



**Division of Workforce
Development and Adult Learning
(DWDAL)**
Policy Issuance



PI 2026-16 Workforce Innovation and Opportunity Act (WIOA) Title I Youth Policy

October 28, 2026

TO Division of Workforce Development and Adult Learning (DWDAL) staff and
Local Workforce Development Area (Local Area) Directors;

FROM Maryland Department of Labor (MD Labor)
DWDAL

SUBJECT Guidance on the implementation of Workforce Innovation and Opportunity Act
(WIOA) Title I Youth Programs

PURPOSE To provide comprehensive policy guidance of MD Labor DWDAL programs and
initiatives.

ACTION Local Area Directors, American Job Center (AJC) Labor Exchange Administrators
(LEAs), and central office managers will ensure all employees are aware of and
receive copies of this policy. DWDAL policies are available on the [MD Labor website](#).

EXPIRATION Until Cancelled.

QUESTIONS

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CANCELLATIONS

The following is hereby cancelled and replaced by this policy issuance: Policy Issuance 2021-14, "Workforce Innovation and Opportunity Act (WIOA) Title I Youth Program," dated October 4, 2021.

Archived policies are available at: <http://www.labor.maryland.gov/employment/wifi/>

EXECUTIVE SUMMARY

The Workforce Innovation and Opportunity Act (WIOA) Title I Youth Program is designed to serve low-income youth who face barriers to continued education and employment. The program supports the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for program participants.

To achieve WIOA Title I Youth Program goals, Local Workforce Development Areas (Local Areas), and local providers that are awarded competitive contracts, must:

1. Determine **youth program eligibility**;
2. Conduct an **objective assessment** of each participant's skills;
3. Develop an **Individual Service Strategy (ISS)** with each participant; and,
4. Provide at least one of WIOA's **14 Youth Program elements** to support each participant in reaching their career and academic goals.

Additionally, an individual is not considered a participant of a WIOA Title I Youth program until they have:

1. Been determined eligible based on the criteria below;
2. Taken the objective assessment;
3. Developed an ISS; and,
4. Received at least one of WIOA's 14 Youth Program element services.

To participate in the WIOA Title I Youth Program, at a minimum, a youth must:

1. Be a U.S. citizen or non-citizen authorized to work in the U.S.;
2. Register for Military Selective Service, if applicable; and,
3. Meet the WIOA Out-of-School Youth (OSY) or In-School Youth (ISY) eligibility criteria specified in this Policy Issuance.

GENERAL INFORMATION

WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

WIOA was signed into law on July 22, 2014 and went into effect July 1, 2015. WIOA supersedes the Workforce Investment Act of 1998 and amends the Adult Education and Family Literacy Act, the Wagner-Peyser Act, and the Rehabilitation Act of 1973. To help both businesses and job seekers meet their needs, the workforce system established under WIOA is integrated by design. WIOA envisions connecting businesses with job seekers through meaningful partnerships among workforce, education, human services, and economic development entities to ensure optimum results and leveraging of resources. The law addresses the needs of job seekers by establishing a workforce system that helps them access employment, education, training, and support services to succeed in the labor market. Through the American Job Centers (AJCs), WIOA works to address employer needs by matching them to the skilled workers they need to compete in the global economy.

WIOA TITLE I YOUTH PROGRAM

The WIOA Title I Youth Program is designed to serve low-income youth¹ who face barriers to continued education and employment. The program supports the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for program participants.

To achieve WIOA Title I Youth Program goals, Local Areas, and local providers that are awarded competitive contracts, must:

1. Determine **youth program eligibility**;
2. Conduct an **objective assessment** of each participant's skills;
3. Develop an **Individual Service Strategy (ISS)** with each participant; and,
4. Provide at least one of WIOA's **14 Youth Program elements** to support each participant in reaching their career and academic goals.²

Additionally, an individual is not considered a participant of a WIOA Title I Youth program until they have:

1. Been determined eligible based on the criteria below;
2. Taken the objective assessment;
3. Developed an ISS; and,
4. Received at least one of WIOA's 14 Youth Program element services.

¹ More detailed information on the definition for "low-income" can be found later in this policy.

² More details on each of these activities can be found later in this policy.

PROGRAM ELIGIBILITY

To participate in the WIOA Title I Youth Program, at a minimum, a youth must:

1. Be a U.S. citizen or non-citizen authorized to work in the U.S.;
2. Register for Military Selective Service, if applicable; and,
3. Meet the WIOA Out-of-School Youth (OSY) or In-School Youth (ISY) eligibility criteria specified in this Policy Issuance.

OUT-OF-SCHOOL YOUTH (OSY)

OSY is defined by WIOA Section 129(a)(1)(b) as an individual who is:

1. Not attending any school;³
2. Between the ages of 16-24⁴ at the time of enrollment;
3. One or more of the following:
 - a. A school dropout;
 - b. A youth who is 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 quarter is based on how a local school district defines its school year quarters (Note: In line with WIOA, in providing assistance to an OSY who is required to attend school under Maryland law, the priority in providing such assistance shall be for the individual to attend school regularly);
 - c. A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual who either is basic skills deficient, or is an English Language Learner (ELL);
 - d. An individual who is subject to the juvenile or adult justice system;
 - e. A homeless individual or runaway;
 - f. An individual who is 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 child eligible for assistance under Section 477 of the Social Security Act (42 U.S.C. 677)⁵, or an individual who is in an out of home placement;
 - g. An individual who is pregnant or parenting;⁶
 - h. A youth who is an individual with a disability; and/or,

³ 20 CFR 681.230, "[What does "school" refer to in the "not attending or attending any school" in the out-of-school and in-school eligibility criteria?](#)" states that in general, the applicable State law for secondary and postsecondary institutions defines "school." However, for purposes of WIOA, USDOL does not consider providers of adult education under Title II of WIOA, YouthBuild programs, the Job Corps program, high school equivalency programs, or dropout re-engagement programs to be schools. Therefore, in all cases except the one provided below, WIOA youth programs may consider a youth to be an OSY for purposes of WIOA youth program eligibility if they attend adult education provided under Title II of WIOA, YouthBuild, Job Corps, high school equivalency programs, or dropout re-engagement programs regardless of the funding source of those programs. Youth attending high school equivalency programs funded by the public K-12 school system who are classified by the school system as still enrolled in school are an exception; they are considered ISY.

⁴ Participants may continue to receive services beyond the age of 24 once they are enrolled in the program, because age eligibility is based on age at enrollment.

⁵ Section 477 of the Social Security Act (42 U.S.C. 677) can be found at this link:
https://www.ssa.gov/OP_Home/ssact/title04/0477.htm

⁶ Including non-custodial parents.

- i. A low-income individual who is basic-skills deficient, an ELL, or an individual that requires additional assistance to enter or complete an educational program or to secure or hold employment, as defined by the Local Area's Local Plan.⁷

Maryland's Compulsory Education Law

Md. Code, Educ. § 7-301, known as the Maryland Compulsory Education law, dictates that individuals must generally attend school through the age of 18. While WIOA dictates that OSY must be between the ages of 16-24 at the time of enrollment; in Maryland, OSY should be between the ages of 18-24 at the time of enrollment since they are required to attend school at ages 16 and 17.

