



WORKFORCE INNOVATION  
OPPORTUNITY ACT (WIOA)  
PROGRAM POLICY  
REVISION 5

EFFECTIVE DATE: June 30, 2025

SUBJECT: YOUTH SERVICES

REFERENCES

Title 1 of the Workforce Investment Opportunities Act (WIOA) of 2014 et.al; WIOA Regulations,

- TEGL 23• 14;
- TEGL 21-16;
- Office of Management and Budget (OMB) cost principles codified in 2 CFR Part 220, Part 225 and Part 230;
- 20 CFR 681.430;
- 20 CFR 681.460;
- 20 CFR 681.600; 20 CFR 683.255.
- Section 129(a)(I )(B)(iii); (a)(I)(C)(iv)

**PURPOSE.**

This policy instruction and guidance outlines the provision and administration of WIOA Title I Youth Services throughout the Northern Area. It is designed to ensure compliance with federal and state regulations while enhancing the effectiveness, consistency, and reach of workforce programs aimed at youth.

**BACKGROUND.**

The WIOA of 2014 created a transformative framework for delivering workforce services by prioritizing out-of-school youth facing significant barriers to employment and

education. The legislation promotes comprehensive, individualized, and sustained services that guide youth toward long-term educational and career success

## **ACTION**

The WIOA requires that 14 mandatory service-related elements be included and available in the structure and design of WIOA youth programs in local areas. It prioritizes that provision and availability of the services be targeted primarily on out-of-school youth and establishes the minimum amount of funding that must be spent on the delivery of work related activities. WIOA outlines a broader youth vision that supports an integrated service delivery system.

### **A. Program Elements**

**ACTION:** Local youth programs must offer and make available all 14 WIOA-mandated service elements. The design must focus on an integrated delivery model that places emphasis on services for out-of-school youth. Local workforce areas must spend no less than 75% of youth formula funds on out-of-school youth and at least 20% of youth funds on work based learning activities. The 14 elements are defined below.

- (1) Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to a high school diploma or equivalent, or a recognized postsecondary credential.
- (2) Alternative secondary school services or dropout recovery services, such as basic education skills training, individualized instruction, and ESL programs.
- (3) Paid and unpaid work experiences with academic and occupational education components. Examples include summer jobs, pre-apprenticeships, internships, job shadowing, and on-the-job training. Per 20 CFR 681.600 and 681.590, at least 20% of youth formula funds must be used for work experience.
- (4) Occupational skills training aligned with local in-demand industry sectors and that leads to recognized postsecondary credentials. Must meet WIOA section 123 standards.
- (5) Concurrent education and workforce preparation training within an integrated education and training model (20 CFR 681.630).
- (6) Leadership development opportunities such as peer mentoring, community service, decision-making training, civic engagement, and exposure to postsecondary education.
- (7) Supportive services in accordance with 20 CFR 681.570 and NALWDB's supportive services policy.

(8) Adult mentoring for at least 12 months, which can extend beyond the period of program participation.

(9) Follow-up services for not less than 12 months after the completion of program participation, including supportive services, mentoring, financial literacy education, labor market information, and transition services to postsecondary education or employment.

(10) Comprehensive guidance and counseling, including referrals to appropriate drug, alcohol, mental health, or other counseling services as necessary.

(11) Financial literacy education to build the capacity of participants to manage spending, credit, budgeting, debt, and to understand financial products and identity theft protection.

(12) Entrepreneurial skills training focused on business startup knowledge, resource forecasting, capital access, risk identification, and business plan development (20 CFR 681.560).

(13) Services that provide labor market and employment information, including career exploration, job trends, and earning potential for in-demand occupations (20 CFR 681.460).

(14) Activities supporting transition to postsecondary education and training, including SAT/ACT prep, college application assistance, FAFSA completion, and program referrals.

**LIMITATIONS:** In accordance with WIOA Section 188(a)(3) and 29 CFR Part 2 Subpart D, WIOA funds may not be used for employment or training within facilities used primarily for religious instruction or worship.

