



APPROVAL DATE: 3/23/10
APPROVED BY: Betty Baker, WIB Chair

**COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF SOCIAL SERVICES**

POLICY NO: 27-08
TO: Service Providers
FROM: Department of Social Services
EFFECTIVE: December 9, 2009 (revised December 10, 2014)
SUBJECT: WIA Title I Eligibility Documentation and Verification

REFERENCES:

- WIA Final Rule, 20 Code of Federal Regulations (CFR), Part 663 – Adult and Dislocated Worker Activities under Title 1 of the Workforce Investment Act, Subpart A, Delivery of Adult and Dislocated Worker Services through the One-Stop Delivery System, Sections 663.105-663.165
- WIA Final Rule, 20 Code of Federal Regulations (CFR), Part 664 - Youth Activities Under Title I of the Workforce Investment Act, Subpart B - Eligibility for Youth Services
- Workforce Investment Act Eligibility Technical Assistance Guide, prepared by the California Employment Development Department (EDD), found online at the following website: http://www.edd.ca.gov/Jobs_and_Training/pubs/rwiad04-18.pdf

PURPOSE:

This policy provides guidance regarding the San Luis Obispo County Workforce Investment Board's definition of WIA Title 1 Adult, Dislocated Worker, and Youth eligibility documentation and verification procedures as well as eligibility definitions and acceptable documentation, as specified in the WIA Eligibility Technical Assistance Guide (Reference Attachment 1 for a list of acceptable eligibility documentation and verification).

BACKGROUND:

One-Stop Operators, WIA Youth Services providers, and applicants must make reasonable efforts to document eligibility for WIA-funded programs.

Definitions:

- **Verification** – means to confirm an eligibility requirement through examination of official documents, e.g. birth certificates, public assistance records, or by verbally confirming information by speaking with representatives of appropriate agencies. In the case of verbal confirmation, written documentation of the conversation should be included in the file.
- **Documentation** – means to maintain on-file physical evidence, which is obtained during the verification process. Such evidence may include copies of documents, completed telephone/document inspection forms and signed applicant statements.
- **Attachment:** List of WIA Eligibility Documentation and Verification.

POLICY AND PROCEDURES:

Policy and procedures for time limits covering the application process:

- A. Staff have thirty (30) days from the initial eligibility interview to obtain documentation and confirm eligibility.
- B. Data entered into CalJOBS cannot exceed 30 days from the current date. All entries must be made within 30 days of occurrence.

ACTION:

The Administrative Entity for the WIB and its service providers shall follow this policy. This policy will remain in effect from the date of issue until such time that a revision is required.

INQUIRIES:

Inquiries should be addressed to WIB Admin at wibadmin@co.slo.ca.us.

REVISION HISTORY:

DATE	DETAILS
12/10/2014	<ul style="list-style-type: none"> • Updated time limits for data entry within CalJOBS • Updated WIA Eligibility Documentation and Verification table

List of WIA Eligibility Documentation and Verification

GENERAL ELIGIBILITY	
The three general eligibility criteria apply to all WIA Title I programs	
Eligibility Criteria (Verify each eligibility criterion)	Acceptable Documentation (One document per eligibility criterion is required. Only the documentation sources listed below may be used.)
<p>1. Birth date/age</p>	<ul style="list-style-type: none"> • Baptismal record • Birth certificate • Form DD-214 “Report of Separation” • Driver's license • Federal, state or local government issued identification card • Hospital record of birth • Passport • Public assistance/social service records • School records or identification card • Work permit • Cross match with Department of Public Health vital records • Tribal records
<p>2. U.S. work authorization</p> <p>Note: For the list of acceptable verification documents included in the Form I-9, go to www.uscis.gov.</p>	<ul style="list-style-type: none"> • Verification document(s) that satisfy List A of the Form I-9 • Verification document(s) that satisfy List B <u>and</u> C of the Form I-9
<p>3. Selective Service registration</p>	<ul style="list-style-type: none"> • Selective Service acknowledgement letter • Form DD-214 “Report of Separation” • Screen printout of the Selective Service verification internet site: https://www.sss.gov/RegVer/wfVerification.aspx • Selective Service registration card • Selective Service verification form (Form 3A) • Stamped post office receipt of registration • Selective Service status information letter • Evidence presented by an individual that his failure to register with the Selective Service was not knowing and willful (e.g., a written explanation accompanied by supporting documentation such as a third party affidavit)

