

 MARICOPA COUNTY Workforce Development Board	SECTION/REFERENCE DES WIOA Title I-B Youth Program Policy Section 300	POLICY NUMBER 26-01
	ORIGINAL ISSUE DATE January 2026	REVISION DATE January 2026
	AUTHORIZED BY: Maricopa County Workforce Development Board	
SUBJECT: Youth Program Eligibility		ADDENDA:

PURPOSE:

The WIOA Youth Program requires youth ages 14 – 24 to be eligible under the Federal guidelines in order receive program services. Participants may continue to receive services beyond the age of 24 after they are enrolled in the program.

RESPONSIBILITIES OF: Career Advisor, Program Supervisors, Quality Improvement Team, and WIOA youth applicants

DEFINITIONS:

Barriers to Employment: Circumstances which present a substantial disability or interference to the individual's ability to obtain or retain employment.

Basic Skills Deficient: The individual computes or solve problems, reads, writes, or speaks English at or below the 8th grade level or 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.

English Language Learner: An individual who has limited ability in reading, writing, speaking or comprehending the English Language, and:

- Whose primary language is other than English
- Who lives in a family or community environment where the dominant language is other than English

Dropout: 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 "dropout" for purposes of Youth program eligibility.

Homeless or runaway youth: Individuals between the ages 14 to 24, who lack a fixed, regular, and adequate nighttime residence.

- Meets the criteria defined in Section 41403(6) of the Violence Against Women Act of 1994; or
- Meets the criteria defined in Section 725(2) of the McKinney-Vento Homeless Assistance Act.

Offender: An adult or juvenile who:

- Is or has been subject to any stage of the criminal justice process, and for whom services under this act may be beneficial; or
- Requires assistance overcoming barriers to employment, resulting from a record of arrest or conviction.

Parenting: Includes either a custodial or non-custodial mother or father. When a youth is within the Youth program age-eligibility requirements, the age at which the youth became a parent does not factor into the definition of parenting.

Participant: Individual who is determined eligible to participate in the WIOA youth program and who receives a service funded by WIOA.

Postsecondary Education: The education level that follows the successful completion of secondary education, often referred to as high school. Postsecondary education includes universities and colleges, as well as trade and vocational schools.

Pregnant: Only includes the expectant mother

DESCRIPTION:

The youth program provides a comprehensive array of high-quality services, including career exploration and guidance, continued support of educational attainment, and training for employment within in-demand industries and occupations to In-School Youth (ISY) ages 14-21 and Out-of-School Youth (OSY) ages 16-24. The program's goal 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 or during follow-up. The youth program provides services to youth with barriers to employment, with a special focus on supporting the education and career success of OSY.

At the time of eligibility determination, service providers must determine if a youth meets the In-School Youth (ISY) or Out-of-School Youth (OSY) criteria to participate in the youth program.

The applicant's status (age, barrier/challenge, school status, etc.) does not change throughout his/her participation.

The applicant is considered a WIOA Youth participant after the completion of Eligibility Determination, the Objective Assessment, development of the Individual Service Strategy (ISS) and a Youth Program Element. These services must be added to the Arizona Job Connection (AJC) Service and Training (S&T) Plan to trigger participation as a Youth participant.

Eligibility is tracked and verified using the Arizona Job Connection (AJC) system and participant's case file.

Orientation/Initial Assessment to the program will be conducted individually or in groups and will consist of an overview of the enrollment process, assessments, training programs, attendance requirements while in training, and information regarding financial aid and support services. If the youth is not enrolled at this time, a referral must be given to another program that better meets his or her needs.

Suitability should be determined during orientation. Not all youth who seek WIOA-funded services will be suitable for the program, *at that given time*. The youth may have a challenge that WIOA services are unable to resolve, or the youth's expectations may not be in line with the services/objectives of WIOA youth program. The Youth Service Provider must adequately assess the youth's goals, barriers, and expectations to determine if the youth is suitable for the program. If a youth is determined not to be suitable, a referral must be given to another program that better meets the youth's needs.

Eligibility must be determined, and the enrollment approved prior to providing funded services to the participant. A minimum of 75%* of funds must be spent on **out of school youth**.

