

## WIA TITLE I-B PROGRAM MANAGEMENT POLICIES AND PROCEDURES

### MEMORANDUM #10-01A

**To:** All WIA Title I-B and ARRA Adult Program Subrecipients

**Subject:** Adult Eligibility/Registration

**Supersedes:** Adult Eligibility/Registration #08-01A

**Effective Date:** July 1, 2011

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#### **A. BACKGROUND**

The Workforce Investment Act of 1998 (WIA) established the requirements for delivery of services through the One-Stop Delivery System. The One-Stop System, or WorkSource System as it is known in our state, is the basic delivery system for adult services. Through this system, individuals who are 18 years of age and older can access a continuum of services. These services are organized into three levels: core, intensive, and training and are provided through WorkSource Centers, Affiliate Sites, and Self-Service Sites. Program registration is the process for collecting information for supporting a determination of eligibility for a specific program. This information may be collected through methods that include electronic data transfer, personal interview, or other means as summarized on an individual's WIA REGISTRATION Form.

Within the WIA Title I-B Adult Program, there are additional criteria for determining an individual's eligibility for specific services which may be available under that program.

To receive intensive services, an eligible and registered adult must have received at least one core service and be determined by the seeker services staff to be in need of more intensive services to obtain employment which permits *self-sufficiency* as defined by Snohomish County Workforce Development Council (WDCSC) in Memorandum #\_\_-20, *Self-Sufficiency*.

At a minimum, a WIA Title I-B eligible adult must receive at least one intensive service and be determined by the seeker services staff to be in need of training services to obtain employment which permits self-sufficiency as defined by WDCSC to be eligible to receive training services. Eligibility for training services is documented by: (1) the development of an INDIVIDUAL EMPLOYMENT PLAN (IEP), (2) the development of a

financial plan to ensure the individual's ability to participate in training, (3) determination that the training is for an occupation in which the individual is likely to be able to obtain employment leading to self-sufficiency as defined by WDCSC, and, for WIA-funded training only, (4) selection of the training provider from the Eligible Training Provider List.

## **B. REGISTRATION POLICY**

WIA I-B Adult Program registration occurs at the point where there is significant staff involvement. Significant staff involvement occurs at the point where:

1. a planned intervention of WIA I-B services occurs, and
2. a WorkSource IEP is initiated which identifies the need for WIA I-B dollars for implementation. At this point, the WorkSource IEP becomes a WIA I-B IEP.
3. A WIA REGISTRATION FORM and supporting documentation consistent with this policy have been completed and collected and the individual determined eligible for WIA Title I-B Adult Program services.
4. A WIA PARTICIPANT TRAINING/JOB SEARCH AGREEMENT form.

Each of these conditions must be met before an individual may be registered and before any services other than self-service or informational services may be provided.

Equal Employment Opportunity data must be collected on each individual during the registration process as documented on the WIA REGISTRATION FORM. These forms must be retained for individuals who are not registered under a WIA I-B program as well as for individuals who are. If, for any reason, a WIA REGISTRATION FORM which is started is not completed, there must be an accompanying RECORD OF ACTIONS TAKEN TO CORRECT REGISTRATION DEFICIENCIES in the applicant's file.

## **C. ELIGIBILITY AND REGISTRATION CRITERIA**

In accordance with WIA Section 132 (b)(1)(B)(v)(I); an eligible adult is defined as an individual who at the time of application:

1. is not less than 18 years of age; and
2. is a United States citizen or eligible non-citizen; and
3. for males born on or after January 1, 1960, in compliance with the Selective Service Act.
4. Additionally, priority shall be given to recipients of public assistance and other low-income individuals for intensive and training services.

WIA defines a public assistance recipient as an individual who receives, or is a member of a family that receives, cash payments under a Federal, State, or local income-based public assistance program.