## **B. PROGRAM DESIGN**

**Objective Assessment:** All youth participants must receive an objective assessment of their academic skill levels, occupational skills, prior work experience, employability, interests, aptitudes (including in-demand industry sectors), and supportive service needs. Local programs must use assessment tools that are valid and reliable for the target population. Assessments must include accommodations as needed for youth with disabilities in compliance with 20 CFR 681.290.

Youth with disabilities may also benefit from informal or discovery-based assessments and require information on benefits planning, workplace accommodations, and access to appropriate services. When available, results from assessments conducted within the past six months may be used if they meet program standards.

**Individual Service Strategy (ISS):** Each participant must have a documented Individual Service Strategy (ISS) based on the results of their objective assessment. The ISS must

identify the youth's educational and employment goals and outline the services necessary to achieve them. ISS plans should be reviewed regularly and updated to reflect progress, barriers, and changes in goals or service needs.

**Co-Enrollment:** Youth ages 18–24 who meet eligibility criteria (and who may also be eligible for enrollment in Adult and DW services) may be co-enrolled in the WIOA Title I Youth and Adult programs. Co-enrollment is appropriate when it best meets the youth's service needs. In these cases, providers must ensure that funding sources are tracked and allocated separately to avoid duplication of services. Coordination between youth and adult services should ensure seamless delivery and shared accountability.

1. **Pre-Participation Expenditures:** WIOA youth funds may be expended for recruitment, outreach, and eligibility determination efforts (such as assessments of basic skills or income) prior to formal enrollment. However, program services—defined as any of the 14 WIOA program elements—may only begin after eligibility has been fully determined and documented. No WIOA youth program services may be delivered or charged to WIOA funds prior to participant registration in the state's case management system.
2. **Eligibility and Documentation:** To participate, youth must meet eligibility criteria under WIOA Section 129 and provide documentation for each element. All documents must be retained per NALWDB Policy 30 – Electronic File Policy.

**Eligibility Criteria: In-School Youth (ISY) must be:**

- Attending school (as defined by state law),
- Not younger than 14 or older than 21,
- Low-income, and
- One or more of the following:
  - Basic skills deficient
  - An English language learner
  - An offender
  - Homeless, runaway, in foster care, aged out of foster care, in out-of-home placement, or eligible under the Social Security Act
  - Pregnant or parenting
  - A youth with a disability

**Out-of-School Youth (OSY) must be:**

- Not attending school,
- Not younger than 16 or older than 24, and
- One or more of the following:
  - A school dropout
  - Within compulsory school age but not attending for at least the most recent complete school year quarter
  - Has a diploma or equivalent and is low-income and basic skills deficient or an English language learner

- Involved with the justice system
- Homeless, runaway, in foster care, aged out, or eligible under the Social Security Act
- Pregnant or parenting
- A youth with a disability
- Low-income and requires additional assistance to complete education or obtain employment

**Self-Attestation:** When allowable documentation is not reasonably obtainable, self-attestation may be used as a last resort. Efforts should be made to acquire appropriate source documentation prior to their use. If the barrier of obtaining this documentation proves to be too time consuming or is not available then a self-attestation can be used for eligibility items in accordance with TEGL 23-19 and 20 CFR 681. Participants may verify the following eligibility elements via self-attestation:

- Homeless, runaway, or foster care status
- Pregnant or parenting
- Offender status
- Additional assistance barrier
- Disability (only if other verification is unavailable)
- Low-income status (if no other source is available)
- School dropout or not attending school

The participant must complete and sign a standardized self-attestation form under penalty of perjury. Staff must document all efforts made to obtain other verification prior to accepting self-attestation. Forms must be uploaded into the participant's file and reviewed during monitoring.

**C. COST ALLOCATION AND WORK EXPERIENCE** All youth program expenditures must be properly tracked and documented. Staff time for in-school and out-of-school youth will be allocated quarterly based on active caseload reports from the prior quarter. The corresponding percentages shall be used to determine cost distribution between ISY and OSY funding streams. Direct service expenditures (such as work experience wages or supportive services) will be charged based on the participant's in/out-of-school status at the time of enrollment.

**Timely Determination:** Youth staff time allocations related to work experience shall be calculated quarterly. Caseload reports identifying each case manager's total participants and number of work experience participants must be generated and reviewed. The percentage of work experience participants will determine the allowable percentage of time charged to the work experience cost category. Supporting documentation for these allocations must be maintained by provider fiscal staff and reflected in monthly cash requests.

