

Northwest Workforce Council

POLICY AND PROCEDURE DIRECTIVE

EFFECTIVE DATE: October 15, 2001

SUBJECT: Eligibility Verification and Priority Selection for Title I-B Adults

REFERENCE #: WIA 01-21 (Revised 01-02-2010)

This policy establishes Northwest Workforce Council (NWC) verification and registration standards for adult eligibility and priority selection for WIA Title I-B funded Intensive and Training Services. Registration is the process of application completion and information collection that verifies the determination of eligibility.

Eligibility

To be eligible to receive applicable WIA Title I funded services as an adult under WIA Title I-B, an individual must meet the: 1) definition of “adult” at WIA section 101(1) [an individual who is age 18 or older], 2) citizenship status requirements as described in Section 188 (a) (5) (3) and 3) selective service registration status (when applicable) as referenced in Section 189(h). Additional requirements are established by law and regulation for WIA Title I-B funded intensive and training.

Being determined “eligible” for intensive and training services funded under WIA Title I-B does not entitle an individual to receive WIA Title I-B intensive and training services (Washington State WIA Policy 3640).

Priority Selection

The NWC Operations Plan establishes the following policy for priority selection for WIA Title I-B Adult funded Intensive Services and Training Services. (This policy does not require that only public assistance recipients and other low-income individuals may receive intensive and/or training services).

WIA I-B Adult Program Eligibility and Priority Selection for Services:

The Council has developed the following priorities and service strategies directing Adult program services to low income individuals, welfare recipients, veterans and other individuals in need of intensive and training services under the WIA Title I-B Adult Program:

- 1) Priority for intensive services will be given to unemployed low income individuals who have demonstrated an appropriate effort to obtain employment through participation in core services and have been unsuccessful in this attempt. Unemployed WorkFirst participants will also be given priority if: they have been referred by an appropriate source; and their Individual Responsibility Plan (IRP) has been amended by mutual agreement; and if the intensive services provided by WIA are not otherwise available or funded through the WorkFirst programs. Of this population, Veterans and other covered persons will be given a priority for services (Washington State WIA Policy 1009 Rev.1 - *Priority of Services for Veteran and Eligible Spouses* - <http://www.wa.gov/esd/policies/systems.htm>).

- 2) Should funds be available, priority will then be given to unemployed Veterans and other covered persons
- 3) Should further funds be available, priority will then be given to unemployed individuals, including former WorkFirst participants no longer receiving cash assistance, whose incomes are 175% or less of the poverty guidelines.
- 4) Should further funds be available, WIA Title I-B funds may also be used to serve low income employed adults. Enrollment would be limited to those individuals seeking training in the Region's Key Industry Sectors (Health, Manufacturing and Construction). Training options include Occupational Skills Training, Short Term Training or On the Job Training.
- 5) Should further funds still be available, after priority service is provided under the WIA Title I-B, funds may also be used to serve any other unemployed or underemployed individuals in need of intensive services to gain employment.

Training Services will become available to individuals who have engaged in intensive services and will also use the above priority criteria. Following an interview, evaluation, or assessment, and case management, individuals must meet additional criteria for training services:

1. There is no suitable employment available.
2. The participant will benefit from appropriate training: The training program will provide the necessary skills to obtain employment in a demand occupation.
3. There is a reasonable expectation of employment following the completion of training: The training must be for a demand occupation in the labor market where the participant resides or is planning to relocate within Washington State.
4. Training is reasonably available to the participant from either public or private sources: The training site must be within the commuting area of the participant. Training at institutions outside of the commuting area may be approved if similar training programs are not offered within the local commuting area.
5. The applicant is qualified to undertake and complete the training program. The following factors will be considered:
 - physical and mental capabilities
 - educational background
 - previous work experience
 - financial resources for duration of training program (Unemployment Insurance, Worker Retraining, Pell Grant, State needs Grant, Workforce Investment Act and Training Benefits)
 - Personal or family financial resources available in the event that the above mentioned assistance exhaust prior to completion of the training program
6. The applicant is unable to obtain grant assistance from other sources to pay the full costs of training.
7. Training is suitable (suitability in this case means the participant satisfies all criteria from #5) for the worker and is available at a reasonable cost: The training provider shall not approve training when the cost of the training is unreasonably high in comparison with the average cost of training in similar occupation at other providers. The service provider shall not approve training:

- In an occupational area that requires an extraordinarily high skill level relative to the participant's current skill level.
- When the cost of training is substantially higher than the costs of other training that is suitable for the participant.

Equity in this selection process will be based on the ability of workforce system resources to address the individual needs of the priority group and other interested job seekers. Enrollment decisions in the process of selecting individuals for intensive and training services will be based upon the coordination of resources developed by the Northwest Partnership for Workforce Development.

The Council's and the Northwest Partnership for Workforce Development's criteria for assessment, the use of workforce skill standards, and definitions of satisfactory progress, will ensure participants receive services in an efficient and effective manner, without undue delays in service completion.

The Northwest Workforce Council and Local Chief Elected Officials may revise this priority policy and criteria for intensive services and training services should adverse impacts for low income and welfare recipients or other identified populations become evident.

Note: Policies regarding service priority for the WIA Title I-B Adult Employment and Training Grant do not apply to individuals served through the WIA Title I-B Dislocated Worker Grant.

Eligibility Criteria for employed adults for Intensive and Training Services:

Eligible *adults* who are employed or are seeking employment within industries that are sectoral initiatives approved by the NWC, have received at least one core service, and are determined to be in need of intensive or training services to obtain or retain employment that leads to self-sufficiency. Self-sufficiency is defined as having family income exceeding the **Low-Income** (80% of median family income) limits based on Department of Housing and Urban Development median family income guideline for Northwest Workforce Area using the Bellingham Metropolitan Statistical Area: <http://www.huduser.org/datasets/il/il09/index.html> click on the FY 2009 Income Limits Documentation and then follow links to the Bellingham WA MSA data.

POLICY

NWC policy ensures that adequate and correct determinations of adult eligibility and priority selection are made within WIA law and regulations as well as state and NWC policies.

Each file must include a completed application for each applicant and applicable verification that confirms eligibility. All questions on the Intake Form must be answered, and both the applicant and the intake coordinator must sign the intake form. The participant must be advised that all information is subject to verification, and that false registration is grounds for immediate termination, and prosecution under the law. All eligibility issues that arise must be referred to the NWC's Deputy Director or designee for investigation and resolution. All documents supporting eligibility must be included in the applicant's file and available for review by the administrative entity. Examples of acceptable documentation are included in attached: "Acceptable Documentation for Determining Adult Eligibility and Priority Selection."

The order of priority for the methods of verification of eligibility (age, citizenship, and selective service) include:

1. Documentary evidence identified in attached “Acceptable Documentation for Determining Adult Eligibility and Priority Selection” or as approved by the WDC Executive/Deputy Director.
2. When documentary evidence is not available or if it cannot be provided when time is of the essence, verification can be provided through collateral contacts that confirm the participant’s eligibility by someone outside the participant’s immediate family or through participant self-certification of eligibility criteria.

There is no order of priority for methods of Verification for the Priority Selection Criteria. Any of the above three methods of verification may be used to verify the Priority Selection Criteria such as includable and excludable income.

