



Montana Department of LABOR & INDUSTRY

Division: Workforce Services Division

Category: WIOA

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Policy No.: 10-16

Title I Youth Program Policy

Background: The Workforce Innovation and Opportunity Act (WIOA) Title I Youth Program provides resources to enable in-school youth (ISY) and out-of-school youth (OSY) to obtain and retain good jobs by providing them with workforce services such as career guidance and educational and training opportunities. The youth program is designed to:

- Provide career exploration and guidance;
- Support educational advancement;
- Support opportunities for skill training; and
- Culminate in employment that offers career and advancement opportunities; enrollment in postsecondary education; or a registered apprenticeship.

Scope: This policy applies to all service providers operating WIOA Title I Youth programs; WIOA Title I Youth program manager and supervisor; WIOA fiscal officer; and the WIOA monitoring team. This policy is effective January 1, 2026.

Policy:

Required for Youth Participants:

- Determination of eligibility;
- An individual seeking youth participant-level services must have their authorization to work in the U.S. verified prior to participation. Approved work authorization documentation must be provided by the customer before youth services can begin. For a list of acceptable documentation, refer to the Work Authorization Verification Worksheet (WIOA.54).
- An objective assessment, including academic and occupational skill levels, strengths, and needs to identify appropriate services;

- An Individual Service Strategy (ISS) to identify career pathways, including education and employment goals; career planning and assessment results; and achievement objectives and services; and
- Case management (including follow-up services as applicable).

Youth Eligibility

To receive Title I Youth services, an individual must:

- Be 14 through 24 years of age;
- Be a U.S. citizen or legally authorized to work in the U.S.; and
- Meet Selective Service requirements (if applicable).

Service Priority for Individualized Career Services and Training Services:

- Veterans and eligible spouses receive priority of service for all U.S. Department of Labor (USDOL) funded job training programs, including WIOA programs.

Additional Eligibility Requirements for In-School Youth (ISY)

- An individual who is between 14 and 21 years of age;
 - Attends school at program entry, including secondary and postsecondary school, an alternative school, or a registered homeschool.
 - A low-income individual and one of the following:
 - Basic skills-deficient;
 - English language learner
 - An offender who:
 - Is or has been subject to any stage of the criminal justice process
 - Or who requires assistance in overcoming barriers to employment resulting from a record of arrest or conviction.
 - Homeless individual, including runaway youth;
 - Youth in foster care, who aged out of foster care or turned 16 years old and left foster care for kin guardianship or adoption;
 - Pregnant or parenting;
 - Disabled individual; or
 - An individual who requires additional assistance to complete an educational program or secure and retain employment.

Note: Of the total ISY enrolled by a local area during a program year, no more than 5 percent may be individuals who require additional assistance to complete an educational program or to secure or hold employment.

Additional Eligibility Requirements for Out-of-School Youth (OSY)

- An individual who is not attending any school (secondary or post-secondary)
- An individual who is between the ages of 16 and 24 years of age and meets one or more of the following criteria:
 - School drop-out

- A youth who is at compulsory age for attending school but has not done so for at least the school year's recent complete quarter.
- A low-income recipient of a school diploma or recognized equivalent, who is also:
 - Basic skills-deficient; or
 - An English language learner.
- An offender who:
 - Is or has been subject to any stage of the criminal justice process
 - Or who requires assistance in overcoming barriers to employment resulting from a record of arrest or conviction.
- Homeless individual or runaway
- Individual in foster care or who aged out of the foster care system
- Pregnant or parenting
- Disabled individual; or
- An individual who requires additional assistance to complete an educational program or secure and retain employment.
- An eligible ISY or OSY who has their high school diploma or GED and who is basic skills deficient or an English language learner must also meet the WIOA definition of low-income.
- Youth participants whose eligibility criteria require them to be low-income individuals are defined as covered individuals. Up to five percent of a local area's covered individuals may be enrolled in the youth program if they meet all other eligibility criteria except the low-income criterion. In a program year, the number of newly enrolled covered individuals who are not low-income must not exceed five percent of the local area's total new enrollments of covered individuals.

Note: Requests to enroll youth who are not low-income must be approved by the Youth Program Manager prior to enrollment. Please refer to the Youth (WIOA.12) Verification Worksheet.

Additional Considerations related to Low-income Eligibility Requirements

- An individual is considered low-income if he or she receives or is eligible for free or reduced lunch or lives in a high-poverty area.
- These criteria apply to the individual even if the school chooses to offer all students free or reduced lunch.
- If an OSY is a parent living in the same household as a child who receives or is eligible for free and reduced lunch based on income, then the parent would meet the low-income criteria based on the child's eligibility.

Selective Service Requirements

Individuals are required to register with Selective Service if they meet the following criteria:

- U.S. citizen or permanent resident non-citizen;
- Between the ages of 18 and 26; and
- Assigned male at birth.

