

Southwest Washington Workforce Development Council
Workforce Innovation and Opportunity Act Policies and Procedures

ELIGIBILITY GUIDELINES AND DOCUMENTATION REQUIREMENTS
POLICY #: 3028 Revision 1

Original Policy Date: 8/28/2013
Effective Date: 7/1/2015

Revision Date: 10/20/2015

Purpose:

To communicate integrated eligibility guidelines and documentation requirements for Wagner-Peyser and Workforce Innovation and Opportunity Act Title 1-B Youth, Adult, and Dislocated Worker programs.

Note: This policy and attached Handbook may be revised subject to additional DOL guidance, WIOA Final Rules and WIOA-compliant Data Element Validation (DEV) guidance and requirements.

Background:

This integrated WIOA eligibility policy includes an eligibility and documentation “Handbook” that details specific WIOA Title I Youth, Adult, and Dislocated Worker program eligibility criteria and incorporates supplemental guidance specific to WIOA Title I programs.

The Handbook identifies acceptable documentation of various eligibility criteria that align with the data element validation (DEV) requirements as of the issuance of [TEGL 06-14](#). The Handbook will be updated and revised accordingly when WIOA DEV requirements are issued by the U.S. Department of Labor Employment and Training Administration (DOL/ETA).

Policy:

a. Program Eligibility

This policy addresses eligibility requirements for Wagner-Peyser and the Title 1-B Adult, Dislocated Worker, and Youth programs.

Program eligibility requirements are detailed in the [handbook](#).

b. Data Element Validation (DEV) and Documentation Requirements

Service Providers are required to maintain adequate documentation to ensure credibility of eligibility determinations and to support DEV requirements in alignment with this policy and [WorkSource Policy 1003 – Data Element Validation](#).

The U.S. Department of Labor, Employment and Training Administration (U.S. DOLETA) mandates annual DEV to assess the accuracy of reported participant data. DOL/ETA has established specific documentation requirements. Several of the data elements validated through this process pertain to program eligibility.

It is the policy of the state to align WIOA program eligibility documentation with existing DEV documentation requirements for any eligibility components that are included under DEV (refer to handbook Sec. 6). Aligning these requirements will increase efficiencies and ensure DEV requirements are met (for eligibility components) at the time of participant enrollment. In this way, eligibility documentation will support future data validation efforts.

As noted, the Handbook identifies acceptable documentation of various eligibility criteria that align with WIA DEV requirements as of the issuance of [TEGL 06-14](#). The Handbook will be updated and revised accordingly when DEV requirements for WIOA are issued by the U.S. Department of Labor Employment and Training Administration (DOL/ETA). Until such time as that guidance is available, Service Providers are directed to continue referring to WIA-based DEV requirements in [TEGL 06-14](#).

In addition to the alignment described above, there are other eligibility components not addressed by DEV. The state has aligned its policy with additional documentation requirements provided by DOL/ETA (e.g. Selective Service Registration) and the state (e.g. Unemployment Insurance), and ESD has established eligibility documentation requirements for additional eligibility components that are not addressed by DOL/ETA.

c. Self-Attestation

It is the policy of the SWWDC to utilize self-attestation as a minimum documentation requirement for any eligibility component unless specific documentation requirements are provided in DOL/ETA guidance (i.e. DEV requirements in TEGL 28-11 or Selective Service documentation requirements in TEGL 11-11 Change 2) or state law (i.e. the requirements governing UI eligibility determination). In an effort to reduce the amount of administrative burden resulting from the capture and maintenance of paper documentation, SWWDC allows the use of self-attestation (as defined in this document, its handbook and TEGL 28-11) wherever permissible under federal guidelines. These guidelines have been noted in the attached handbook.

To ensure properly documented customer self-attestation, SWWDC requires Service Providers to use the attached sample self-attestation form. Improperly documented self-attestation or self-attestation on eligibility elements not permitted under federal law or guidance or this policy may result in disallowed costs. Properly documented self-attestation serves as documentary evidence of eligibility determination and does not, by itself, warrant disallowed cost findings. At the same time, properly documented self-attestation does not, by itself, preclude disallowed cost findings if it is determined during monitoring, reviews, or audits that the attestation was false.

Definitions:

For a complete list of definitions refer to the attached handbook.

Data Element Validation (DEV) – The federally mandated process by which the state annually assesses the accuracy of reported participant data (refer to WorkSource System Policy 1003 and TEGL 06-14).

Self-Attestation – Self-attestation (also referred to as a participant statement) occurs when a participant (applicant) states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this

status. The key elements for self-attestation are: (a) a participant (applicant) identifying his or her status for a permitted data element and (b) signing and dating a form attesting to this self-identification. These forms can be accessed in Sec. 7 of the attached handbook.

References:

- [Workforce Innovation and Opportunity Act of 2014](#)
- [WIOA Notice of Proposed Rule Making: Notice of Proposed Rulemaking on Title I and Title III programs](#)
- [Training and Employment Guidance Letter \(TEGL\) 23-14](#)
- [Training and Employment Guidance Letter \(TEGL\) 03-15](#)

Supersedes:

The following guidance documents have been incorporated in the Eligibility Policy Handbook. All of these documents have been superseded by this policy and the accompanying handbook.

SWWDC Policies:

- 3028 WIA Eligibility
- WIA Eligibility Handbook
- 3032 WIOA Transition Policy

Website:

<http://www.swwdc.org/service-providers/policies.html>

Attachments:

Attachment A: Eligibility Handbook ([click here](#))

Attachment B: Self Attestation Adult/Dislocated Worker Form ([click here](#))

Attachment C: Self Attestation Youth Form ([click here](#))