

ACTION BULLETIN

TO: All WIOA Contracted Service Providers

DATE: January 17, 2020

SUBJECT: **Standard Local Eligibility Guidance for WIOA, Title I Formula Funding Streams (Adult, Dislocated Worker & Youth): Right to Work; Selective Service Registration; Date of Birth/Age; Documentable Social Security Number; and Residency**

Purpose of Bulletin:

The purpose of this bulletin is twofold:

- 1) To identify and label the Standard Local Eligibility Criteria that spans each of the three WIOA formula funding streams (Adult, Dislocated Worker, and Youth):
 - a. Right To Work in the United States;
 - b. Selective Service Registration for males born in 1960 or later;
 - c. Date of birth / Age;
 - d. Documentable Social Security Number; and
 - e. Residency
- 2) To define each of these standard local eligibility criteria and establish acceptable methods for determining and documenting WIOA eligibility within each of these categories. Please note that in some instances, this bulletin will refer to other ACWDB Action Bulletins for a full and complete summary of that particular WIOA eligibility category.
- 3) This revision transmits clarification regarding the WIOA age requirements for In-School Youth participants.

Citation(s):

- Workforce Innovation and Opportunity Act, (WIOA)
- Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996
- WIOA (Public Law 113-128)
- ACWDB's Action Bulletin (AB) 17-05 - Verification of RIGHT TO WORK (RTW) Status for All Workforce Innovation and Opportunity Act (WIOA) Applicants"
- ACWDB's AB 92 - Selective Service Registration Verification Policy

Background:

As with all WIOA Eligibility Requirements, proper documentation must be submitted, reviewed and determined sufficient for verification of eligibility prior to enrollment into any WIOA-funded program services.

Definitions and Acceptable methods of Documentation:

1. Right to Work

- a. Definition (Per WIOA Section 188(a)(5):
Participation in programs and activities . . . shall be available to citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized by the Attorney General to work in the United States.
- b. Acceptable Methods of Documentation:
Verification of Right to Work (RTW) eligibility must be collected in compliance with Federal I-9 requirements. Examples of acceptable forms of verification can be located in AB 17-05 as referenced below.

Please refer to ACWDB’s “AB 17-05 – Verification of RIGHT TO WORK (RTW) Status for All Workforce Innovation and Opportunity Act (WIOA) Applicants”

2. Selective Service Registration

- a. Definition [Per WIOA (Public Law 113-128)]:
“Enforcement of Military Selective Service Act.--The Secretary shall ensure that each individual participating in any program or activity established under this title, . . . has not violated section 3 of the Military Selective Service Act . . .”
- b. Acceptable Methods of Documentation:
Males who apply for WIOA-funded services must be in compliance with the Selective Service registration requirements. These requirements apply to all three of the WIOA, Title I Formula funding streams. Males must be able to provide documentation as prescribed in AB 92 as referenced below.

Applicants who are identified as “male” on their birth certificates or other official forms of government issued identification and who are born on or after January 1, 1960, are required to register with Selective Service within 30 days of their 18th birthday and up to, but not including their 26th birthday.

Please refer to ACWDB’s AB 92 – Selective Service Registration Verification Policy for further clarification.

3. Date of Birth / Age

a. Definition:

All WIOA, Title I Formula funding streams come with age restrictions.

Funding Stream	Grant #	Federal Age
Adult	201	Ages 18 & Up
Dislocated Worker	501	Ages 18 & Up
In-School Youth	301	Ages 14 through 21
Out-of-School Youth	301	Ages 16 through 24

b. Acceptable Methods of Documentation:

In order to determine age appropriateness for each funding stream, applicants must provide **a single form** of valid documentation from the following list:

- Birth Certificate
- Baptismal Certificate
- Driver's License / State Issued Identification
- Official documentation from Department of Homeland Security or a Passport
- Military Document DD-214 or a Military Issued Identification
- Social Service Records
- Letter or other form of verification based on current, Official, School Records
- Other Official Documentation with **prior** approval from a member of ACWDB's Workforce Services Support Team (WSST)

