



# Montana Department of LABOR & INDUSTRY

Division: Workforce Services Division

Category: WIOA

Effective Date: 11/22/2017

Last Revised: 04/01/2025

Policy No.: 10-16

## WIOA Title I Youth Program Policy

**Background:** The Workforce Innovation and Opportunity Act (WIOA) Title I Youth program provides resources to serve eligible out-of-school youth and in-school youth through an integrated service delivery system. A comprehensive array of youth services are provided in partnership with the WIOA One-Stop System and under the direction of the State Workforce Innovation Board (SWIB). The Youth program is designed to:

- Offer career exploration and guidance;
- Support continued educational attainment;
- Support opportunities for skills training, for example, pre-apprenticeship or work experience; and
- Culminate in employment with career and promotional opportunities; enrollment in post-secondary education; or a registered apprenticeship.

**Scope:** This policy applies to all service providers operating WIOA Title I programs, WIOA Title I program manager(s), WIOA fiscal officers, and the WIOA monitoring team. This policy is effective April 1, 2025.

## Policy:

### Required Services for Youth Participants:

- Determination of eligibility;
- An objective assessment, including a review of the academic and occupational skill levels and service needs and strengths to identify appropriate services and career pathways; and
- An Individual Service Strategy (ISS) to identify career pathways, including education and employment goals; career planning and results of the assessment; and achievement objectives and services; and
- Case management, including follow-up services.

### Youth Eligibility:

- In-School Youth (ISY) is defined as:
  - Attending any school at program entry, including youth attending secondary school, post-secondary school, an alternative school or registered home school;
    - WIOA does not consider providers of Adult Education under WIOA Title II, Youth Build programs, and Job Corps programs to be schools.
  - Not younger than age 14 or (unless an individual with a disability who is attending school under State law) older than age 21 at the time of enrollment. Because age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 21 once they are enrolled in the program;
  - A low-income individual; and

- One or more of the following:
  - Basic skills deficient;
  - An English language learner;
  - An offender;
  - A homeless individual aged 14 to 21, including runaway youth (the definition of low income includes homelessness);
  - Youth in foster care or has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption (the definition of low come includes individuals in foster care);
  - A youth who is pregnant or parenting;
  - An individual with a disability; or
  - A youth (14-21) who requires additional assistance to:
    - Complete an educational program: a youth who is at risk of dropping out of high school as documented by his/her school; or had previously dropped out of an educational program but has returned to school (including an alternative school); has below average grades; or a youth with poor attendance patterns in an educational program during the last 12 calendar months; or has been suspended or expelled from school within the last 12 calendar months; or has previously been placed in out-of-home care (foster care, group home, or kinship care) for more than 6 months.
    - OR
    - Secure or hold employment: an in-school youth who has not held a job for more than three consecutive months; or has a poor work history to include no work history; or has been fired from a job in the last 6 calendar months; or lacks work readiness skill necessary to obtain and/or retain employment.
    - Note: In each local area, not more than 5 percent of the ISY newly enrolled in a given program year may be eligible based on “requires additional assistance to complete an educational program or to secure or hold employment.”
- An Out-of-School Youth (OSY) is defined as:
  - Youth who is not attending any school, including youth in home schools that are not registered with the county superintendent;
  - Not younger than 16 nor older than 24 at the time of enrollment. Because age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 24 once they are enrolled in the program; and
  - One or more of the following:
    - A school dropout;
    - A youth who is within the age of compulsory school attendance and has not attended school for at least the most recent complete school year calendar quarter. School year calendar quarter is based on how a local school district defines its school year quarters.
    - A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English language learner;
    - An individual who is subject to the juvenile or adult justice system;
    - A homeless individual, aged 16 to 24, which may include a runaway youth;
    - Youth in foster care or has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption;
    - A youth who is pregnant or parenting;
    - An individual with a disability; or
    - A low-income youth (16-24) who requires additional assistance to:
      - Enter or complete an educational program: a youth who is in need of a high school diploma; or has dropped out of a post-secondary educational program

