

**Department of Economic Opportunity
Workforce Innovation and Opportunity Act Youth Program Eligibility - Consultation Matrix**

<u>Policy Section</u>	<u>Stakeholder Comment</u>	<u>Submitted by</u>	<u>Policy Language Change</u>	<u>DEO Comments</u>	<u>Authority</u>
IV. A.2. In-School Youth Eligibility Criteria	As this policy provides guidance for Florida, is DEO able to obtain clarification from FLDOE if the state’s K-12 system law allows us to serve youth with disabilities by the system beyond the age of 21, instead of leaving it up to individual regions to try to decipher?	LWDB 13	Yes	The policy language (in footnote 3) has been updated.	Sec. 300.101 Free appropriate public education (FAPE) - Individuals with Disabilities Education Act Section 1003.571, Florida Statutes Chapter 6A-6.03028, Florida Administrative Code
IV. A.3. Determining School Status	We would like to request clarity on how to treat school status for a HS grad enrolled in a training program outside of our state college system, such as trade school, private technical school, etc. Guidance says someone is out of school if enrolled in “non-credit-bearing postsecondary classes.” Is someone attending a local nursing school considered to be in a non-credit bearing postsecondary class and therefore out of school? Or, are they in-school because they are “attending any school?”	LWDB 13	No	If the youth participant is enrolled in any credit-bearing postsecondary education classes, including credit-bearing community college classes and credit-bearing continuing education classes, they are considered attending postsecondary education and, therefore, an in-school youth. If the youth is only enrolled in non-credit bearing postsecondary classes, they would not be considered attending postsecondary school and, therefore, an out-of-school youth.	Training and Employment Guidance Letter (TEGL) 21-16
IV. A.4. Determining Low Income Status	Does DEO have examples of state income-based public assistance in Florida that isn’t mentioned elsewhere in the guidance?	LWDB 13	No	No. DEO does not have additional examples.	TEGL 21-16
IV. B.2. Objective Assessment	Our interpretation is that the region can decide how to assess basic skills and it doesn’t need to be through a formal test. Can DEO confirm this? Some youth	LWDB 13	No	DEO does not agree with this interpretation. Per the federal regulations found at 20 CFR 681.290, “in assessing basic skills, local programs must use <i>assessment instruments</i> that	20 CFR 681.290

	<p>customers already have a high level of academic achievement and don't need a formalized academic assessment (i.e. TABE, GAIN, etc.). Can previous education achievement like a degree be used to assess basic skills instead of some instrument? Could a placement test be used to assess their academic level/</p>		<p>are valid and appropriate for the target population, and must provide reasonable accommodation in the assessment process, if necessary, for individuals with disabilities". The local board may decide how to assess basic skills; however, it must be through a formalized testing instrument.</p> <p>No. A degree would not be used to assess basic skills as formalized testing instruments designed to measure skills-related gains must be used. A placement test may be used only if it meets this criterion.</p>	
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