

Workforce Innovation and Opportunity Act
Boston Workforce Investment Board
Title I Policies

- I. Boston Residency Policy
- II. Income Calculation Policy
- III. Individual Service Strategy Policy and Instructions
- IV. Social Security Policy
- V. Selective Service Policy
- VI. Non-Low-Income Policy
- VII. Applicant Statement Policy
- VIII. Requires Additional Assistance Barrier Policy
- IX. Self-Sufficiency Policy

I. Boston Residency Policy

Each WIOA Title I Youth participant must be a Boston resident at the time of eligibility certification. Exceptions can be made for participants who are homeless and placed outside of Boston. In this case, Boston residency prior to placement, homelessness, and intent to return to Boston must be documented. *Documentation must include the participant's name and his/her Boston address.* Documentation can be sourced from any of the following:

1. Letter from a Government Agency (DTA, DYS, SSA, etc.)
2. Government-issued ID (Driver's License, MA ID, etc.)
3. Lease
4. Boston Housing Authority Verification
5. Landlord Statement
6. Utility Bill
7. Homelessness Documentation
8. Recent pay stub or bank statement
9. Residence or Auto Insurance Policy
10. Letter from school
11. Medicaid or Medicare Card
12. Postmarked Mail Addressed to Applicant
13. Selective Service Registration Card
14. Applicant Statement Form (See VIII: Applicant Statement Policy)

II. Income Calculation Policy

As stated in Mass Workforce Issuance 19.101, youth may need to be proven low-income in order to be eligible to receive WIOA services. If program staff use the 6 months of family income method to prove low-income status, the OWD Family Income Eligibility Worksheet must be used when determining eligibility.

All income, both inclusions and exclusions, must be entered on the Worksheet, as listed according to Mass Workforce Issuance 01-08. Income inclusions and exclusions must also be documented. **If a family member has no income, an applicant statement form must also explain the extent to which program staff verified documents for family members that have no income.** (See VIII: Applicant Statement Policy.)

The Worksheet auto-calculates and annualizes income entered. Participants must document and verify their family size, which is also entered into the Worksheet. The maximum allowable income for the family size entered displays on the worksheet. If the participant's annualized income is lower than the maximum allowable income, the youth is determined low-income. OWD updates the Worksheet each year to reflect updated income guidelines. If not all documents are available for the six-month period, the program staff uses OWD Methods for Calculating Annualized Income sheet to find the most appropriate method and follows those directions.

The program staff sends the Income Calculation Worksheet with backup documentation and the applicant statement, if applicable, to OWD as part of the eligibility documents for review and approval.

References: [Mass Workforce Issuance 19.101: WIOA Title I Youth Eligibility](#)
[Mass Workforce Issuance 01-08: Income Inclusions/Exclusions](#)

Attached: OWD Family Income Eligibility Worksheet
Methods for Calculating Annualized Income

WIOA-Youth Family Income Eligibility Worksheet

Date Of Submission: Need Income From:
 Youth Name: MOSES ID:
 Calculation Method: Straight Pay or Salary Year -To- Date Method
 Average Pay Intermittent

Month	February	March	April	May	June	July	Total
Youth							
Youth Name	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Family Members							
Name & relationship	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
							\$0.00
							\$0.00
							\$0.00
Total	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Title I Inclusions							
Soc Sec Retirement	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Pensions							\$0.00
Worker Comp							\$0.00
Alimony							\$0.00
Interest and dividends							\$0.00
Veterans Payment							\$0.00
Soc Sec Disability Ins							\$0.00
Net Rental Income							\$0.00
Other:							\$0.00
WIOA Eligibility Total	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Title I Exclusions							
Unemployment Comp	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Child support							
TAFDC							
SNAP							
Supplemental SSI							
SSI/survivor benefits							
Other:							
	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

WIOA Title I Eligibility

Family size: Annualized total gross income (x2): \$0.00
 Max. family income for family size: \$18,509.00
 Income Eligible: Yes No

CERTIFICATION: I attest that all information provided above is true to the best of my knowledge and that there is no intent to commit fraud.

Youth Signature & Date _____ Staff Signature _____

FOR OWD USE ONLY

Income Eligible: Yes No
 OWD : _____ Date: _____

METHODS FOR CALCULATING ANNUALIZED INCOME

When calculating income, States and SDAs are encouraged to use any one of the following methods as appropriate. The examples are illustrative only and SDAs should obtain as many pay stubs as possible.

