TANF Youth Development Program Policy

I. PURPOSE:

To provide policy and guidance to the TANF Youth Development contractor in the North Central Workforce Development Area. This policy ensures that every participant who receives Temporary Assistance for Needy Families (TANF) Youth program services is properly determined eligible and registered.

Workforce Solutions for North Central PA has incorporated, in this policy, the Pennsylvania Department of Labor and Industry Temporary Assistance for Needy Families (TANF) Youth Development Program (YDP) Desk Guide for TANF YDP Providers, PY 2025. This Guide along with the North Central WDA specific program information provided in this document, will serve as background information, reference, guidelines and policy for the TANF YDP.

II. REFERENCES:

- Workforce Innovation and Opportunity Act (WIOA or Opportunity Act), Public Law 113-128, enacted July 22, 2014
- Temporary Assistance for Needy Families (TANF) Statute, Title IV, Part A of the Social Security Act (42 U.S.C. §§ 601–619)
- PA TANF State Plan
- Federal poverty guidelines
- TEGL No. 21-16: WIOA Youth Program Guidance
- Desk Guide for TANF YDP Providers, PY 2025

III. BACKGROUND:

The Temporary Assistance for Needy Families (TANF) program is a federal program that helps low-income families with children. In Pennsylvania, TANF funds support programs that help families meet basic needs and work toward independence.

Workforce Solutions for North Central PA works with the Pennsylvania Department of Human Services, the Department of Labor & Industry, and the Board's Youth Committee to provide services for needy and at-risk youth. These services support TANF goals, such as helping families care for their children, preparing youth for work, reducing teen pregnancies, and encouraging strong family relationships.

The TANF Youth Development Program (YDP) gives youth career counseling, skill-building activities, and work experiences to help them move from public assistance toward self-sufficiency and long-term success.

Within the North Central Workforce Development Area, this program is locally designed to align youth activities with employer needs, educational systems, and community partnerships.

IV. DEFINITIONS:

Basic Skills Deficient means –

1. A youth with English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
2. A youth or adult who 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; or
3. A qualified youth in the 6^{th}, 7^{th} or 8^{th} grades performing below their grade level.

Career Pathway – means a combination of rigorous and high-quality education, training, and other services that—

1. aligns with the skill needs of industries in the economy of the State or regional economy involved;
2. prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including registered apprenticeships
3. includes counseling to support an individual in achieving the individual's education and career goals;
4. includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
5. organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable; enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and
6. helps an individual enter or advance within a specific occupation or occupational cluster.

Career Counseling – providing participant-centered services to help individuals explore career options, develop employment plans, and access necessary workforce development activities and supportive services. It includes both job and career counseling, and aims to foster motivation, informed decision-making, and career exploration.

Career Exploration – involves activities like discussing vocational interest inventory results, the local labor market, and in-demand occupations, as well as identifying potential career pathways.

Compulsory School Age – the time a child enters school until they graduate or turn age 18. Pennsylvania law requires students to attend school from age 6 to age 18, or until they graduate from a high school, whichever occurs first (except as otherwise provided by law). A student less than

18 years of age must comply with compulsory school age requirements unless they:

1. Have graduated from high school;
2. Have permission from their resident school district to attend a private trade school or private business school continuously during the school year;
3. Are enrolled in a day or boarding school that is accredited by an accrediting association approved by the Pennsylvania State Board of Education;
4. Are enrolled in a private tutoring program, a home education program or a school operated by a church or religious body that meets the state's minimum required days and hours of instruction; or
5. Are employed consistent with the applicable provisions of section 1330 of the Pennsylvania School Code.

Electronic/Digital Signature – a participant-generated signature completed by electronic means (Adobe, Panda doc, DocuSign, etc.), or through a submission such as an email, text, or unique online survey response which is traceable to the participant.

English Language Learner – an individual who has limited ability in reading, writing, speaking, or comprehending the English language, and:

1. Whose native language is a language other than English; or
2. Who lives in a family or community environment where a language other than English is the dominant language. (WIOA sec 203(7)).

