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## WIOA Eligibility Policy

The NWPA Job Connect Board has developed this eligibility policy to ensure that all Workforce Innovation and Opportunity Act (WIOA) participants who receive WIOA Adult, Dislocated Worker, and Youth program-funded services are eligible for and registered to receive services. Program services contractor staff, PA CareerLink® staff, and NWPA Job Connect Board staff are responsible for implementing this policy.

### **Eligibility Requirements**

#### **WIOA Adult Eligibility**

Adults must meet basic eligibility requirements for WIOA program services. Basic eligibility requirements include:

- Be 18 years of age or older
- Be a citizen or noncitizen authorized to work in the U.S.; and
- Meet selective service registration requirements (see below).

See the NWPA Job Connect Board's Priority of Service Policy for additional eligibility requirements for adults to qualify for priority of service to receive training or career services.

#### **WIOA Dislocated Worker Eligibility**

To qualify for services as a Dislocated Worker, job seekers must satisfy the basic WIOA eligibility requirements, which include:

- Be 18 years of age or older
- Be a citizen or noncitizen authorized to work in the U.S.; and
- Meet selective service registration requirements (see below).

Also, a Dislocated Worker must also fit in one (1) or more of the following five (5) categories as described in WIOA Section 3(15). See Appendix A for definitions.

- Terminated/Laid Off; Eligible for unemployment compensation (UC), and Unlikely to Return
- Permanent Closure/Substantial Layoff
- General Announcement of Employer Closure
- Formerly Self-Employed/Currently Unemployed
- Displaced Homemaker

## WIOA Youth Eligibility Requirements

Youth must meet basic eligibility requirements to participate in the WIOA Youth Program. Both in-school and out-of-school youth must meet the following eligibility requirements:

Be a citizen or noncitizen authorized to work in the U.S.; and  
Meet selective service registration requirements (see below)

Additional eligibility requirements for In-School Youth include:

- An individual who is between 14 and 21 years of age.
- An individual who is attending school, including secondary and post-secondary school (as defined by state law).
- A low-income individual (see Appendix A); **and**
- One or more of the following:
  - Basic skills deficient
  - An English language learner
  - An offender
  - A homeless individual, a runaway, an individual in foster care, or an individual who has aged out of the foster care system
  - Pregnant or parenting
  - A youth who is an individual with a disability
  - An individual who requires additional assistance to complete an educational program or to secure or hold employment (See below for definition). *No more than 5% of ISY served in a program year may be deemed eligible based on this criterion.*

Additional eligibility requirements for Out-of-School Youth include:

- An individual who is not attending any school (including secondary or post-secondary).
- An individual between the ages of 16 and 24 years of age; and
- One or more of the following:
  - A school dropout
  - A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter
  - A recipient of a secondary school diploma or its equivalent who is a low-income individual and is--
  - Basic skills deficient; or
  - An English language learner.
  - An individual who is subject to the juvenile or adult juvenile justice system
  - A homeless individual, a runaway, an individual in foster care, or an individual who has aged out of the foster care system
  - An individual who is pregnant or parenting
  - A youth who is an individual with a disability
  - A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment (see below for definition).

An eligible in-school youth or an out-of-school youth who has a high school diploma or GED/high school equivalency and is basic skills deficient or an English language learner must also meet low-income definition (WIOA Section 3(36)).

#### Requires Additional Assistance

“An individual who requires additional assistance to complete an educational program or to secure or hold employment” is defined by the NWPA Job Connect as a youth who meets one or more of the following criteria:

- Has an Individualized Education Program (IEP)
- Has a letter from a guidance counselor asserting their need of additional assistance to complete an educational program or to secure or hold employment
- Is credit deficient (i.e. one or more grade levels behind peer group)
- Has a poor work history (been fired from 1 or more jobs within the last six months, OR has a history of sporadic employment, such as “has held 3 or more jobs within the last 12 months, and is no longer employed”)
- Has actively been seeking employment for at least 2 months but remains unemployed or underemployed. This includes a youth with no employment history, with limited work experience, and/or actively seeking full-time employment, but have only achieved part-time employment; or
- Has incarcerated parent(s)

