

WIOA Young Adult Program

Chapter 04: Documentation of Eligibility

Summary

Guidelines for documenting initial program eligibility for Youth and Young Adults under the Workforce Innovation and Opportunity Act (WIOA).

Relevant Laws, Rules or Policies

[Workforce Innovation and Opportunity Act \(Public Law 113-128\)](#)

[WIOA Final Rule \(Dated 08-19-2016\)](#)

[WIOA Final Rule: Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions \(Dated 08-19-2016\)](#)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 23-14 \(Dated 3-26-15\)](#)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 19-14 \(Dated 2-19-15\)](#)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 08-15 \(Dated 11-17-15\)](#)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 21-16 \(Dated 3-2-17\)](#)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 14-18 \(Dated 3-25-19\)](#)

[U.S. Dept. of Labor Training and Employment Notice No. 22-19 \(Dated 4-3-20\)](#)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 21-16, Change 1 \(Dated 7-30-21\)](#)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 10-16, Change 3 \(Dated 6-11-24\)](#)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 07-18, Change 1 \(Dated 7-10-25\)](#)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 23-19, Change 3 \(Dated 12-1-25\)](#)

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Policy

Initial general eligibility determination is to be based on a review of an application form signed by the applicant. The information provided on the application form used to determine eligibility for services under the WIOA Young Adult Program must be comprehensive enough to meet appropriate eligibility requirements. Documentation provided by the applicant and/or parent/guardian may be subject to subsequent data validation.

Any young adult applicant can sign their own application form without requiring a signature from a parent or guardian. Whenever possible, a parental signature is preferred if the parent is supportive of the youth's goals and objectives, but it is not required.

About Self-Attestation:

Many (but not all) eligibility information items can be self-attested to by the applicant. In the instance of self-attestation, the applicant will be required to sign a form that affirms the self-attested characteristics being used for eligibility purposes. The completed application and eligibility determination form generated from Workforce One signed by the participant, case manager and parent/guardian (optionally) is to be kept on file by the service provider.

Self-attestation means a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. DOL broadly interprets what is considered an electronic/digital signature. Electronic signatures or a submission from the participant such as an email, text, or unique online survey response, are considered an electronic signature or verification; it must be participant-generated and traceable to the participant. Providers must retain documentation of self-attestations provided by participants and should use other forms of source documentation when possible.

Providers may only use self-attestation when all efforts to collect other allowable source documentation have been exhausted. DOL's expectation is that self-attestation will be limited. **Self-attestation may not be used to document date of birth or low-income status at program entry.**

Documentation of Barriers Related to Eligibility

Please note that WIOA data validation requirements may include a review of any of the items listed below. In addition, each item is relevant to eligibility at the time of enrollment—NOT the time of application. All required Workforce One Eligibility/Demographic Characteristics should match the initial application form. However, ONLY those items necessary for eligibility determination may need to be verified/documented or self-certified. In determining which characteristics to verify, the WDA should use the documentation presented by the applicant. The following data items located on the application form used to determine eligibility require documentation that may be subject to data validation requirements:

Date of Birth: Acceptable documentation includes: a driver's license; baptismal record; birth certificate; DD-214 form; report of transfer or discharge paper; Federal, State, Local, or Tribal identification card; passport; hospital record of birth; public assistance/social service records; school records or ID Cards; work permit; family bible; cross-match with state agency records; justice system records; Selective Service registration; signed letter from a parent or guardian; medical records.

Individual/Family Income (Low Income Status at Program Entry): Acceptable documentation includes: Veterans' Administration award letter; bank statements; pay stubs; compensation award letter under the Food and Nutrition Act of 2008 (7 USC2011 et seq.); court award letter; pension statement; employer statement/contact; family/business financial records; housing authority verification; quarterly estimated tax statement for self-employed persons; Social Security Administration benefit statements; Unemployment Insurance claim documents; copy of authorization to receive cash public assistance; copy of public assistance check; public assistance eligibility verification; cross-match with refugee assistance records; cross-match with public assistance records; cross-match with UI wage records; school records documenting eligibility for free or reduced price school lunch under the National School Lunch Program. If using the criteria "Youth Living in a High Poverty Area", acceptable documentation includes case notes.

NOTE: For WIOA young adults who are out-of-school at the time of enrollment, eligibility using "low income" applies only where the applicant is qualifying for eligibility solely on the basis of one of the following: "needs additional assistance" OR is an "English Language Learner" OR is "basic skills deficient". OSY applicants with one or more other barriers do NOT need to meet income eligibility requirements.

School Status at Time of Enrollment (*not Application*): Acceptable documentation includes: applicable records from education institution (GED certificate, diploma, attendance record, transcripts, drop out letter, school documentation); intake application or enrollment form; electronic records; case notes, self-attestation.

Basic Skills Deficient: Acceptable documentation includes: case notes; assessment test results; applicable records from educational institution (transcripts, academic assessments, other school documentation). **IMPORTANT NOTE: DOL does NOT allow self-attestation for basic skills deficiency.**

English Language Learner (ELL) at Program Entry: Acceptable documentation includes: case notes; assessment test results; applicable records (transcripts, or other school documentation) from an educational institution; intake application or enrollment form; Individual Service Strategy; self-attestation.