1. STRAIGHT PAY OR SALARY METHOD

Under the Straight Pay Method, the participant supplies a sample of pay stubs covering the most recent six months of family income. Upon reviewing the pay stubs the intake worker determines that the wage information on the pay stubs is the same. There is no variation in the wages for any of the pay stubs submitted for the income verification.

The intake worker will calculate the income based upon the wages indicated on one of the pay stubs, since there are no variations in the gross income on the pay stubs. Based upon the length of the pay period represented by the pay stubs, (usually weekly, bi-weekly or monthly) the gross income is multiplied by the number of pay periods in a year. That is, 52 x gross wages, 26 x gross wages, or 12 x gross wages respectively. The result will be the annualized income used to determine eligibility.

EXAMPLE:

Five (5) pay stubs are provided indicating gross wages of \$548.00 each. The pay stubs are sporadic and cover a period of 3 months. The pay frequency is bi-weekly. An intake worker would multiply the gross wages indicated on the pay stub by the frequency occurrence.

$$26 \times \$548 = \$14,248$$

2. AVERAGE PAY METHOD

Under the Average Pay Method, a sample of six pay stubs are submitted which show variations in the gross earnings. The variations may result from overtime, lost time or work for different employers.

In calculating the annualized income, the intake worker must determine the average gross earnings based upon the number of pay stubs provided. To determine the average gross earnings, the intake worker must total the gross earnings of all the pay stubs provided and divide the result by the number of pay stubs. The result will be the average gross earnings per pay period. After determining average gross earnings the intake worker will then determine the pay frequency and multiply the gross average earnings by the number of pay periods in a year.

EXAMPLE:

Participant provides intake worker with six (6) pay stubs with gross earnings of; \$534.00, \$475.00, \$398.00, \$534.00, \$498.00, and \$534.00. The pay frequency is weekly. The intake worker should do the following:

$$\text{Add: } \$534 + \$475 + \$398 + \$534 + \$498 + \$534 = \$2973.00$$

$$\text{Divide: } \$2973/6 = \$495.50 = \text{Average gross earnings}$$

$$\text{Multiply: } \$495.50 \times 52 = \$25,766 \text{ Annualized gross income}$$

3. YEAR-TO-DATE METHOD

Under the Year-To-Date Method of calculating annualized gross income, the participant provides recent pay stubs with cumulative year-to-date gross earnings indicated on the pay stub. The cumulative year-to-date gross earnings indicate the gross earnings up to the date of the pay period ending date on the pay stub. To compute the annualized income, the intake worker counts the number of pays that have occurred since January 1, and divides that number into the gross year to-date earnings indicated on the pay stub. [After this computation, the steps are the same as for the average pay method.] The result of this computation (average gross income per pay period) is then multiplied by the number of pay periods in a year to determine the annualized gross earnings.

EXAMPLE:

Participant provides the intake worker with a recent pay stub whose gross year-to-date earnings are \$13,756. The pay period ended September 30, 1992. The pay frequency is bi-weekly. Upon counting the number of pays that have occurred since January 1, 1992, the intake worker has determined that the participant has been paid 19 times. Calculation of the gross annualized income would be done as follows:

Divide \$13,756 by 19 bi-weekly pays = \$724.00

Multiply \$724.00 by 26 = \$18,824 (based upon bi-weekly pay frequency 26 pays per year) or

Divide \$13,756 by 38 weekly pays = \$362.00

Multiply \$362.00 by 52 = \$18,824 (based upon weekly pay frequency 52 pays per year)

4. INTERMITTENT WORK METHOD

When an applicant has not had steady work with one or more employers, she/he should supply as many pay stubs as possible and complete an Applicant Statement explaining all missing pay stubs and non-work periods during the last six months. In such cases the intake worker should total all wages for the six month period and multiply the result by two to annualize the wage income.

If the applicant reports little or no includable income, as shown above, she/he should indicate other resources relied upon for life support during the last six months on the Applicant Statement. Such resources may include such things as unpaid debts, gifts, loans, unemployment compensation, etc.

III. Individual Service Strategy Policy and Instructions

As stated in Mass Workforce Issuance 14-77, the Individual Service Strategy (ISS) is the basis for the entire case management strategy. It is designed to be developed in partnership with the participant and reflect the needs indicated by the objective assessment and the expressed interests of the participant. The ISS is the framework for justifying decisions concerning the appropriate service mix and sequence of services.