**Note: For Program Year 2025, this requirement has been reduced to 50% as stated in the [State's WIOA Title I Waiver](#).*

Eligible Out of school Youth (OSY) means an individual who is:

- Not attending school (Adult Education, Job Corps, and YouthBuild are *not* considered school);
- Between 16 and 24 years old at the time of enrollment and one or more of the following:
 - A school dropout, including a youth who is not attending an alternative school at the time of enrollment;
 - A low-income individual with a secondary school diploma or its recognized equivalent and:
 - Basic skills deficient; or
 - An English language learner;
 - Subject to the juvenile or adult justice system;
 - Homeless (i.e. lacks a fixed, regular and adequate nighttime residence);
 - A runaway;
 - In foster care, has aged out of foster care, or who has attained 16 years of age and has left foster care for kinship, guardianship, or adoption;
 - A youth who has been removed from his/her home and is in an out-of-home placement;
 - Pregnant or parenting;
 - An individual with a disability; or
 - A low-income individual in need of additional assistance to enter or complete an education program or to secure or hold employment, as defined by the LWDA. (See the "Needs Additional Assistance" policy for more information.

Eligible In-school Youth means an individual who is:

- Attending school, including secondary and postsecondary school; and
- Between 14 and 21 years old at the time of enrollment. (The age requirement is extended 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.) and
- A low-income individual **and** one of the following:
 - Basic skills deficient;
 - An English language learner;
 - An offender;
 - Homeless (i.e., lacks a fixed, regular, and adequate nighttime residence);
 - A runaway;
 - In foster care, has aged out of foster care, or has left foster care for kinship guardianship or adoption;
 - A youth who has been removed from his/her home and is in an out-of-home placement;
 - Pregnant or parenting;
 - An individual with a disability; or
 - Requires additional assistance to enter or complete an education program or to secure and hold employment, as defined by the LWDA.

5% Limitation

No more than five percent of In-School Youth enrolled in the program year may be “an individual who requires additional assistance to complete an educational program or to secure and hold employment”. In-School Youth enrolled in the program must be tracked to ensure that no more than five percent are enrolled using this criterion.

5% Exception

WIOA allows a low-income exception where five percent of WIOA youth may be participants who ordinarily would be required to be low-income for eligibility purposes and meet all other eligibility criteria for WIOA youth except the low-income criteria. The five percent calculation is based on the percent of newly enrolled youth in a given program year who would ordinarily be required to meet the low-income criteria.

- All In-School Youth must be low-income unless included in the five percent low-income exception.
- Low-income eligibility requirements apply to Out-of-School Youth only if they are eligible as recipients of secondary school diplomas or its recognized equivalent and are at least one of the following:
 - Basic skills deficient;
 - An English language learner; or
 - In need of additional assistance to enter an educational program or to secure employment.

The 5% Exception must be tracked to ensure compliance.

DOCUMENTATION FOR ELIGIBILITY

- Youth service providers must use the DES WIOA Title I-B Youth Program Eligibility Checklist.
- LWDAs must ensure timely documentation is collected in regard to eligibility determination.
- Attempts to secure documentation and the outcome must be recorded in the AJC case notes within 15 calendar days from the date that the career advisor requests documentation from the youth.
- All eligibility documents must be uploaded into the AJC system. If the document contains Personal Identifiable Information (PII) and is not required for DES data validation, do not upload into AJC but instead create a case note that the document was visually verified. Eligibility documents required for DES data validation containing PII must have PII redacted prior to being uploaded into the AJC system.

For all verification and acceptable eligibility documents:

- Staff must use the DES WIOA Title I-B Youth Program Eligibility Checklist and Youth Data Validation Checklist to identify eligibility documents for the WIOA Title I Youth Program and for data validation.
- The checklist identifies source documents, which are documents used to verify eligibility requirements.
- All eligibility documents required for data validation must be uploaded into AJC. Documents containing PII must have PII elements redacted prior to being uploaded in the AJC system.
- Documents required for eligibility and not data validation containing personal identifiable information (PII) will should not be uploaded in the AJC system. Instead of uploading documents that contains PII, a case note will be entered in AJC to say that particular document has been collected and visually verified.

- Staff must ensure that reasonable attempts have been made to secure source documentation as identified in the checklist.

The WIOA Title IB Applicant Statement may be used as permitted on the WIOA Eligibility and Verification Checklist when the information is unverifiable, or it is unreasonably difficult for the applicant to obtain.

