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**Date:** August 9, 2019

**To:** Program Managers, SETA-Funded Youth Service Providers,  
and SETA Workforce Development Staff

**From:** Kathy Kossick, SETA Executive Director

**RE:** Policy on Eligibility and Enrollment for WIOA In-School Youth  
Programs/CalJOBS Application and Youth Addendum

### **WIOA Directive WDD 19-5**

#### **Purpose**

The Directive provides guidance on the eligibility and enrollment process for Workforce Innovation and Opportunity Act (WIOA) In-School Youth.

#### **WIOA Eligibility for Youth Services:**

Before youth can receive individualized services, youth must be registered/enrolled in the Workforce Innovation and Opportunity Act and must meet the following criteria:

- A. Attending school
- B. Not younger than age 16 and or older than age 21
- C. A low income youth **and**
- D. Have one or more of the following barriers provided in (Title 20 CFR Section 681.220):
  1. Basic skills deficient.
  2. An English language learner.
  3. An offender.
  4. A homeless youth or a runaway, in foster care or has aged out of the foster care system.
  5. Pregnant or parenting.
  6. A youth who is an individual with a disability.
  7. An individual who requires additional assistance to complete an educational program or to secure or hold employment.  
(In-School subgrantees can enroll only 5% of their youth.)

E. As outlined in California's Unified Strategic Workforce Development Plan 2016-2020 (State Plan), examples of an individual who requires additional assistance could include, but are not limited to, the following:

1. Have repeated at least one secondary grade level or are one year over age for grade.
2. Have a core grade point average of less than 1.5.
3. For each year of secondary education, are at least two semester credits behind the rate required to graduate from high school.
4. Are emancipated youth.
5. Have aged out of foster care.
6. Are previous dropouts or have been suspended five or more times or have been expelled.
7. Have received court/agency referrals mandating school attendance.
8. Are deemed at risk of dropping out of school by a school official.
9. Have been referred to or are being treated by an agency for a substance abuse related problem.
10. Have experienced recent traumatic events, are victims of abuse, or reside in an abusive environment as documented by a school official or other qualified professional.
11. Have serious emotional, medical or psychological problems as documented by a qualified professional.

F. On an individual basis, and with approval from the SETA Youth Workforce Development Manager, a small percentage (not more than 5 percent) of youth that do not meet the income criteria may be served by WIOA. WIOA Youth providers need to track all 5% approved youth in the CalJOBS system. The youth must meet one or more of the following criteria:

1. Basic skills deficient.
2. An English language learner.
3. An offender.
4. A homeless youth or a runaway, in foster care or has aged out of the foster care system.
5. Pregnant or parenting.
6. A youth who is an individual with a disability.
7. An individual who requires additional assistance to complete an educational program or to secure or hold employment.

### **Eligibility Process:**

A. Subgrantees are responsible for the following:

1. Determining eligibility/suitability of a WIOA Youth Participant based on the criteria listed above. Subgrantees must review the CalJOBS system prior to enrolling youth into the program to ensure Participant has not participated in another program.
2. Registering youth into the CalJOBS system.
3. Gathering all appropriate documents proving youth is eligible for the program.
4. Submitting eligibility packet to SETA Support Staff for approval (Subgrantee makes all corrections in the CalJOBS system).
5. Subgrantee MUST provide a service before entering in the WIOA Application and activity codes 412 – Objective Assessment 413 – Develop Service Strategies and 433 Career Awareness. Once subgrantee receives approval from SETA, the application and activity codes must be entered into the CalJOBS system within seven business days.