While in most cases an OSY will be 18-24, there may be situations where a 16 or 17 year old is eligible as an OSY. An individual who is between the ages of 16 and 17 and meets the qualification listed under 3(b) of the OSY definition, OR meets one of the following exceptions to the Maryland Compulsory Education Law, may qualify as an OSY. Additionally, individuals in this category must meet all other requirements of the OSY definition in order to be eligible.

The exemptions to the Maryland Compulsory Education law are for an individual under the age of 18 who:

1. Has obtained a Maryland high school diploma, an equivalent out-of-state high school diploma, or equivalent;
2. Is a student with a disability and has completed the requirements for a Maryland High School Certificate of Completion;
3. Is receiving regular, thorough instruction during the school year in the studies usually taught in the public schools to children of the same age;
4. Has completed an instructional program under item (3) above;
5. Is severely ill and requires home or hospital instruction;
6. Is married;
7. Is in military service;
8. Is committed by court order to an institution without an educational program;
9. Provides financial support to the child's family as documented by a Local Department of Social Services (LDSS);
10. Subject to the approval of the county superintendent, has been expelled;
11. Is pregnant or a parent and is enrolled in an alternative educational program;
12. Attends an alternative educational program;
13. Subject to written parental consent and written agreement with the county board, attends a public school on a part-time basis and attends a private career school; or,
14. Is waived from the provisions of the Compulsory education law by the State Superintendent.

IN-SCHOOL YOUTH (ISY)

An In-School Youth (ISY) is defined by WIOA Section 129(a)(1)(c) as an individual who is:

1. Attending school;
2. Between the ages of 14-21⁸ at the time of enrollment;

⁷ Low-income status must be documented for OSY that are determined eligible due to being basic skills deficient, an ELL or an individual that requires additional assistance to enter or complete an education program or to secure or hold employment.

⁸ Unless the youth is an individual with a disability, who is attending school under Maryland law.

3. Low-income; and
4. One or more of the following:
 - a. Basic skills deficient;
 - b. An English Language Learner (ELL);
 - c. An offender;
 - d. A homeless individual, 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;
 - e. Pregnant or parenting;
 - f. A youth who is an individual with a disability; and/or,
 - g. An individual who requires additional assistance to complete an educational program or to secure or hold employment, as defined by the Local Area's Local Plan.

There is a limitation in WIOA related to the "additional assistance" criterion that applies only to ISY. WIOA Section 129(a)(3)(B) states that in each Local Area, no more than five percent of the ISY assisted youth may be eligible who require additional assistance to complete an educational program or to secure or hold employment. Local Areas must ensure that in a given program year, no more than five percent of ISY enrolled in the program year are eligible only based on the "additional assistance" criterion.

OTHER ELIGIBILITY

WIOA allows a low-income exception where five percent of WIOA Title I Youth Program participants who meet all other eligibility criteria for WIOA youth, except the low-income criteria, may participate. The tables below categorize ISY and OSY eligibility by whether or not they require low-income status.

ISY That Do Require Low-Income Status	ISY That Do NOT Require Low-Income Status
<ol style="list-style-type: none"> A. A low-income individual who is either basic skills deficient or an ELL; and/or, B. A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment. 	<ol style="list-style-type: none"> A. An individual who is subject to the juvenile or adult justice system; B. A homeless individual or a runaway; C. An individual who is 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 child eligible for assistance under Section 477 of the Social Security Act (42 U.S.C. 677), or an individual who is in an out of home placement; D. An individual who is pregnant or parenting; and/or, E. An individual with a disability.

OSY That Do Require Low-Income Status	OSY That Do NOT Require Low-Income Status
<ul style="list-style-type: none"> A. 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 ELL; and/or, B. A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment. 	<ul style="list-style-type: none"> A. A school dropout; B. A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. The school year calendar quarter is based on how a local school district defines its school year quarters. (Note: In line with WIOA, in providing assistance to an OSY who is required to attend school under Maryland law, the priority in providing such assistance shall be for the individual to attend school regularly); C. An individual who is subject to the juvenile or adult justice system; D. A homeless individual or a runaway; E. An individual who is 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 child eligible for assistance under Section 477 of the Social Security Act (42 U.S.C. 677)⁹, or an individual who is in an out of home placement; F. An individual who is pregnant or parenting; and/or, G. An individual with a disability.

⁹ Section 477 of the Social Security Act (42 U.S.C. 677) can be found at this link: https://www.ssa.gov/OP_Home/ssact/title04/0477.htm.

SOURCE DOCUMENTATION FOR WIOA TITLE I YOUTH PROGRAM

Source documentation allows programs to verify the eligibility status of potential participants of the WIOA Title I Youth Program. Additionally, it allows the State to conduct data validation, a series of internal controls or quality assurance techniques to verify the accuracy, validity, and reliability of data.

The following charts detail the acceptable source documentation for each eligibility criterion.

GENERAL WIOA PROGRAM ELIGIBILITY

Criteria	Acceptable Source Documentation
Citizen or Authorized to Work in the U.S. Per TEGL 02-14, Deferred Action for Childhood Arrivals (DACA) individuals are considered to be “immigrants authorized by the Attorney General to work in the United States.” Therefore, DACA participants with employment authorization may access any WIOA services for which they otherwise would qualify.	A. U.S. Passport or U.S. Passport Card (Unexpired); B. Permanent Resident Card or Alien Registration Receipt Card (Form I-551) C. Foreign passport that contains a temporary I-551 stamp or temporary I-551 printed notation on a machine-readable immigrant visa D. Employment Authorization Document that contains a photograph (Form I-766) E. Foreign passport with Form I-94 or Form I-94A with Arrival-Departure Record, and containing an endorsement to work F. Passport from the Federated States of Micronesia (FSM) or the Republic of the Marshall Islands (RMI) with Form I-94 or Form I-94A indicating nonimmigrant admission under the Compact of Free Association Between the United States and the FSM or RMI G. U.S. Social Security Card H. Certification of report of birth issued by the Department of State (Forms DS-1350, FS-545, FS-240) I. Original or certified copy of birth certificate issued by a State, county, municipal authority, or territory of the United States bearing an official seal J. Native American tribal document K. U.S. Citizen ID Card (Form I-197) L. Identification Card for Use of Resident Citizen in the United States (Form I-179) M. Employment authorization document issued by the Department of Homeland Security (DHS)
Selective Service Registrant	A. Verification from Selective Service Administration
Age/Birth Date	A. Driver's License B. Baptismal Record C. Birth Certificate D. DD-214 E. Report of Transfer or Discharge Paper

	F. Federal, State, Local or Tribal Identification Card G. Passport H. Hospital Record of Birth I. Public Assistance/Social Service Records J. School Records or ID Cards K. Work Permit L. Family Bible M. Cross-Match with State Agency Records N. Justice System Records O. Selective Service Registration P. Signed Letter from a parent or guardian Q. Medical Records
Social Security Number (SSN)	A. SSN Card B. Other Federal or State ID with SSN