WIA defines an other low-income individual as an individual who:

- a. is a member of a household that receives (or has been determined within the 6-month period prior to application for the program involved to be eligible to receive) food stamps pursuant to the Food Stamp Act of 1977 (7 U.S.C. 2011 et seq.), note that expedited food stamp eligibility cannot be used to determine eligibility for food stamps; or
- b. qualifies as a homeless individual, as defined in subsections (a) and (c) of section 103 of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302) as amended; or
- c. received an income, or is a member of a family that received a total includable family income for the 6-month period prior to application which is at or below the OMB Poverty Level or 70% of the Lower Living Standard Income Level for the local area, whichever is higher, as shown in Memorandum #\_\_-02/02A.

An individual with a disability whose own income meets the requirements of an other low-income individual described in c. above, but who is a member of a family whose income does not meet such requirements, may be considered to be a family of one for the purpose of applying the above definition.

#### **D. INCOME AND PRIORITY OF SERVICE**

Consistent with WIA, WDCSC has established the following priority service process as described in its Operations Plan.

Priority Service Category: During any given month, at least 75% of the eligible WIA I-B individuals who are registered and begin receiving services under the Adult Program will be cash public assistance recipients, other low-income individual as defined above, be a member of a family that is homeless or at risk of homelessness and referred to WIA through the Investing in Families coordinated entry process, or have a 6-month annualized includable family income at or below 175% of the OMB Poverty Level relative to family size as shown in Memorandum #\_\_-02/02A.

Non-Priority Service Category: During any given month, no more than 25% of the applicants registered under the WIA I-B Adult Program will be adults who do not meet the priority criteria but do face other challenges to employment. An applicant must be approved by the Site Operator **prior to registration** into the WIA I-B Adult Program within this category. This category cannot be utilized retroactively to establish eligibility. Selection of an individual under this category requires assessment of her/his individual situation as documented on the WIA ADULT AND DISLOCATED WORKER PROGRAM LIFE DOMAIN ASSESSMENT form. Only non-low-income individuals who do not meet the

threshold for self-sufficiency as shown in Memorandum #\_\_-20 in effect on the date of intake as documented on the form will be considered potentially eligible for services under this policy.

#### **E. JOBS FOR VETERANS ACT AND PRIORITY OF SERVICE**

Additional priority of service criteria related to the Jobs for Veterans Act is provided in Memorandum #\_\_-13 as amended.

#### **F. LOCAL OPERATIONAL DEFINITIONS USED IN ELIGIBILITY DETERMINATION AND REGISTRATION**

Local operational definitions for terms italicized in the descriptions above have been established by WDCSC and are provided below.

*Self-sufficiency* is defined in Memorandum #\_\_-20.

#### **G. REGISTRATION SYSTEM**

Consistent with the Act, the registration system will include:

1. The use of the WIA REGISTRATION FORM to generate all information necessary to determine eligibility and meet reporting requirements; and
2. The applicant signature and date on the WIA REGISTRATION FORM attesting that the information on the form is true to the best of the applicant's knowledge; and
3. The service provider signature and date on the form; and
4. The maintenance of adequate documentation to ensure the credibility of the eligibility determination, which shall consist of copies of documents used to determine and verify eligibility.

1. Income verification: For those requesting or needing intensive services **only** an APPLICANT STATEMENT or appropriate documentation should be used to verify income for applicant's family size. **Appropriate documentation is preferred and should be used when reasonable and available.** For those requesting or requiring training services additional verification should be used for verifying income and may include items such as pay stubs, wage records from Employment Security, and W2s as shown in Attachment A. An applicant statement may be used to provide additional income verification for those needing training services provided other sources of verification have been exhausted. Rationale for using this statement in the case of customers needing training service should be fully explained in SKIES.

5. Verification of the information provided on the WIA REGISTRATION FORM shall be maintained as part of each applicant's/registrant's file.

Each criterion used to establish eligibility must be supported by a verifying document. Examples of documents which can be used to support eligibility for each criterion are provided in Attachment A. This list is not intended to exclude other forms of reasonable verification which the applicant can provide as determined by the Site Operator and approved by WDCSC.