Per TEGL 8-15, allowable work experience expenditures include, but are not limited to:

- Wages/stipends paid to participants
- Staff time spent identifying and developing work experience opportunities
- Staff time spent managing work experiences
- Evaluating work experience outcomes
- Participant orientation sessions
- Employer orientation sessions
- Academic education directly related to the work experience
- Incentive payments tied to successful completion
- Employability skills/job readiness training

Work Experience Hours: Staff time will be allocated based on quarterly caseload data and tracked separately for in-school and out-of-school youth. Work experience expenditures may include wages, stipends, employer development, participant preparation, evaluation, and oversight.

Work Experience Hours:

- In-School Youth: Up to 250 hours
- Out-of-School Youth: Up to 350 hours

Requests for additional hours require written justification and Executive Director approval.

#### **Work Experience Staff Time Allocation Table:**

- 0–25% WE caseload = 15% of staff time
- 26–50% = 20%
- 51–75% = 25%
- 76–100% = 30%

Example A: Case Manager Josh Doe has 27 participants. 16 of these 27 are Work Experience participants. His caseload WE percentage is 59%, therefore 25% of his total time may be charged to Work Experience.

Example B: Case Manager Jane Doe has 13 participants. 2 of these 13 are Work Experience participants. Her caseload WE percentage is 15%, therefore 15% of her total time may be charged to Work Experience.

Example C: Case Manager John Doe has 16 participants. None of these 16 are Work Experience participants. His caseload WE percentage is 0%, therefore 0% of his total time may be charged to Work Experience.

This policy supersedes all previous NALWDB youth service policies.

**Youth Requiring Additional Assistance – Local Definition:** To determine eligibility under WIOA Section 129 for youth who "require additional assistance," the NALWDB defines this barrier as including, but not limited to:

- Lack of a driver's license or reliable transportation
- History of chronic absenteeism or academic disengagement
- Raised by a non-parent caregiver (e.g., grandparent or relative)
- Residing in a high-poverty census tract or receiving free/reduced lunch
- Youth with a history of multiple school suspensions or expulsions

Additional circumstances that rise to the level of "needs additional assistance" may be approved by the Executive Director, if not listed above (at their discretion) and must be justified in the participant file with an approval letter from the Executive Director uploaded.

**Data Integrity and Monitoring:** All documentation must be recorded in accordance with NALWDB Policy 30 and the state's case management system. Files are subject to periodic review by NALWDB and state monitors. Timely, accurate, and complete documentation is essential to maintain data integrity and avoid disallowed costs.

**Youth Engagement and Feedback:** To promote participant-centered services, youth programs are encouraged to collect input from participants through youth satisfaction surveys, informal interviews, or youth advisory boards. Feedback should inform continuous improvement of service delivery, accessibility, and relevance.

**Performance Accountability:** The program must meet all WIOA Title I Youth primary indicators of performance, including:

- Placement in employment, education, or training during the 2nd quarter after exit
- Placement in employment, education, or training during the 4th quarter after exit
- Median earnings in the 2nd quarter after exit
- Credential attainment within one year of exit
- Measurable skill gains (MSG)
- Effectiveness in serving employers

Providers must document services and outcomes in accordance with state and federal policy and take active steps toward performance improvement when targets are not met.

**Confidentiality:** All participant information must be securely maintained and used solely for the administration of workforce services. Staff must comply with federal, state, and local confidentiality policies, including safeguarding personally identifiable information (PII) and sensitive case file data.

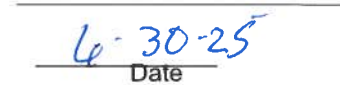
**Grievance Procedures:** Youth participants must be informed of their rights under WIOA, including the right to file a grievance or complaint. Providers must display the

grievance procedure in service locations and provide it in writing to participants during intake. Complaints may be filed for issues such as discrimination, denial of service, or violations of program rights.

INQUIRIES: Contact the WIOA Program Manager at 505-986-0363 for further information or clarification.



NALWDB Board Chairman

  
Date