



Oklahoma Office of Workforce Development
900 N. Portland Ave.
Oklahoma City, OK 73107

TECHNICAL ASSISTANCE - #TA-05-2016

DATE: November 9, 2016

RE: Youth Eligibility Technical Assistance (TA) & Additional Questions and Responses

Local Area Questions:

- With a parent or legal guardian that is currently or previously incarcerated for a felony conviction;
- With a parent or legal guardian who lacks a high school diploma or GED; or
 1. Is this criteria only for a minor under the age of 18?

OOWD Response: No. The OSY Additional Assistance Criteria applies to OSY 16-24. The ISY Additional Assistance Criteria applies to ISY 14-21.

Local Area Question:

2. If not, at what age are you considered an adult and no longer have an appointed legal guardian?

OOWD Response: Oklahoma State Statute says. "Adult" means an individual eighteen (18) years of age or older.

Local Area Question:

3. Is there a clarification for: "live with" a currently incarcerated parent or legal guardian? If they are currently incarcerated, they would not be in the home.

OOWD Response: "With a parent or legal guardian," was set as the criteria by the state and it means, "a youth with a parent or legal guardian. The original intent of the "with" was as stated. However, we received questions prior to and after the formal appeal of the youth policy for clarification of "with" and a suggestions that it be clarified to state "living with a parent or legal guardian, and as a result the state issued guidance to the local areas as follows:

Local Question in policy Appeal: How do you define "with" on In School Youth Eligibility?

OOWD Response: The term "with" is in reference to an eligible youth *living* with a parent or a legal guardian who meets one of the listed criteria. That is, the low income youth lives with a parent or legal guardian who is currently or previously incarcerated or, a low income youth who lives with a legal guardian who lacks a high school diploma or GED.



OOWD Update: However this was not the goal in developing this criteria. It was to help youth overcome barriers, not to create more. Please determine the ISY or OSY status of your local youth under the additional assistance criteria as intended in the original development of the barrier.

It means the youth has a parent or legal guardian that is currently or previously incarcerated for a felony conviction, or who lacks a high school diploma or GED. It was never the intention of the state for the youth to have to be living with the parent. However, if the youth is living with a parent or legal guardian, they also meet this criteria as well.

Local Area Question:

4. Who would you call to get a telephone verification on the parent or guardian status for these parental criteria?

OOWD Response: The local area needs to develop a local process and policy. Use the current eligibility documentation and uploader requirements as a reference.

OOWD #01-2016 Appeal Question: Is telephone verification an efficient form of validation?

What about self-attestation?

OOWD Response in June 10, 2016 Technical Assistance Memorandum to Local Areas: To document parent or legal guardian status, you may use the Telephone Verification Form, Attachment D. To determine whether the youth attends a chronically underperforming or Focused Designation School, please refer to the State Department of Education website <http://www.ok.gov/sde/priority-schools> or obtain school records verifying previous attendance at a chronically underperforming or Focused Designation School.

Documentation sources for offender status include:

- Court Documents
- Letter of Parole
- Letter from Probation Officer
- Police Records
- Telephone Verification documenting offender status (Attachment D) by a parent or legal guardian, or Criminal Justice System Official

The validation instructions located in Appendix A offer multiple forms of acceptable source documentation. OOWD requires the most reliable form of documentation available to be used. For example, records from an educational institution are a more reliable source than participant self-attestation. As such, self-attestation can only be used after all reasonable attempts to secure other documentation have failed.

Local Area Question:

5. Priority School Scenario: If Stilwell Public Schools is on the Dept of Ed website as a Priority School, does everyone that attended Stilwell Public Schools meet this criteria?

OOWD Response: A low income Youth who attends or has attended chronically under performing schools listed as a priority or targeted intervention school on the State Department of Education website meets the criteria.

Local Area Questions:

With poor work history including non-reoccurring employment income or sporadic employment.

6. What is the definition of “non-reoccurring employment income”?
7. What is the current definition of “poor work history”?
8. What support/backup is required for this criteria, simply documented work history in OSL?

OOWD Response to Questions 6-8: Low Income Youth between 18-24 years of age with a pattern of Poor Work History. Poor Work History includes non-reoccurring employment income and sporadic employment.

Poor Work history is the criteria: It was specifically included in the policy at the request of the local boards in their policy appeal. The definition of poor work history is non-reoccurring employment income or sporadic employment.

OOWD Response: The local area needs to develop a local process and policy.