

WIOA Title I Program Eligibility, Enrollment & Documentation Policy

POLICY #: P-1005, Revision 9

EFFECTIVE DATE: March 7, 2023

Supersedes: WIOA Title I Program Eligibility, Enrollment & Documentation Policy, Rev. 6, Effective 9-28-22

PURPOSE

This policy, and corresponding WIOA Title I Program Eligibility, Enrollment & Documentation Policy Handbook (Program Eligibility Handbook) communicates WorkForce Central's eligibility, enrollment, and documentation requirements for the Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, and Youth (Young Adult) programs.

This policy was revised to:

- Align WorkForce Central's authorization for self-attestation with DOL and ESD updated allowances to include:
 - Updated formats by which applicants may self-attest to applicable program eligibility and data validation elements.
 - Encourage self-attestation when collection of source documentation is unavailable or doing so will delay program enrollment.

The following revisions were made to the accompanying Program Eligibility Handbook:

- Updated citations and references.
- Updated definition of self-attestation to align with ESD and DOL revised definition.
- Added WorkForce Central's EMAP referral and documentation requirements.
- Updated hyperlinks for revised paper WIOA Title I program applications.
- Clarified Selective Service registration requirements for transgender individuals in compliance with ESD policy.
- Aligned program eligibility and data validation source documentation requirements with DOL and ESD to include:
 - Updated formats by which applicants may self-attest to applicable program eligibility and data validation elements.
 - Encourage self-attestation when collection of source documentation is unavailable or doing so will delay program enrollment.
 - Authorize the use of self-attestation for validating age/date of birth and veteran status.
 - Updated source documentation for separating service members.

This policy and the accompanying Program Eligibility Handbook are located on WorkForce Central's Policy Library at <https://workforce-central.org/about/policies/>.

POLICY

This policy and the accompanying Program Eligibility Handbook reflect the most current laws, rules, and guidance for WIOA Title I program eligibility determination, program enrollment, and data validation requirements as communicated by the Department of Labor Employment and Training Administration (DOL), Washington State's Employment Security Department (ESD), and WorkForce Central.

As directed in ESD Policy 1019, Revision 7, this policy and accompanying Program Eligibility Handbook address the following requirements:

1. WorkForce Central's Responsibility

General:

- Identification of the local record keeping system to be used:
 - Service providers must upload all paper documents associated with participant eligibility, delivery of services, and service outcomes into ESD's Management Information System (MIS) commonly referred as "ETO" (Efforts to Outcomes) and to record all services and case notes into ETO as required in state and local policy including the accompanying Program Eligibility Handbook and WorkForce Central's ETO Data Validation and Documentation Policy, located on [WorkForce Central's Policy Library](#).
- Identification of local supplemental documentation requirements:
 - In addition to WIOA Title I program eligibility documentation, WorkForce Central prioritizes enrollment to Pierce County residents who must submit evidence of their residency, as outlined in the accompanying Program Eligibility Handbook.
- WorkForce Central's authorization to use self-attestation:
 - Self-attestation may be used for authorized eligibility and data validation purposes when other source documentation listed in [ESD Policy 1003, Rev. 4 Attachment B](#) is unavailable, or when collecting source documentation poses a hardship on the applicant, or if the collection of documentation will delay program enrollment. Self-attestation may be collected in the following formats:
 - Signed and dated **paper WIOA Application** uploaded into ETO.
 - Electronically signed and dated **ETO WIOA Eligibility Application**.
 - Signed and dated electronic/digital declaration of a certain data element. Electronic signatures or a submission from a participant such as an **email or text** is considered a verification of a data element. The electronic signature, email, or text must be generated and traceable to the participant. Such documentation must be uploaded into ETO.
- WorkForce Central's determination of when WIOA Title I Youth (Young Adults) ages 18-21 who reside at home are considered individuals rather than dependents and the parameters for these determinations:
 - WorkForce Central has determined youth ages 18-21 who reside with their parents or guardians and who fall into one or more of the following categories can be considered independent for income eligibility determination:
 - Youth ages 18-21 who are personally receiving TANF, food stamps, or Social Security benefits.
 - Youth ages 18-21 who are attending post-secondary education and who qualify as an independent student on the Free Application for Federal Student Aid (FAFSA).
 - Youth ages 18-21 who are supporting their parents or other family members who are unemployed or unable to work.
- WorkForce Central's determination of family size and includable/excludable income for the WIOA Title I Youth (Young Adult) and Adult programs:
 - Complete details for determining family size and includable/excludable income for the WIOA Title I Youth (Young Adult) and Adult programs are outlined in the accompanying Program Eligibility Handbook.