4. Documentable Social Security Number

a. Definition:

Applicants for WIOA-funded services are asked to provide documentation to verify that they possess a valid Social Security Number.

b. Acceptable Methods of Documentation:

Applicants for all WIOA, Title I Formula funding stream programs, should provide **a single form** of valid documentation from the following list:

- Military Records / DD-214
- Social Service Records
- Pay Stubs / W-2 / Employer Records
- Employment Development Department (EDD) Records
- Social Security Documents / Social Security Card
- Official Federal or State Tax Forms (not filing forms completed by the applicant or a tax preparer)
- Other Official Documentation with **prior** approval from a member of ACWDB's Workforce Services Support Team (WSST)

5. Residency

a. Definition:

Locally, the ACWDB has implemented a residency requirement that applies to all WIOA, Title I, programs funded through WIOA Formula funding streams (Adult, Dislocated Worker, and Youth).

ACWDB's WIOA-Funded programs should prioritize services to applicants who meet the following criteria:

- On the Date of Application, the applicant:
 - Resides within ACWDB's designated Local Area*; or
 - *Alameda County excluding the City of Oakland
 - Is presently employed at a plant, facility or business that is located within ACWDB's Local Area; or
 - Has been employed at a plant, facility or business that is located within ACWDB's Local Area within six months of the date of application
- If the applicant does not meet any of the criteria as referenced above, ACWDB has enacted an Exception Policy that allows up to 10% of enrolled participants from outside of our designated Local Area.

b. Acceptable Methods of Documentation:

Applicants for all WIOA, Title I Formula funding stream programs, must provide **a single form** of valid documentation from the following list:

- Valid Driver's License / State Issued Identification
- Current Social Service Records
- Utility Bill issued less than 30 days from the date of application containing the applicant's name and address
- Financial Statement issued less than 30 days from the date of application containing the applicant's name and address
- Medical Statement issued less than 30 days from the date of application containing the applicant's name and address
- Current EDD Records (for address of applicant or employer)
- Letter or other form of verification based on Current, Official, School Records
- Current Shelter Letter containing the name of the applicant and the general location of the shelter (for confidentiality reasons, these letters may state that the person therein named resides in a facility located in Alameda County, but not the City of Oakland)
- Other Official Documentation with **prior** approval from a member of ACWDB's Workforce Services Support Team (WSST)

c. 10% Exception to Residency Policy Requirements

ACWDB allows a 10% exception to the Residency Policy requirement. Under this exception, 10% of any center's enrolled population, under a single funding stream, may be job seekers who reside outside of ACWDB's designated service area (as defined above).

Please refer to ACWDB's AB 17-04 – Residency Policy Exception for further clarification.

Policy and Procedures:

The policies and procedures referenced above become effective **July 1, 2017**. Policies and procedures as outlined in other ACWDB Action Bulletins – as referenced in the narrative above may have different effective dates.

Additional Eligibility Elements:

In addition to the Standard Local Eligibility criteria outlined in this bulletin, each of the three formula funding streams, (Adult, Dislocated Worker and Youth) has supplementary elements of eligibility that are specific to that stream and must be documented prior to a determination of eligibility for WIOA-funded services. These additional eligibility criteria must be documented at the time of application along-side the eligibility standards outlined in this Bulletin and are identified and defined in action bulletins specific to those funding streams. Please reference ACWDB Action Bulletins as follows for a complete understanding of determination of WIOA eligibility:

- WIOA Adult Eligibility Guidance/Priority of Service for Adults;
- WIOA Dislocated Worker Eligibility Guidance (AB 17-02); and
- WIOA Youth Eligibility Guidance (AB 17-03)

Information and Inquiries:

For further information and inquiries please contact:

Michele G. Garcia
ACWDB Interim MIS Administrator
24100 Amador Street, 6th Floor,
Hayward, CA 94545-1203
510.259.3814
mggarcia@acgov.org