- For high-risk Out-of-School youth, the WIOA Title IB Applicant Statement is acceptable to allow upfront enrollment of the youth.
- High risk Out-of-School youth means not having a high school diploma or HSE and meeting one of the following eligibility criteria:
 - Basic skills deficient;
 - An English language learner;
 - An offender;
 - Homeless (i.e. lacks a fixed, regular and adequate nighttime residence);
 - A runaway;
 - In foster care, has aged out of foster care, or has left foster care for kinship guardianship or adoption;
 - A youth who has been removed from his/her home and is in an out-of-home placement;
 - Pregnant or parenting;
 - An individual with a disability; or
 - Requires additional assistance to enter or complete an education program or to secure and hold employment, as defined by the LWDA.
- An exception includes out-of-school youth who meet the “Requires additional assistance to enter or complete an education program or to secure or hold employment” eligibility criteria, as they are not considered high risk. As such, the WIOA Applicant statement may not be used for upfront enrollment for youth that meet this eligibility criteria.
- If additional documentation is required on the WIOA Eligibility and Verification Checklist for data validation purposes, the LWDA may request the documentation from the youth after the youth has begun to receive Youth services.
 - LWDA must ensure all youth that are less than 18 years old have a WIOA 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. All reasonable attempts must be made to secure the co-signature of the parent or legal guardian to the WIOA Application and/or Applicant Statement form in the instance where a minor is applying for WIOA services. If there is no parent or legal guardian available, a responsible adult in the life of the minor will have to suffice. A responsible adult (age 18 or older) can be a family member who has no legal guardianship but provides room and board, a religious person currently familiar with the family history of the minor, a counselor at a homeless shelter, etc... The ARIZONA@WORK career advisor or other LWDA staff must not sign as the witness.

A low-income youth is an individual who:

1. Receives or has received, or is a member of a family that receives or has received in the past six months, assistance through:
 - a. The Supplemental Nutritional Assistance Program (SNAP)

- b. The program of block grants to States for the temporary assistance for needy families (TANF)
 - c. The Supplemental Security Income (SSI) program
 - d. State or local income-based public assistance
- 2. Is in a family where the total includable family income does not exceed the higher of "a or b" below:
 - a. The federal poverty line guidelines
 - b. 70 percent of the US DOL Lower Living Standard Income Level (LLSIL) for each program year.
- 3. Qualifies as a homeless individual who lacks a fixed, regular, and adequate nighttime residence;
- 4. Is a foster child for whom state or local government payments are made
- 5. Receives, or is eligible to receive, a free or reduced-price lunch under the Richard B. Russell National School Lunch Act (NSLA)
- 6. Is an individual with a disability whose own income meets the low-income requirements, but who is a member of a family where the total income does not meet the low-income requirements. The youth can be counted as a family of one, so that the youth's income meets the low-income requirement; or
- 7. Is a youth who lives in a high poverty area, as determined by the American Community Survey.

High Poverty Areas

Youth living in high poverty areas are automatically considered low-income individuals. WIOA defines a high poverty area as a census tract, set of continuous census tracts, Indian reservation, tribal land, or Native Alaskan Village or county with a poverty rate of at least 30 percent, as set every five years using the American Community Survey five-year data. LWDA's must use Determining High Poverty Census Tracts in Arizona and the High Poverty Census Tracts Spreadsheet from the DES WIOA resource page or other tools developed by the LWDA to determine if a youth lives in a high poverty area by census tract.

Determining Family Size: Since low-income status is based on family size (except for individuals automatically considered to be low income) the family size for the previous six months must be determined.

Arizona DES defines a family as two or more individuals related by blood, marriage, or decree of court who are in a single residence, and are included in one or more of the following categories:

- 1. A married couple and dependent children;
- 2. A parent or guardian and dependent children; or
- 3. A married couple

Note: When an individual is not living in a single residence with other family members, the individual is not considered a member of the family for the purpose of WIOA Title IB income calculations.

Once the family size has been determined, the household income can be calculated. Eligibility for youth is determined by calculation of family income **received** in the six months immediately prior to WIOA application date.

Income Verification

LWDA staff must attempt to gather information such as other public assistance the individual may receive, such as 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.

- Documentation related to income verification as outlined on the WIOA Eligibility and Verification Checklist must be collected and uploaded into AJC.
- Income that is being used to determine income eligibility for WIOA Title I services should be identified using the WIOA Eligibility and Verification Checklist. If a verification document cannot be obtained, the WIOA Title IB Applicant Statement with signatures by the individual and a witness who has knowledge of the information provided may be accepted as a last resort as permitted by the WIOA Eligibility and Verification Checklist.
 - **Note:** The career advisor or other LWDA staff must not sign as the witness.
- If a participant is receiving child support, the witness would be 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 the case notes in AJC.
- LWDA staff may verify Social Security benefits through Social Security Consent-Based SSN Verification Services. Fees associated with this verification are an allowable cost under WIOA Youth Program funds and can be paid by the LWDA. Applicants are not to be charged for this verification.
- Individuals 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 Eligibility and Verification Checklist.
- TANF documentation must be current and indicate that the individual is receiving or is a member of a family that is receiving, or has received in the past six months, TANF assistance at the time of application to the WIOA program.
- SNAP documentation must be current and indicate that the individual is receiving or is a member of a family that is receiving, or has received in the past six months, SNAP assistance at the time of application to the WIOA program.
- SSI/SSDI documentation must be current and indicate that payments were made to a single recipient. The individual applying to WIOA must be the recipient at the time of application to a WIOA program in order to be considered as a family of one.
- Individuals who receive, or are eligible to receive free or reduced lunch must provide:
 - School documentation of a free or reduced lunch;
 - A letter from TANF documenting approval; or
 - A letter from SNAP that documents approval.
- High poverty area verification must include 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 live in a high poverty area. The poverty rate for a high poverty area must also be included in case notes in AJC.

