WIOA Eligibility Policy

Purpose:
This policy provides guidance to ensure all WIOA Adult, Dislocated Worker, Youth and TANF Youth program participants who receive funded services are eligible for and enrolled in the WIOA or TANF Youth program. This policy also discusses self-sufficiency as it relates to WIOA eligibility. Participants who want to appeal their eligibility determination will find information at the end of this policy.

Audience:
- Title I Provider staff
- TANF Youth Development Program Staff
- NWPA Job Connect Board Staff
- PA CareerLink® staff

Background:
Under WIOA, adults, dislocated workers, and youth who receive services funded under WIOA Title I must be registered into the program. (This does not include self-service or information-only activities). Registration is the process for collecting information to support a determination of eligibility.

The TANF Youth Development Program requires enrollment for eligibility purposes.

One of WIOA's main purposes is to increase economic self-sufficiency through workforce development activities. The end goal is to enable participation in the local economy through meaningful employment and a sustainable income that provides economic self-sufficiency.

Definitions: See Appendix A

Policy:
Eligibility Requirements

- General WIOA Eligibility for Adults and Dislocated Workers:
- 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:
  - Every male citizen and male permanent resident noncitizen (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 26th 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.
- See NWPA Job Connect Selective Service Registration Policy for more specific information.

Self- Sufficiency
NWPA Job Connect has determined self-sufficiency to be at or above 235% of the Federal Poverty Income Guidelines (FPIG). An individual in the NWPA Workforce Development Area is at or above self-sufficiency is the entire household's gross earned income is at or above 235% of the FPIG.

WIOA Adult Eligibility
Adults must meet basic eligibility requirements for WIOA program services. Priority of service must be established for WIOA Adult participants.

Priority of Service
- Determined during WIOA enrollment
- Applying Priority of Service:
- Staff must follow the statutory priority groups when providing individualized career services and training services funded by the WIOA Title I Adult program.
  - Public Assistance recipients
  - Low-income individuals
  - Individuals who are basic skills deficient
  - Veteran's and eligible spouses within these groups receive priority of service over non-veterans.
  - Veteran's Priority of Service:
  - Eligible veterans and eligible spouses receive priority of service across all programs and funding streams based on WIOA eligibility criteria.

Performance Goals (Priority of Service):
Measured by a state-established formula comparing the percentage of individuals in the three (3) statutory priority groups, adding any enrolled under a local discretionary priority group, versus the percentage of all other individuals enrolled in the Adult program.
Minimum benchmark if 50.1% of enrolled Adults fall under one of the three statutory priority categories.

WIOA Dislocated Worker Eligibility
Along with meeting general eligibility requirements, a Dislocated Worker must fit into one or more of the following 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)
- 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)).

In School Youth: Additional eligibility requirements 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.

Out-of-School Youth: Additional eligibility requirements 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).

Requires Additional Assistance
An individual who requires additional assistance to complete an educational program or to secure or hold employment" is defined by 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 or community member, such as clergy or caseworker, 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)

Notes for requires additional assistance:

- No more than 5% of ISY served in a program year may be deemed eligible using this criterion.
- The WIOA Title I program services provider(s) must report to NWPA Job Connect the number of WIOA ISY participants determined eligible under this criterion.
- WIOA ISY enrollments will be monitored quarterly by NWPA Job Connect.

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.
- Applies to 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.

Data Validation and Eligibility Determination:

Source Documentation: Title I staff must maintain acceptable source documentation for the data elements identified in the PA WIOA Common Measures Data Validation Guide. Documents must be uploaded in CWDS and maintained in participant files.

Verification before program participation: Title I staff must verify eligibility prior to the provision of services as indicated under federal and state statute and regulations.

- Limit data collection to items required for eligibility rather than requiring submission of all documentation necessary for data validation purposes. Staff should request the additional documentation after intake and initial service provision.

Verification and Documentation:

- Verification and Documentation are related but distinct parts of the eligibility determination and data validation process.
- *Verification*- confirm eligibility requirements through examination of documents via relevant websites, direct communication with representatives of authorized agencies, or other authorized methods.
- *Documentation*-maintain physical evidence, which is obtained during the verification process, in CWDS or paper file.
- *Preferred methods of Verification*- workforce staff should make all reasonable efforts to obtain the most reliable form of verification available without delaying enrollment or the provision of services. When multiple methods are available, the following hierarchy reflects the preferred order:
    - Hard documentation
    - Document inspection
    - Telephone verification
    - Self-attestation

Note: An individual who chooses not to share a Social Security Number cannot be denied services. Staff should follow available guidance in the CWDS Help Center.