Federal Poverty Income Guidelines (FPIG) – are figures issued by the U.S. Department of Health and Human Services (HHS) and are used to establish eligibility for a variety, but not all, public assistance programs. These figures are revised annually based on changes in the Consumer Price Index.

Homeless – an individual who meets any of the following criteria:

1. Lacks a fixed regular, and adequate nighttime residence; this includes a participant who:
    - Is sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason
    - Is living in a motel, hotel, trailer park, or campground due to a lack of alternative adequate accommodations
    - Is living in an emergency or transitional shelter
    - Is abandoned in a hospital
    - Is awaiting foster care placement
2. Has 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, such as a car, park, abandoned building, bus or train station, airport, or camping ground;
3. Is a migratory child who in the preceding 36 months was required to move from one school district to another due to changes in the parent's or parent's spouse's seasonal employment in agriculture, dairy, or fishing work; or
4. Is under 18 years of age and absents himself or herself from home or place of legal residence without the permission of his or her family (i.e. runaway youth).

Individual Service Strategy – a dynamically developed and collaboratively built plan that outlines a youth's objectives, and strategies for achieving education and employment goals. This plan jointly developed by a participant and career planner is based on the needs of each youth.

Individual with a Disability – meets the requirement of "being regarded as having such an impairment" if the individual establishes that he or she has been subjected to a prohibited action because of an actual or perceived physical or mental impairment whether or not the impairment limits or is perceived to limit a major life activity.

Note: *This does not apply to impairments that are transitory and minor. A transitory impairment is an impairment with an actual or expected duration of 6 months or less. (WIOA sec 3(25) and 42 U.S.C. 12102(3)).*

Pregnant or Parenting – an individual who is parenting can be a mother or father, custodial or non-custodial. As long as the youth is within the WIOA youth age eligibility, the age when the youth became a parent does not factor into the definition of parenting. A pregnant individual can only be the expectant mother. (TEGL No. 21-16).

Public Service Employment – work within government or for organizations that serve the public good, often involving roles that benefit the community. This can include jobs in government, non-profits, and other organizations focused on public welfare. It's characterized by a focus on serving the needs of the public, rather than generating profit.

School Dropout – an individual who is no longer "attending any school" and who has not received a secondary school diploma or its recognized equivalent. (WIOA Sec. 3(54)).

Self-Attestation – a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant.

Work Experience – a planned, structured learning experience that takes place in a workplace for a limited period of time. Internships and other work experiences may be paid or unpaid, as appropriate and consistent with other laws, such as the Fair Labor Standards Act. An internship or other work experience may be arranged within the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience setting where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists.

V. POLICY AND PROCEDURES:

A. Compliance Requirements

1. TANF Youth Providers will follow the yearly issued, *TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF) YOUTH DEVELOPMENT PROGRAM (YDP) Desk Guide for TANF YDP Providers.*

2. All Workforce Solutions policies relevant to confidentiality, personally identifiable information, grievance and complaint procedures, limited language proficiency, and the Americans with Disabilities Act must be followed at all times.

3. The expected participant enrollment documents are provided on Workforce Solutions website and available under Commonwealth of PA Department of Labor & Industry Resources, Workforce Policies & Forms.

B. Eligibility Requirements

1. Youth will engage in an Eligibility, Qualification, or Re-certification Process in CWDS before receiving services. Refer to **Appendix E: Preliminary Screening Tool Instructions** regarding the use and application of the Preliminary Screening Tool for TANF YDP eligibility determination. To be verified as a qualified participant for the TANF YDP an individual must:
    a. Be between the ages of 12 (or have completed the 5th grade) and 24 years at the time of enrollment
    b. Have proof of Social Security Number (SSN)
    c. Have proof of identity
    d. Be a U.S. citizen or a TANF-eligible non-citizen
    e. Be a PA resident
    f. Have a personal monthly gross earned income that does not exceed 235% of the FPIG
        - Youth income is determined by their sole monthly gross income unless youth is married or residing in the same household as the other parent of their dependent children
        - Household size and income will include dependent children, other parent, or spouse in these situations
        - Proof of income must be dated in the last 30 days
        - Personal monthly gross income verification is required only at the time of enrollment (See **Appendix D: Excluded Earned Income of a Child**)
    g. Youth may complete the WIOA Statement of Family Size/Family Income Form for verification of income which is available in the CWDS Help Center
2. In order to support youth who are in the most need, Workforce Solutions has elected to require youth to have a barrier beyond income in order to be served under the TANF Youth Program. These barriers are part of the Commonwealth expected prioritization and include:
    a. School dropout or at risk to dropout
    b. Within the age of compulsory attendance, but has not attended for at least the most recent complete school year calendar quarter
    c. Basic skills deficient
    d. English language learner
    e. Has a disability
    f. Court-involved or at risk of involvement
    g. Child of an incarcerated parent(s)
    h. In foster care or aging out of foster care
    i. Homeless or runaway
    j. Pregnant or parenting