WIOA TITLE I YOUTH PROGRAM

Criteria	Acceptable Documentation
School status at participation	A. Cross-Match with Postsecondary Education Database; B. Copy of Educational Institution Enrollment Record; C. Applicable Records from Education Institution (GED certificate, diploma, attendance record, transcripts, report card, or school documentation); D. Signed Intake Application or Enrollment Form; E. Electronic Records; F. Case Notes; or, G. Self-Attestation.
An individual who is subject to the juvenile or adult justice system	A. Documentation from the Juvenile or Adult Criminal Justice System; B. Written Statement or Referral Document from a Court or Probation Officer C. Referral Transmittal from a Reintegration Agency D. Intake Application or Enrollment Form E. Case notes F. Needs Assessment G. Individual Service Strategy H. Federal Bonding Program Application I. Self-Attestation
Homeless youth and/or runaway Individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of the McKinney-Vento Homeless Assistance Act section 103(a)(1) and the	A. Case Notes; B. Signed Intake Application or Enrollment Form; C. Written Statement or Referral Transmittal from a Shelter or Social Service Agency; D. Needs Assessment;

<p>Violence Against Women Act 34 U.S.C. § 12473); and includes —(i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement; (ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of section the McKinney-Vento Homeless Assistance Act 103(a)(2)(C)); (iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and (iv) migratory children (as such term is defined in Elementary and Secondary Education Act of 1965, 20 U.S.C.A. § 6399 (3)) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).</p>	<p>E. Signed Individual Service Strategy; F. A letter from caseworker to support provider; or G. Self-Attestation.</p>
<p>Individual who is 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 child eligible for assistance under Section 477 of the Social Security Act (42 U.S.C. 677), or an individual who is in an out of home placement</p> <p>An individual is eligible to participate as a foster care recipient if that individual was placed in an out-of-home placement by DHS and either:</p> <p>(1) Resided in an out-of-home placement on the individual’s 18th birthday or at the time the individual graduated from high school or successfully obtained a high school diploma;</p> <p>(2) Resided in an out-of-home placement on the individual’s 13th birthday and was placed into guardianship or adopted out of an out-of-home placement after the individual’s 13th birthday; or,</p> <p>(3) Resided in an out-of-home placement in the State for at least 1 year on or after the individual’s 13th birthday, and returned to live</p>	<p>A. Case Notes; B. Signed Intake Application or Enrollment Form; C. Written Statement or Referral Transmittal from a Shelter or Social Service Agency; D. Needs Assessment; E. Signed Individual Service Strategy; F. A letter from caseworker to support provider; or, G. Self-Attestation.</p>

<p>with the individual's parents after the out-of-home placement ended.</p> <p>An individual is also considered an eligible foster care recipient if that individual is a younger sibling of a foster care recipient who is eligible, so long as the younger sibling exited foster care through a concurrent placement into guardianship or adoption by the guardian or adoptive family.</p>	
<p>Individual who is pregnant or parenting</p>	<p>A. Case Notes;</p> <p>B. Needs Assessment;</p> <p>C. Women, Infants, and Children (WIC) Eligibility Verification;</p> <p>D. TANF Single Parent Eligibility Verification;</p> <p>E. Signed Intake Application or Enrollment Form;</p> <p>F. Signed Individual Service Strategy; or,</p> <p>G. Self-Attestation.</p>
<p>Individual with a disability</p> <p>An individual with:</p> <p>(A) a physical or mental impairment that substantially limits one or more major life activities of such individual;</p> <p>(B) a record of such an impairment; or,</p> <p>(C) being regarded as having such an impairment (as described in the Americans with Disabilities Act § 12102 (3)).</p>	<p>A. School 504 Records Provided by the Student</p> <p>B. Assessment Test Results</p> <p>C. School Individualized Education Program (IEP) record; or,</p> <p>D. Self-Attestation.</p>
<p>Low income individual</p> <p>An individual who—</p> <p>(i) receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through SNAP established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), the program of block grants to States for TANF program under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), or the supplemental security income program established under title XVI of the Social Security Act (42 U.S.C. 1381 et seq.), or State or local income-based public assistance;</p> <p>(ii) is in a family with total family income that does not exceed the higher of—(I) the poverty line; or (II) 70 percent of the Lower Living Standard Income Level;</p> <p>(iii) is a homeless individual (as defined in section the Violence Against Women Act (34</p>	<p>A. Award Letter from Veteran's Administration;</p> <p>B. Bank Statements;</p> <p>C. Pay Stubs;</p> <p>D. Compensation Award Letter;</p> <p>E. Court Award Letter;</p> <p>F. Pension Statement;</p> <p>G. Employer Statement/Contract;</p> <p>H. Family or Business Financial Records;</p> <p>I. Housing Authority Verification;</p> <p>J. Quarterly Estimated Tax for Self-Employed Persons;</p> <p>K. Social Security Benefits;</p> <p>L. UI Claim Documents;</p> <p>M. Copy of Authorization to Receive Cash Public Assistance;</p> <p>N. Copy of Public Assistance Check;</p> <p>O. Public Assistance Eligibility Verification;</p> <p>P. Cross-Match with Refugee Assistance Records;</p> <p>Q. Cross-Match with Public Assistance Records; or</p>

<p>U.S.C.A. § 12473) or a homeless child or youth (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)));</p> <p>(iv) receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C.1751 et seq.);</p> <p>(v) is a foster child on behalf of whom State or local government payments are made; or,</p> <p>(vi) is an individual with a disability whose own income meets the income requirement of clause (ii), but who is a member of a family whose income does not meet this requirement.</p>	<p>R. Cross-Match with UI Wage Records;</p> <p>The following documentation is considered acceptable when documenting family size in relation to low-income status: Applicant statement; birth certificate; court/divorce decree; landlord statement; lease; marriage certificate; medical card; most recent tax return supported by IRS Documents (i.e., Form Letter 1722); Public assistance/Social Service Agency records; Public housing authority (if resident of or on waiting list); Written statement from publicly supported 24 hour care facility or institution.</p>
<p>Individual who requires additional assistance to enter or complete an educational program or to secure or hold employment</p>	<p>A. Case Notes;</p> <p>B. Signed Intake Application or Enrollment Form;</p> <p>C. Needs Assessment;</p> <p>D. Signed Individual Service Strategy; or,</p> <p>E. Self-Attestation.</p>
<p>Basic skills deficient/Low Levels of Literacy</p> <p>With respect to an individual:</p> <p>(A) Who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or,</p> <p>(B) Who is a youth or adult, that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.</p>	<p>A. Case Notes;</p> <p>B. Assessment Test Results; or,</p> <p>C. Applicable Records from Education Institution (transcripts, academic assessments, or other school documentation).</p>
<p>English Language Learner</p> <p>An eligible individual who has limited ability in reading, writing, speaking, or comprehending the English language, and:</p> <p>(A) whose native language is a language other than English; or,</p> <p>(B) who lives in a family or community environment where a language other than English is the dominant language.</p>	<p>A. Case Notes;</p> <p>B. Assessment Test Results;</p> <p>C. Applicable Records from Education Institution (transcripts or other school documents);</p> <p>D. Signed Intake Application or Enrollment Form;</p> <p>E. Signed Individual Service Strategy; or,</p> <p>F. Self-Attestation.</p>
<p>Ex-offender</p> <p>An adult or juvenile—</p> <p>(A) who is or has been subject to any stage of the criminal justice process, and for whom services under this Act may be beneficial; or,</p>	<p>A. Case Notes;</p> <p>B. Documentation from the Juvenile or Adult Criminal Justice System;</p> <p>C. Written Statement or Referral Document from a Court or Probation Officer;</p> <p>D. Referral Transmittal form a Reintegration Agency;</p> <p>E. Signed Intake Application or Enrollment Form;</p>

