



ELIGIBILITY POLICY AND DOCUMENTATION REQUIREMENTS

Workforce Innovation and Opportunity Act Policies and Procedures

EFFECTIVE DATE: May 20, 2021

POLICY #: P200 v.8

I. PURPOSE:

This policy communicates the Workforce Development Council of Seattle-King County (WDC) local workforce development board policy and operational guidance on eligibility and documentation requirements under Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, and Youth programs

II. BACKGROUND:

A variety of federally funded programs that provide services in the WorkSource system require determination of eligibility to provide customer with certain services. The Seattle-King County Workforce Region practices Integrated Service Delivery (ISD), an approach that accepts customer self-attestation in order to access basic and some individualized career services. However, customers who require more than the services that are available through self-attestation must complete an eligibility determination in order to receive those additional services.

The U.S. Department of Labor (DOL) mandates annual Data Element Validation (DEV) to assess the accuracy of reported participant data through specific documentation requirements. A number of the data elements validated through this process pertain to program eligibility. WorkSource System Policy 1019 Rev. 4 Eligibility Guidelines and Documentation Requirements integrates additional documentation requirements provided by DOL (e.g., Selective Service Registration) and the State (e.g., Unemployment Insurance), and establishes documentation requirements for eligibility components not addressed by DOL (e.g., legal entitlement to work in the U.S.).

III. POLICY:

- A. **Applicability:** Service Providers funded by WIOA Title I Adult, Dislocated Worker, and Youth must comply with the eligibility and documentation requirements detailed in this policy and in Attachment A – Eligibility Policy Handbook which is a component of this policy.
- B. **Accountability:** Under this policy WIOA Title I funded Service Providers will only be held accountable to the laws, rules, and guidance in effect at the time decisions are made on eligibility, documentation, self-attestation, and local responsibilities.
- C. **Documentation Requirements:** All documentation described in the Handbook must be maintained in participant files and the state management information system (MIS) as appropriate. Service Providers must maintain adequate documentation to ensure credibility of eligibility determinations and to support DEV requirements in alignment with this policy and the attached handbook.
- D. **Self-Attestation:** The WDC encourages the use of self-attestation using the guidelines in the

Handbook to reduce the administrative burden of collecting and recording of paper documentation. Self-attestation should be used:

- a) in instances where documentation of an eligibility criteria is not practical.
 - b) As the minimum documentation requirement for the provision of all basic career services and any individualized career services delivered as basic career services per WDC policy 02-2017 Co-Enrolled Integrated Service Delivery.
- i. Self-attestation may not be used for any eligibility component where specific documentation requirements are provided in DOL/ETA guidance (i.e. DEV requirements in TEGL 22-15 or Selective Service documentation requirements in TEGL 11-11, Change 2) or state law (i.e. the requirements governing Unemployment Insurance eligibility determination).
 - ii. To ensure properly documented customer self-attestation, Service Providers must use the Self-Attestation Form(s) included in the Handbook.
 - iii. WIOA Title I funded Service Providers must properly use and document self-attestation, as described in the handbook. Improperly documented self-attestation or the use of self-attestation for eligibility elements where not permitted under federal law or state policy may result in disallowed costs. Properly documented self-attestation does not preclude disallowed cost findings if it is determined during monitoring, reviews, or audits that the attestation was false.
- E. Whenever new DEV or Eligibility guidance is released, notice will be provided to the Seattle-King County WorkSource System and Service Providers, and this policy and handbook will be updated accordingly.

IV. PROCEDURES

- A. Service Providers are required to implement the requirements of this policy and the handbook and use the forms provided therein.

V. REFERENCES:

- WorkSource System Policy 1019, Revision 4 - Eligibility Guidelines and Documentation Requirements
- WorkSource System Policy 1003, Revision 1 - Data Element Validation
- Training and Employment Guidance Letter (TEGL) 07-18 – Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)
- Training and Employment Guidance Letter (TEGL) 22-15 – Program Year (PY) 2015/Fiscal Year (FY) 2016 and PY 2014/FY 2015 Data Validation and Performance Reporting Requirements and Associated Timelines
- Training and Employment Guidance Letter (TEGL) 11-11, Change 2 – Selective Service Registration Requirements for Employment and Training Administration Funded Programs

VI. ATTACHMENTS

- Attachment A: Program Eligibility Handbook
- Attachment B: Income Guidelines
- Attachment C: WorkSource Services Catalog

Supersedes: WDC Policy 02-2011, v.7