Refer to the table below for Income Inclusions/Exclusions listing for determining household income.

Income Inclusions	Income Exclusions
Wages and salaries	Allowances, earnings, and payments to individuals participating in programs under Title I of WIOA
Self-employment income	Any payment to volunteers under Title I (VISTA and others) and Title II (RSVP, foster grandparents, and others) of the Domestic Volunteer Service Act of 1973
Social Security (Old-Age, Survivors, and Disability Insurance) benefits	Payments to volunteers under Section 8(b)(1)(B) of the Small Business Act (SCORE and ACE)
Private and government retirement benefits	Payments and allowances to individuals participating in AmeriCorps to the extent excluded by the National and Community Service Act of 1990
Military pension payments and benefits- • Authorized by Title 10 U.S. Code (such as those received by military retirees whether or not their retirement was based on disability) • Paid under Chapter 15 of Title 38 U.S. Code	Student financial assistance received under Title IV of the Higher Education Act of 1965, including the Pell Grant, Supplemental Education Opportunity Grant, State Student Incentive Grants, National Direct Student Loan, PLUS, College Work Study, and Byrd Honor Scholarship Programs, to the extent excluded by the Act
Interest, dividends, rental income, and other property income	Payments received under the Carl D. Perkins Vocational Education Act, as amended by the Carl D. Perkins Vocational and Applied Technology Act Amendments of 1990, P.L. 101-392
Unemployment and workers' compensation	Military service-related income – • Any amounts received as military pay or allowances by any person who served on active duty, and certain other specified benefits paid while on active duty or paid by the Department of Veterans Affairs (VA) for vocational rehabilitation, disability payments, or related VA-funded programs • All pay and/or financial allowances

	earned while a veteran was on active duty - Any financial benefits received by a covered person under the following Chapters of Title 38 of the U.S. Code: 11. for service-connected disability or death 13. Dependency and indemnity compensation for service-connected deaths 30. All-volunteer force educational assistance program 31. Training and rehabilitation for veterans with service-connected disabilities 35. Survivors' and dependents' educational assistance 36. Administration of educational benefits - Benefits received under Chapter 106 of Title 10 U.S. Code, Educational assistance for members of the selected reserve
Regular contributions for support (alimony and child support)	Lump sum payments or large cash settlements (i.e., payments that are not received on a regular basis), including compensation for a loss that must be replaced (e.g., payment from an insurance company for fire damage to a house)
Lump sum payments that are put into a savings account and are regularly withdrawn by the household for living expenses (the amount withdrawn is counted as income)	

Basic Skills Testing

A youth is basic skills deficient when one of the following definitions applies:

- The youth performs any of the following at or below an 8th grade level:
 - Compute or solve math problems;
 - Read English;
 - Write English; or

- Speak English.
- The youth is unable to:
 - Compute or solve problems, read, write, or speak English at a level necessary to function on a job, in the individual's family, or in society, as determined in local policy.
- The Test of Adult Basic Education (TABE) Version 11/12 must be used to determine whether the youth is basic skills deficient. The LWDA or Youth Service Provider may use other assessment tools appropriate to the target population as determined by the LWDA except for determining basic skills deficiencies.
- Testing must be administered during the eligibility determination process or no later than the date of participation, i.e., the date of the first service.
- LWDA's are not required to re-test youth, if the youth was tested using TABE Version 11/12 within the past six months and the partner program has provided the test results.

When administering assessments, individuals with disabilities should be provided appropriate accommodations according to the guidelines associated with the assessment tools used to determine functioning levels, Section 188 of WIOA, and LWDA policy.

Selective Service Requirements

- Each LWDA is responsible for determining Selective Service status of male youth prior to program enrollment. Every male citizen, or any male residing in the United States, born after December 31, 1959, 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 must occur prior to attaining his 26th birthday.
- 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.
- A detailed list of males who are and who are not required to register with Selective Service due to an exemption may be found online at <https://www.sss.gov/Registration-Info/Who-Registration>.
- Selective Service registration can be verified online at <https://www.sss.gov/Home/Verification>. The male's name, date of birth, and social security number is needed to verify registration.
- See the "Selective Service Requirement" policy for additional information.