k. Migrant
l. In need of additional assistance to enter or complete an educational program or to secure and hold employment
m. Family receiving any benefit(s) from the local County Assistance Office (including medical card) may be used as a barrier to qualify a participant for the TANF YDP under "In need of additional assistance to enter or complete an educational program or to secure and hold employment."

Refer to **Appendix B: Verifications for Participation** for additional guidance.

C. Eligibility Verification and Documentation Standards

1. Applicable documentation to support eligibility is to be uploaded in CWDS.
2. Electronically signed documents are permissible only with the authentication history included or by a method traceable back to the participant.
3. The standards for WIOA Title I should be followed for verification documents
4. A youth's 12-month qualification period begins on the date the initial TANF YDP application was completed.
5. No TANF funds may be used for group activities where non-verified eligible youth are present. NOTE: If a TANF YDP provider chooses to serve individuals before establishing them as qualified participants, the provider accepts the responsibility for funding services to those non-TANF individuals with an alternative funding source.
6. All guidance relevant to institutional eligibility are to be followed. Those in local area placement facilities are not to be enrolled unless they meet the guidance within Appendix C: TANF and Institutional Eligibility.
7. Youth who wish to continue participation after 12 months must complete the recertification process by completing a new application.
    a. All verifications previously collected must be maintained in the case file and be clearly identifiable for the case file review process.
8. Whenever possible, Workforce Solutions encourages the TANF Youth Provider to co-enroll youth in WIOA or other appropriate programs.
9. The TANF Youth Provider must ensure that a secondary review of the eligibility documentation is conducted by a designated staff member other than the individual who initially determined eligibility to ensure program integrity and minimize the risk of serving ineligible participants with TANF funds.
    a. The reviews must verify that all required documentation has been collected, is valid, and meets TANF YDP eligibility criteria
    b. The secondary reviewer must sign and date a review checklist or eligibility determination summary, which must be included in the participant's case file
    c. The secondary review must occur before services are initiated

D. 14 WIOA Youth Program Elements

1. Activities provided to TANF Youth must be direct services and are to incorporate the following 14 WIOA Youth Program Elements to align with the TANF Statewide Plan (See TEGL 21-16 for more information).
    a. Tutoring, study skills training, and instruction leading to secondary school completion, including dropout prevention strategies
    b. Alternative secondary school offerings or dropout recovery services
    c. Paid and unpaid work experiences with an academic and occupational education component
    d. Occupational skills training, with a focus on recognized postsecondary credentials and in-demand occupations. (Per the Bureau of Policy at DHS, Pennsylvania opted out of the use of funds for Individual Training Accounts (ITAs), therefore, ITAs are not allowable)
    e. Leadership development activities, e.g., community service, peer-centered activities
    f. Supportive services
    g. Adult mentoring
    h. Follow-up services for at least 12 months after program completion. NOTE: TANF YDP services end upon the completion of the 12-month cycle unless the participant re-certifies or follow up services can be provided if co-enrolled in WIOA
    i. Comprehensive guidance and counseling, including drug and alcohol abuse counseling
    j. Integrated education and training for a specific occupation or cluster
    k. Financial literacy education
    l. Entrepreneurial skills training
    m. Services that provide labor market information about in-demand industry sectors and occupations
    n. Postsecondary preparation and transition activities

All 14 elements must be available, but are provided based on individual need determined by the case manager and youth.

