



PROCEDURE FOR WIOA TITLE I ENROLLMENT

Procedure Number: 2020b

Effective Date: February 4, 2022

Subrecipients must use the state management information system to determine and record eligibility and complete enrollment of job seekers who could benefit from Individualized Career Services, Training Services and/or Supportive Services funded with WIOA Title I Adult, Dislocated Worker and/or Youth resources.

While Basic Career Services only require registration of job seekers, all other WIOA Title I funded services require enrollment. WIOA does not require a sequence of services – job seekers may be enrolled at any time to receive Individualized Career, Training or Supportive Services based on their needs.

Subrecipients should check the job seeker’s dashboard in ETO prior to enrollment. Information in the job seeker’s ETO file may also provide insights regarding the services used by the job seeker, the services needed and potential eligibility. For example, a job seeker who has complete the dislocated worker questions affirmatively in the “Basic Career Services Only” eligibility touchpoint, should be screened to see if they meet the criteria to be served as a Dislocated Worker once fully enrolled.

Process

- Subrecipients and partners should determine whether a job seeker could benefit from services beyond Basic Career Services to achieve their employment goals. This could happen any number of ways - in the resource room when job seekers need additional assistance to complete their job search, desk side as staff determine that a job seeker has barriers to employment, in workshops where facilitators notice that some job seekers need more support to successfully complete next steps, or when partners refer job seekers for help.
- To determine eligibility, subrecipients may use recent interviews, evaluations, or assessments by partner programs to determine if Individualized Career Services

would be appropriate. If no previous assessment is available, subrecipients should use the assessments identified in the [Service Plan Procedure](#) to determine the need for services.

- Subrecipients should determine if the job seeker is eligible for priority of services as described in the [Eligibility, Registration and Enrollment Policy](#). While any job seeker may access any Basic Career Service, priority for Individualized, Training and Supportive Services must be provided to those with barriers to employment, as described in the table below. Priority applies to which job seekers are prioritized for services and the order in which these individuals are prioritized for services. For example, if there is a waiting list for training services, those with priority of service would be moved up the list, ahead of other eligible job seekers who do not have priority, or if on a given day, several job seekers are identified as potentially eligible for Training Services, but there are insufficient resources for all of them to access training, those with priority would receive the funding. Job seekers must still meet the eligibility requirements for the funding stream funding the service.
- For the Adult funding stream, the order of priority is as follows. The term “covered person(s)” refers to veterans and eligible spouses per priority of service for veterans. Subrecipients will use the definition of “low income” provided in the [Low Income and Self Sufficiency Procedure](#) to determine which job seekers are low income.

Priority	Mandatory Priority Group	Explanation
First	Covered persons (veterans and eligible spouses) who are low income, recipients of public assistance, or basic skills deficient.	Guidelines for serving covered persons (WorkSource System Policy 1009 Revision 3 – Priority of Service) apply within the mandatory priority criteria of low-income / public assistance recipient.
Second	Individuals (non-covered persons) who are low-income (may include unemployed individuals), recipients of public assistance, or basic skills deficient.	The mandatory priority criteria (low-income / public assistance recipients / basic skills deficient) have preference over covered persons (veterans and eligible spouses) who do not meet the mandatory priority criteria.
Third	Covered persons (veterans and eligible spouses) who are	Guidelines for serving covered persons (WorkSource System Policy 1009 Rev. 3 - priority of services) apply in the third category (individuals who are not low-income / public assistance recipients / basic skills deficient).

*Fourth	Job seekers who require Individualized Career, Supportive and or Training Services to achieve their goals for employment and enter a path toward self-sufficiency.	This fourth priority was added by Workforce Snohomish as per WorkSource System Policy 1009 Rev. 3 - priority of services
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***All fourth priority enrollments require documented approval from the subrecipient lead**

Note: At least 50.1% of all Adult enrollees must come from priority groups 1 & 2.

For the Dislocated Worker funding stream, covered persons (as per the First and Third Mandatory Priority Groups above) will be prioritized to receive Title I Dislocated Worker funded Individualized Career, Training and Support services.

Career, Training and Supportive Services may also be provided to individuals who are underemployed if they have been dislocated from full-time employment and meet one of the following eligibility criteria:

- Employed less than full-time and is seeking full-time employment;
- Employed in a position that is inadequate with respect to their skills and training; employed and meets the definition of a low-income individual;
- Employed, but whose current job earnings are not sufficient compared to earnings from previous employment.

Underemployed job seekers who meet the definition of a low-income individual may receive priority for Career, Supportive and Training Services under the Adult funding stream.

Underemployed job seekers who meet the definition of an individual with a barrier to employment in WIOA sec. 3(24) may also be served in the Adult program; however, unless they are a recipient of public assistance, a low-income individual, or are basic skills deficient, they are not eligible for priority of service.

