

**ACTION BULLETIN**

**TO:** All In-School Youth Service Providers Under the Workforce Innovation and Opportunity Act (WIOA) as Contracted through Alameda County Workforce Development Board (ACWDB)

**DATE:** July 3, 2025

**SUBJ:** **5% Limitation of Use of the “Requires Additional Assistance” (RAA) Barrier for In-School Youth Enrollments**

**PURPOSE OF BULLETIN:**

This purpose of this bulletin is to provide notification to all contracted service providers funded to serve WIOA-eligible In-School Youth participants regarding the 5% limitation on enrollment of participants using the RAA barrier. Additionally, this bulletin establishes a policy and procedure regarding how service providers can request and be granted allowance to enroll participants who have no other permissible barrier option to qualify for WIOA In-School Youth services.

This new procedure will be implemented effective July 1, 2025, at the beginning of Program Year (PY) 2025/2026.

**REFERENCES:**

- California Employment Development Department (EDD) Workforce Services Directive (WSD) 17-07 – WIOA Youth Requirements; issued January 16, 2018
- ACWDB’s Action Bulletin (AB) 17-03 R7 – WIOA Youth Eligibility Guidance issued June 27, 2022

**BACKGROUND:**

While there are differences in eligibility requirements between WIOA’s In-School and Out-of-School Youth programs, all WIOA Youth participants must possess at least one WIOA-identified barrier in order to qualify for services. The identified barriers are somewhat similar within the two different programs, but there are differences in how they are applied. This bulletin addresses the limitation that is applied to all In-School Youth participant enrollments capping those enrollments to five percent (5%) for participants who qualify based on the RAA barrier.

On January 16, 2018, the State issued WSD 17-07 – WIOA Youth Requirements – wherein clarification was provided regarding the 5% limitation on enrollment of WIOA In-School Youth participants using the RAA Barrier.

The RAA barrier for In-School Youth carries the following definition:

1. Requires Additional Assistance to complete an educational program
  - a. Has repeated at least one secondary grade level or is one year over age for average students in their current grade
  - b. Possesses a core grade point average of less than 1.5
  - c. For each year of attendance in secondary education, the student is at least two semester credits behind the rate required to graduate from high school
  - d. Is an emancipated youth
  - e. Current or former foster care
  - f. Was previously a dropout or had been suspended five or more times or has been expelled from school
  - g. Has received court/agency referrals mandating school attendance
  - h. Is deemed “at risk” of dropping out of secondary school by a school official
  - i. Has been referred to or is being treated by an agency for substance abuse related challenges
  - j. Has experienced recent traumatic events, is a survivor of abuse, or resides (or has resided) in an abusive environment as documented by a school official or other qualified professional

### **POLICY:**

Youth service providers contracted to provide WIOA services to In-School Youth participants may not exceed the 5% cap for enrollment of participants who qualify for services based on the RAA barrier within a single program year.

In an effort to improve tracking of usage of the 5% cap, ACWDB has developed a policy and recommended procedure for Youth service providers to request and be granted allowance to enroll participants whose only barrier falls under the definition of “Requires Additional Assistance” as defined above.

### **PROCEDURE:**

When screening potential WIOA In-School Youth applicants for eligibility, service providers must first attempt to verify the applicant’s eligibility based upon the other allowable youth barriers as defined below:

- Basic Skills Deficient
  - Individual scores below the 9<sup>th</sup> grade level in either reading/comprehension or math using a pre-approved standardized test (Comprehensive Adult Student Assessment Systems (CASAS) is the standard for ACWDB service providers)
- English Language Learner
  - Individual possesses limited ability to read, write, speak, or comprehend the English language; and whose native language is other than English; or who lives in a community/home where the dominant language is other than English
- Justice Involved/Impacted
  - Individual has had involvement with the criminal justice system or requires assistance in overcoming barriers to employment resulting from a record of arrest

or conviction. Note for this category individuals do NOT have to have a conviction on their record

- Housing Insecure / Runaway
  - Individual who lacks a fixed, regular, adequate nighttime residency, or who has a primary nighttime residence that is a supervised publicly or privately-operated shelter designed for temporary living accommodations, or who sleeps in a public or private place not designated as regular sleeping accommodations for human beings, or who is living in a motel, hotel, trailer park, or campground due to lack of alternative adequate accommodations
- Foster Care/Former Foster Care Youth
  - Youth engaged in the Foster Care system
  - Youth aged out of Foster Care
  - At least 16 years of age who left Foster Care for kinship guardianship, adoption, or to return to their home/family
- Pregnant/Parenting Youth (including non-custodial parents)
  - Male or female between the ages of 14 and 24 who is either pregnant or expecting a child, or parenting a dependent child
- Individual with a disability
  - Individual with a physical or mental impairment that substantially limits one or more major life activities (including, but not limited to:)
    - Caring for oneself
    - Performing manual tasks
    - Seeing, hearing, speaking
    - Eating, sleeping, walking, standing
    - Lifting, bending, breathing
    - Learning, reading, concentrating, thinking, communicating
    - Working
    - Normal cell growth
    - Immune system function
    - Digestive, bowel, bladder, brain, respiratory, circulatory, endocrine, and reproductive functions

If a determination is made that the individual does not possess any of the conditions that would qualify them based on the barrier definitions above, then it will be the responsibility of the intake/eligibility coordinator to reach out to their assigned Workforce Services Technician (WST) to request use of the “Required Additional Assistance” barrier.

Since the RAA barrier usage is capped at 5%, Youth service providers must take into account that they will likely be granted only one or two enrollments under this category for an entire program year. Therefore, it will be vital to ensure that the request to use this barrier will be utilized to allow enrollment of a participant who is likely to follow through with services and achieve outcomes that will reflect positively on the Youth program.

Use of the RAA barrier will be granted by the WST based on the number of new enrollments being reflected in the CalJOBS<sup>SM</sup> system for the current program year at the time that the request is submitted to the WST. Therefore, there must be at least 20 enrollments currently reflected before one (1) enrollment will be permitted using the RAA barrier. Subsequently, there will need to be 41 total enrollments for the program year reflected in CalJOBS before a second enrollment will be allowed for a participant using the RAA barrier.

The intake/eligibility coordinator should send an email to their assigned WST that includes the following information:

- Participant's name
- State ID (if they have already been registered in the CalJOBS system)
- Explanation regarding how the applicant meets the definition of the RAA barrier

WST staff may request a conversation to discuss other possible barriers that may be used to determine eligibility for the individual before granting allowance to use the RAA barrier.

WST staff will track all requests and usage of the RAA barrier to ensure that service providers do not exceed the 5% cap for enrollment of participants using the RAA barrier.

The intake/eligibility coordinator must request use of the RAA barrier **and receive approval from their assigned WST before enrolling the participant into the WIOA In-School Youth program.**

### **ACTION:**

All ACWDB In-School Youth service providers must adopt and enact this new policy. Additionally, this bulletin should be shared with all staff responsible for the provision of workforce services administered through the ACWDB.

*ACWDB Action Bulletins referenced in this item were the most current available on the date this bulletin was drafted. Any updated information will be located at [ACWDB's Program Policies Page](#).*

*Any discrepancies arising between this policy/procedure and federal or state provisions (due to future revisions) will default to the current minimum federal and state regulations and guidance available – until such time that this policy can be updated.*

### **For information and inquiries please contact:**

Michele G. Garcia  
Workforce Board System Administrator  
24100 Amador Street, 6<sup>th</sup> Floor  
Hayward, CA 94544-1203  
(510) 259-3802 | [mggarcia@acgov.org](mailto:mggarcia@acgov.org)