- 88 during the last 12 calendar months; or has a diploma but requires additional  
89 education in order to obtain or retain employment.
- 90 • OR
- 91 • Secure and hold employment: a youth (including a youth with a diploma or  
92 equivalent) not currently attending any school and who has not held a full-time  
93 job for more than three consecutive months; has a poor work history, to include  
94 no work history; has been fired from a job in the last six calendar months; or lacks  
95 work readiness skills necessary to obtain and/or retain employment.
- 96 • Low-income eligibility requirement:
- 97 ○ In addition to the criteria found at WIOA sec 3 (36) in the definition of “low-income individual”, a  
98 youth is low-income if he or she receives or is eligible to receive a free or reduced lunch or if he  
99 or she lives in a high poverty area.
- 100 ■ The criteria applies to the individual even if the school chooses to offer all students free  
101 or reduced lunch.
- 102 ■ If an OSY is a parent living in the same household as a child who receives or is eligible to  
103 receive free or reduced lunch based on their income level, then such an OSY would  
104 meet the low-income criteria based on his/her child’s qualification.
- 105 ○ For OSY, only those youth who are the recipient of a secondary school diploma or its recognized  
106 equivalent and are either basic skill deficient or an English language learner, and youth who  
107 require additional assistance to enter or complete an education program or to secure or hold  
108 employment, must be low-income. All other OSY meeting OSY eligibility listed above are not  
109 required to be low-income.
- 110 ○ All in-school youth must be low-income to meet the in-school youth eligibility criteria, except those  
111 that fall under the low-income exception.
- 112 ■ A low-income exception is allowed where 5 percent of WIOA youth may be participants  
113 who ordinarily would be required to be low-income for eligibility purposes and meet all  
114 other eligibility criteria for WIOA youth except the low-income criteria. Please refer to the  
115 In-School Youth (WIOA.12) Verification Worksheet [or](#) Out-of-School Youth (WIOA.13)  
116 Verification Worksheet for complete list of acceptable documentation.
- 117 ○ Individuals who are recipients of public assistance (TANF, SNAP, Supplemental Security Income  
118 (SSI), Refugee Cash Assistance (RCA), and General Assistance (GA)) may meet Categorical  
119 Income Eligibility and be considered income eligible. No further income verification is required if  
120 the individual has provided acceptable documentation.
- 121 ■ TANF and SNAP (Food Stamp) documentation must be current and verify that the  
122 individual receives or is a member of a household that is receiving TANF or SNAP  
123 benefits. Examples of documentation include: a Letter of Award if the individual is the  
124 recipient; documentation that lists the individual is a member of the household receiving  
125 TANF or SNAP; or documentation such as a TANF or SNAP benefit summary showing the  
126 dates to verify that benefits were received within the six-month period prior to enrollment  
127 in the WIOA program. Please refer to the In-School Youth (WIOA.12) Verification  
128 Worksheet [or](#) Out-of-School Youth (WIOA.13) Verification Worksheet for complete list of  
129 acceptable documentation.
- 130 ■ The individual must be the sole recipient of SSI, RCA or GA payments and be considered  
131 a family of one. Examples of acceptable documentation include: a Letter of Award or  
132 other authorization notice to receive cash public assistance. Please refer to the In-School  
133 Youth (WIOA.12) Verification Worksheet or Out-of-School Youth (WIOA.13) Verification  
134 Worksheet for complete list of acceptable documentation.
- 135 • Veterans will receive priority of service in applying for and receiving youth services.

## Objective Assessment:

Youth participants must receive an objective assessment of their academic and occupational skills, strengths, and services needed, including the development of an ISS and one or more of the 14 youth elements.

- The objective assessment will include a review of all the following:
  - Basic skills;
  - Occupational skills;
  - Prior work experience;
  - Employability;
  - Interests;
  - Aptitudes (including interests and aptitudes for nontraditional jobs);
  - Supportive service needs; and
  - Developmental needs.
- An objective assessment is not required if the provider determines it is appropriate to use a recent assessment (within the last 6 months) of the participant conducted by another education or training program. This may include evaluations completed by a secondary school, Vocational Rehabilitation, adult basic education and literacy programs or other education or training provider.
- Academic skills assessments help program staff determine participants' academic skill levels and uncover any subject areas requiring improvement.
- OSY must be assessed for basic skill deficiencies. The instrument used to assess basic skills must be administered by an Adult Education provider funded through Montana's Office of Public Instruction. This process applies to:
  - OSY without a diploma or the equivalent at the time of enrollment because they dropped out of school; or are within the age of compulsory school attendance but have not attended school for at least the most recent complete school year quarter.
  - OSY with a diploma or the equivalent and basic skills deficiencies at the time of enrollment. Note: Pretesting OSY with a diploma and basic skills deficiencies is not necessary. However, depending on the participant's career goals identified in the ISS, youth providers should work with the Adult Education provider to determine if testing is appropriate.
- Youth providers must work with the Adult Education provider in their area to schedule pre-testing remediation and post-testing if required for their participants.
- Participants who do not follow through with scheduled assessment appointments for pre-testing, remediation (time spent in remediation is determined by the Adult Education provider), or post-testing may be pulled from Work Experience (WEX) sites and be denied supportive services. Providers will be subject to corrective action which may include repayment of any funds expended on OSY for the time-period when youth should have been tested.
- Providers should record Measurable Skill Gains (MSGs) for youth who tested as basic skills deficient in the pre-test and increased their grade level in post-tests. To verify the MSGs, the provider must document both pre-test and post-test scores. Please refer to the Measurable Skill Gains policy for more details.
- ISY do not need to be assessed for basic skills; however, the provider must track youth who are basic skills deficient. Documentation of basic skills deficiencies may include school records, a current IEP, or a report card. Basic skills deficiencies will be documented on the ISS and in case notes with supporting documentation maintained in the participant's file.