## **Case Management:**

1. Subgrantee MUST conduct an objective assessment of the youth participant academic levels, skill levels, and services needs on an Individual Service Strategy (ISS) (Exhibit B).
2. All 14 elements must be made available to the youth; Tutoring, study skills training, instruction, and dropout prevention, Alternative secondary school services or dropout recovery services, Paid and unpaid work experience, Occupational skills training, Education offered concurrently with workforce preparation and training for specific occupation, Leadership development opportunities, Supportive services, Adult mentoring, Follow-up services, Comprehensive guidance and counseling, Financial literacy education, Entrepreneurial skills training, services that provide labor market information, and Postsecondary preparation and transition activities Youth who are enrolled as a drop-out, must be enrolled in an educational program in the current program year.
3. A minimum of 20% expenditure requirement for work experience must be spent in the program year (Title 20 CFR Section 681.620).
4. Subgrantee must provide services to the youth on a minimum of a monthly basis and document all services in the CalJOBS Case Management system.

## **BASIC SKILLS DEFICIENCY DETERMINATION FOR ELIGIBILITY CERTIFICATION**

The Federal Register states that “Definitions and eligibility documentation requirements regarding the deficient in basic skills requirement criterion may be established at the local level”. The Federal register states that Basic Skills deficient means that an individual reads, writes or has computing skills at or below the 8th grade level on a generally accepted standardized test. This directive is to determine a local definition of “basic skills deficient” for Sacramento County.

The following has been approved by the Sacramento Works Youth Committee and the Sacramento Works, Inc. Board:

**NOTE: In determining if an In-School Youth is basic skills deficient in English or Math at time of eligibility the following guidelines should be considered:**

*In order to graduate from high school, the State of California mandates that a student must have completed a minimum of two years of high school Math including Algebra I and three years of English. When certifying a WIOA In-School Youth as basic skills deficient in Math or English by using the current transcript, determine if the youth is currently taking the required classes or has completed the requirements in the previous grade level.*

**A youth can be considered deficient in basic literacy or numeracy skills if the youth:**

- 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 OR
- Their latest transcript indicates a GPA of less than 2.0 on a 4.0 scale or its equivalent within any of the following subject areas: English or Math OR
- Has a progress report from their current instructor of English or Math indicating the student is at risk of receiving a D or F with that class OR
- For each year of secondary education, are at least two semester credits behind the rate required for graduation.

**NOTE: All In-School youth who are determined basic skills deficient at time of eligibility must have progress case notes in the CalJOBS system showing youth is progressing either in math or reading grades and/or GPA.**

## **CaJJOBS APPLICATION AND YOUTH ADDENDUM**

In order to enroll in WIOA Youth Services, a CaJJOBS Application and Youth Addendum must be completed and signed by the customer. If the customer is under 18 years of age, the application must be signed by a parent/guardian (Exhibit A).

Should you have any questions, contact WIOA Eligibility Supervisor, Becky Hansen, at (916) 263-3859, or email [Becky.Hansen@seta.net](mailto:Becky.Hansen@seta.net)

Attachment A – CaJJOBS Registration Youth Addendum

Attachment B – Individual Service Strategy (ISS)

### **REFERENCES**

- WIOA (Public Law 113-128)
- Title 2 Code of Federal Regulations (CFR) Part 200: “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (Uniform Guidance)
- Title 2 CFR Part 2900: “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (Department of Labor [DOL] Exceptions)
- Title 20 CFR Part 681: “Youth Activities under Title I of the WIOA”
- Title 20 United States Code (U.S.C.) Section 1401: “Definitions”
- Training and Employment Guidance Letter (TEGL) 21-16, Third WIOA Title I Youth Formula Program Guidance (March 2, 2017)
- TEGL 8-15, Subject: Second Title I WIOA Youth Program Transition Guidance (November 17, 2015)
- TEGL 23-14, Subject: WIOA Youth Program Transition (March 26, 2015)
- TEGL 19-14, Subject: Vision for the Workforce System and Initial Implementation of the WIOA (February 19, 2015)
- TEGL 12-14, Subject: Allowable Uses and Funding Limits of Workforce Investment Act (WIA) Program Year (PY) 2014 funds for WIOA Transitional Activities (October 28, 2014)
- TEGL 13-09, Subject: Contracting Strategies That Facilitate Serving the Youth Most in Need (February 16, 2010)
- California Education Code (EC) Sections 47612.1, 58500, and 66010
- California Unemployment Insurance Code Section 14209
- Workforce Service Directive