Individuals who fail to register with Selective Service by their 26th birthday, and provide a written explanation and supporting documentation of any of the following reasons, may be eligible for WIOA services:

- Over the age of 26 and were willing to register with Selective Service; but did not know about the requirement;
- Incarceration, institutionalization or hospitalization between the ages of 18 and 26; or
- Non-citizen status and non-permanent resident status before age 26.

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 includes a review of all of the following:
 - Basic skills;
 - Occupational skills;
 - Prior work experience;
 - Employability;
 - Aptitudes (as they relate to interests and work experience (WEX));
 - Supportive service needs; and
 - Developmental needs.
- An objective assessment is not required if the provider determines it is appropriate to use a recent assessment completed within the last 6 months and 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 and Family Literacy Act (AEFLA) provider. 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 AEFLA provider to determine if testing is necessary.
- Youth providers must work with the AEFLA 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 as determined by the AEFLA 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 the individual should have been tested.

- Providers must 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 must be documented on the ISS and in case notes, with supporting documentation maintained in the participant's file.

Individual Service Strategy (ISS)

- An Individual Service Strategy (ISS) must directly link to one or more of the following primary indicators of performance:
 - Employment Rate
 - Median Earnings
 - Credential Attainment
 - Measurable Skill Gains
- The ISS must include participant goals.
- The participant must be involved in the design and implementation of services to ensure the ISS meets their needs. The ISS must be an appropriate mix and sequence of services and support to reach realistic goals.
- The ISS must be updated and reviewed at least quarterly.
- 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).

Youth Services and Activities

WIOA Section 129(c)(2) describes 14 program elements that must be made available to youth participants. Service providers have the discretion of which specific services are provided to a youth based on the individual's objective assessment and ISS.

- Providers must ensure youth participants have access to all 14 program elements either through direct service or referral partnerships.
- Program providers are not required to directly deliver all 14 elements. However, at a minimum, providers must directly deliver elements 3, 7, 9, and 13.
- During the enrollment period, at least one element must be utilized every quarter.
- Please refer to the Operations Manual for a list of the 14 elements and their descriptions.

Training Services

- Occupational skills training allows Individual Training Accounts (ITA) for OSY ages 16 to 24 using WIOA funds when appropriate. Montana Department of Labor & Industry (MTDLI) has a waiver from the US Department of Labor (USDOL) that allows ITAs for ISY ages 16 to 21. 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 services must be provided for a 12-month period to all participants after program exit.
- During the follow-up period, quarterly contact should be provided to help ensure youth are successful in employment and/or post-secondary education and training.
- Wage and employment information [for use with WIOA performance indicators] must be collected and entered into MIS one time every quarter for youth who exit to self-employment, agriculture, railroad or federal government employment.
- Additional examples of follow-up services can be found in the WIOA Operations Manual.

Case Management:

Case management responsibilities include but are not limited to:

- 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; and
- Entering program services and start and end dates.

Youth Payments

WIOA Youth allows for several forms of payments to be made available to program participants in the form of incentives, stipends, and wages. The following section articulates the distinction between these payments, and how incentives and stipends are permitted to be provided to enrolled participants. For additional details regarding specific funding amounts and limit for each type of incentive payment, please refer to the Operations Manual.

Incentives	Stipends	Wages
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Incentive payments are awarded to participants in recognition of an achievement directly tied to training activities or work experiences. Incentive payments must be awarded in response to a specific outcome achieved (e.g., credential attainment, job placement, placement in post-secondary education).	Stipends are predetermined, fixed payments that may be awarded to individuals for participation or attendance in training or work experience activities. Stipends are based on the levels of program participation or attendance met. Stipends are not considered income for WIOA eligibility purposes, are not required to meet minimum wage requirements (i.e., providers do not need to pay youth the current minimum wage), are not dispersed as payroll, and income tax is not withheld.	A wage is generally a payment for services rendered where an employer/employee relationship exists. This form of compensation is usually paid through a payroll system and is subject to the taxes applicable to the employer of record and participants. Paying a wage usually indicates that a program views the youth as an employee.
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238 Monitoring And Technical Assistance:

- 239 • A formal monitoring will be conducted by the entity designated by SWIB.
- 240 • The WIOA Title I Youth program manager will provide technical assistance to case managers.
- 241 • Service providers are required to verify eligibility for the Youth Program. Guidance on the
- 242 program's eligibility and related timelines for reporting participant information is available in
- 243 the WIOA Operations Manual.

244 References:

- 245 • [20 CFR 681 Youth Activities](#)
- 246 • [Eligible Training Provider List \(ETPL\) Policy](#)
- 247 • [MCA 39-51-204 \(m\) Exclusions from Definition of Employment](#)
- 248 • [TEGL 10-23, Change 2 Work Authorization Verification in Grant Programs](#)
- 249 • [U.S. Department of Labor \(USDOL\) WIOA Youth Formula Program](#)