## Individual Service Strategy (ISS):

- The Individual Service Strategy (ISS) with youth must directly link to one or more of the following primary indicators of performance:
  - Employment Rate; and
  - Median Earnings;
  - Credential Attainment;

- Measurable Skill Gains.

- An ISS is required for all WIOA Title I Youth in-school and out-of-school participants. Services provided by the youth program are based on the individual needs of the participant; therefore, the participant must be involved in the design and implementation of services to ensure their needs are being met.
- The ISS identifies where the participant is, where the participant wants to be, and the appropriate mix and sequence of services and support needed to reach realistic goals. Once completed, the ISS will be continually updated.
- The ISS will be reviewed at least quarterly and updated as needed.
- A signed copy of the participant agreement must be provided to the participant and the original attached to the ISS and maintained in the Management Information System (MIS).
- Goals must be identified on the ISS.

#### Youth Services and Activities:

- The following 14 elements must be available to youth participants. Service providers have the discretion of what specific services are provided to a youth based on the individual's objective assessment and ISS.
  1. Tutoring, study skills training and instruction leading to secondary school completion, including dropout prevention strategies;
  2. Alternative secondary school offerings;
  3. Paid and unpaid Work Experiences (WEX) that have academic and occupational education as a component. For details, please refer to the Youth Work Experience (WEX) policy.
  4. Occupational skill training with priority consideration for training programs that lead to recognized post-secondary credential that align with in-demand industry sectors or occupations;
  5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
  6. Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors;
  7. Supportive Services;
  8. Adult mentoring for the duration of at least 12 months that may occur both during and after program participation;
  9. Follow-up services must be provided for 12 months to all participants after completion of participation. For details, please refer to the WIOA Operations Manual.
  10. Comprehensive guidance and counseling which may include drug and alcohol abuse counseling as well as referrals to counseling, as appropriate to the needs of the individual youth.
  11. Financial literacy education;
  12. Entrepreneurial skills training;
  13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
  14. Activities that help youth prepare for and transition to post-secondary education and training.
- Youth goals may be provided in conjunction with youth services as shown in the examples below:
  - Basic skills goal; activities to improve basic education skills for youth with proficiencies below the ninth-grade level
  - Occupational skills goal; high School equivalency certificate prep (applies to youth 16 years and older).
  - Work readiness skills goal; work experience

#### Training Services:

- Occupation Skills Training, one of the 14 elements that are offered to youth participants, allows Individual Training Accounts (ITA) for OSY ages 16 to 24 using WIOA funds when appropriate. Priority

- consideration must be given to training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the local area. (requires ETP)
- Programs that combine workplace training with related instruction, which may include cooperative education programs and Registered Apprenticeship programs; (requires ETP)
  - Training programs operated by the private sector; (requires ETP)
  - Skill upgrading and retraining; (requires ETP)
  - Entrepreneurial training; (requires ETP)
  - Adult education and literacy activities conducted at ABLE, provided in combination with services for the Incumbent Worker Training program; (does not require ETP)
  - Customized training conducted with a commitment by a business or group of businesses to employ an individual upon successful completion of the training; (does not require ETP) or
  - On-The-Job Training (OJT). (does not require ETP)

#### Follow-up activities:

- Follow-up activities must also be provided to youth participants who exit to self-employment or agricultural, railroad or federal government employment for a minimum of 4 quarters.
- Participants placed in follow-up must be contacted at least once per quarter to obtain wage date.