E. Documentation and Case Management Procedures

1. Activities must be documented in the participant case notes in CWDS. The Youth Element provided should be the title of the applicable case note.
2. As recommended by the Youth Committee, Workforce Solutions has elected to focus on providing quality work experience opportunities to eligible TANF Youth.
    a. Work Experiences for TANF Youth should not go beyond 6 months at one work site
    b. Youth may engage in multiple work experiences to engage in career exploration. These may be in shorter duration
    c. Work Experience is to be related to the youth's chosen career focus or as exploration of a career of interest
        i. Though public service employment has its merits, youth must be receiving a valuable learning experience which is of more benefit to them than the employer
        ii. Public service employment should be limited to building soft skills, unless a clear career path to the youth's career of interest can be established for the work experience.
        iii. Youth should not be placed in work experience for the purpose of an income only

d. Work Experience is not to be a stand-alone service. Youth are to be given the opportunity to have career counseling related to their chosen career of interest prior to, during, and following a Work Experience

3. Workforce Solutions recognizes youth too young, or otherwise unable to obtain working papers, may benefit from TANF YDP under the Youth 14 program elements. These youth may also be served through the Business and Education Connect programs.
4. All youth in work experience or receiving supportive services must receive financial literacy services.
5. Supportive services are available to TANF youth as needed when necessary to enable an individual to participate in authorized TANF YDP activities. Please see the Workforce Solutions Supportive Service Policy for more information.
    a. Partnerships must be cultivated with private and public-sector agencies to leverage and increase the resources available to meet the needs of youth. TANF participant referrals should be made to partners who can provide other needed services for the overall support and success of a youth or young adult
    b. Youth may not receive a special allowance (SPAL) from the CAO for the same supportive service received from the TANF YDP provider

    NOTE: All 14 WIOA Youth Program Elements must be made available. However, not all participants are required to receive all 14 WIOA Youth Program Elements. Program elements that a participant will receive will be based on individual needs as determined by the participant and the TANF YDP case manager
6. CWDS is Pennsylvania's Workforce System of Record and will be used for reporting purposes including TANF YDP enrollment numbers. For more information on CWDS, staff should review Workforce System Policy (WSP) 01-2015, Change 1.

F. Participant File and Record Management

1. The TANF YDP provider will create a confidential TANF YDP File for each participant. The internal controls associated with the storage and access of the overall TANF youth participants must be established in writing by the provider. The TANF YDP File must be kept in a secure designated location locally, with limited accessibility. Staff not associated with the TANF YDP case may not have access to the TANF YDP File. Files should include:
2. TANF YDP Application (may be the printed one from CWDS)
3. Required Document Checklist
    a. Social security number verification
    b. Verification of identity
    c. Proof of citizenship / Alien status
    d. Proof of PA residency (dated in last 6 months)
    e. Proof of household income (dated within last 30 days)
    f. Proof of additional barrier
4. Signed Authorization for the Release of Information
5. Participant Authorization/Orientation Documentation Form for the North Central Workforce Development Area NC-125
6. Individual Service Strategy

a. including both education and career goals with a career pathway evident
b. signed by participant and parent for those under 18
c. includes regular progress and plan updates

7. Verification of activity under youth 14 program elements (examples of verification resources, see page 16, *Desk Guide for Providers to the TANF YDP*)
   a. Work Experience
      i. Job description
      ii. Work experience agreement
      iii. Orientation documents (both participant and employer)
      iv. Work Permit
      v. Parental notification form
      vi. Written documental of issuing authority notification
      vii. Payroll documents
      viii. Progress reports
   b. Supportive Services
      i. Supportive Service request with applicable back-up documentation
      ii. Documentation of services received from agencies referred
      iii. Case notes indicating other resources attempted