The ISS is developed with the participant upon the enrollment into a WIOA Title I Youth program. It is reviewed and updated regularly as the youth participates in the program, and reviewed formally at least twice annually.

The ISS must:

- Include goals and service plans that are open-ended
- Map services that are consistent with participant needs and goals
- Contain both short and long term goals that are measurable and have target completion dates
- Be customizable to meet the needs and strengths of each participant
- As appropriate, include referrals made to entities external to the program
- Service element are associated with the goals
- Service plan is drafted in cooperation with the participant
- Include documentation of periodic review in cooperation with the participant
- Include participant and program representative signatures demonstrating mutual commitment
- Include date initially developed, review dates, and date of completion

The ISS captures: education history, work history, basic academic skills, career interests and skills, occupational skills, assets and strengths, labor market information, support services, goals with a plan of action, fourteen elements activities, and progress notes.

Objective assessments are completed with the following tools:

1. Basic/Academic skills: CASAS, TABE 9/10, GAIN, or MAPT
2. Career Interests: Mass CIS Interest Profiler
3. Occupational Skills: Mass CIS SKILLS
4. Assets and Strengths: Mass CIS SKILLS
5. Labor Market Information: Mass CIS Career InfoNet
6. Work Readiness: Massachusetts Work Based Learning Plan

Other objective assessment tools can be used, upon approval by OWD. Copies of the assessment results are kept in the youth's file and inputted into MOSES.

WIOA Youth-funded programs are given the option to use either the hard copy ISS form or the MOSES Case Plan as part of the youth file. If a program decides to use the ISS form, all information must also be entered into MOSES. See OWD's MOSES Guide for reference.

If a program decides to use the MOSES Case Plan in place of the ISS form, the following is entered into MOSES:

- Work Experience
- Education Information
- Basic/Academic skills assessments (add in pre- and post-test scores and test dates)
- Career interests assessments
- Labor Market Information
- Goals (add a description and plan of action)

- Barriers
- Services and corresponding notes

The Case Plan is then generated and printed through the Job Seeker/Documents/Job Seeker Case Plan feature in MOSES.

Once generated, the following is written or typed into the Case Plan:

- Skills
- Strengths and Assets
- Personal Interests
- Youth and case worker signatures

The Work Readiness assessment is completed separately and kept in the youth file.

References: [Mass Workforce Issuance 14-77: Youth Individual Service Strategy Requirements](#)

Attached: Individual Service Strategy form

Individualized Service Strategy (ISS) for Youth
Workforce Innovation and Opportunity Act (WIOA)

A. Personal Information

Youth's Name: _____	Date _____	
Phone: _____	E-Mail: _____	
Address: _____		
City: _____	State: _____	Zip Code: _____
Age: _____	Date of Birth: _____	MOSES ID # _____
Case Manager: _____		

Educational Background:	In-School Youth <input type="checkbox"/>	Out-of-School Youth <input type="checkbox"/>
High School:	Graduated Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Obtained GED Yes <input type="checkbox"/>	Dropped Out <input type="checkbox"/>
School name and location _____		
Highest grade completed _____ Date Completed _____		
Degree/Certification received _____		

Post High School:	<input type="checkbox"/> YES, currently attending	<input type="checkbox"/> YES, not currently attending	<input type="checkbox"/> No
Name of Institution _____ Date Completed _____			
Degree/Certification received _____			

Work Experience:	Have you had any work experience? (include internships and job shadowing) Yes <input type="checkbox"/> No <input type="checkbox"/>		
Employer _____			
Job Title _____		Dates of employment _____	
Hours per Week _____		Hourly Wage _____	
Internship Title _____		Dates of internship _____	
Hours per Week _____		Stipend _____	

B. Skills

Basic Education Skills:

Test Name _____

Reading (grade level) _____ Scale Score _____ EFL Level _____

Math (grade level) _____ Scale Score _____ EFL Level _____

Career Interests and Skills:

Name of Career Interest Inventory _____ Date Completed _____

Include a copy of the assessment results in the youth's file and also add the results in MOSES. Go to the Testing tab and choose "category" then select Career Information Systems. Go the "service detail" and select the Interest Profiler. List the top three occupations in the occupation section.

Top Three Interest Areas	Choose the Top Choice from Each Interest Area
1.	
2.	
3.	

