

MN Notes from NYEC-DOL Ask Away Session, 4/14/2026

DOL presenters: Lillian Fix and Evan Rosenberg

Questions Submitted by Minnesota

Q. Can you please clarify what the current guidance is regarding the required work authorization status for an individual to participate in WIOA Youth, with the issuance of TEGL 10-23 Change 3?

A. DOL will be going through a proposed rulemaking process in the Federal Register to implement further guidance on the work authorization issue. In the meantime we should refer to the following guidance:

[WorkforceGPS - Training and Employment Guidance Letters and Notices for the WIOA Youth Program](#)

[TEGL 23-19 Change 3 | U.S. Department of Labor](#)

Q. Does WIOA require that a youth participant be enrolled in training to qualify for needs-related payments as a supportive service? The regulations specify this as a requirement for Adults and Dislocated Workers but we don't see similar language in the regulations related to youth so just want to confirm if this is a requirement.

A. No, this is not a federal requirement for WIOA Youth. Any WIOA Youth is eligible to receive supportive services, including needs-related payments, although state or local policy may add requirements or stipulations to the provision of supportive services.

Other Questions of Interest Addressed During the Call

Q. Are fringe benefits an allowable cost for a youth's participation in a work experience?

A. This is allowable if the benefit is required based on the rules of employment and if the person is considered an employee. See [WorkforceGPS - Forms of Payments for WIOA Youth Program Participants](#) for further guidance regarding wage vs. stipend, identifying employer-employee relationship, etc.

Q. Can you provide guidance on WIOA requirements for youth clients who utilize a first name and gender different from what is on his/her birth certificate when completing & signing WIOA paperwork for program eligibility and enrollment?

A. Data validation requires that the source documentation match the information in the enrollment record. See [TEGL 23-19 Change 3 | U.S. Department of Labor](#) for data validation requirements.

Q. If a participant is not employed as of the youth eligibility date, are they automatically considered low income if they are a household size of one? Scenario: a participant had income in the past 6 months through a temp job and they earned over the income limit for a family of one, but they have not worked in over a month and are now enrolling in WIOA. Are they considered low income since they no longer have any income, or since they earned over the limit for a family of 1 in the past 6 months are they NOT low income?

A. An individual is not considered low income automatically if they are a family of one. Provider should follow process of state or local area for determining low-income status based on income received.

Q. If we have a WIOA youth who is interested in a career in healthcare or another in-demand industry in our area, but she has a part time job at a local fast food restaurant, are we allowed as WIOA providers to place her in a WIOA short term work experience? This would give her an opportunity to experience a career aligned with her interests and still keep her part-time job with the fast food company.

A. There is no federal rule prohibiting a participant from being in a work experience while also holding a part time job. From a program perspective, work experience in a participant's desired field is encouraged.

Q. What do we do if we enroll a youth that is 16 or 17 years old who is not registered for selective service yet due to his age, but turns 18 during the program and refuses to register for selective service at that time? Are they still eligible to participate in the program and receive services? We are starting to see this issue with youth and parents refusing to register for selective service after enrollment, even though it was discussed prior to enrollment.

A. It is a federal requirement for males ages 18-25 to register for Selective Service to participate in federal programs. It is the program's responsibility to encourage and assist the participant to register. Note that in the event of a draft, men who are called for induction would be able to submit a claim for conscientious objector classification if they choose. If the participant still refuses to register, he would need to be exited from the program.

Q. Under WIOA Title I Youth (Sec. 129(c)(2)(C)), can a hands-on training component within a pre-apprenticeship program conducted in a simulated worksite environment (e.g., a pole yard training facility replicating line worker field conditions) be classified as a Youth Work Experience activity, when it includes structured supervision,

employer-informed tasks, and preparation for entry into Registered Apprenticeship or employment?

A. Pre-apprenticeship activities are considered work experience activities. If the pre-apprenticeship program also includes an occupational skills training component separate from the work experience, you may report the pre-apprenticeship under both the work experience and occupational skills training program elements.

Q. How can youth earn a credential, aside from their GED/Work combination, to meet the performance metric?

A. DOL referred to the following guidance for information on determining if a credential will meet the requirements to count in the Credential Attainment Rate:

[TEGL 10-16, Change 3 | U.S. Department of Labor](#)

[TRAINING AND EMPLOYMENT NOTICE No. 25-19 | U.S. Department of Labor](#)

Q. If person meets automatic low-income status (homeless, foster youth, etc.) can the provider use that documentation to also document low-income status?

A. Yes, the documentation for homeless, foster youth status, etc. can also be used as documentation of low-income status for data validation.

Q. If a WIOA youth attends Commercial Drivers License (CDL) training does the drivers permit count as a skills progression for Measurable Skill Gains (MSG) performance?

A. Yes, the permit can be used to document skill attainment for the MSG on the way to earning the CDL, which can count as a credential.

Q. If youth are co-enrolled as an Adult, can a local area allow them to exit the youth program while continuing to provide adult services if they no longer need program elements?

A. This will depend on whether the state has a common exit policy and uses a common exit date.

Q. Is the use of 'Not in the Labor Force' for no income acceptable for those who have not had any income within the past 6 months prior to the application date, but had work experience longer than 6 months prior, or is it only acceptable for those with no previous work history?

A. If there is no other documentation of the earnings longer than 6 months ago and there is no other option to document low-income status then the “Not in the Labor Force” classification can be used.

Q. During intake and eligibility for WIOA Youth, should youth sign their legal or preferred name?

A. On documents related to eligibility the name would need to match source documentation. On other documents such as an Individual Service Strategy, the State or local area can decide to accept the participant's preferred name. DOL suggests noting in the file the reason for different names (i.e. legal name vs. preferred name).

Q. If service providers were to use the "Not in the Labor Force" classification to verify no income for a youth, what document would we keep on file? Would the participant complete a WIOA Self-Attestation stating that they have never held employment?

A. Yes, this is reasonable approach, although DOD does not have any specific guidance on specific self-attestation forms required.