

TEGL 23-19 Change 3 – Clarifications for WIOA Youth Programs

Q: Is self-attestation for low-income status (PIRL element 802) allowed if the participant states they have zero income? What is recommended as best practice for documenting or verifying zero income?

A: Self-attestation is not allowed for low-income status. If a participant has no income, the response to PIRL element 400 “Employment Status at Program Entry” can be used to document low-income status by entering Not in the Labor Force. PIRL element 400 allows self-attestation. Recommend adding a case note to indicate that response to Employment Status at Program Entry documents zero income. This only applies if the individual is a family of one (not living with family or an individual with a disability). If the applicant is not in a family of one, then the family needs to meet low-income definition and this does not work.

Q: Regarding documenting low-income status through eligibility for free/reduced lunch, is a statement from the school acceptable documentation? [TEGL 23-19 Change 3](#) does not list this in the acceptable documentation sources.

A: Yes, this allowable and DOL recognizes this is missing from the TEG. It may be updated in a future issuance. (Note in Minnesota the documentation must state that the individual is eligible for the Federal school lunch program because most Minnesota students receive state-funded free lunch even if they do not qualify for the federal program.)

Q: How is “youth living in a high poverty area” documented for the low-income status at program entry field (PIRL data element 802)?

A: Workforce One is programmed to determine if a participant’s address is in a high poverty area as defined in [20 CFR 681.260](#) and directed in [TEGL 21-16, Change 1](#). If WF1 validates that the address is in a high poverty area, TEG 23-19, Change 3 guidance is to document through case notes. Currently the counselor must add a manual case note but WF1 is being changed in an upcoming release to add an automatic case note stating: “The address entered on Enrollment was validated against census tract data from the American Community Survey (ACS). The address is on a high poverty census tract.”

Q: Is there a specific self-attestation form needed for PIRL element 400 (Employment Status at Program Entry)?

A: A specific form is not required by DOL but follow state policy (most often includes statement signed by the individual and dated). (Note from TEG 23-19 Change 3: Self-attestation means a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. The Department broadly interprets what

is considered an electronic/digital signature. Electronic signatures or a submission from the participant such as an email, text, or unique online survey response, are considered an electronic signature or verification; it must be participant-generated and traceable to the participant. Grantees must retain documentation of self-attestations provided by participants. Grantees should use other forms of source documentation when possible.)

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