(B) who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.	F. Needs Assessment; G. Signed Individual Service Strategy; H. Federal Bonding Program Application; or, I. Self-Attestation.
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SELF ATTESTATION

There are circumstances that may warrant self-attestation, as detailed above. Self-attestations are not to be used as the primary method of verifying data elements, however, it is an acceptable source of documenting almost all program elements related to WIOA Youth eligibility. Self-attestation should only be used when the preferred options of paper documentation or third party corroboration are not available. Self-attestation occurs when a participant states their status for a particular data element, such as “pregnant or parenting youth,” and then signs and dates a form acknowledging this status. The key elements for self-attestation are: (a) the participant identifying their status for permitted criteria and (b) signing and dating a form attesting to this self-identification. The form and signature can be on paper or in the State management information system, with an electronic signature. Local Areas’ policies should indicate whether self-attestation is conducted on physical forms or electronically.¹⁰

PARTICIPANT FILE CASE RECORDS FOR WIOA TITLE I YOUTH PROGRAMS

Local Area and other grantee staff must develop an adequate organization system to ensure that the information contained in participant¹¹ records is well-documented, protected, consistent, accessible, and accurate from the point of program registration to the point of exit.¹²

Case notes refer to either paper or electronic statements by the case manager that identify, at a minimum, the following: (a) a participant's status for a specific data element, (b) the date on which the information was obtained, and (c) the case manager who obtained the information. Case notes must tell a story regarding all services that are received. Supervisors and directors must ensure that all staff document case notes in both the Maryland Workforce Exchange (MWE) and individual participant files. Examples of a needs assessment include an intake form or an objective assessment. Local Areas must upload documentation or include images of the documentation in the MWE if they use electronic record management. Local Areas that use only electronic records, and no physical case files, must note that in local policy and procedures.

All records, both electronic and physical, must be maintained in accordance with Training and Employment Guidance Letter (TEGL) 39-11, “[Guidance on the Handling and Protection of Personally Identifiable Information \(PII\)](#),” and DWDAL’s policy concerning privacy and data security¹³ to maintain confidentiality

¹⁰ Local Areas that use a Self-Attestation Form will need to translate the form into the languages indicated as applicable to that Local Area in the DWDAL Language Access Plan. The Self-Attestation Form is a “vital document.” The DWDAL and Division of Unemployment Insurance Language Access Plan is available at the following link: <http://www.labor.maryland.gov/employment/wioa-access.pdf>.

¹¹ A “participant” is an individual engaged in a core program beyond self-service or information-only services. A “youth participant” is a reportable individual when they have satisfied all applicable program requirements for the provision of services, including eligibility determination, an objective assessment, and development of an individual service strategy, and received 1 of the 14 WIOA youth program elements identified in sec. 129(c)(2) of WIOA.

¹² The “point of exit” refers to the last date a participant received services, not including self-service, information only, or follow up services, where no future services are scheduled. These services are not counted in the measurement of 90 calendar days of “no service.” An exiter may access the system and receive services assigned by the system.

¹³ DWDAL’s current policies can be found at the following link: <https://www.labor.maryland.gov/employment/mpi/>.

and protect Personally Identifiable Information (PII). PII is participant-level and employee data that either by itself, or when combined with other data, can link to a specific individual or identity.

When determining eligibility, staff are encouraged to document all barriers to employment that an individual discloses. This information is key to the determination of local performance metrics and ultimately the negotiation of local performance goals. It also helps to determine Priority of Service and provides an accurate understanding of the customers served through Maryland's workforce system.

WIOA TITLE I YOUTH PROGRAM FUNDING REQUIREMENTS

WIOA Title I Youth Programs are required to spend a minimum of 75 percent of funds on OSY. Additionally, Local Areas must spend at least 20 percent of WIOA Title I Youth Program funds on work experiences that incorporate academic and occupational education. In total, 80 percent of funds must be obligated at the end of the first year.¹⁴

SELECTING SERVICE PROVIDERS AND CO-ENROLLMENT

SELECTING SERVICE PROVIDERS

Local Workforce Development Boards (Local Boards) have the option to directly provide some or all of the youth workforce development activities to WIOA Title I Youth Program participants. For services not being directly provided by the Local Boards, Local Boards have the option to develop contracts to select WIOA Title I Youth Program service providers that will allow multiple agencies and organizations to fund different aspects of the WIOA Title I Youth Program. Each local system of services can be coordinated through a combination of contracts and Memoranda of Understanding (MOUs)¹⁵ between the participating entities.

In granting or contracting WIOA Title I Youth Program services, Local Boards must award grants or contracts according to local procurement policies. Providers must be identified based on criteria in the State Plan¹⁶ and take into consideration the ability of the providers to meet performance accountability measures. Any selected providers funded are recipients of federal funds and are subject to WIOA rules.

Local Boards may determine the length of time for each provider contract as long as the contracting process follows procurement guidelines. Additionally, a Local Board may award grants or contracts on a sole-source basis only if it determines there is an insufficient number of eligible providers in the Local Area for grants or contracts to be awarded on a competitive basis.¹⁷

MD Labor encourages Local Areas that grant or contract out services to include MD Labor's Disability and Youth Services Coordinator in the Request for Proposal (RFP) evaluation and selection process. Once funds are awarded, Local Areas must provide MD Labor with timely copies of the selected service providers' contracts or grant agreements.

CO-ENROLLMENT

Given WIOA's focus on providing an integrated service delivery system that leverages resources across the State, MD Labor encourages Local Areas to co-enroll youth participants in both the WIOA Title I Youth Program and other related programs when appropriate to provide participants maximum flexibility in the services they can access. Co-enrollment is meant to supplement, not supplant, the services provided through WIOA Title I Youth Programs.

Possible programs for co-enrollment include, but are not limited to:

¹⁴ More details can be found in [WIOA](#) sec. 127 and 132.

¹⁵ More details on MOUs can be found in the *WIOA Memoranda of Understanding and Resource Sharing Agreements* policy, located on DWDAL's policy issuance page: <https://www.labor.maryland.gov/employment/mpi/>.

¹⁶ Maryland's WIOA State Plan can be found here: [2024-2028stateworkforceplan-wioacombined.pdf](https://www.labor.maryland.gov/employment/mpi/).

¹⁷ 20 CFR 681.400, "[What is the process used to select eligible youth service providers?](#)"

1. WIOA Title I Adult Program;
2. WIOA Title I Dislocated Worker Program;
3. WIOA Title II Adult Education Program;
4. WIOA Title III Wagner-Peyser Program;
5. Temporary Assistance for Needy Families (TANF) Program;
6. Supplemental Nutrition Assistance Program (SNAP);
7. Division of Rehabilitation Services (DORS) Program;
8. Jobs for Veterans State Grant Program;
9. Trade Adjustment Assistance (TAA) Program;
10. John H. Chafee Foster Care Independence Program;
11. Local Management Boards;
12. Job Corps; and/or,
13. Community-Based Organizations.

