

GLOW WORKFORCE INVESTMENT BOARD POLICY

TO: All One-Stop Career Center Staff and Providers

SUBJECT: Priority of Service for Individuals under the Recovery Act WIA Adult Funding Stream

ISSUANCE DATE: Approved by GLOW WIB September 15, 2009

Purpose

To issue priority of service policy for adults who are recipients of public assistance and other low-income individuals who require intensive and training services under the Recovery Act WIA Adult funding stream.

Background

The American Recovery and Reinvestment Act of 2009 (The Recovery Act) signed by President Obama on February 17, 2009 is intended to preserve and create jobs, promote the nation's economic recovery, and to assist those most impacted by the recession. On March 18, 2009, the United States Department of Labor's, Employment and Training Administration released guidance (Training & Employment Guidance Letter No. 14-8) for implementing Workforce Investment Act and Wagner-Peyser Act funding under the Recovery Act. The Recovery Act contains several provisions designed to target services to certain populations. One such provision mandates that priority of service must be enacted for recipients of public assistance and other low income individuals who receive intensive and training services under the WIA Adult funding stream.

Policy

One Stop Operators shall ensure that all adults enrolled in ARRA WIA funded Adult programs are eligible and meet the priority of service criteria when enrolled for intensive and training services.

1. The first population to receive intensive and training services is public assistance and low income veterans (or eligible spouses of veterans);
2. The second priority is for public assistance and low-income non-veterans;
3. The third priority is for veterans (or eligible spouses of veterans) who are not low-income or receiving public assistance;
4. The last priority is for adults who are non-veterans who are not low-income or receiving public assistance.

Definitions

The term "low-income individual" means an individual who:

- A. Receives, or is a member of a family that receives, cash payments under a Federal, State, or local income-based public assistance program;
- B. Received an income, or is a member of a family that received a total family income, or the 6-month period prior to application for the program involved (exclusive of unemployment and survivors insurance benefits received under section 202 of the Social Security Act (42 U.S.C.402)) that, in relation to family size, does not exceed the higher of:
 - the poverty line, for an equivalent period; or
 - less than 70 percent of the Lower Living Standard Income Level (LLSIL), for an equivalent period;
- C. Is a member of a household that receives (or has been determined within the 6-month period prior to application for the program involved to be eligible to receive) food stamps pursuant to the Food Stamp Act of 1977 (7 U.S.C. 2011 et seq.);
- D. Qualifies as a homeless individual, as defined in subsections (a) and (c) of section 103 of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302);
- E. Is a foster child on behalf of whom State or local government payments are made; or

- F. In cases permitted by regulations promulgated by the Secretary of Labor, is an individual with a disability whose own income meets the requirements of a program described in subparagraph (A) or of subparagraph (B), but who is a member of a family whose income does not meet such requirements.

The term “veteran” is defined as:

- A. A veteran who is an individual who served in the active military, naval, or air service, and who was discharged or released from such service under conditions other than dishonorable (WIA definition);
- B. A recently separated veteran is any veteran who applies for participation under this title within 48 months after the discharge or release from active military, naval, or air service (WIA definition); or
- C. The spouse of:
- A veteran who died of a service connected disability;
 - a member on active duty who (at time of spouse’s application) is listed as missing in action, captured in the line of duty, or forcibly detained; or
 - A veteran with a total disability from a service connected disability or one who died while being evaluated for it.

Eligibility Documentation Procedure

- 1) The WIA Priority of Service Worksheet is to be completed for each customer that we provide an Initial Assessment.
- 2) The Staff Person interviewing the customer enters the information into the worksheet to determine if the customer qualifies for priority of service.
- 3) Once the determination is made, a comment regarding priority of service will be added at the end of notation being done for the DEV status. A single comment will document both the DEV and the priority of service.
- 4) The comment will be used to document the order that customers are placed on training orientation lists.

Monitoring

The WIB will review LWIA Management Report data to determine the number of new Adult customers enrolled under Recovery Act Funds. A sample of these records will be reviewed to ensure that the proper procedures to determine eligibility for priority of service have been followed and appropriate comments have been included in OSOS to document their eligibility. Any deficiencies will be immediately addressed by the One Stop Management if necessary.

Priority of Service – Non-Recovery Act Funds

Although not a formal policy, as GLOW does not consider formula funds to be limited, our Centers strive to assist those most in need with all WIA Funding whenever possible. With the additional funding directed towards low income/public assistance agencies in the local area and the coordination between our Centers and local DSS, we are confident that priority of service does not need to apply to non-Recovery Act funds however the Centers will continue to ensure that those most in need receive assistance