TRAINING AND EMPLOYMENT NOTICE	NO. 13-11
	DATE October 25, 2011

TO: ALL U.S. DOL YOUTHBUILD PROGRAMS
           ALL U.S. DOL/ETA REGIONAL OFFICE YOUTHBUILD FPOs

FROM: JANE OATES
           Assistant Secretary

SUBJECT: YouthBuild Participant Documentation /s/

1. **Purpose.** To provide information to all U.S. Department of Labor (DOL) funded YouthBuild programs about required documentation for participant eligibility and for validating performance outcomes.

2. **References.**
   - Workforce Investment Act of 1998 (WIA) 20-C.F.R. 664.310
   - YouthBuild Transfer Act (PL 109-281 September 2006)
   - Training and Employment Guidance Letter (TEGL) 17-05
   - Training and Employment Guidance Letter 27-10, Attachment A

3. **Background.** As a result of the YouthBuild Transfer Act of 2006, the YouthBuild program is authorized under the Workforce Investment Act (WIA PL 105-220), which defines the requirements for participant eligibility and indicators of performance. A recent audit report by the Office of the Inspector General (OIG) noted that some YouthBuild grantees did not have sufficient documentation to verify that participants had met eligibility requirements or to validate participant performance outcomes. YouthBuild grantees must be thorough in determining whether a youth is eligible to enroll in the program, retaining sufficient documentation of eligibility and evidence of participant performance outcomes. This guidance is to further clarify the necessary eligibility documentation and participant performance outcome documentation that YouthBuild grantees are required to obtain and maintain on file for each participant.

4. **Information.**
   a. Participant Eligibility Documentation:
   DOL YouthBuild grants should review TEGL 27-10, http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3022, Attachment A "*YouthBuild Eligibility Guidelines and Source Documentation*" which specifically states acceptable documentation to ensure youth enrolled qualify to participate in a YouthBuild program. This documentation of eligibility must be obtained and verified before any DOL funds are expended on a young person. If DOL funds are utilized to pay for services before a young person has been deemed eligible to receive services, those expended funds can be deemed disallowed costs under the YouthBuild grant.

It is important that all staff responsible for recruiting and enrolling youth into a DOL-funded YouthBuild program know the exact participant eligibility requirements and required documentation. It is the program's responsibility to verify the information presented at the time of enrollment to ensure youth meet the eligibility guidelines required under the law; that is, the document must not only demonstrate eligibility but also must be valid.

To be eligible to participate in a YouthBuild program a youth must be:
1. Not less than age 16 and not more than age 24, on the date of enrollment **AND**
2. Be one or more of the following:
   - A member of a low-income family **OR**
   - A youth in foster care (including youth aging out of foster care) **OR**
   - A youth offender **OR**
   - A youth with a disability **OR**
   - The child of an incarcerated parent **OR**
   - A migrant youth
3. **AND** has dropped out of school.

Up to 25 percent of participants may be youth who do not meet parts two or three of the above requirements provided that they are:
   - Basic skills deficient, even if they have their high school diploma or GED **OR**
   - Have been referred by a local secondary school to a YouthBuild program that leads to the attainment of a secondary school diploma.

Appropriate documentation of a participant's eligibility must be kept in a participant file. For all eligibility criteria, other than drop-out status, documentation must be copies of official documents. For a complete list of source documentation requirements, please refer to TEGL 27-10, Attachment A, which is available at:
http://wdr.doleta.gov/directives/attach/TEGL/TEGL27-10ATT-A.pdf.

Most of the documentation required is readily available through interaction with the participant and family, as well as through partner agencies and organizations. Self-attestation is "self-certification," a means by which a young person will sign a document that attests or certifies to a particular circumstance and for the YouthBuild program, may only be used to confirm the drop-out status of the youth for purposes of eligibility. The drop-out self attestation form must provide a space for the youth to write an explanation regarding the specific criteria and include a place for the case manager/counselor to witness the explanation. This form can be easily designed with the following words embedded somewhere within: *"I certify that the following information is true."* Local WIA Youth Programs and One-Stop Career Centers generally have sample forms of the above available that may be adapted to serve the same purposes under the YouthBuild program.

b. Participant Performance Outcome Documentation:
   Each of the five performance outcomes require documentation that supports the data that is in the YouthBuild Case Management and Performance Management Information System. Allowable documentation of the three common performance outcomes is described in TEGL 17-05 "Common Measures Policy for the Employment and Training

Administration's (ETA) Performance Accountability System and Related Performance Issues." TEGL 17-05, available at http://wdr.doleta.gov/directives/attach/TEGL17-05.pdf, provides additional detail on the types of records and sources allowable for data verification. Generally, performance outcomes can be verified using the following:

1. Placement in Education or Employment: Wage records and supplemental data sources can be used as documentation for placement into employment or the military, and administrative records can be used as documentation for placement into education or training.

2. Credential Attainment: A photocopy of the credential attained must be on file for each credential attained by the youth.

3. Literacy/Numeracy Gains: Assessment instruments that are approved by the U.S. Department of Labor can be used to demonstrate gains in literacy or numeracy. These instruments include assessments such as the Test of Adult Basic Education (TABE) or the Comprehensive Adult Student Assessment Systems (CASAS), among others. A complete list of currently acceptable tests can be found at http://www.nrsweb.org/docs/pubs/NRSTestBenchmarks.doc. Grantees should record both the pre-and post-assessments and keep those assessments on file.

4. Retention in Employment or Education: Because retention is just a longer term measure of placement in employment or education, grantees should use the allowable forms of documentation as listed for the placement in employment or education. As a reminder, placements in the second and third quarters after exit do not necessarily need to be the same as those in the first quarter after exit. That is, if a person is employed in three different jobs in each of the three quarters following exit, the person will still meet this measure; however, the grantee must have the allowable forms of documentation for each job or educational placement.

5. Recidivism: The recidivism measure tracks whether youth participants that are juvenile or adult offenders at time of enrollment in YouthBuild re-offend within one year of enrollment in the program. Administrative records must be used for youth who have re-offended and may include contact with probation/parole officers or record sharing or matching from court records or from juvenile justice or state or federal prison sources. The files should also contain documentation that indicates that the case manager has checked with local probation/parole officers that the individual has no new offenses.

5. **Inquiries.** Questions concerning this Training and Employment Notice should be directed to the appropriate Regional Office.