



Montana Department of LABOR & INDUSTRY

1 Division: Workforce Services Division
2 Category: WIOA
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5 Policy No.: 10-16
6

7 Title I Youth Program Policy

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

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

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

21 22 Policy:

23 Required for Youth Participants:

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

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

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36 **Youth Eligibility**

37 To receive Title I Youth services, an individual must:

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

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42 **Service Priority for Individualized Career Services and Training Services:**

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

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46 **Additional Eligibility Requirements for In-School Youth (ISY)**

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

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

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

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

73 ○ A youth who is at compulsory age for attending school but has not done so for at
74 least the school year's recent complete quarter.

75 ○ A low-income recipient of a school diploma or recognized equivalent, who is also:
76 ■ Basic skills-deficient; or
77 ■ An English language learner.

78 ○ An offender who:
79 ■ Is or has been subject to any stage of the criminal justice process
80 ■ Or who requires assistance in overcoming barriers to employment resulting
81 from a record of arrest or conviction.

82 ○ Homeless individual or runaway

83 ○ Individual in foster care or who aged out of the foster care system

84 ○ Pregnant or parenting

85 ○ Disabled individual; or

86 ○ An individual who requires additional assistance to complete an educational program
87 or secure and retain employment.

88 ● An eligible ISY or OSY who has their high school diploma or GED and who is basic skills
89 deficient or an English language learner must also meet the WIOA definition of low-income.

90 ● Youth participants whose eligibility criteria require them to be low-income individuals are
91 defined as covered individuals. Up to five percent of a local area's covered individuals may
92 be enrolled in the youth program if they meet all other eligibility criteria except the low-
93 income criterion. In a program year, the number of newly enrolled covered individuals who
94 are not low-income must not exceed five percent of the local area's total new enrollments of
95 covered individuals.

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

99 Additional Considerations related to Low-income Eligibility Requirements

100 ● An individual is considered low-income if he or she receives or is eligible for free or reduced
101 lunch or lives in a high-poverty area.

102 ● These criteria apply to the individual even if the school chooses to offer all students free or
103 reduced lunch.

104 ● If an OSY is a parent living in the same household as a child who receives or is eligible for
105 free and reduced lunch based on income, then the parent would meet the low-income
106 criteria based on the child's eligibility.

108 Selective Service Requirements

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

110 ● U.S. citizen or permanent resident non-citizen;

111 ● Between the ages of 18 and 26; and

112 ● Assigned male at birth.

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

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

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123 **Objective Assessment**

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

127 • The objective assessment includes a review of all of the following:
128 ○ Basic skills;
129 ○ Occupational skills;
130 ○ Prior work experience;
131 ○ Employability;
132 ○ Aptitudes (as they relate to interests and work experience (WEX));
133 ○ Supportive service needs; and
134 ○ Developmental needs.

135 • An objective assessment is not required if the provider determines it is appropriate to use a
136 recent assessment completed within the last 6 months and conducted by another education
137 or training program. This may include evaluations completed by a secondary school,
138 Vocational Rehabilitation, adult basic education and literacy programs or other education or
139 training provider.

140 • Academic skills assessments help program staff determine participants' academic skill
141 levels and uncover any subject areas requiring improvement.

142 • OSY must be assessed for basic skill deficiencies. The instrument used to assess basic skills
143 must be administered by an Adult Education and Family Literacy Act (AEFLA) provider. This
144 process applies to:
145 ○ OSY without a diploma or the equivalent at the time of enrollment because they
146 dropped out of school; or are within the age of compulsory school attendance but
147 have not attended school for at least the most recent complete school year quarter.
148 ○ OSY with a diploma or the equivalent and basic skills deficiencies at the time of
149 enrollment.
150 Note: Pretesting OSY with a diploma and basic skills deficiencies is not necessary.
151 However, depending on the participant's career goals identified in the ISS, youth
152 providers should work with the AEFLA provider to determine if testing is necessary.

153 • Youth providers must work with the AEFLA provider in their area to schedule pre-testing
154 remediation and post-testing if required for their participants.