#### **H. SITE OPERATOR ROLE**

It is the Site Operator's responsibility to review and approve all registration paperwork for completeness, accuracy, and internal consistency within 30 days of an applicant's registration. It is also the Site Operator's responsibility to approve registration of all applicants under the non-priority service (25%) category **prior to registration**. The Site Operator is further responsible for entering the appropriate data for tracking client registration and eligibility information into the designated Management Information System using established protocols; maintain a centrally controlled file for each program applicant and registrant which contains all documents collected; and provide any and all Federal, State, County, and WDCSC monitors and auditors with access to such records given reasonable notice.

As noted above, the Site Operator is to maintain separate files for applicant paperwork begun, but never completed, which does not result in a client registration into the WIA I-B system. Additionally, the Site Operator is responsible for assuring additional confidentiality of files for applicants and registrants who do not sign the CONSENT FORM documenting approval of data sharing among Center partners.

**Acceptable Documentation for  
Determining Adult and Priority Service  
Eligibility under Section D.**

<b>Eligibility Criteria</b>	<b>Conditions</b>	<b><u>Acceptable</u> Documentation - Local policy may allow for other acceptable documentation.</b>
<b>ADULT</b>		
a. Age	All registrants must be 18 years of age or older	<ul style="list-style-type: none"> <li>▪ Birth certificate or hospital record of birth</li> <li>▪ Driver's license or state identification card</li> <li>▪ Baptismal certificate</li> <li>▪ Voter registration card</li> <li>▪ DD Form 214 (Report of transfer or discharge)</li> <li>▪ Alien registration card</li> <li>▪ Food stamp records or medical coupons</li> <li>▪ School enrollment documents</li> <li>▪ Naturalization certificate</li> <li>▪ Public assistance records</li> <li>▪ United States(U.S.) passport</li> <li>▪ Native American tribal document(s)</li> <li>▪ Applicant statement form in the absence of other documentation</li> </ul>
b. Citizen or eligible non-citizen	All registrants must be legally entitled to employment within the United States (U.S.) and territories	<ul style="list-style-type: none"> <li>▪ Documentation sufficient to meet Employer Eligibility Verification requirements established by the United States Department of Justice Immigration and Naturalization Service (I-9 requirements)</li> </ul>
c. Selective Service Registration	With very few exceptions, all male registrants who were born on or after January 1, 1960 and were in the U.S. before their 26 <sup>th</sup> birthday are required to register for Selective Service	<ul style="list-style-type: none"> <li>▪ Selective Service registration card</li> <li>▪ Receipt of registration</li> <li>▪ On-line confirmation or telephonic verification with Selective Service</li> <li>▪ DD Form 214 (Report of Transfer or Discharge)</li> <li>▪ Copy of registration form</li> </ul>

d. Low-Income	To be eligible for priority to receive intensive and/or training services, a registrant must meet low-income requirements.	<ul style="list-style-type: none"> <li>▪ Proof of cash public assistance</li> <li>▪ Proof of eligibility for or receipt of food stamps for the month of intake</li> <li>▪ Proof of homelessness</li> <li>▪ An Investing in Families Referral Form</li> <li>▪ Proof of state supported foster child</li> <li>▪ Family size verification form or other proof of family size with proof of includable income for the six months prior to the date of intake</li> <li>▪ Proof of disability plus proof of the applicant's includable income for the six months prior to the date of intake</li> <li>▪ Applicant statement form in the absence of other documentation supported by a GUIDE Screen printout</li> </ul>
e. Other Eligible	To be eligible to receive intensive and/or training services as a non-priority registrant, a registrant must be "at risk" or "in crisis" in at least two categories	<ul style="list-style-type: none"> <li>▪ WIA Adult and Dislocated Worker Program or Investing in Families Life Domain Assessment and Site Operator approval</li> </ul>