*Note: No more than 5% of ISY served in a program year may be deemed eligible based on the “requires additional assistance” criterion. The WIOA Title I program services contractor(s) will include the number of ISY participants determined and documented to be eligible under the “requires additional assistance” criterion on their regular reporting to the LWDB to ensure that this 5% limitation is not exceeded. It will also be included as part of LWDB monitoring of its WIOA Title I program services contractor(s).*

#### Youth 5% Exception

Up to 5% of youth registered may be classified as not low income but meet the other requirements. This eligibility exception rule applies to all ISY, but only to those OSY who are only basic skills deficient; an English Language Learner; and/or requires additional assistance to enter or complete an educational program or to secure and hold employment; and are not low income. **Requests to enroll youth who are not low-income must be approved by the NWPA Job Connect.**

#### **Selective Service Requirements**

Every male citizen and male permanent resident noncitizen (this includes individuals assigned male at birth) in the United States between the ages of 18 and 26 are required to register with Selective Service. Males who failed to register with Selective Service by their 26<sup>th</sup> birthday and can provide written explanation and supporting documentation of any of the following may be eligible for WIOA services:

- Over the age of 26 and were willing but unknowing of the requirement to register with Selective Service
- Incarceration, institutionalization, or hospitalization between the ages of 18-26; or

- Noncitizen status and nonpermanent resident status before age 26.

NWPA Job Connect Board staff will monitor Selective Service exceptions to ensure that proper procedures are followed. A waiver for WIOA enrollment must be requested for non-registered males.

### **Primary Eligibility Review**

It is the Title I provider's responsibility to review and sign off on all registration paperwork for completeness and accuracy prior to the secondary eligibility review. Title I staff must maintain a centrally controlled file for each program applicant and registrant which contains documents collected. Documents must also be uploaded into CWDS for eligibility verification. Title I staff will provide federal, state, and NWPA Job Connect monitors with access to such records given reasonable notice.

Acceptable documentation to verify eligibility can be found in the [WIOA Data Element and Acceptable Eligibility Verification Guide](#), as well as the [PA Data Validation Guide](#) found in the Help section of CWDS. To ensure a quick and seamless experience, Title I staff should focus on the documents needed for WIOA eligibility first. If different items need to be obtained for Data Validation purposes, those can be collected while the participant is receiving WIOA services.

### **Secondary Eligibility Review**

The NWPA Job Connect requires the Title I provider to designate staff to review WIOA eligibility. The reviewer must ensure the uploaded documents in CWDS represent the eligibility element and the application is complete and accurate. The reviewer will complete the secondary eligibility review document, and the signed document must be kept in the participant file.

### **Self-Certification/Self-Attestation**

Self-certification is an acceptable source for documenting eligibility and data validation. A submission from a participant, such as an email, text, or unique online survey response is considered an electronic signature or verification and is an acceptable form of self-attestation.

- Self-attestation may be used when document collection would delay or prevent a customer from enrolling in a program and moving ahead with services.
- Self-attestation is participant generated. The participant must use their own words to certify a statement.
- Other acceptable documentation or verification for the participant must be used if readily available or reasonably attainable.
- A case progress note must document why self-attestation was used and what action steps were taken to obtain other primary sources of documentation.
- A blanket self-attestation cannot be used.

For a list of items that may be verified with self-certification, see the [PA Data Validation Guide](#) in the CWDS Help Desk.

**Note:** Basic Skills Deficient may not be self-certified under any program, as there are specific definitions and guidelines regarding this barrier.

### **Telephone Verification**

Title I providers are encouraged to use telephone verification prior to using self-certification to verify eligibility for Adult, Dislocated Worker, and Youth. Telephone verification involves verifying criteria through phone calls with recognized governmental or social services agencies. Information obtained must be verified and recorded on the Telephone/Document Inspection Verification Form found in the CWDS Help section. The completed form must be uploaded into CWDS and saved in the participant file.

### **Random Sampling Methodology**

To verify applicant self-certification usage and to monitor self-attestations, NWP Job Connect will adopt a random sampling methodology. The methodology will verify eligibility in self-attested applications and will be implemented for all Title I programs.