Ex-Offender: Acceptable documentation includes: documentation from the juvenile or adult criminal justice system; written statement or referral document from a court or probation officer; referral transmittal from a reintegration program/agency; intake application or enrollment form; case notes; needs assessment; Individual Service Strategy; Federal bonding program application; self-attestation.

Homeless Participant, Homeless Youth or Runaway Youth: Acceptable documentation includes: intake application or enrollment form; written statement or referral from a shelter or social service agency; needs assessment; case notes; Individual Service Strategy; letter from a caseworker or support provider; self-attestation.

Foster Care Youth: This may include any youth who is 24 years of age or younger at the time of enrollment and is currently in the foster care system or has aged out of the foster care system. Acceptable documentation includes: written confirmation from a social services agency; case notes; foster care agency referral transmittal; intake application or enrollment form; needs assessment; Individual Service Strategy; self-attestation.

Pregnant or Parenting Youth: Acceptable documentation includes: needs assessment; Women, Infants and Children (WIC) eligibility verification; TANF/MFIP single parent eligibility verification; intake application or enrollment form; Individual Service Strategy; case notes; self-attestation.

Individual with a Disability: Acceptable documentation includes: school Section 504 records provided by the student; assessment test results; school Individualized Education Program (IEP); self-attestation. The applicant can identify as having a disability but choose not to self-identify any additional details regarding the disability.

Youth who Requires Additional Assistance: See local policy/definition. Acceptable documentation includes: intake application or enrollment form; case notes; needs assessment; Individual Service Strategy; self-attestation. Program operators should use this ONLY if the participant has no other barriers. If there are other barriers, the “Youth Who Require Additional Assistance” should NOT be used. This will assist in ensuring Minnesota does not exceed more than five percent of youth served using this “barrier of last resort.”

Notes regarding Social Security Numbers, Selective Service Registration, Work Authorization:

Social Security Numbers: An individual and family members are not required to disclose their Social Security Numbers (SSN) for eligibility determination. While providers must ask the individual for their SSN for performance reporting purposes, services cannot be denied if the individual chooses not to share it. While SSNs are needed for purposes of wage record matching to support performance accountability data collection efforts, eligibility and service provision do not and should not be conditioned upon an individual providing their SSN or SSN card. As discussed in more detail in TEGL 14-18; Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor (DOL), when requesting an SSN, providers must explain, in writing, the authority to request it, the purpose, how the information will be used for understanding outcomes, and the right to decline disclosure. Providers should also discuss privacy measures they use to protect personally identifiable information. Note that grantees may request a participant’s SSN during their period of service, once an individual may feel a greater level of trust. Providers may also explain to participants that employers will require disclosure of SSNs for tax purposes, so they can be prepared for that eventuality. However, it remains the participant’s choice whether to share their SSN with the grantee. If a participant provides their SSN, providers are encouraged to request documentation to ensure that the number being used

for performance accountability data collection is accurate. Such documentation includes: Social Security card; W-2 form, IRS form letter 1722; pay stubs; Social Security benefit checks; DD-214 Report of Transfer or Discharge; Military ID; Other Federal or state ID with a Social Security Number. A participant cannot be denied services for failing to provide such documentation.

Selective Service: all males born on or after January 1, 1960 who have reached their 18th birthday but who have not reached their 26th birthday MUST present documentation showing compliance with the Selective Service registration requirement to participate in the WIOA Youth program. Documentation can be in the form of a Selective Service Acknowledgement letter; Form DD-214 Report of Separation; Selective Service registration card; a stamped post office receipt of registration; Letter; Selective Service Verification Form (Form 3A). Selective Service registration status cannot be self-attested. If the participant has not registered for the Selective Service, a registration form should be filled out and mailed or completed online. If the young adult is unable to locate the required documentation, Selective Service status can be checked at [Selective Service Systems > Registration > Check a Registration](#). A screen printout from the Selective Service Verification website also constitutes valid documentation (see Related Links).

Please Note: Selective Service registration only applies to individuals born biologically as males. Persons born as males, but later identifying themselves as something other than male are still legally required to register for Selective Service. Conversely, a person born as a female, but now identifying as something else should not register for Selective Service. Additional information can be found at www.sss.gov

Selective Service status for persons registered as male is NOT subject to federal data validation requirements. However, state and/or local monitors will check (where applicable) to ensure any male over the age of 18 during participation is registered.

Authorization to Work Status: is required for WIOA Youth eligibility. Acceptable documentation includes: Form I-9 acceptable documents, including documents presented by green card holders; and Employment Authorization Documents (EADs) held by individuals including refugees, asylees, parolees, and other immigrants with work authorization, including individuals with deferred action, Deferred Action for Childhood Arrivals (DACA) protection, and individuals who have work authorization while their applications for asylee, parolee, or other status (such as Temporary Protected Status or other) are pending. Verification of an individual's work authorization status through the U.S. Citizenship and Immigration Services' Systematic Alien Verification for Entitlements (SAVE) system is also acceptable documentation. **Self-attestation is not allowed for authorization to work status.**

Related Links

[Selective Service Systems > Registration > Check a Registration](#)
[WIOA Youth Source Documentation Cheat Sheet](#)