

MassWorkforce Issuance

100 DCS 19.104

☒ **Policy** ☐ **Information**

To: Chief Elected Officials
Workforce Board Chairs
Workforce Board Directors
Title I Administrators
Career Center Directors
Title I Fiscal Officers
DCS Operations Managers

cc: WIOA State Partners

From: Alice Sweeney, Director
Department of Career Services

Date: March 16, 2016

Subject: Youth Requires Additional Assistance

Purpose: To notify Local Workforce Boards, One-Stop Career Centers, youth practitioners, and other workforce partners of policy and procedural guidance for establishing the locally defined Youth Requires Additional Assistance policy as part of the Workforce Innovation and Opportunity Act (WIOA) Title I youth eligibility criteria.

Background: Youth who participate in WIOA Title I youth funded activities must meet the eligibility criteria for an in-school youth or an out-of-school youth and meet one or more of the barriers as described in WIOA section 129 (a)(1)(B) and (C).

According to WIOA section 129 (a)(1)(C)(VII) one of the barriers for an in-school youth is “an individual who requires additional assistance to complete an education program or to secure or hold employment.” Out-of-school youth have a similar barrier with the added phrase “to enter”; “an individual who requires additional assistance to enter or complete an educational program or to secure or hold employment (WIOA section 129 (a)(1)(B)(VIII)).” Both in-school and out-of-school youth who require additional assistance must be low-income.

Local workforce boards have the ability to assess additional barriers for youth in their local area based on demographics and unique local conditions. The youth

requires additional assistance barriers defined at the local level provides flexibility for boards to determine what constitutes as barriers in addition to the already defined WIOA youth eligibility barriers as described in WIOA section 129 (a)(1)(B) and (C).

A locally defined barrier in the youth requires additional assistance policy must not be duplicative of the WIOA in-school and out-of-school eligibility barriers. Locally identified barriers must describe a population of youth who may benefit from WIOA Title I youth activities but would otherwise be excluded based on eligibility. Locally identified barriers must be clearly defined with specified documentation requirements and implemented with formal board approval.

As listed in WIOA §129(a)(3)(B) not more than 5% of the in-school youth in each local area may be individuals who require additional assistance to complete an educational program or to secure or hold employment.

At the time of eligibility determination, youth must present verifiable documentation indicating that they meet the eligibility requirements for either an in-school youth or an out-of-school youth and that they require additional assistance.

Policy:

Utilization of the Youth Requires Additional Assistance barrier for program eligibility determination must be supported by a locally approved policy. The local definition must be approved by the Local Workforce Board and included in the Annual Plan. Implementation of the Youth Requires Additional Assistance barrier must include documentation that clearly demonstrates that the youth meet this definition.

- A. **Definition** – Mass Workforce Issuance [100 DCS 19.101.1](#) WIOA Title I Youth Eligibility Policy provides that the definition of a youth who requires additional assistance is defined as a low-income youth who requires additional assistance as defined and approved by the local workforce board.
- B. **Operational Parameters** – The term youth requires additional assistance in Mass Workforce Issuance 100 DCS 19.10.1 should be treated the same as the definition of barriers listed in WIOA section 129(a)(1)(B) and 129(a)(1)(C) and the income exceptions listed in WIOA section 129(a)(3). Local Workforce Boards that establish their own locally defined barriers must establish both a clear definition and verifiable methods for documenting such eligibility.
- C. **Local Workforce Board Approval** – According to the WIOA proposed regulations § 681.300 Local Workforce Boards may establish local approved “Requires Additional Assistance...” barriers. The activities leading to the adoption of new barriers must be formally documented and official minutes of the relevant Local Workforce Board’s proceeding available for review.
- D. **Barrier Documentation Requirements** – Each locally approved barrier must specify the allowable source documents that may be used by the framework service provider to determine a youth’s eligibility. Local areas should review

the youth section of Attachment B of Mass Workforce Issuance 100 DCS 19.101.1 to guide their development of documentation sources.

- E. **Standard Operation Procedures** – Local Workforce Boards must develop standard operating procedures for each locally defined barrier. Case management staff and youth vendors must be trained on the use of the barrier, including definition of the barrier, allowable documentation sources, and use of self-attestation in relation to the barrier. Information regarding the use of the Local Workforce Board’s defined additional barrier should be recorded in the “Barriers Box” in MOSES.
- F. **Record Keeping** - Case managers must check off “Requires Additional Assistance Barrier” in MOSES and a comment notating the use of the locally defined barrier should be entered into the “Barriers Box”.
- G. **Case File** – Hard copy documentation of all barriers shall be maintained in the youth case file.
- H. **Annual Plan Addendum** - Each Local Workforce Board must submit for review an addendum to its Annual Plan immediately upon adoption of a newly defined local “Youth Requires Additional Assistance” policy. The addendum should describe the newly approved barriers, the associated operational parameters, and all acceptable documentation requirements. A letter signed by either the Local Workforce Board Chair or Executive Director and including each of the following elements will suffice:
 - The board approved barrier(s);
 - summary of board authorized proceedings and date of approval;
 - the operational parameters for the barrier(s) including a definition;
 - the documentation requirements for each barrier; and
 - standard procedures for staff implementation.

Attachment A provides examples of Youth Requires Additional Assistance barriers used by local areas across the nation. The examples listed in Attachment A are examples of youth characteristics drawn from state and local level policies throughout the country; Massachusetts does not endorse the use of any particular characters and the listing in Attachment A is not intended to be all-inclusive.

For convenience, a template (Attachment B, Part 2) has been designed for local areas to record the documentation requirements of each locally defined “additional barrier”. The template, based on Attachment B of Mass Workforce Issuance 100 DCS 19.101.1, should be included as part of the required addendum to the area’s Annual Plan.

The completed addendum should be sent to the following individuals:

Lisa Caissie
Department of Career Services
19 Staniford Street
Boston, MA 02114 or
electronically to the same at:
Lcaissie@detma.org

Action

Required: Local Workforce Boards must assure that all appropriate staff is informed and knowledgeable of the policy and related procedural requirements describe in this policy issuance.

Attachments: A: Examples of Additional Barriers for Use by Local Workforce Boards and Youth Standing Committees

B: Current Youth Barriers and Acceptable Forms of Documentation: Part 1, 2, and 3

Effective: Immediately

Inquiries: Please email all questions to PolicyQA@detma.org. Also, indicate Issuance number and description.