#### Case Management:

- Because it is essential to the success of WIOA youth service delivery, case management must be conducted throughout the entirety of the youth's participation.
- A significant failure to meet case management responsibilities based on program monitoring may result in formal corrective action if there is no improvement from one year to the next.
- Documenting monthly contact or contact attempts with participants.
- Providing a countable activity every 90 days. Refer to form WIOA.49 for a list of activities/services.
- Maintaining the participant file by recording all program services, case notes, and documentation in MIS within seven (7) working days and as service/contact occurs;
- Entering program services and start and end dates.

#### Youth Incentives:

For recognition and achievement in training activities and work experiences, WIOA permits incentive payments to youth participants; provided the incentives are tied to specific program goals, outlined in writing before the start of the program, aligned with the local program's organizational policies, and issued with respect to the requirements included in Cost Principles in 2 CFR 200.

- WIOA-funded incentives for youth participants must be tied to achievement of training, work experience, and/or education milestones and outcomes and documented in the participant's ISS. The ISS must describe the plans for preparing the youth for post-secondary education and/or employment, finding effective connections to the job market and businesses, and an understanding of the links between academic and occupational learning. The youth must be an active participant in the WIOA Youth program to receive an incentive. Incentives may also be awarded to youth who have successfully completed the WIOA program and obtained full-time unsubsidized employment.
- Providers must document the plans for providing incentives based upon the youth attaining one or more goals in the youth's ISS and in case notes in MIS. Service providers must track incentive awards, whether cash or non-cash, through the Objectives and Services section of the MIS Employment Plan following the same funding process of obligating, authorizing, and making payments as with any service that has funding attached.
- WIOA-funded incentive payments may not be used for activities such as recruitment, submitting eligibility documentation, and program participation. Youth incentives may not include entertainment costs such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment.

- Cash incentive awards are limited to \$500 per participant over the course of their program participation.
- This policy contains suggested cash and non-cash dollar amounts. Providers have discretion to determine the actual amount of the award (up to the limits specified below), based on youth achievement of training, work experience, and education milestones and outcomes; funding; and whether the award will be in the form of cash or non-cash. Incentives, both cash and non-cash, must be in an amount that is consistent to each youth receiving an incentive for their achievement. If a provider determines that the amount awarded for the attainment of one goal is \$10, then all youth achieving that goal and receiving an incentive award will receive \$10.
- Non-cash incentives, such those listed below, require documentation that the participant is on track to graduate; for example, a letter from a school counselor on official letterhead:
  - Cap and gown;
  - Class picture; or
  - Class ring.
- OSY who are basic skills deficient in reading and/or math or language; actively participating in program services; and who have achieved an increase of at least one educational functioning level may be awarded up to the following amounts based on pre- and post-test scores. The required documentation is a copy of the MIS measurable skill gains (MSG) screen and documents showing pre- and post-test results.
  - \$25 cash or gift certificate for increase of .5 to 1.0 grade level;
  - \$50 cash or gift certificate for increase of 1.1 to 1.9 grade level or more;
  - \$75 cash or gift certificate for testing 9.0 or above in both reading and math if the increase is more than three grade levels after second year of program participation.
- OSY who enroll in school with basic skills deficiencies may receive up to the following incentives for returning to school and successful completion. Required documentation is a copy of the diploma or post-secondary degree or documentation of completion of first term from school official.
  - The first term: \$50 limit;
  - Attainment of a Diploma or Degree: \$250 limit.
- School completion incentive applies to OSY, who are employed full-time and enroll in an educational program leading to the attainment of a GED/state approved high school equivalency diploma, professional license or certificate. The incentive is limited to those participants who maintain good standing and actively progress toward accomplishment of a GED/state approved high school equivalency diploma or professional license or certificate as described in the ISS. Required documentation is a copy of the GED/state approved high school equivalency diploma or professional license or certificate.
  - \$250 for receiving a GED/state approved high school equivalency diploma;
  - \$250 for receiving a professional license/certificate.
- Participants may receive the following incentives for core class grade related improvements. Required documentation are school records showing grade or pass/fail records.
  - \$10 cash or gift certificate for going from failing to passing for one semester;
  - \$20 cash or gift certificate for passing all classes with a C or higher for one semester;
  - \$30 cash or gift certificate for increasing one full grade for the school year;
  - \$40 cash or gift certificate for passing all classes with a C or higher for the school year.
- Attainment of a secondary school diploma or equivalent applies to participants, whether ISY or OSY, who at the time of enrollment have not attained a high school diploma or equivalent and are awarded such during program participation. For purposes of this policy, attainment of a secondary school diploma or equivalent includes:
  - High school diploma; or
  - High School Equivalency Test (HiSET)

Participants may be awarded a cash incentive up to \$250 for obtaining their High School Diploma or HiSET. Required documentation is a copy of the diploma or HiSET certification. Participants may not be awarded cash incentives for attending state-sponsored high school equivalency classes.