Youth participants must meet eligibility criteria for participation and receive a staff-assisted service¹⁸ within each program before co-enrollment occurs.

¹⁸ Participants that only utilize self-service options through a program are not eligible for co-enrollment.

OBJECTIVE ASSESSMENTS

WIOA § 129(c)(1)(A) requires youth programs to provide an objective assessment of the academic level, skill level, and service needs of each participant in order to properly identify the appropriate services and career pathways for that individual.

The objective assessment must include a review of:

1. Basic skills;
2. Occupational skills;
3. Prior work experience;
4. Employability;
5. Interests;
6. Aptitudes, including interests and aptitudes for nontraditional jobs;
7. Supportive service needs;
8. Developmental and Mental health needs.

If the participant has been assessed by a provider to pursue another education or training program within the last year, the WIOA Title I Youth Program provider may use that existing assessment to fulfill program requirements. When used, the provider must retain copies of previous assessment(s) and/or assessment result(s) in the participant's case file.

More detailed descriptions on the other aspects of objective assessments can be found in the *Basic Education Skills and English Language Assessment* policy, located on DWDAL's policy issuance page at: <https://www.labor.maryland.gov/employment/mpi/>.

REASONABLE ACCOMODATIONS

Under Section 188 of WIOA and 29 CFR Part 38, reasonable accommodations or modifications are available upon request to qualified individuals with disabilities including those with a record of a substantially limiting impairment, unless providing such an accommodation would cause undue hardship. Local Areas describe their processes for requesting reasonable accommodations in their Local Plans, located at: <https://www.labor.maryland.gov/wdplan/wioalocalplans.shtml>.¹⁹

INDIVIDUAL SERVICE STRATEGY

The Individual Service Strategy (ISS) serves as a guide for both the participant and staff by outlining the necessary and recommended next steps in the program. Through the ISS, staff should aim to identify the appropriate combination and sequence of services to help the participant fulfill goals and program requirements. Staff must interpret assessment results and incorporate those results into service planning and activities. This will help to ensure that youth achieve established goals and obtain desired career and educational outcomes. The ISS must map out anticipated progress taking into account individual needs, abilities and goals.

¹⁹ More information on reasonable accommodation can be found in Maryland's Nondiscrimination Plan: <http://www.labor.maryland.gov/employment/ndp/>.

Local Areas must ensure that each WIOA Title I Youth Program provider develops an ISS with each youth participant after they have been objectively assessed. When developing the ISS, the Youth Program staff and the participant must jointly take the objective assessment results into account.

The ISS must identify career pathways and must, at a minimum, include an examination of short-term and long-term:

1. Education goals;
2. Employment goals;
3. Appropriate achievement objectives or benchmarks/milestones; and,
4. Appropriate services.

Once completed, Local Areas must ensure that the ISS is signed, either on paper or electronically, by the Youth Program staff and the participant.²⁰ Local Areas must ensure that each participant receives a signed copy of their ISS as record.

Once an ISS is completed, if a participant then pursues a different education or training program within the same quarter, the new WIOA Title I Youth Program provider may use the existing ISS to fulfill program requirements.

In order to ensure ongoing review of the ISS, staff must meet with youth participants every 90 days, at a minimum, to review progress and make necessary adjustments. As the ISS is a living document that should be adjusted as the participant and case manager deem necessary, changes should be recorded, signed, and dated by both the staff person and participant. At times, the most recent ISS will remain in effect with no changes. In this case, a case note should be created reflecting that the staff and the participant met to review the ISS and that no changes were necessary. The date of the meeting must be listed in the case note.

Examples of updates to the ISS include, but are not limited to:

1. Participant progress;
2. Completed activities or benchmarks;
3. Rewriting new goals once objectives have been met;
4. Outlining a clear direction or career pathway for the participant;
5. Changes to household status;
6. Legal name changes;
7. Address changes; and,
8. Other updates to contact information.

²⁰ Local Areas utilizing electronic signatures must have policies and procedures for electronic signatures documented in their Local policies.

YOUTH PROGRAM ELEMENTS

WIOA requires that 14 key program elements be made available to all WIOA Title I Youth Program participants.²¹ The 14 program elements are:

1. Tutoring, skills training, and dropout prevention;
2. Alternative secondary school services;
3. Paid and unpaid work experiences;
4. Occupational skills training;
5. Leadership development opportunities;
6. Supportive services;
7. Adult mentoring;
8. Comprehensive guidance and counseling;
9. Concurrent education and workforce preparation activities;
10. Financial literacy education;
11. Entrepreneurial skills training;
12. Labor Market Information (LMI);
13. Preparing for post-secondary education and training; and,
14. Follow-up services.

Not every participant will receive each service, however, if an individual is in need of one of the 14 elements then it must be made available to them. The remainder of this section provides details on the 14 program elements.

In addition to the elements above, WIOA Youth funds can be used to support digital literacy efforts, including paying for devices and broadband internet service that will allow a participant to create or maintain a wireless connection for distance learning, search for jobs, and engage in other employment and training services.

TUTORING, SKILLS TRAINING, AND DROP OUT RETENTION

Tutoring, skills training, and dropout prevention assists individuals in completing the requirements for a recognized post-secondary credential, as well as, attaining a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities). Maryland offers a High School Diploma to those who successfully pass the GED® or the National External Diploma Program® (NEDP). MD Labor encourages Local Areas to use WIOA Title II Adult Education service providers for instruction as a way to foster increased WIOA partnerships while helping youth participants prepare for the GED® and NEDP® programs.

ALTERNATIVE SECONDARY SCHOOL SERVICES

At the federal level, an alternative school is defined as a public secondary school that addresses needs of students that typically cannot be met in a regular school, provides nontraditional education, serves as an adjunct to a regular school, or falls outside the categories of regular, special, or vocational education.

²¹ More information can be found in 20 CFR 681.400-600, "[Youth Program Design, Elements, and Parameters](#)," as well as TEGL 21-16, Change 1, "[Third Workforce Innovation and Opportunity Act \(WIOA\) Title I Youth Formula Program Guidance](#)."

In Maryland, these programs mostly target students with behavioral issues, students who were in contact with law enforcement, and/or students with academic difficulties; as evidenced by low grades or being behind grade levels. Many also target students with attendance problems.

PAID AND UNPAID WORK EXPERIENCES

Paid and unpaid work experiences, which involve academic and occupational education, are prioritized under WIOA. Annually, Local Areas must spend a minimum of 20 percent of non-administrative funds on work experience, which may include:

1. Summer employment opportunities;
2. Employment opportunities during the school year;
3. Pre-apprenticeship, Youth Apprenticeship, and School-to-Apprenticeship programs;
4. Internships;
5. Job shadowing; and,
6. On-the-Job Training (OJT) opportunities.

MD Labor encourages Local Areas to coordinate work experiences, particularly summer employment, with other organizations and agencies that serve youth; which could include TANF, DORS, the Maryland Department of Housing and Community Development's (DHCD) Community Services Block Grant (CSBG) Program, and Community Development Block Grant (CDBG) Program, community colleges, and local governments, among others.