Table 2 – Dislocated Worker Eligibility

DISLOCATED WORKER ELIGIBILITY (A dislocated worker must meet the WIA general eligibility criteria and one of the seven eligibility criteria below)	
Eligibility Criteria (Verify one of the seven eligibility criteria)	Acceptable Documentation (One document per eligibility criterion is required)
<p>1. (A) Has been terminated or laid off, or who has received a notice of termination or layoff, from employment;</p> <p>AND</p>	<ul style="list-style-type: none"> • Worker Adjustment and Retraining Notification Act (WARN) notice • Photocopy of a printed media article or announcement describing the layoff. The photocopy must include the name of the medium in which published and the date of publication • Employer or union representative letter or statement • DE 8406 Personalized Job Search Assistance (PJSA) appointment notice form • DE 8530 Reemployment Eligibility Assistance (REA) letter • DE 1106/Z Appointment notice of referral to an Initial Assistance Workshop (IAW) • Screen print of IAW schedule • Reemployment plan generated from IAW • Invitation letter to Self-Employment Assistance (SEA) orientation • Screen print of SEA schedule. • Self-attestation
<p>(B) (a) Is eligible for or has exhausted entitlement to unemployment compensation;</p> <p>or</p> <p>(b) Has been employed for a duration sufficient to demonstrate attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a state unemployment compensation law;</p>	<ul style="list-style-type: none"> • Statement by an Unemployment Insurance (UI) representative • UI records, including the DE 1180PH Claim Status and History form, DE 4581 Continued Claim Paper form, DE 8406 PJSA appointment notice form, DE 8530 REA letter, and Employment Development Department (EDD) Web-CertSM printout • DE 1106/Z Appointment notice of referral to an IAW • Screen print of IAW schedule • Reemployment plan generated from IAW • Invitation letter to SEA orientation • Screen print of SEA schedule. <p style="text-align: center;">or</p> <ul style="list-style-type: none"> • Pay check stubs • W-2 and/or tax returns • UI records, including DE 429Z Notice of UI Award and DE 4581 Continued Claim paper form • Statement by the employer or union representative • Statement by a UI representative • Self-attestation

AND

(C) Is unlikely to return to a previous industry or occupation.

- DE 1106/Z Appointment notice of referral to an IAW
- Screen print of IAW schedule
- Reemployment plan generated from IAW
- Invitation letter to SEA orientation
- Screen print of SEA schedule
- DE 8406 PISA appointment notice form

Note: If one of the above is not available, documented telephone verification from the EDD field office will suffice.

- Internet site, such as CalJOBSSM that indicates lack of industry/occupation availability
- Screen print of Labor Market Information Division screens that indicates lack of industry/occupation availability
- Doctor statement indicating applicant's inability to return to previous industry/occupation due to physical limitations
- Vocational rehabilitation counselor's statement indicating applicant's inability to return to previous industry/occupation due to physical limitations
- Employment Specialist's determination
- Self-attestation

<p>2. Has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of an permanent closure of, or any substantial layoff at, a plant, facility, or enterprise.</p> <p>Note: In the case of downsizing or workforce reduction when it is unclear which employees will be affected, a layoff notice is appropriate.</p>	<p><u>Closure or substantial layoff:</u></p> <ul style="list-style-type: none"> • Bankruptcy documents, if declared under <i>Chapter 7</i>, Title 11 U.S.C. Notice of foreclosure or a similar document provided by a financial institution when such document clearly shows that a closure or mass layoff will occur as a result of its issuance • Copy of a printed media article/announcement describing the closure/mass layoff; the copy must include the name of the medium in which published and the date of publication • Statement from the employer or union representative • Statement from the employer’s bank official, attorney, supplier, accountant, or another knowledgeable individual • WARN notice • Telephone verification • Self-attestation <p><u>Notice of Layoff or Laid off:</u></p> <ul style="list-style-type: none"> • WARN notice • Copy of other specific notice to employee of intent to layoff • UI Form 501 (Separation Statement), when completed on both sides and signed by an employer representative • Employer or union representative letter or statement • Telephone verification • Self-attestation
<p>3. Is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days;</p> <p>or,</p> <p>For purposes of eligibility to receive core services only, is employed at a facility at which the employer has made a general announcement that such facility will close.</p>	<ul style="list-style-type: none"> • Bankruptcy documents, if declared under Chapter 7, Title 11, U.S.C. • Notice of foreclosure or a similar document provided by a financial institution when such document clearly shows that a closure or mass layoff will occur as a result of its issuance • Copy of a printed media article/announcement describing the closure/mass layoff; the copy must include the name of the medium in which published and the date of publication • Statement from the employer or union representative • Statement from the employer’s bank official, attorney, supplier, accountant, or another knowledgeable individual