- Work experience incentive is based on a series of evaluations over the course of a youth's work experience:
  - Up to \$50 for a satisfactory (fair or above) written evaluation by supervisor after 3 pay periods;
  - At the end of the work experience, up to \$100 for achieving satisfactory (fair or above) written evaluations 90 percent of the time.
  - Note: Incentive payments directly tied to a work experience is an allowable work experience expenditure.
  - Attainment of occupational skills credential applies to those participants who are enrolled in training, have not received an occupational skills credential, and attain an occupational skills credential during participation. An occupational skills credential is defined as a nationally recognized degree or certificate. Credentials include, but are not limited to, post-secondary degrees, recognized skill standards, and licensure of industry-recognized credentials. Required documentation is a copy of the occupational skills credential or degree from two-year or community college. Up to \$250 may be awarded for attainment of an occupational skills credential.
- Job retention incentive applies to youth who have successfully completed the WIOA program and are employed full time. Required documentation is verification by their current employer and a quarterly progress report by the case manager.
  - \$25 for getting a job;
  - \$100 for retaining a job for 3 months;
  - \$150 for retaining a job for 6 months;
  - \$250 for retaining a job for 12 months.

### Youth Stipends

Stipends are allowable in the WIOA Title I Youth program. The stipend's intent is to encourage and motivate WIOA youth to participate in certain classroom activities (seat time) that prepare youth for work experiences and help youth reach specific goals and obtain positive outcomes. Providers must document the plans for providing stipends on the ISS and in case notes.

- Stipend payments must be based on the actual time of participation in the activity as documented on the attendance or time sheet. The attendance sheet must be signed by the participant and the instructor before the stipend payment may be made. A copy of the attendance sheet must be maintained in the participant's file. Providers will track stipend payments through the Objectives and Services section of the MIS Employment Plan following the same funding process of obligating, authorizing, and making payments as with any service that has funding attached.
- Stipends may be paid based on actual hours of attendance. Providers have the discretion to determine the amount of the stipend payment up to but not exceeding the current state minimum wage. Stipends must be paid in an amount consistent with other WIOA youth receiving stipends in the same classroom activity.
- Classroom activities (seat time) include but are not limited to:
  - Work Readiness Skills
  - Financial Literacy Education;
  - Entrepreneurial Skills Training; and
  - Career Awareness classroom activities.
- Stipends may be used to count toward WEX activities e.g., Work Readiness Skills workshops.
- A stipend is not an entitlement and may be provided on a case-by-case basis as determined by the provider.
- A stipend is not a supportive service.

379 **Monitoring and Technical Assistance:**

- 380       • A formal monitoring will be conducted by the entity designated by SWIB.
- 381       • The WIOA Title I Youth program manager will provide technical assistance to case managers.
- 382       • Service providers are required to verify eligibility for the Youth Program. Guidance on the program’s
- 383       eligibility and related timelines for reporting participant information is available in the WIOA Operations
- 384       Manual.
- 385

386 **References:**

- 387       • [20 CFR 681 Youth Activities](#)
- 388       • [WIOA Section 129 Youth Workforce Investment Activities](#)
- 389       • [Eligible Training Provider List \(ETPL\) Policy](#)
- 390       • [MCA 39-51-204 \(m\) Exclusions from Definition of Employment](#)
- 391       • [2 CFR 200 Uniform Administrative Requirements](#)
- 392       • [TEGL 23-14 Youth Activities](#)
- 393       • [TEGL 08-15 Youth Program Transition Guidance](#)
- 394       • [TEGL 10-16, Change 1 Performance Accountability](#)
- 395       • [TEGL 21-16 Youth Formula Program Guidance, including Low-income Definition](#)
- 396       • [TEGL 26-16 Additional Youth Formula Program Guidance](#)