Attachment A: Acceptable Documentation for Determining Adult Eligibility And Priority Selection		
Eligibility Criteria Adult	Conditions	Commonly Used Documentation
a. Age	18 years of age or older	<ul style="list-style-type: none"> ▪ Birth Certificate or hospital record of birth ▪ Drivers License or DMV Identification ▪ Baptismal Certificate ▪ Voter Registration Card ▪ DD Form 214 (Report of Transfer or Discharge) ▪ Alien Registration Card ▪ Food Stamp Records or Medical Coupons ▪ School enrollment documents ▪ Naturalization Certificate ▪ Public Assistance Records ▪ US Passport ▪ Native American Tribal Document(s) ▪ Other documents or procedures as provided by NWC policy
b. Citizenship or eligible non-citizen	If the applicant is to be eligible for WIA adult funded services, then the applicant must be legally entitled to work in the United States.	<ul style="list-style-type: none"> ▪ Social Security Card ▪ Birth certificate ▪ Any form of documentation as defined by Immigration and Naturalization Service (INS) for work eligibility ▪ Other documents or procedures as provided by NWC policy
c. Selective Service Registration	Almost all male U.S. citizens, and male aliens living in the U.S., who are 18 through 25, are required to register with Selective Service.	<ul style="list-style-type: none"> ▪ Selective Service Registration Card ▪ Receipt of registration ▪ On-line confirmation or Telephonic verification with Selective Service ▪ DD Form 214 (Report of Transfer or Discharge) ▪ Other documents or procedures as provided by NWC policy

Criteria for Priority Selection	Definitions	Commonly Used Documentation (see Forms Manual for other income sources)
<p>1st: Low-Income Individual (WIA Sec.101(25))</p> <p>2nd: Veteran and other covered individual</p> <p>3rd: 175% or less of Poverty Guidelines</p> <p>4th: low income employed adults limited to those individuals seeking training in the Region’s Key Industry Sectors (Health, Manufacturing and Construction).</p> <p>5th: Above 175% of Poverty and assessed as needing intensive services for employment</p>	<p>Low-Income Individual includes:</p> <ul style="list-style-type: none"> • Public assistance • Income below the Poverty Line or 70% of Lower Living Standard Income Level • Food Stamp recipient • Homeless • Foster Child • Person of disability with personal income below poverty/70% <p>A “covered person” is one of the following:</p> <p><u>A veteran</u> who is an individual who served in the active military, naval, or air service, and who was discharged or released from such service under conditions other than dishonorable(WIA definition);</p> <p><u>A recently separated veteran</u> is any veteran who applies for participation under this title within 48 months after the discharge or release from active military, naval, or air service (WIA definition); or</p> <p><u>The spouse of :</u></p> <ul style="list-style-type: none"> • A veteran who died of a service connected disability; • a member on active duty who (at time of spouse’s application) is listed as missing in action, captured in the line of duty, or forcibly detained; or • A veteran with a total disability from a service connected disability or one who died while being evaluated for it. 	<ul style="list-style-type: none"> ▪ <u>Includable income</u> as defined by WIA Forms Manual including: <ol style="list-style-type: none"> a. Gross wages/salaries (including OJT wages): wage stubs, employer statement, UI b. Net self-employment/business income: Income & Loss Statement, Accountant’s statement c. Retirement/pensions: award letters, bank deposits/statements d. Alimony: court records e. Regular insurance/annuity payment: award letter, bank statements f. Dividends and interest: brokerage & bank statements g. Net gambling/lottery winnings ▪ <u>Excludable income</u> as defined by WIA Forms Manual including: <ol style="list-style-type: none"> a. Unemployment compensation: UI records b. Child support: court records c. Old Age and Survivors Insurance (OASI): award letters, bank statements d. Public assistance: DSHS documents, DSHS statements e. Foster child care payments: DSHS records or statements f. Pell; Stafford and Perkins loans; needs-based scholarship: award letters, college statements g. WIA allowances (except OJT) h. Assets drawn down: brokerage or bank statements i. Gifts; loans; inheritance; one-time insurance payments j. Non-cash benefits k. Active military duty income: wage stubs or statements l. Assessment documents such as, but not limited to, Services Justification, Job Search Log, Career Kit, etc. <p style="text-align: center;">DD214 Member 4</p>