Methods of verifying eligibility:

Self-Attestation: Also referred to as an applicant statement- occurs when an individual states his or her status for a particular data element, such as "runaway youth," and then signs and dates a form acknowledging this status. The key elements for self-attestation are:

- The individual identifying his or her status for permitted elements; and
- Signing and dating a form attesting to this self-identification

Self-Certification: A viable source for documenting eligibility which helps enroll individuals in a timelier manner.

- If self-certification is used, a rationale must be provided via case notes describing that no other verification method is possible.

- For a list of items that may be verified with self-certification, see the PA Data Validation Guide in the CWDS Help Desk. Also, refer to the WIOA Application dropdown menus for each eligibility item.

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

- The Statement of Family Size and Income may not be used to verify Low Income status since Low Income Status is no longer an allowable element for verification through self-attestation.

- Work Authorization cannot be verified using self-attestation.

- A blanket self-attestation cannot be used.

Telephone Verification

- NWPA Job Connect in accordance with the PA Department of Labor and Industry allows for the use of telephone verification to verify eligibility, especially in consideration of individuals with barriers to employment.
- Title I staff may verify criteria through phone calls with recognized governmental or social service agencies.
- Information 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.
- Information must be adequate to enable a monitor to refer to the verifying agency.

Primary Eligibility Review:

- The Title I staff must review and sign off on all registration paperwork, including eligibility documentation.
- 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.

Secondary Eligibility Review:

- This process ensures the accuracy and appropriateness of eligibility determination and helps reduce the risk of disallowed costs.
- The Title I provider will assign staff to review WIOA applications and eligibility documents.
- The reviewer must ensure the uploaded documents in CWDS represent the eligibility element, and the application is complete and accurate.
- The reviewer must complete the secondary eligibility review document and upload the signed document into CWDS.
- A case note must be entered into CWSD indicating the results of the secondary eligibility review.

Random Sampling Methodology:
NWPA Job Connect staff perform fiscal and programmatic monitoring reviews of all subcontracted WIOA programs to include inspection of participant eligibility. Based on previous experience, NWPA Job Connect estimates that less than 1% of participants report incorrect information when self-attesting. To ensure validity of self-attested data, NWPA Job Connect will use a 90% confidence interval and a 5% margin of error.

Reviews will include a random sampling of enrolled participants for eligibility confirmation.

1. The random sample will be pulled from the Participation Report within CWDS.
2. See chart below for sample size based on participation numbers. This is measured by funding stream and not by individual provider.
    a. When applicable, cases from each county and case manager will be reviewed.
3. Sampling will consider previous monitoring reviews to eliminate duplication of reviewed cases.
4. Eligibility will be reviewed from the sample cases for use of self-attestation.
    a. Eligibility will be examined to determine whether the participant would be eligible through other provided documents.
    b. Case notes will be reviewed to ensure service providers made attempts to obtain eligibility documents during the application process.
    c. If it is determined that case notes are insufficient resulting in questions regarding eligibility, service providers may be required to obtain and provide additional supporting documentation for the self-attested item.

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

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

Participant Eligibility Appeals:

Participant eligibility must be conducted by the program service provider. No applicant may be enrolled in a program without eligibility approval by the program service provider. If an applicant believes the eligibility review results are incorrect, they may appeal the decision in the following manner:

Step One:

The applicant appeal letter should be submitted to the program service provider via mail or email, stating the reasons the applicant believes the decision should be reconsidered.

PA CareerLink® Oil Region
1345 15th Street, Suite 2
Franklin, PA 16323

PA CareerLink® Erie
450 E. 16th Street
Erie, PA 16503

Step Two:
The applicant will be provided with an opportunity for a formal conference with the program service provider within ten (10) days of receipt of the appeal in attempt to resolve the issue.

Step Three:
If the parties agree the initial information submitted was incorrect or incomplete, then the participant will be afforded the opportunity to obtain additional documentation to prove their eligible status. If the applicant is not satisfied with the resolution, a request may be submitted to the NWPA Job Connect Director or Monitor for review.