<p>4. Was self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters.</p>	<ul style="list-style-type: none"> • Bankruptcy documents listing both the name of the business and the applicant's name • Business license • Copy of a completed federal income tax return (Schedule SE) for the most recent tax year • Copy of a printed media article/announcement describing the closure/mass layoff; the copy must include the name of the medium in which published and the date of publication • Copy of articles of incorporation for the business listing the applicant as a principal • Self-attestation
<p>5. Is a displaced homemaker.</p>	<ul style="list-style-type: none"> • Public assistance records • Court records • Divorce papers • Bank records • Spouse's member's layoff notice • Spouse's death record • Self-attestation
<p>6. Is an eligible dislocated worker (meets the WIA Title I general eligibility criteria and one of the five methods listed above) who, since dislocation and prior to application, has not been employed in a job that paid a wage defined by the Local Workforce Investment Board (local board) as either:</p> <p>(a) a self-sufficient dislocated worker wage;</p> <p>(b) leading to self-sufficiency;</p> <p>or</p> <p>(c) providing more than stopgap employment.</p>	<ul style="list-style-type: none"> • Acceptable documentation from one of the five dislocated worker eligibility criteria above <p>and</p> <ul style="list-style-type: none"> • Pay Stubs • Bank statements (direct deposit) • Employer statement/contact • Family or business financial records • Tax documents • Self-attestation

Table 3 – Youth Eligibility

YOUTH ELIGIBILITY (A youth participant must meet the WIA general eligibility criteria and the eligibility criteria below)	
Eligibility Criteria (Verify each eligibility criterion)	Acceptable Documentation (One document per eligibility criterion is required.)
1. Low-income individual	See the Low-Income Table
2. An Individual who is one or more of the following:	
(A) Deficient in basic literacy skills	<ul style="list-style-type: none"> • Standardized assessment test • School records • Case notes
(B) A school dropout	<ul style="list-style-type: none"> • School documentation/statement/records • Drop out letter • WIA application • Local area Management Information System • Self-attestation
(C) Homeless or a runaway; or	<ul style="list-style-type: none"> • Written statement from an individual providing temporary residence • Written statement from social service agency • Written statement from a shelter • WIA application • Self-attestation
a foster child	<ul style="list-style-type: none"> • Written confirmation from social service agency • Case notes
(D) Pregnant or a parent	<ul style="list-style-type: none"> • Copy of child’s birth certificate • Baptismal record • Observation of pregnancy status • Doctor’s note confirming pregnancy • Self-attestation
(E) An offender	<ul style="list-style-type: none"> • Documentation from juvenile or adult criminal justice system • Documented phone call with court or probation representatives • WIA application • Self-attestation

<p>(F) An individual who requires additional assistance to complete an educational program, or to secure and hold employment</p>	<ul style="list-style-type: none"> • Repeated at least one secondary grade level • Court/agency referrals mandating school attendance • Have a core GPA of less than 1.5 • At least 2 semester credits behind the rate required to graduate • An emancipated youth • Deemed at risk of dropping out of school by a school official • Have never held a job • Have aged out of foster care • Previous dropout or have been suspended 5+ times or expelled • Have been referred to or are being treated for a substance abuse related problem • Experienced a recent traumatic event • Has serious emotional, medical or psychological problems • Have never held a full-time job for more than 13 consecutive weeks • Been fired from a job within the 12 months prior to application • Documentation showing participant attends an alternative school/Individual Service Strategy • Case notes • WIA application • Local area Management Information System • Self-attestation
<p>3. Up to five percent of WIA youth participants may be individuals who do not meet the low income criteria (youth eligibility criterion 1 above) if such individuals are within one or more of the following categories:</p>	
<p>(A) A school dropout</p>	<p>See youth eligibility criterion 2(B) above</p>
<p>(B) Basic skills deficient</p>	<ul style="list-style-type: none"> • Standardized assessment test • School records • Case notes
<p>(C) Are one or more grade levels below the grade level appropriate to the individual's age</p>	<ul style="list-style-type: none"> • Telephone verification with the school • Statement from school • Report card • School records
<p>(D) Pregnant or a parent</p>	<p>See youth eligibility criterion 2(D) above</p>

<p>(E) Possess one or more disabilities, including learning disabilities</p>	<ul style="list-style-type: none"> • Medical records • Physician's statement • Psychiatrist or psychologist diagnosis/statement • Social Security administration disability records • Letter from drug or alcohol rehabilitation agency • School record/official statement • Observable condition (self-attestation with the interviewer serving as the corroborating witness) • Rehabilitation evaluation • Sheltered workshop certification • Social service records/referral • Veterans administration letter/records • Vocational rehabilitation letter/statement • Workers compensation records/statement • Telephone verification • Other applicable, verifiable, documentation • Self-attestation
<p>(F) Homeless or a runaway</p>	<p>See youth eligibility criterion 2(C) above</p>
<p>(G) An offender</p>	<p>See youth eligibility criterion 2(E) above</p>
<p>(H) Face serious barriers to employment as identified by the State or the local board</p>	<ul style="list-style-type: none"> • Have repeated at least one secondary grade level or are one year over age for grade; • Have a core GPA of less than 1.5; • For each year of secondary education, are at least two semester credits behind the rate required to graduate from high school; • Are emancipated youth; • Have aged out of foster care; • Are previous dropouts or have been suspended five or more times or have been expelled; • Are court/agency referrals mandating school attendance; • Are deemed at risk of dropping out of school by a school official; • Have been referred to or are being treated by an agency for a substance abuse related problem; • Experienced recent traumatic events, are victims of abuse, reside in an abusive environment as documented by a qualified professional; • Have serious emotional, medical or psychological problems as documented by a qualified professional; • Have never held a job (applies to older youth); • Have been fired from a job within the 12 months prior to application (applies to older youth); and • Have never held a full-time job for more than 13 consecutive weeks (applies to older youth).

