken action that demonstrates an intent to use program services and who meets specific reporting criteria for the program including youth who:
 - i. Provide identifying information;
 - ii. Use the self-service system;
 - a) Self-service system includes the youth independently access any workforce development system program’s information either in a physical location, such as a One-stop resource room or partner agency or remotely via use of electronic technologies.
 - b) Virtual services that provide a level of service beyond independent job search or information seeking on the

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part of a youth would not qualify as self-service.

- iii. Receive information-only services or activities.
Informational-only services are activities or services that are readily available information that does not require assessment by a staff member of the individual’s skills, education, and career objective. Examples of informational services include providing:
 - a) Labor market information;
 - b) The unemployment rate;
 - c) Information on businesses that are hiring or reducing their workforce;
 - d) Information on high growth industries; and
 - e) Referrals other than referrals to employment.
- c. Enrollment must occur when a youth requires services beyond self-service, or informational- only services and activities. The program enrollment will depend on the participant’s eligibility (see section H. Eligibility Determination). Examples of services that require significant staff involvement include the staff member’s assessment of the youth’s skills, education, or career objectives in order to achieve any of the following:
 - i. Assisting the youth in deciding appropriate next steps in the search for employment, training, and related services, including job referral;
 - ii. Assisting the youth in assessing barriers to employment; or
 - iii. Assisting the youth in accessing other related services necessary to enhance their employability and individual employment needs.
- d. Enrollment into the Youth Program includes the collection of documentation to support eligibility determination;
- e. All of these services must be added to the S&T Plan in the AJC system for the youth to be considered enrolled:
 - i. Eligibility determination;
 - ii. Provision of an objective assessment;
 - iii. Development of an ISS; and
 - iv. Career Planning;
 - v. Participation in any of the 14 Youth Program Elements.
- f. Enrollments are pending in AJC until they are approved by designated staff. All pending enrollments must be resolved no later than 15 days from initial eligibility determination. The Youth Program provider must run the applicable AJC report to monitor the timelines of the pending client record. Extenuating circumstances must be noted in case notes

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to extend the enrollment beyond the 15 days. No extension is to be made beyond 30 days from date of initial eligibility determination.


- g. When pending enrollments are not approved within 30 calendar days, the AJC system requires that the youth’s eligibility be re-determined. This includes collecting new/updated verification documentation for eligibility determination.
- h. Transactions relating to program-provided activities and services must be entered or updated in AJC promptly and accurately to ensure expediency of services.
- i. Youth Program providers must run the applicable AJC report on a monthly basis to ensure timely follow-ups and accurate data recording.

O. Co-Enrollment

Co-enrollment means enrollment in more than one program at a time. Co-enrollment allows for the leveraging of additional resources for training and financial support, enhanced service delivery and increased customer support which results in greater participant outcomes.

1. Youth age 18 and older may be co-enrolled in the ARIZONA@WORK City of Phoenix Adult program. There is no requirement that the youth must be 18 years old for co-enrollment in the Dislocated Worker program. Providers must:
 - a. Ensure the youth meets eligibility criteria for both the Youth Workforce and Adult programs or the Youth Workforce and Dislocated Worker programs to co-enroll participants;
 - b. Determine the appropriate level of service and combination of program services that will be provided to youth age 18-24 based on the service needs of the participant and if the participant is career-ready based on the objective assessment of the occupational skills, prior work experience, employability and participant’s needs;
 - c. Identify and track the funding streams for youth who are enrolled concurrently in the ARIZONA@WORK City of Phoenix Youth/Adult Program or the Youth/Dislocated Worker Program;
 - d. Ensure services are not duplicated; and
 - e. Ensure previous foster care youth who have been co-enrolled in WIOA Title IB Youth Program and Adult/Dislocated Worker Program and are now adults continue to remain eligible for both the Youth Program and Adult Program services and do not require re-determination of eligibility.