Occupational Skills Assessment:

Name of Occupational Skills Assessment Tool _____ Date Completed _____

Include a copy of the assessment results in the youth's file and also add the results in MOSES. Go to the Testing tab and choose "category" then select Career Information Systems. Go the "service detail" and select Skills. List the top five very satisfying skills.

Top Five Very Satisfying Skills	
1.	4.
2.	5.
3.	

Assets and Strengths:

Name of Assets and Strengths Assessment Tool _____ Date Completed _____

Top Five Assets and Strengths	
1.	4.
2.	5.
3.	

C. Labor Market Information

Name of Labor Market Inventory Tool _____ Date Completed _____

Include a copy of the Labor Market Information in the youth's file also add the results in MOSES. Go the Case Plan tab and click on the Assessment tab. Enter the Labor Market Information results in the Labor Market for Skills section.

Labor Market Information Results: _____

D. Massachusetts Work-Based Learning Competencies

		Needs Development	Competent	Proficient	Advanced
Attendance and Punctuality	1st Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2nd Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Workplace Appearance	1st Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2nd Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accepting Direction and Constructive Criticism	1st Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2nd Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Motivation and Taking Initiative	1st Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2nd Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Understanding Workplace Culture, Policy, and Safety	1st Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2nd Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Speaking	1st Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2nd Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Listening	1st Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2nd Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Interacting with Co-Workers	1st Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2nd Review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Date of 1st Review _____ Date of 2nd Review _____

E. Support Services

Needs	Recommended Services	Referral
1. Transportation		
2. Pregnant/parent		
3. Probation/Court Involvement		
4. Disability		
5. Health		
6. Housing		
7. Alcohol/Substance Abuse		
8. Child Care		
9. Other		

SPECIAL CONSIDERATIONS

PERSONAL INTERESTS

F. Goals

Type of Goal	Goal Summary	Date Established	Date Attained
1.			
2.			
3.			

ISS PLAN OF ACTION TOWARDS BASIC SKILLS GOALS

ISS PLAN OF ACTION TOWARDS OCCUPATIONAL GOALS

ISS PLAN OF ACTION TOWARDS WORK READINESS GOALS

G. Fourteen Elements of Youth Services

Youth are required to have access to all fourteen elements provided in-house or through partnerships and referrals. Enrollment into the fourteen elements must be documented in MOSES.

Service Element	X. Comments	XI. Provider	Start Date	End Date
1. Tutoring				
2. Alternative Education				
3. Paid and unpaid work experience				
4. Occupational Skills Training				
5. Education with workforce preparation				
6. Leadership Development Opportunities				
7. Supportive Services				
8. Adult Mentoring				
9. Follow-Up Services				
10. Comprehensive Guidance and Counseling				
11. Financial literacy				
12. Entrepreneurial skills training				
13. Labor market information				
14. Post-secondary preparation				

 Youth Signature Date

 Case Manager Signature Date

H. Youth Progress Notes

Date of Entry	Service	Progress and/ or Amendment to Plan	Case Manager

IV. Social Security Policy

In order to help safeguard the personal information of prospective WIOA participants, *OWD does not accept social security cards as an allowable document in the eligibility process.* Any documents submitted to OWD with a social security number will be returned and/or deleted.

All MOSES Reports generated by OWD are reflective of this policy and only show the last four digits of the participant's social security number.

V. Selective Service Policy

Selective Service registration is required for all WIOA Youth participants who are male-born and 18 years old or older. *If a youth is not registered for Selective Service, he cannot become, or continue to be, a participant in the WIOA Youth program.* If a participant is 18 or older upon enrolling in a WIOA Youth program, the participant must be registered prior to WIOA grant enrollment.

Each WIOA Youth participant who is male-born and is not yet 18 years old is encouraged to sign the Commitment to Register for Selective Service form stating that he will register for Selective Service within 30 days of his 18th birthday as a condition for participation in the WIOA Youth program. When a youth turns 18 while enrolled in the WIOA grant, it is the responsibility of the participant to register and the responsibility of the WIOA-funded program to document and verify that the individual has registered.

Visit www.sss.gov to register online or to check a registration. It will verify SSS verification with the individual's social security number.

References: [Mass Workforce Issuance 19.101: WIOA Title I Youth Eligibility](#)

Attached: Commitment to Register for Selective Service form

Commitment to Register for Selective Service
Workforce Innovation and Opportunity Act - Youth

I understand that as part of my participation in a federally funded Workforce Innovation and Opportunity Act Youth program, I must register for the U. S. Selective Service within 30 days of turning 18 years old, and I agree to do so.