Based on previous experience, NWP Job Connect estimates that less than 1% of participants report incorrect information when self-attesting on application forms. To ensure the validity of self-attested data, NWP Job Connect will use a 90% confidence interval and 5% margin of error. A random sample of the population using self-attestation will be selected to verify if the information those individuals reported is correct. The size of the sample depends on the size of the population and is outlined below. Population will be measured by funding stream (e.g., all OSY) and not by individual provider. NWP Job Connect staff will request a sampling of self-attested items from Title I based on the sampling size listed below. Title I may need to reach out to the participants for additional information to verify the self-attested items. This monitoring will be done once per program year.

Population Size	Random Sample Size
25	8
50	9
75	9
100	10
200	10
300	10
400	10
500	14
750	20
1000	26

If more than 10% of examined participants are found to be ineligible, NWP WDB will take corrective action, including providing technical assistance to program services contractors using self-certification as a form of eligibility.

### **REFERENCES**

WIOA Section 3(2), (5), (15), (16), (36)  
WIOA Section 129(a)(1)(B) and (C)  
Workforce System Guidance No 04-2015 (Change 1)  
PA WIOA Common Measures Data Validation Guide

WIOA Data Element and Acceptable Eligibility Verification  
 20 CFR §681.250  
 TEGL No. 10-23

## HISTORY

Name	Date	Rev. Level	Description of Change	Effective Date
Deb O'Neil	03/13/2017	A	New policy per state	08/11/2017
Susan Richmond	4/12/2022	B	Update language to include DWG	04/18/2022
Susan Richmond	06/01/2023	C	Updated Self Certification Section based on updated state guidance. Changed WDB to NWPA Job Connect; added references	07/14/2023
Susan Richmond	02/26/2024	D	Updated to cover reduction in administrative barriers and clean up some errors	05/10/2024
Susan Richmond	2/20/2025	E	Restructure the policy for clarity	05/16/2025

## Appendix A: Definitions

### Definition of Key Terms

**“Basic Skills Deficient”** individuals are:

- A youth with English reading, writing, or computing skills at or below the 8<sup>th</sup> grade level on a generally accepted standardized test; or
- A youth or adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.

**“Low-income individuals”** meet one or more of the characteristics listed below:

- Recipient of cash public assistance
- Family income does not exceed the higher of 70% of the Lower Living Standard Income Level (LLSIL)
- Receives food stamps or was determined eligible to receive in the last six months
- Homeless
- Publicly supported foster child
- Individual with a disability and own income at or below 70% of the LLSIL or the poverty line
- Receives, or is eligible to receive, a free or reduced-price school lunch
- An individual who resides in a high poverty area, defined as an area that has a poverty rate of at least 30% (set every 5 years, using ACS 5-year estimate)

**“Not attending any school”** means a youth not receiving services from a public school, charter school, cyber charter school, career and technical school, sectarian school, or private school. Individuals enrolled in adult basic education/GED or high school equivalency preparation, skills training, or other remedial education programs, including YouthBuild and Job Corps are not considered as attending any school for the purposes of this policy.

**Self-attestation** occurs when an individual states his or her status for a particular data element and then signs and dates a form acknowledging this status.

**Self-certification** means an individual’s signed attestation that the information said individual submitted to demonstrate eligibility for a program under Title I of WIOA is true and accurate.

### **Terminated/Laid Off; Eligible for unemployment compensation (UC) and Unlikely to Return**

- Has been terminated or laid off, or who has received a notice of termination or layoff from employment, including a separation notice from active military service (under other than dishonorable conditions); AND is eligible for or has exhausted entitlement to unemployment compensation or has been employed for a duration sufficient to demonstrate, to the appropriate entity, attachment to the workforce, but is not eligible for UC due to insufficient earnings or having performed services for an employer that was not covered under a state UC law: AND is unlikely to return to a previous industry or occupation; OR

**Permanent Closure/Substantial Layoff/ General Announcement of Employer Closure**

- Has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of a permanent closure of, or any substantial layoff at a plant, facility, military installation, or enterprise
- Is employed at a facility which the employer has made a general announcement that the facility will close within 180 days

**Formerly Self-Employed/Currently Unemployed**

- 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.

**Displaced Homemaker-** an individual who has been providing unpaid services to family members in the home and who:

- Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment; and
- Has been dependent on the income of another family member but is no longer supported by that income; or
- Is the dependent spouse of a member of the Armed Forces on active duty and whose family income is significantly reduced because of a deployment, a call or order to active duty, a permanent change of station, or the service-connected death or disability of the member.