G. Compliance, Verification and Reporting

1. The results of the Preliminary Screening Tool in CWDS will determine what other verifications are needed. Note: Value-added Labor Exchange services provided will result in additional verification requirements within EE01 & resultant documentation needed.
   For more information, see **Appendix B: Verifications for Participation and Document Checklist.**
2. All documents related to TANF YDP shall be maintained for six (6) years or three (3) years past the period of performance end date. All documentation related to TANF YDP participation must be kept and made available for monitoring purposes.
3. The TANF YDP Provider will be responsive to all documentation requests for the purpose of state, federal, and local monitoring and oversight. Provider is to follow all guidelines, state, federal, local policies procedures and laws. Provider should notify Workforce Solutions of any fiscal or programmatic issues within 48 hours of recognition of error or infraction.
4. Workforce Solutions monitoring and technical assistance visits will be conducted at least annually.
5. The TANF YDP provider will submit all reports as required and requested:
   a. TANF Final Reports will focus on the actual youth workforce activities and services provided (14 program elements), as well as the actual number of participants served (including age-ranges and targeted barrier populations and outcomes)
   b. TANF YDP Providers will submit quarterly reports to Workforce Solutions prior to each Workforce Development Board meeting and as requested by Workforce Solutions.
   c. TANF Youth Quarterly Report shall include**:**
      - Total # TANF Youth WEX by county
      - TANF (Participant) Barriers
      - TANF Youth Financial Report

- Co-Enrollments
- Memorandum of Agreements
- Narrative on 14 elements being provided
- Success stories

d. Additionally, the Participant Eligibility and Tracking Form (Attachment 6) will be submitted along with the TANF Youth Quarterly Report to encompass all TANF Youth participants included on the above Quarterly Report

e. A final year end will be required (Attachment 7) which should also include a final matching Eligibility and Tracking Form (Attachment 6)

APPENDICES and ATTACHMENTS:

Appendices are part of the Desk Guide:
Appendix A: 235% of 2025 Federal Poverty Income Guidelines – see page 21 of the Desk Guide
Appendix B: Verifications for Participation – see page 22 of the Desk Guide
Appendix C: TANF and Institutional Eligibility – see page 25 of the Desk Guide
Appendix D: Excluded Earned Income of a Child – see page 27 of the Desk Guide
Appendix E: Preliminary Screening Inquiry Tool Instructions – see page 28 of the Desk Guide
Creating a CWDS Base Record – see page 35 of the Desk Guide
Participant Clearance – see page 39 of the Desk Guide

Attachment 1: Required Document Checklist
Attachment 2: Conflict Resolution Request Form
Attachment 3: Multiple Conflict Resolution Request Form
Attachment 4: Authorization for Release of Information Form
Attachment 5: 235% FPIG Calculator
Attachment 6: Participant Eligibility/Tracking Form
Attachment 7: Year End Report

VI. POLICY EXCEPTIONS:

Any discrepancies arising between Workforce Solutions policy and or procedures with federal and state provisions due to current or future revisions will default to the current minimum federal and state regulations and guidance available. Workforce Solutions policy and or procedures may set forth stricter requirements than provided by federal and state guidance, but in no case will local policy and or procedures not meet minimum federal and state policy.

VII. RESCISSIONS:

None

VIII. EXPIRATION:

Ongoing

IX. INQUIRIES:

Questions shall be directed to:

Pamela Streich, Executive Director at pstreich@ncwdb.org; or
Tonya Mauk, Oversight and Project Manager at tmauk@ncwdb.org; or
Donna Hottel, Strategic Planning and Project Manager at dhottel@ncwdb.org

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X. EXPIRATION DATE:

Ongoing.

XI. POLICY HISTORY:

This policy is reviewed annually (at a minimum), typically during the first week of July, by Workforce Solutions' staff to assess and implement any necessary changes, edits, updates and revisions.

Name of Staff Reviewer	Date of Review	Description of Change(s)	Effective Date
Donna Hottel, Pam Streich, Tonya Mauk	October 6, 2025	Reviewed and formatted. New desk guide and form updates	July 1, 2025
Pam Streich & Donna Hottel	June 16, 2022	New Manual / Form Updates	July 1, 2022
Pam Streich	July 1, 2019	New Manual/Forms	July 1, 2019
Pam Streich	January 2019	Guidance	January 1, 2019