I understand that failure to do so will result in termination from the program.

Date of 18th birthday _____

Print name _____

Signature _____

Date _____

VI. Non-Low-Income Exception Policy

WIOA Title I Youth

Boston Workforce Investment Board

Purpose: To provide guidelines for the appropriate use of the Non Low-Income Exception in eligibility determination for Workforce Innovation and Opportunity Act Title I Youth participants in the Boston Workforce Investment Area. This policy replaces the previous WIA 5% Window policy.

Background: In order for a Title I Youth to be eligible, the participant must meet each of the following criteria:

1. A citizen or national of the United States; lawfully admitted permanent resident alien, refugee, asylee, parolee, or other immigrant authorized by the Attorney General to work in the United States. §188(a)(5)
2. In compliance with the Military Selective Service Act. (DOL TEGL 9-98) (This applies to males 18 or older who were born on or after January 1, 1960).
3. WIOA establishes separate criteria for Out-Of-School Youth and In-School Youth.

Out-Of-School Youth is defined as an individual who is:

- (a) Not attending any school (as defined under State law);
- (b) Not younger than 16 or older than 24 at the time of enrollment; and
- (c) Meets one or more of the following conditions:
 - (1) School Dropout;
 - (2) Within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar is based on how a local school district defines its school year quarters;
 - (3) Recipient of a secondary school diploma or its recognized equivalent who is low-income and basic skills deficient or an English language learner;
 - (4) Subject to the juvenile or adult justice system;
 - (5) A homeless child or youth, a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
 - (6) Pregnant or parenting;
 - (7) An individual with a disability;
 - (8) Low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment. (WIOA sections 3(46) and 129(a)(1)(B).)

In-School Youth is defined as an individual who is:

- (a) Attending school (as defined by State law);
- (b) Not younger than 14 or (unless an individual with a disability who is attending school under State law) older than 21 at the time of enrollment;
- (c) Low-income; and
- (d) Meets one or more of the following conditions:
 - (1) Basic Skills Deficient

- (2) An English Language Learner
- (3) An Offender
- (4) Homeless, a runaway, in foster care or has aged out of foster care system, a child eligible for assistance under 477 of the Social Security Act (42 U.S.C), or in an out-of-home placement.
- (5) Pregnant or parenting
- (6) An individual with a disability
- (7) Requires additional assistance to complete an educational program or to secure or hold employment.

Policy:

Definition – According to WIOA §129(3)(A)(i), a “covered individual” means any In-School Youth, or an Out-of-School Youth who is:

- Recipient of a secondary school diploma or its recognized equivalent who is low-income and basic skills deficient or an English language learner
- Low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment

In the Boston local area, not more than 5 percent of “covered individuals” may be persons that are not low income. Individuals who are not low-income and enrolled in activities funded by WIOA Title I must provide source documentation to prove they are “covered individuals”.

Documentation – When submitting WIOA eligibility documents, intake staff must check off “Non-Low-Income Request” on the Enrollment Checklist, complete the Income Eligibility Worksheet, and submit all corresponding source documentation. Enrollment as a non-low-income participant is subject to availability and OWD approval.

Title I vendors must ensure that participants are enrolled correctly and their MOSES reports reflect the appropriate number of participants have been approved under the non-low-income exception.

References:

[Mass Workforce Issuance 100 DCS 19.101: WIOA Title I Youth Eligibility](#)

[Workforce Innovation and Opportunity Act](#)

Inquiries:

Please email all questions to Cassandra.White@boston.gov.

VII. Applicant Statement Policy

Purpose: To provide guidelines for the appropriate use of the Applicant Statement form in eligibility determination for Workforce Innovation and Opportunity Act Title I Youth participants in the Boston Workforce Investment Area. This policy replaces the previous WIA Applicant Statement policy.

Background: Applicant statements may be used, in a limited way, to document those items that, in some cases, are not verifiable or may cause undue hardship for individuals to obtain. Consistent with requirements described in USDOL Technical Assistance Guide (TAG) JTPA Title II Eligibility Documentation Guide (published in 1993 and adopted by USDOL for use in determining eligibility under Title I of the Workforce Investment Act), an applicant statement may be used *as the sole source document only* for determining family income, residence and family size or in determining whether a customer is to be considered “hard to serve” because of barriers of pregnancy/parenting or his/her status as “homeless”, an “offender” or a school “dropout”, and *may not be used as the sole source document* for any other eligibility criteria. Local Boards must develop policies that describe how applicant statements are used in conjunction with practicable attempts to secure recommended documentation. Applicant statements should be supported by a documented corroborative contact or reliable witness attesting to the accuracy of the statement. The corroboration may be via witness signature on the applicant statement form or supporting telephone verification form.