Table 4 – Low-Income

LOW-INCOME (A low-income individual must meet one of the criteria below.)	
Eligibility Criteria (Verify one of the seven eligibility criteria)	Acceptable Documentation (One document per eligibility criterion is required)
<p>1. Receives, or is a member of a family that receives, cash payments under a federal, state, or local income-based public assistance program.</p>	<ul style="list-style-type: none"> • Authorization to receive cash public assistance • Public assistance check • Medical card showing cash grant status • Public assistance records • Refugee assistance records • Cross-match with public assistance database
<p>2. Received an income, or is a member of a family that received a total family income, for the six- month period prior to application for the program that, in relation to family size, does not exceed the higher of:</p> <p>(A) The poverty line for an equivalent period; or</p> <p>(B) 70 percent of the Lower Living Standard Income Level for an equivalent period.</p> <p>Note: Documentation should be provided for each applicable inclusive income source received by the applicant and each family member for the six-month income period immediately preceding the determination date.</p> <p>It is necessary to verify family size when utilizing family income eligibility.</p> <p>An applicant who claims little or no income must submit a statement that little or no income was received during the past six months, and that he/she was not employed for that period.</p>	<ul style="list-style-type: none"> • Alimony agreement • Award letter from Veterans Administration • Bank statements (direct deposit) • Compensation award letter • Court award letter • Employer statement/contact • Family or business financial records • Housing authority verification • Pay stubs • Pension statement • Public assistance records • Quarterly estimated tax for self-employed persons (Schedule C) • Social Security benefits records • UI documents and/or printout • Self-attestation
<p>3. The applicant 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.).</p>	<ul style="list-style-type: none"> • Current authorization to obtain food stamps • Food stamp card with current date • Current food stamp receipt • Postmarked food stamp mailer with applicable name and address • Statement from County Welfare Office • Public assistance records
<p>4. 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).</p>	<ul style="list-style-type: none"> • Written statement from an individual providing temporary residence • Written statement from social service agency • Written statement from a shelter • WIA application • Self-attestation

<p>5. Foster child for which state or local government payments are made on his/her behalf.</p>	<ul style="list-style-type: none"> • Written confirmation from social services agency • Case notes
<p>6. An individual with a disability whose own income meets the low-income requirements of #1 and #2 listed above, but is a member of a family whose income does not meet such requirements.</p> <p>Note: Disability status as well as income must be verified. An individual with a disability shall be considered a family of one for eligibility purposes.</p>	<ul style="list-style-type: none"> • Medical records • Physician's statement • Psychiatrist or psychologist diagnosis/statement • Social Security Administration disability records • Letter from drug or alcohol rehabilitation agency • School record/official statement • Observable condition (self-attestation with the interviewer serving as the corroborating witness) • Rehabilitation evaluation • Sheltered workshop certification • Social Service records/referral • Veterans Administration letter/records • Vocational rehabilitation letter/statement • Workers compensation records/statement • Telephone verification • Other applicable, verifiable, documentation • Self-attestation

Table 5 – Priority for WIA Services

PRIORITY FOR WIA SERVICES	
Veterans' Priority of Service	
Eligibility Criteria	Acceptable Documentation (Only the documentation sources listed below may be used.)
Veterans and eligible spouses are entitled to priority of service under WIA Title I programs.	<ul style="list-style-type: none"> • Form DD 214 • Veterans' Administration letter or records • Cross match with veterans data
Adult Program Priority	
Eligibility Criteria	Acceptable Documentation
If the local board determines that funds are limited in the local area, priority for intensive and training services must be given to recipients of public assistance and other low-income individuals.	See the Low-Income Table

Table 6 – Employment Status at Participation

EMPLOYMENT STATUS AT PARTICIPATION	
Eligibility Criteria	Acceptable Documentation
Employed	<ul style="list-style-type: none"> • Pay stub • Case notes showing information collected from participant
Not employed	<ul style="list-style-type: none"> • Case notes showing information collected from participant
Underemployed	<ul style="list-style-type: none"> • Employment specialist or case manager's determination • Telephone verification • Self-attestation