OCCUPATIONAL SKILLS TRAINING

Occupational skills training is typically delivered to participants through community colleges, industry partners, and/or private career schools to provide youth with employer-driven, specific vocational skills at entry, intermediate, or advanced levels. Occupational skills training prepares participants for proficiency in performing actual tasks and technical functions that are required by certain industries. After completing this training, participants may receive industry recognized certificates.

Local Areas shall give priority consideration for training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the Local Area.

CONCURRENT EDUCATION AND WORKFORCE PREPARATION ACTIVITIES

When offered concurrently, evidence suggests that the combination of education and workforce preparation activities and training is beneficial to WIOA Title I Youth Program participants. Examples include, but are not limited to:

1. Internships or job shadowing combined with GED® or NEDP® classes;
2. Integrated Education and Training (IET);
3. Computer training coupled with basic skills training or literacy activities;
4. Summer work activities coupled with contextual learning on the job;
5. Pre-apprenticeship, Youth Apprenticeship, and School-to-Apprenticeship;
6. Job readiness activities (resume writing, interviewing skills, applying for jobs online) combined with GED® or NEDP® classes or tutoring; and,

7. Occupational skills training coupled with intensive medical terminology tutoring (i.e., Certified Nursing Assistant/Geriatric Nursing Assistant training).

LEADERSHIP DEVELOPMENT OPPORTUNITIES

Leadership development opportunities encourage responsibility, confidence, employability, self-determination, and other positive social behaviors. Examples include, but are not limited to:

1. Exposure to postsecondary educational opportunities;
2. Community and service learning projects;
3. Peer-centered activities, including peer mentoring and tutoring;
4. Organizational and team work training;
5. Training in decision making, including determining priorities;
6. Life skills training such as parenting, work behavior training, and budgeting of resources;
7. Civic engagement activities; and,
8. Activities which put youth in a leadership role.

SUPPORTIVE SERVICES

WIOA recognizes that youth often face increased barriers to access services. Therefore, Local Areas may utilize supportive services to provide assistance to individuals who would not otherwise be able to participate in a program, and to ensure the success of new participants once enrolled. Local Areas must adhere to using supportive services in accordance with their Local policies and procedures. Local Areas that do not have supportive service policies in place will receive a finding during State monitoring.

Examples of supportive services include, but are not limited to:

1. Assistance obtaining a driver's license;
2. Transportation assistance;
3. Uniforms, tools, and related equipment;
4. Child or dependent care;
5. Union initiation fees;
6. Food;
7. Registered Apprenticeship application fees; and,
8. Clothing for interviews and job fairs.

ADULT MENTORING

For youth that receive adult mentoring services, the mentoring should occur both during and after program participation, for a total duration of at least 12 months. Mentoring should be a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee. A mentor cannot be the assigned youth case manager, except for in Local Areas where adult mentors are sparse, in which case the case manager may serve as a mentor.²² In order to be flexible to the needs of the youth participant, mentoring may occur either virtually or in person. Additionally, mentoring

²² See 20 CFR 681.490, "[What is Adult Mentoring](#)" and the associated explanation in the Federal Register: [Federal Register, Vol 81, No 161, Friday August 19, 2016, Page 56177](#).

may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company.

COMPREHENSIVE GUIDANCE AND COUNSELING

Comprehensive guidance and counseling should be identified to fit the individual needs of a participant. This includes drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate. When referring participants to necessary counseling that cannot be provided by the local youth program or its service providers, the local youth program must coordinate with the organization it refers to in order to ensure continuity of service.

FINANCIAL LITERACY EDUCATION

WIOA recognizes that establishing good financial knowledge and behaviors early in life is important for achieving long-term financial well-being. The financial literacy education program element may include activities which:

1. Support the ability of participants to create budgets, initiate checking and savings accounts at banks, and make informed financial decisions;
2. Support participants in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards;
3. Teach participants about the significance of credit reports and credit scores; what their rights are regarding their credit and financial information; how to determine the accuracy of a credit report and how to correct inaccuracies; and how to improve or maintain good credit;
4. Support a participant's ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions;
5. Educate participants about identity theft, ways to protect themselves from identify theft, and how to resolve cases of identity theft and in other ways understand their rights and protections related to personal identity and financial data;
6. Support activities that address the particular financial literacy needs of non-English speakers, including providing the support through the development and distribution of multilingual financial literacy and education materials;
7. Support activities that address the particular financial literacy needs of youth with disabilities, including connecting them to benefits planning and work incentives counseling;
8. Provide financial education that is age appropriate, timely, and provides opportunities to put lessons into practice, such as by access to safe and affordable financial products that enable money management and savings; and,
9. Implement other approaches to help participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high quality, age-appropriate, and relevant strategies and channels, including, where possible, timely and customized information, guidance, tools, and instruction.

ENTREPRENEURIAL SKILLS TRAINING

WIOA identifies entrepreneurship and small business development as an important employment option for populations that have barriers to employment. Entrepreneurial skills training provides the basics of starting and operating a small business. Such training must develop the skills associated with entrepreneurship. Such skills may include, but are not limited to, the ability to:

1. Take initiative;
2. Creatively seek out and identify business opportunities;
3. Develop budgets and forecast resource needs;
4. Understand various options for acquiring capital and the trade-offs associated with each option; and,
5. Communicate effectively and market oneself and one's ideas.

Approaches to teaching youth entrepreneurial skills include, but are not limited to, the following:

1. Entrepreneurship education that provides an introduction to the values and basics of starting and running a business. Entrepreneurship education programs often guide youth through the development of a business plan and also may include simulations of business start-up and operation;
2. Enterprise development which provides support and services that incubate and help youth develop their own businesses. Enterprise development programs go beyond entrepreneurship education by helping youth access small loans or grants that are needed to begin business operation and by providing more individualized attention to the development of viable business ideas; and,
3. Experiential programs that provide youth with experience in the day-to-day operation of a business. These programs may involve the development of a youth-run business that young people participating in the program work in and manage. Or they may facilitate placement in apprentice or internship positions with adult entrepreneurs in the community.

LABOR MARKET INFORMATION

Labor Market Information (LMI) refers to services that provide labor market and employment information about in-demand industry sectors or occupations available in the Local Area to WIOA Title I Youth Program participants, and may include career awareness, career counseling, and career exploration services. In addition to connecting youth to self-service LMI tools, youth providers should share and discuss state and local LMI with youth participants. LMI also identifies employment opportunities and provides knowledge of job market expectations, including education and skill requirements and potential earnings.

Numerous tools and applications are available that are user-friendly and can be used to provide labor market and career information to youth. These tools can be used to help youth make appropriate decisions about education and careers. Examples include, but are not limited to:

1. The Growth Industry Tool (<http://www.labor.maryland.gov/lmi/wiagrowthind/git.shtml>)
2. The Growth Occupation Tool (<http://www.labor.maryland.gov/lmi/wiagrowthind/got.shtml>)
3. General Maryland LMI Information (<https://labor.maryland.gov/lmi/>)

PREPARING FOR POST-SECONDARY EDUCATION AND TRAINING

Post-secondary education and training affords participants long-lasting economic and employment opportunities. Therefore, activities that help youth prepare for, and transition to, post-secondary education and training are key.