Example: Use of the sample APPLICANT STATEMENT FORM (Attached) is as follows: If an applicant states that he/she is unable to provide evidence that no income was received during the past six months, and that he/she was unemployed for that period, the blank spaces following the words ***"I certify, under penalty of perjury, that I"*** may be completed, for example, as follows: ***"have received no income from any source during the past six months, that I have been unemployed during that time, and have been supported by donations/contributions from relatives and friends."*** This should be corroborated by the person(s) providing the support.

Policy: Applicant statements may be used, in a limited way, to document those items that, in some cases, are not verifiable or may cause undue hardship for individuals to obtain. an applicant statement may be used *as the sole source document only* for determining family income, residence and family size or in determining whether a customer is to be considered “hard to serve” because of barriers of pregnancy/parenting or his/her status as “homeless”, an “offender” or a school “dropout”, and *may not be used as the sole source document* for any other eligibility criteria. Applicant statements should be supported by a documented corroborative contact or reliable witness attesting to the accuracy of the statement. The corroboration may be via witness signature on the applicant statement form or supporting telephone verification form.

References: [Mass Workforce Issuance 100 DCS 19.101: WIOA Title I Youth Eligibility](#)

[Workforce Innovation and Opportunity Act](#)

Inquiries: Please email all questions to Cassandra.White@boston.gov.

APPLICANT STATEMENT FORM

The applicant statement may be used to document eligibility for family income, residence, and proof of family size when all other attempts to secure documentation have been exhausted.

I certify, under penalty of perjury that I _____

(If applicant cannot obtain a satisfactory witness or provide a telephone contact, explain above.)

Applicant's Signature _____ Date _____

Applicant's Address, City, State, Zip _____

Corroborating Witness Signature _____ Date _____

Witness' Relationship to Applicant _____

Office Use Only

The above applicant statement is being utilized for documentation of the following eligibility criteria:

Signature of eligibility/intake worker _____

Date _____

VIII. Requires Additional Assistance Barrier Policy

Boston Workforce Investment Board

Purpose: To provide guidelines for the appropriate use of “Requires Additional Assistance” as a barrier in eligibility determination for Workforce Innovation and Opportunity Act Title I Youth participants in the Boston Workforce Investment Area. This policy replaces the previous WIA Requires Additional Assistance policy.

Background: In order for a Title I Youth to be eligible, the participant must meet each of the following criteria:

1. A citizen or national of the United States; lawfully admitted permanent resident alien, refugee, asylee, parolee, or other immigrant authorized by the Attorney General to work in the United States. §188(a)(5)
2. In compliance with the Military Selective Service Act. (DOL TEGL 9-98) (This applies to males 18 or older who were born on or after January 1, 1960).
3. WIOA establishes separate criteria for Out-Of-School Youth and In-School Youth.

Out-Of-School Youth is defined as an individual who is:

- (a) Not attending any school (as defined under State law);
- (b) Not younger than 16 or older than 24 at the time of enrollment; and
- (c) Meets one or more of the following conditions:
 - (1) School Dropout;
 - (2) Within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar is based on how a local school district defines its school year quarters;
 - (3) Recipient of a secondary school diploma or its recognized equivalent who is low-income and basic skills deficient or an English language learner;
 - (4) Subject to the juvenile or adult justice system;
 - (5) A homeless child or youth, a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
 - (6) Pregnant or parenting;
 - (7) An individual with a disability;
 - (8) Low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment. (WIOA sections 3(46) and 129(a)(1)(B).)

In-School Youth is defined as an individual who is:

- (a) Attending school (as defined by State law);
- (b) Not younger than 14 or (unless an individual with a disability who is attending school under State law) older than 21 at the time of enrollment;
- (c) Low-income; and
- (d) Meets one or more of the following conditions:
 - (1) Basic Skills Deficient
 - (2) An English Language Learner
 - (3) An Offender

- (4) Homeless, a runaway, in foster care or has aged out of foster care system, a child eligible for assistance under 477 of the Social Security Act (42 U.S.C), or in an out-of-home placement.
- (5) Pregnant or parenting
- (6) An individual with a disability
- (7) Requires additional assistance to complete an educational program or to secure or hold employment.

