

## Eligibility Determination for Out-of-School Youth: Making it Easier for Out-Of-School Youth to Access Services

STATE PLAN     LOCAL PLAN     POLICIES & GUIDANCE     BUDGET CHOICES

CLASP's [Opportunities for Action](#) is a series of short memos with recommendations for state and local areas to fully realize the options in the Workforce Innovation and Opportunity Act (WIOA) to help low-income and lower-skilled youth and adults achieve economic success.

Leading up to WIOA, the process for certifying income eligibility and status in “high-risk” categories was burdensome for youth and local systems. WIOA title I youth is an improvement over previous law. For example, out-of-school youth in high-risk categories **are not required** to prove low-income status to receive services. This includes individuals who have dropped out of high school; have not attended school for at least one calendar quarter of the most recent school year; or are subject to the juvenile or adult justice systems. It also includes homeless individuals, runaways, current or former foster care youth, and individuals who have a disability or are pregnant or parenting. Youth who are not attending school and hold a secondary credential or are either basic skills deficient or an English language learner must be “low income.”

WIOA also allows residence in a high-poverty area to meet the definition of “low income” for in-school and out-of-school youth. While these provisions are improvements over the Workforce Investment Act, there are still many challenges related to eligibility certification and documentation. Under WIOA, out-of-school youth must still produce documentation to demonstrate their “risk status.” Neither the new law nor the [proposed regulations](#) from the U.S. Department of Labor (DOL) address eligibility certification. Requiring youth in precarious situations to navigate major bureaucracies to produce documentation of their risk status before any service is rendered is a major barrier to serving those most in need. If at-risk youth are turned away from receiving services the first time they seek help, this may dissuade them from seeking help again. This is not an effective design for the front end of a youth system.

### Policies & Guidance

States can take immediate action to ensure out-of-school youth in high-risk situations have access to WIOA services. These steps include:

- 1. Establish a state-wide policy that promotes self-attestation and self-certification as acceptable—and preferable—for upfront eligibility determination of out-of-school youth in "high-risk" categories (with the exception of “Youth Who Needs Additional Assistance”). This would allow services to begin immediately for youth who provide such statements.**

In prior years, states and local areas have used DOL guidance on data accuracy and verification to establish acceptable criteria for certification, which usually requires documentation from the school system, justice system, welfare system, or administrative records. While self-attestation is allowed for some categories, it is clearly expressed in many cases that this is a last resort.

We recommend that states build on DOL's self-attestation guidance, which was issued in the [Advisory: Training and Employment Guidance Letter No. 6-14 "Program Year \(PY\) 2013/Fiscal Year \(FY\) 2014 Data Validation and Performance Requirements and Associated Timelines."](#) In this document, self-attestation (also referred to as a participant statement) is defined as "when a participant states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status. The key elements for self-attestation are: (a) the participant identifying his or her status for permitted elements and (b) signing and dating a form attesting to this self-identification. The form and signature can be on paper or in the state management information system, with an online signature." Self-attestation is included as an allowable source of documentation for the purposes of data validation for youth in the following categories:

- Pregnant or Parenting Youth;
- Youth Who Needs Additional Assistance;
- Offender;
- Homeless Individual and/or Runaway Youth; and
- School Status at Participation.

States should also clarify that self-attestation can support upfront eligibility determination for out-of-school youth who: do not have a secondary credential; are subject to the juvenile or adult justice system; are homeless and/or runaway youth; or are pregnant or parenting. Once a youth has been determined eligible and is receiving services, the process for collecting official documentation can happen over time for the purposes of data validation.

**2. Work in partnership with the U.S. Department of Labor to develop guidance and technical assistance on sampling procedures and range of tolerance such that those adhering self-attestation eligibility methods should feel protected against findings of disallowed costs.**

In partnership with DOL, states should make clear that the requirements for data quality and validation are a separate process from eligibility determination, so that local areas can apply this eligibility approach without fear of disallowed cost or other administrative findings.

**Related CLASP resources:** [Comments on proposed regulations](#); [Recruitment and Engagement for Out-of-School Youth Webinar](#).

**Questions?** Contact [Kisha Bird](#), director of youth policy at [kbird@clasp.org](mailto:kbird@clasp.org).

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