WIOA Title I Youth (Young Adult) Program:

- WorkForce Central's definition of "youth who require additional assistance to enter or complete an educational program or to secure or hold employment":
 - WorkForce Central defines youth who need additional assistance to enter or complete an educational program or to secure or hold employment as youth who meet one or more of the

following criteria:

- Education:
 - One or more years behind modal grade for one's age group.
 - Repeated at least one secondary grade level before dropping out.
 - Placed on probation, suspended from school, or expelled from school one or more times during the past two years.
 - Employment:
 - No prior paid work experience.
 - Has been terminated from a job within the 12 months prior to program enrollment.
 - Has a family history of chronic unemployment, including long-term public assistance.
 - Living arrangements/Family:
 - Current residency or associations present a risk to safety and security.
 - Resides in a non-traditional household setting (i.e., unofficial guardian, grandparents, other).
 - Lives with only one or neither natural parent.
 - Lives in public housing or in a federally designated [high poverty areas](#) such as a census tract.
 - Lacks parental support.
 - Child of justice involved parents.
 - Emancipated youth.
 - Medical:
 - Medical situation impeding school or employment.
 - Referred to or is receiving medical care.
 - Geographic/Social/Cultural:
 - Has significant geographical barriers to accessing youth development services.
 - Is a member of a migrant family.
 - Identifies as Indian, Alaska Native, Native Hawaiian, Black, Asian, Latino, Veteran, or from Compact of Free Association (COFA) nations, Pacific Islander communities, LGBTQ communities.
 - Perceives him, her, or themselves as possessing attitudes, beliefs, customs, or practices that influence a way of thinking, acting, or working that may serve as a hinderance to employment (DOLETA 9172)
- WorkForce Central's declaration that it will utilize the "5 percent window" to serve participants in the WIOA Title I Youth (Young Adult) program who do not meet the required income criteria:
 - Service providers must first receive WorkForce Central before enrolling young adults into the WIOA ISY program or OSY program (categories 3 or 9) who otherwise would have to meet the WIOA Title I income eligibility criteria. Criteria and documentation requirements are detailed in the accompanying Program Eligibility Handbook.

WIOA Title I Adult Program:

- WorkForce Central's Priority of Service classifications beyond categories 1, 2, and 3 as established in ESD's Policy 1019, Rev. 7:
 - WorkForce Central authorizes a 4th Priority of Service category for individuals enrolled in the WIOA Title I Adult program who do not meet criteria for Priority of Service categories 1 through 3 and who lack income that allows them to meet their basic needs or allows them to be self-sufficient, based on the Self Sufficiency Calculator and Good Jobs standards.

WIOA Title I Dislocated Worker Program:

- WorkForce Central's definitions of the following WIOA Title I Dislocated Worker program terms are defined in the accompanying Program Eligibility Handbook:

- “Unlikely to return to a previous industry or occupation”.
- “Substantial layoff”.
- “General announcement of plan closing”.
- “Unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters” for determining the eligibility of self-employed individuals, including family members and farm or ranch hands.
- “Employment that leads to self-sufficiency” for a dislocated worker when determining whether the individual needs training services to obtain employment.
- The designated timeframe prior to planned separation (no earlier than 18 months prior) during which military service members can receive Dislocated Worker program services.

2. Program Eligibility and Enrollment

Individuals applying for WIOA Title I services must meet specific program eligibility and enrollment criteria as set forth by DOL, ESD, and WorkForce Central. Specific program eligibility, enrollment, and documentation requirements are detailed in the accompanying Program Eligibility Handbook and WorkForce Central’s ETO Data Validation and Documentation Policy, both located on [WorkForce Central’s Policy Library](#). Service providers will be monitored for compliance to these requirements by DOL, ESD, and WorkForce Central.

3. Data Element Validation (DEV) and Documentation Requirements

WorkForce Central’s WIOA Title I service providers must maintain adequate documentation to ensure credibility of eligibility determination, participant demographics, service provision, and service outcomes to support DOL data element validation (DEV) requirements in alignment with this policy, the accompanying Program Eligibility Handbook, WorkForce Central’s ETO Data Validation & Documentation Policy, DOL, and ESD data validation policies.

WorkForce Central’s internal controls ensure data reported in ETO is valid, reliable, and aligns with source documentation in accordance with this policy and the accompanying Program Eligibility Handbook and WorkForce Central’s ETO Data Validation & Documentation Policy. WorkForce Central will conduct ongoing data validation reviews throughout the program year through the pulling of ETO reports, invoice reviews, completion of monitoring file checklists, and other means.


PROCEDURES

Refer to the accompanying [Program Eligibility Handbook](#) for the detailed WIOA Title I Adult, Dislocated Worker, and Youth (Young Adult) program eligibility determination and enrollment documentation requirements.

REFERENCES

- See WorkForce Central’s WIOA Title I Program Eligibility, Enrollment & Documentation Handbook.

APPROVED


 Katie Condit (Mar 7, 2023 10:10 PST)

Mar 7, 2023

Katie Condit, WorkForce Central CEO Date