FOLLOW-UP SERVICES

Follow-up services are critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-up services may include regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise.

Follow-up services for youth also may include the following program elements:

1. Supportive services;
2. Adult mentoring;
3. Financial literacy education;
4. 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,
5. Activities that help youth prepare for and transition to postsecondary education and training.

All youth participants must be offered an opportunity to receive follow-up services that align with their individual service strategies. Furthermore, follow-up services must be provided to all participants for a minimum of 12 months unless the participant declines to receive follow-up services or the participant cannot be located or contacted. The types of services provided and the duration of services must be determined based on the needs of the individual and therefore, the type and intensity of follow-up services may differ for each participant. Follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome.

INDIVIDUAL TRAINING ACCOUNTS AND TRAINING CONTRACTS

To enhance individual participant choice in their education and training plans and provide flexibility to service providers, WIOA allows providers to use Individual Training Accounts (ITAs) for OSY, ages 16 to 24, using WIOA youth funds. ITAs should only be utilized when determined appropriate through the participant's objective assessment and ISS. If utilizing an ITA, the participant selects eligible training providers through consultation with program staff. When using an ITA, only training providers on the Maryland Eligible Training Provider List (ETPL)²³ can be used.

Under WIOA, training services may be provided if the staff determine that the individual:

1. Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to, or higher than, wages from previous employment;
2. Is in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to, or higher than, wages from previous employment; and/or,
3. Has the skills and qualifications, with or without reasonable accommodations, to successfully participate in the selected program of training services.

Training services must be linked to in-demand employment opportunities in the Local Area or the geographic area in which the participant is willing to commute or relocate. The selection of training services must be:

1. Conducted in a manner that maximizes customer choice;
2. Linked to in-demand occupations, based on LMI;
3. Informed by the performance of relevant training providers; and,
4. Coordinated with other sources of assistance to the extent possible.

More detailed descriptions of ITAs and Training Accounts can be found in the *WIOA Title I Training & Maryland's Eligible Training Provider List* policy, which can be found on DWDAL's policy issuance page: <https://www.labor.maryland.gov/employment/mpi/>.

²³ The Maryland ETPL can be found here: <http://www.labor.maryland.gov/employment/train/>.

PERFORMANCE AND THE MARYLAND WORKFORCE EXCHANGE (MWE)

PERFORMANCE INDICATORS

MD Labor will assess performance based on negotiated WIOA Title I Youth Program performance outcomes. The performance indicators are as follows:

1. Placement in Employment, Education, or Training – Second Quarter after exit;
2. Placement in Employment, Education, or Training – Fourth Quarter after exit;
3. Median Earnings;
4. Credential Rate;
5. Measurable Skill Gains;²⁴ and,
6. Effectiveness in Serving Employers.

MARYLAND WORKFORCE EXCHANGE (MWE)

MD Labor requires Local Areas to record participants' information into the Maryland Workforce Exchange (MWE) in a timely manner. To comply with regulatory reporting requirements, Local Areas must ensure that the following data is reported into the MWE System:

1. Participant characteristics;
2. Participant services received; and,
3. Participant outcomes.²⁵

Local Area Directors, or their designee, must ensure that data is entered into the MWE within 14 days of activity and that all participants are fully enrolled in the MWE System. All data collection and reporting must adhere to TEGL 39-11²⁶ and MD Labor's policy on privacy and data security.²⁷

²⁴ Measurable skill gains must be based on the youth participants ISS, as dictated by TEGL 10-16, Change 3, "[Performance Accountability Guidance for Workforce Innovation and Opportunity Act \(WIOA\) Title I, Title II, Title III, and Title IV Core Programs](#)," dated June 11, 2024.

²⁵ Information for entering outcomes in MWE can be found in the standard [MWE manual](#).

²⁶ TEGL 39-11, "[Guidance on the Handling and Protection of Personally Identifiable Information \(PII\)](#)," dated June 28, 2012.

²⁷ DWDAL's Policy Issuance on privacy and data security can be found here: <http://www.labor.maryland.gov/employment/mpi/>.

REPORTING, MONITORING, AND RECORD RETENTION

REPORTING

Local Areas must submit timely fiscal reports to MD Labor. If reporting requirements are not met, MD Labor may not approve funding in the future.

Local Areas must submit a Quarterly Status Report (QSR) on administrative and program costs no later than the thirtieth date after the quarter ends (July 30th, October 30th, January 30th, and April 30th).

Local Areas must submit all signed fiscal reports by e-mail to dorothee.schlotterbeck@maryland.gov or by mail to the following:

Dorothee Schlotterbeck
Office of Fiscal Administration
MD Labor - DWDAL
100 S. Charles Street, Suite 2000, Tower 1
Baltimore, MD 21201

MD Labor's Office of Fiscal Administration must provide electronic copies of fiscal reports to MD Labor Office of Workforce Development's Disability and Youth Services Coordinator each quarter.

All data collection and reporting must adhere to TEGL 39-11²⁸ and MD Labor's policy on privacy and data security.²⁹

Youth Work Experience Report

MD Labor requires Local Areas to submit the Youth Work Experience (WEX) Report on a quarterly basis. This report tracks the fiscal and performance progress of Local Areas towards meeting the required 20 percent expenditure on work experience. Areas that fall below the 20 percent threshold will be required to submit the WEX report on a monthly basis.

Local Areas must submit the WEX report by e-mail to dorothee.schlotterbeck@maryland.gov or by mail to the following:

Dorothee Schlotterbeck
Office of Fiscal Administration
MD Labor-DWDAL
100 S. Charles Street, Suite 2000, Tower 1
Baltimore, MD 21201

MD Labor's Office of Fiscal Administration must provide electronic copies of the report to MD Labor Office of Workforce Development's Disability and Youth Services Coordinator each quarter.

²⁸ TEGL 39-11, "[Guidance on the Handling and Protection of Personally Identifiable Information \(PII\)](#)," dated June 28, 2012.

²⁹ DWDAL's Policy Issuance on privacy and data security can be found here: <http://www.labor.maryland.gov/employment/mpi/>.

MONITORING

The State acknowledges that USDOL may conduct fiscal and/or programmatic monitoring of WIOA Title I Youth Programs. Therefore, MD Labor may conduct annual fiscal and/or programmatic monitoring of projects to ensure that policies are being followed and expectations are being met, including nondiscrimination and equal opportunity provisions. Monitoring may include desk and/or on-site monitoring.³⁰ Failure of MD Labor to supervise, evaluate, or to provide guidance and direction shall not relieve the grantee of any liability to comply with any applicable laws, regulations, policies, or terms and conditions.

RECORD RETENTION

In accordance with the Code of Federal Regulations, Maryland requires participating programs to retain records for at least three years following the date on which the final cost report charged to a program year's allotment is submitted, or until all audit and litigation issues are resolved, whichever is later. If any litigation, claim, or audit is started before the expiration of the three-year period, the records then must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action has been taken. MD Labor encourages Local Areas to keep records electronically.

All records, both electronic and physical, must be maintained in accordance with TEGL 39-11,³¹ as well as DWDAL's policy concerning security,³² to maintain confidentiality and protect PII. PII is participant-level and employee data that either by itself or combined with other data can link to a specific individual or identity.