Policy:

A. Definition – The definition of a youth that requires additional assistance to complete an educational program or to secure or hold employment will include a low-income individual that:

- 1. Attends secondary or post-secondary school and has a GPA of less than 2.0,
- 2. Received a Failing score on the MCAS (or its equivalent) in the last round,
- 3. Requires English Language Learners instruction,
- 4. Resides in public housing,
- 5. Resides in a high poverty area,
- 6. Resides in a single parent household, or
- 7. Has been identified as truant or having a significant school attendance problem.

B. In-School Youth Limit -- As stated 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.

C. Documentation – Each youth must demonstrate that they are eligible to participate in WIOA Title I activities. A list of documentation that demonstrates participant eligibility for each Requires Additional Assistance barrier is as follows.

Barrier	Allowable Documentation
Attends secondary or post-secondary school and has a GPA of less than 2.0	<ul style="list-style-type: none"> 1. School transcript or report card 2. Letter or email from school official
Received a Failing score on the MCAS (or its equivalent) in the last round	<ul style="list-style-type: none"> 1. MCAS or PARCC test results 2. Letter, report, or email from BPS, another school district, or program staff 3. Telephone verification from BPS, another school district, or program staff
Requires English Language Learners instruction	<ul style="list-style-type: none"> 1. Letter, report, or email from BPS, another school district, or recognized community organization 2. Objective assessment showing need for ELL instruction 3. Letter from a recognized community or youth organization (if other documents are not available) 4. Easily discernable need for English as a Second Language instruction (documented by statement from intake/assessment staff)
Resides in public housing	<ul style="list-style-type: none"> 1. Lease 2. Verification from other government agency 3. Driver’s license 4. Postmarked mail addressed to applicant 5. Utility bill

Resides in a high poverty area	1. DCS Poverty Threshold Database and census tract
Resides in a single parent household	1. Lease or landlord statement 2. Medical card 3. Divorce decree 4. Statement from another government agency 5. Telephone verification
Has been identified as truant or having a significant school attendance problem	1. Report card with attendance information from BPS, another school district, or program 2. Letter, report, or email from BPS, another school district, or program 3. Letter, report, or email from law enforcement official 4. Telephone verification from BPS, another school district, program or law enforcement official

D. Record Keeping -- Case managers must check off “Youth Requires Additional Assistance Barrier” in MOSES and a description of the locally defined barrier should be entered into the “Youth Requires Additional Assistance” dialogue box located on the Barriers tab.

Hard copy documentation of all barriers must be maintained in the youth case file.

References: [Mass Workforce Issuance 100 DCS 19.101: WIOA Title I Youth Eligibility](#)

[Mass Workforce Issuance 14-93: Youth Requires Additional Assistance Barrier](#)

[Workforce Innovation and Opportunity Act](#)

Inquiries: Please email all questions to Cassandra.White@boston.gov.

**WIOA Title I Youth
Self-Sufficiency Policy**
Boston Workforce Investment Board

- Purpose:** To define “Self-Sufficiency” for Workforce Innovation and Opportunity Act Title I Youth participants in the Boston Workforce Investment Area, where youth programs have the capacity to prepare participants to employment or post-secondary opportunities that result in self-sufficiency.
- Background:** Local boards must set the criteria for determining whether employment leads to self-sufficiency. At a minimum, such criteria must provide that self-sufficiency means **employment that pays at least the lower living standard income level** §680.210.
- Policy:** For WIOA Title I Youth participants, the definition of self-sufficiency is defined as full-time employment earning a living wage, as defined by the Boston Jobs and Living Wage Ordinance. The Living Wage is subject to adjustment on July 1 of each year. As of July 1, 2015 the living wage is \$14.11.
- Note:** This policy serves as a long-term goal for all youth programs and recognizes that youth participants may not be immediately placed in employment that is self-sufficient. Nor does this policy ignore that alternative paths for youth participants (i.e. post-secondary education, training) may be more appropriate, even if they delay employment in the short-term.
- References:** [Mass Workforce Issuance 100 DCS 19.101: WIOA Title I Youth Eligibility](#)
[Workforce Innovation and Opportunity Act](#)
[Federal Register Vol 81, No 58: WIOA Lower Living Standard Income Level](#)
- Inquiries:** Please email all questions to Cassandra.White@boston.gov