155 • Participants who do not follow through with scheduled assessment appointments for pre-
156 testing, remediation as determined by the AEFLA provider or post-testing may be pulled from
157 work experience (WEX) sites and be denied supportive services. Providers will be subject to
158 corrective action which may include repayment of any funds expended on OSY for the time-
159 period when the individual should have been tested.

160 • Providers must record Measurable Skill Gains (MSGs) for youth who tested as basic skills
161 deficient in the pre-test and increased their grade level in post-tests. To verify the MSGs, the
162 provider must document both pre-test and post-test scores. Please refer to the Measurable
163 Skill Gains policy for more details.
164 • ISY do not need to be assessed for basic skills. However, the provider must track youth who
165 are basic skills deficient. Documentation of basic skills deficiencies may include school
166 records, a current IEP, or a report card. Basic skills deficiencies must be documented on the
167 ISS and in case notes, with supporting documentation maintained in the participant's file.

168

169 Individual Service Strategy (ISS)

170 • An Individual Service Strategy (ISS) must directly link to one or more of the following primary
171 indicators of performance:
172 ○ Employment Rate
173 ○ Median Earnings
174 ○ Credential Attainment
175 ○ Measurable Skill Gains
176 • The ISS must include participant goals.
177 • The participant must be involved in the design and implementation of services to ensure the
178 ISS meets their needs. The ISS must be an appropriate mix and sequence of services and
179 support to reach realistic goals.
180 • The ISS must be updated and reviewed at least quarterly.
181 • A signed copy of the participant agreement must be provided to the participant and the
182 original attached to the ISS and maintained in the Management Information System (MIS).

183

184 Youth Services and Activities

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

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

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195 Training Services

196 • Occupational skills training allows Individual Training Accounts (ITA) for OSY ages 16 to 24
197 using WIOA funds when appropriate. Montana Department of Labor & Industry (MTDLI) has a
198 waiver from the US Department of Labor (USDOL) that allows ITAs for ISY ages 16 to 21.
199 Priority consideration must be given to training programs that lead to recognized post-
200 secondary credentials that align with in-demand industry sectors or occupations in the local
201 area. (requires ETP)

202 • Programs that combine workplace training with related instruction, which may include
203 cooperative education programs and Registered Apprenticeship programs; (requires ETP)
204 • Training programs operated by the private sector; (requires ETP)
205 • Skill upgrading and retraining; (requires ETP)
206 • Entrepreneurial training; (requires ETP)
207 • Adult education and literacy activities conducted at ABLE, provided in combination with
208 services for the Incumbent Worker Training program; (does not require ETP)
209 • Customized training conducted with a commitment by a business or group of businesses to
210 employ an individual upon successful completion of the training; (does not require ETP) or
211 • On-The-Job Training (OJT). (does not require ETP)

212

213 **Follow-up Activities:**

214 • Follow-up services must be provided for a 12-month period to all participants after program
215 exit.
216 • During the follow-up period, quarterly contact should be provided to help ensure youth are
217 successful in employment and/or post-secondary education and training.
218 • Wage and employment information [for use with WIOA performance indicators] must be
219 collected and entered into MIS one time every quarter for youth who exit to self-employment,
220 agriculture, railroad or federal government employment.
221 • Additional examples of follow-up services can be found in the WIOA Operations Manual.

222 **Case Management:**

223 Case management responsibilities include but are not limited to:

224 • Documenting monthly contact or contact attempts with participants.
225 • Providing a countable activity every 90 days. Refer to form WIOA.49 for a list of
226 activities/services.
227 • Maintaining the participant file by recording all program services, case notes, and
228 documentation in MIS within seven (7) working days and as service/contact occurs; and
229 • Entering program services and start and end dates.

230 **Youth Payments**

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

Incentives	Stipends	Wages
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<p>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).</p>	<p>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.</p>	<p>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.</p>
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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 program's eligibility and related timelines for reporting participant information is available in 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](#)