³⁰ DWDAL's Policy Issuance on monitoring can be found here: <http://www.labor.maryland.gov/employment/mpi/>.

³¹ TEGL 39-11, "[Guidance on the Handling and Protection of Personally Identifiable Information \(PII\)](#)," dated June 28, 2012.

³² DWDAL's Policy Issuance on privacy and data security can be found here: <http://www.labor.maryland.gov/employment/mpi/>.

FAIR PRACTICES AND ACCESSIBILITY

It is MD Labor's policy that all persons have equal opportunity and access to services and facilities without regard to race, religion, color, sex (including pregnancy, childbirth and related medical conditions, transgender status, gender identity, and sexual orientation), marital status, genetic information, age, national origin or ancestry (including Limited English Proficiency), disability, veteran status, political affiliation or belief, for the beneficiaries, applicants, and participants only, on the basis of citizenship status, or participation in a program or activity that receives financial assistance under Title I of WIOA. Interested parties may refer to MD Labor's Nondiscrimination Plan³³ and Language Access Plan³⁴ for more information on accommodations and services.

³³ The Nondiscrimination Plan can be found on MD Labor's website: <https://labor.maryland.gov/employment/wioa-nondis.pdf>.

³⁴ The Language Access Plan can be found on MD Labor's website: <https://labor.maryland.gov/employment/wioa-access.pdf>.

REFERENCES

LAW

- [Workforce Innovation and Opportunity Act](#) (WIOA), 29 U.S.C. § 3101 *et. seq* (2015);
- [John H. Chaffee Foster Care Program for Successful Transition to Adulthood](#), 42 U.S.C. § 677;
- [Violence Against Women Act](#), 34 U.S.C. § 12473;
- [McKinney-Vento Homeless Assistance Act](#), 42 U.S.C. § 11434a(2);
- [Richard B. Russell National School Lunch Act](#), 42 U.S.C. § 1751 *et seq.*;
- [Military Selective Service Act](#), 50 U.S.C. 3801 *et seq.*;
- [Elementary and Secondary Education Act of 1965](#), 20 U.S.C. § 6399 (3);
- [Food and Nutrition Act of 2008](#), 7 U.S.C. § 2011 *et seq.*;
- [Social Security Act, Title IV](#), 42 U.S.C. § 601 *et seq.*;
- [Social Security Act, Title XVI](#), 42 U.S.C. § 1381 *et seq.*;
- [Social Security Act. Title XLII](#). 42 U.S.C. § 677 *et seq.*;
- [Americans with Disabilities Act](#), 42 U.S.C. § 12102(3); and,
- Md. Code, Educ. § 7-301, "[Maryland's Compulsory Education Law](#)."

REGULATION

- 2 CFR Part [200](#) regulatory text– Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards;
- 2 CFR Part [683](#) – Administrative Provisions Under Title I of the Workforce Innovation and Opportunity Act;
- 2 CFR Part [2900](#) – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards;
- 20 CFR Part 681, "[Youth Activities under Title I of the Workforce Innovation and Opportunity Act](#);"
- 29 CFR § 97.42, "[Retention and Access Requirements for Records](#);"
- 29 CFR Part 38, "[Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act](#)."

FEDERAL GUIDANCE

- Training and Employment Guidance Letter (TEGL) 23-19, Change 3, "[Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor \(DOL\) Workforce Programs](#)," dated December 1, 2025;
- TEGL 10-16, Change 3, "[Performance Accountability Guidance for Workforce Innovation and Opportunity Act \(WIOA\) Title I, Title II, Title III, and Title IV Core Programs](#)," dated June 11, 2024;
- TEGL 07-20, "[Effective Implementation of Priority of Service Provisions for Most in Need Individuals in the Workforce Innovation and Opportunity Act \(WIOA\) Adult Program](#)," dated November 24, 2020;
- TEGL 21-16, "[Third Workforce Innovation and Opportunity Act \(WIOA\) Title I Youth Formula Program Guidance](#)," dated March 2, 2017;
- TEN 31-16, "[Framework on Registered Apprenticeship for High School Students](#)," dated January 17 2017;
- TEGL 08- 15, "[Second Title I WIOA Youth Program Transition Guidance](#)," dated November 17, 2015;
- TEGL 4-15, "[Vision for the One-Stop Delivery System under the Workforce Innovation and Opportunity Act \(WIOA\)](#)," dated August 13, 2015;

- TEN 32-14, "[Release and Availability of a Report, "Services for Youth with Disabilities Provided under Title I of the Workforce Investment Act: Results from a Survey of Local Workforce Investment Boards,"](#)" dated June 2, 2015;
- TEGL 23-14, "[Workforce Innovation and Opportunity Act \(WIOA\) Youth Program Transition,](#)" dated March 26, 2015;
- TEGL 02-14, "[Eligibility of Deferred Action for Childhood Arrivals Participants for Workforce Investment Act and Wagner-Peyser Act Programs,](#)" dated July 14, 2014
- TEN 32-13, "[Supporting Successful Transition to Adulthood for Current and Former Youth in Foster Care Through Coordination with the John H. Chafee Foster Care Independence Program,](#)" dated May 28, 2014;
- TEN 28-13, "[Release and Availability of a Report, "Mentoring Youth and Young Parents: A Guidebook for Programs Helping Youth and Young Parents Navigate a Pathway to Self-Sufficiency,"](#)" dated April 9, 2014;
- TEN 31-12, "[Release and Availability of Employment and Training Administration's \(ETA\) First Step: A Youth Practitioner's Resource Guide to Supportive Services,](#)" dated April 12, 2013;
- TEGL 39-11, "[Guidance on the Handling and Protection of Personally Identifiable Information \(PII\),](#)" dated June 28, 2012;
- TEGL-48-11, "[Announcement of Skills to Pay the Bills: Mastering Soft Skills for Workplace Success Curriculum,](#)" dated May 30, 2012;
- TEN 45-11, "[Partnering to Create or Expand Summer Youth Employment Opportunities on Public Lands,](#)" dated May 14, 2012;
- TEN 33-11, "[Partnering with Temporary Assistance for Needy Families \(TANF\) Jurisdictions, State Community Services Block Grant \(CSBG\) Offices, and local CSBG Entities to Create or Expand Summer Youth Employment Opportunities,](#)" dated March 26, 2012;
- TEN 23-11, "[New Research Reports on Summer and Post-Summer Youth Employment Initiatives under the American Recovery and Reinvestment Act of 2009 \(Recovery Act\),](#)" dated January 9, 2012;
- TEGL 05-08, "[Policy for Collection and Use of Workforce System Participants' Social Security Numbers,](#)" dated November 13, 2008.

OTHER RESOURCES

- [Case Management Toolkit: Preparing Youth for a Lifetime of Success](#)
- [DWDAL Policy Issuance Page;](#)
- [Maryland WIOA State Plan;](#)
- [Maryland Local Plans;](#)
- [MD Labor's Nondiscrimination Plan;](#)
- [DWDAL and Division of Unemployment Insurance Language Access Plan;](#)
- [USDOL Waivers;](#)
- Workforce GPS, [Youth Connections.](#)