NWPA Job Connect
1174 Elk Street PO Box 831
Franklin, PA 16323

www.nwpajobconnect.org for emails/phone numbers of the Director/Monitor

Once the request is received, the NWPA Job Connect Director/Monitor will acknowledge receipt within five (5) business days.

The NWPA Job Connect Director/Monitor will review the information and schedule a meeting with the applicant to occur within 15 calendar days of receiving the request to reach an informal resolution between the parties.

Step Four:
If the applicant is still not satisfied with the results, the applicant may send a request to:
Bureau Director
PA Department of Labor and Industry
Bureau of Workforce Partnership and Operations
Labor and Industry Building
651 Boas Street, 12th Floor
Harrisburg, PA 17121

References:
WIOA Section 3(2), (5), (15), (16), (36)
WIOA Section 129(a)(1)(B) and (C)
WIOA Section 134(c)(3)(E); 134(c)(3)(A)
WIOA Section 181(c)
PA WIOA Common Measures Data Validation Guide
WIOA Data Element and Acceptable Eligibility Verification
WSP WIOA Youth Eligibility Definitions
WSP Self-Attestation
20 CFR §681.250
20 CFR §680.600

20 CFR §680.640
20 CFR 683.600
TEGL No. 10-23 Change 3

History

Name	Date	Rev. Level	Description of Change	Effective Date
Susan Richmond	3/24/2026	A	Restructured and combined multiple policies	07/01/2026

Recissions:

NWPA Job Connect #212 WIOA Eligibility Policy
NWPA Job Connect #204 Priority of Service Policy
NWPA Job Connect #205 Self Sufficiency Policy
NWPA Job Connect #300 Participant Eligibility Appeal Policy

Appendix A: Definitions

Basic Skills Deficient individuals are:

- A youth with English reading, writing, or computing skills at or below the 8th 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 schoolor
- private school.

Note** The following are not considered as attending school:

- Adult basic education/GED or high school equivalency preparation
- skills training
- other remedial education programs, including YouthBuild and Job Corps

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 submitted to demonstrate eligibility for a program under WIOA Title I 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

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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.

Eligible Spouse- an individual who is the spouse of any of the following:

- Any veteran who died of a service-connected disability;
- Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
- Missing in action
    - ii. Captured in the line of duty by a hostile force; or
    - iii. Forcibly detained or interned in the line of duty by a foreign government or power;
- Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veteran Affairs; or
- Any veteran who died while a disability was in existence.

Individuals with a barrier to employment are a member of one (1) or more of the following populations:

- Displaced homemakers;
- Low-income individuals
- Indians, Alaska Natives and Native Hawaiians, as such terms are defined in WIOA Sec. 166;
- Individuals with disabilities, including youth who are individuals with disabilities;

- Older individuals (to mean an individual age 55 or older),
- Ex-offenders;
- Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434(a)(2));
- Youth who are in or have aged out of the foster care system;
- Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers;
- Eligible migrant and seasonal farmworkers, as defined in WIOA Section 167(i);
- Individuals within two (2) years of exhausting lifetime eligibility under part A of title IV of the Social Security Act (42 U.S.C. 601 et. seq.);
- Single parents (including single pregnant women);
- Long-term unemployed individuals; or
- Such other groups as the Governor involved determines to have barriers to employment.

Individualized career services include:

- comprehensive and specialized assessments
- development of an individual employment plan
- group and individual counseling
- career planning, short-term prevocational services
- internships and work experiences
- workforce preparation activities
- financial literacy services
- out-of-area job search and relocation assistance, and
- English language acquisition and integrated education and training programs.

Recipients of public assistance includes individuals who receive, or in the past six (6) months have received, or are a member of a family that is receiving or in the past six (6) months has received, assistance through one (1) or more of the following:

- Supplemental Nutrition Assistance Program (SNAP);
- Temporary Assistance for Needy Families (TANF);
- Supplemental Security Income (SSI); or
- State or local income-based public assistance.

Veteran:

- A person who served on active duty in the military service (of the U.S.) for a period of more than 180 days and who was discharged or released with other than a dishonorable discharge; or
- Was discharged or released from active duty because of a service-connected disability; or
- Was discharged as a member of a reserve component under an order to active duty pursuant to Section 672(a), (d), or (g), 673 or 673(b) of Title 10, who served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged from such duty with other than a dishonorable discharge.