2. Youth Workforce Program participants may also have been co-enrolled with

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the following partner programs:

- a. Employment Service (Wagner-Peyser);
- b. Vocational Rehabilitation;
- c. Adult Education and Literacy Programs;
- d. Migrant Seasonal Farm Workers Program (MFSWs) at the point of entry to the One- Stop system to assure equity of services is provided;
- e. Jobs Program (TANF Work Program);
- f. Youth Build;
- g. Job Corps;
- h. Supplemental Nutrition Assistant Employment and Training (SNA E&T);
- i. Indian and Native or American Programs;
- j. Trade Adjustment Assistance (TAA) Programs; or
- k. Other required ARIZONA@WORK City of Phoenix partner programs.

3. When youth are co-enrolled, services provided by partner programs must be added to the Service and Training plan in AJC under partner provided services. When a service is provided by a partner that uses the AJC system (such as Employment Service or TAA) the services do not need to be added to Partner-Provided services on the Service and Training plan because the AJC system automatically considers the individual co-enrolled when they are receiving services from more than one program that uses AJC.

P. Transferring of a Participant to Another Local Workforce Development Board (LWDB)

When a participant requests to be transferred to another LWDB’s WIOA Title I-B Youth program, due to relocation or any other reason, the youth provided from both local areas (transferring and receiving) must exercise due diligences to assist the youth and follow the steps listed under [DES/WIOA Exhibit 100.5, Transfer of a Participant](#)


Q. Serving Youth Outside the Local Workforce Development Area (LWDA)

In Arizona, there are no geographical boundaries in providing services to individuals in any WIOA Title I-B program regardless of the individual’s address. Individuals interested in WIOA Title I-B can apply at any ARIZONA@WORK office regardless of zip code and/or residence. The LLSIL levels of the local area where the applicant is applying to determine eligibility apply.

R. Incentive Payments

Youth providers may use incentive payments for recognition and achievements directly related to training activities and work experiences. Specific program goals, outlined in the ISS, including the amount of the incentive must be entered into the participant’s file case notes. All incentives are based on the availability of funding.

1. Providers must ensure incentive payments are tied to the goals of a work experience, education or training and are outlined in writing before the

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commencement of the program that may provide incentive payments. For additional information, refer to [Policy #300.11 - Youth Incentive Policy](#).

- Awarding of incentive payments must align with the ARIZONA@WORK City of Phoenix policies, as well as Code of Federal Regulations Part 200 and 2900 - Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR parts 200), and WIOA Fiscal Policies (Chapter 3, Section 100).

S. Program Exits

Youth who have not received a qualifying service funded by the Youth Workforce Program or funded by a partner program for 90 consecutive calendar days from the date of last service, and is not scheduled for future services, is considered to have exited the program. Follow-up Services provided to the youth are not a qualifying service and do not extend the exit date. The provider may re-enroll participants in at any time if they remain eligible. There shall be no waiting period prior to re-enrollment. Please refer to [Policy # 400.403-Data Integrity and the Customer Participation Cycle](#).

VI. POLICY MANAGEMENT REQUIREMENTS

Administrative revisions to the policy may be made by the Phoenix Business and Workforce Development (PBWD) Board Executive Director, with notice to the PBWD Board's Executive Leadership Committee. All other substantive revisions will go to the ~~PBWD Board's Advancing Youth Workforce Committee~~ [Board's Executive Leadership Committee](#) for review and recommendation to the ~~PBWD~~ Board for approval.

VII. ADDITIONAL OR MISCELLANEOUS INFORMATION

Related Workforce Development Program References

- Department of Economic Security Policy and Procedure Manual-Workforce Innovation and Opportunity Act (WIOA)
[DES/WIOA Adult, DW, and Youth Program Policies](#)
- ~~2.~~ McKinney Vento Homeless Assistance Act (Section 725(2), Subtitle B of Title VII (42 U.S.C. 11431)). [Section 725\(2\) of the McKinney-Vento Homeless Assistance Act](#)
- ~~2.3.~~ [Arizona Department of Economic Security Policy and Procedure – Exhibit 300B WIOA Youth Program Data Entry and Documentation Procedural Guide](#)
- ~~3.4.~~ Attachment A – Template Cover page and Individual Service Strategy
- ~~4.5.~~ Attachment B – WEX Agreement
- ~~5.6.~~ Attachment C - WIOA Title I-B Youth Program Eligibility Checklist
- ~~6.7.~~ Attachment D – WIOA Title I-B Applicant Statement
- ~~7.8.~~ Attachment E – Lower Living Standard Income Level