Job seekers enrolled to receive services provided with Dislocated Worker funds who become employed, but meet the definition of underemployed, above, may still be considered eligible to receive services funded with Dislocated Worker resources. For instance, an individual who is dislocated from a full-time job who has found part-time employment may still be considered a Dislocated Worker. Individuals can qualify under Category 1 (General Dislocation) if they file and are approved for Unemployment Insurance (UI) benefits after having been determined by the Employment Security Department (ESD) as having voluntarily left employment due to no fault of their own for one of the following good cause reasons (RCW 50.20.050; WAC 192-150, et al):

- Illness or disability of the claimant or death, illness, or disability of an immediate family member.
- Relocate to follow spouse's or registered domestic partner's employment.
- Need to protect the claimant or immediate family member from domestic violence or stalking.
- Usual hours, compensation, or benefits are reduced by 25 percent or more.
- Involuntary change in work site or location (no minimum distance or mile threshold).
- Work site safety has deteriorated.
- Illegal activities at work site
- Usual work changed to work that violates religious or moral beliefs.
- Left part-time work to accept full-time job that was eliminated without prior knowledge.

Under these circumstances, claimants have satisfied criteria 1.1. of the [Eligibility Handbook](#) because ESD recognizes them as terminated even though they, rather than their employers, are the moving party. Such individuals must also be determined unlikely to be return to the industry or occupation they left for a UI good cause voluntarily quit reason (criteria 1.2). Finally, they must satisfy criteria 1.3.1 of the Eligibility Handbook (1.3.2 is not an option) by documenting their status as having been determined eligible for or exhausted UI benefits as good cause voluntary quits are inseparably tied to UI and documented through separation determination letters provided by the Employment Security Department or, if that is not available, other documentation in the form of UI correspondence from the Employment Security Department.

When the spouse of a military service member is unable to continue an employment relationship due to the service member's permanent change of military station, or the military spouse loses employment as a result of the spouse's discharge from the military, then the separation from employment meets the termination component of the WIOA definition of Dislocated Worker. Eligibility determinations must align with UI policy regarding "good cause" for voluntary quits. Below are two common scenarios that would qualify:

- The spouse of a military service member voluntarily quits because he/she is relocating with the service member to a new duty location.
- The spouse of a military service member is no longer eligible to \ work on the base as a result of the (military service member's) discharge.

Note: Good cause is not found when claimants quit work to relocate someplace other than their military spouse's or domestic partner's new duty location, including relocation to the home of record or elsewhere.

U.S. citizens or lawful residents who are survivors of trafficking can receive the same services provided to the general public under WIOA. In addition, under the Traffic Victims Protection Act, certain foreign nationals are also eligible for WIOA Title I services. This includes survivors of both a severe form of trafficking in persons and

individuals granted a nonimmigrant “T” (trafficking) visa. Please see Eligibility Handbook section 5.4 for additional information on Assisting Victims and Survivors of Human Trafficking.

- If the job seeker has not yet created a profile in WorkSourceWA.com, they must do so in order to become enrolled. Job seekers may be unable to create WSWA accounts due to circumstances that prevent access to WorkSource services, such as transportation barriers, no access to technology, or inability to navigate such technology. Under such circumstances, staff must follow the steps outlined in [WIN 0120](#) and detailed in WIN 0120 Attachment A to create a record in ETO.
- Subrecipients must use ETO guidelines to enroll a job seeker for Individualized Career, Training and/or Supportive Services.
- Subrecipients should inform the job seeker of any documentation that will be necessary to complete the process. The job seeker may need to bring the additional documentation to complete the process. For a complete list of acceptable documentation of eligibility, please refer to the [Eligibility Handbook](#) included in WorkSource System Policy 1019 Rev 6.
- All information regarding eligibility determination must be case noted and maintained in participant files, as per the Workforce Snohomish [Case Note Procedure](#).
- Any personally Identifiable information (PII) kept in the participant’s file must be maintained in compliance with Workforce Snohomish’s [Protection of Personally Identifiable Information Policy](#).
- Subrecipients must create a Service Plan for any job seeker enrolled to receive individualized, Supportive and/or Training Services, in compliance with the Workforce Snohomish [Service Plan and Case Notes Policy](#) and procedures.
- Job seekers who meet the eligibility criteria for multiple programs may be asked to complete the eligibility touchpoint for any or all programs for which they are eligible, depending on the needs identified in their Service Plan. For example, a 20-year old job seeker without a post-secondary degree or certificate enrolled as an adult may also qualify as an out of school youth (OSY). If this job seeker could benefit from the program elements provided to OSY, he should be enrolled to receive services funded with WIOA Title I Youth funds as well as WIOA Title I Adult funds.
- Subrecipients should record the development of the Service Plan and any other services the job seeker takes as possible after completing the enrollment in order for the job seeker to become part of the performance pool.
- Job seekers who do not meet the eligibility criteria will still be served but will not have access to those services that require eligibility.

Subrecipient Lead Responsibilities

- The subrecipient lead will review all applications for enrollment within 15 days to assure that the files contain proper documentation of eligibility and case notes.
- The subrecipient lead must assure equitable treatment of all job seekers.
- Subrecipients cannot require individuals to provide SSNs as a condition of program participation or receipt of services. However, they must request a SSN from all customers. Eligible individuals who do not provide SSNs must be provided all categories and types of services for which they qualify, subject to priority of service and resource availability considerations that otherwise apply to all eligible individuals. There is one exception. The U.S. Department of Labor (DOL) has stated that U.S. Internal Revenue Service (IRS) rules take precedence over WIOA rules. Therefore, individuals who do not want to provide a SSN must decide whether or not to continue to withhold that information when the service would require reporting to the U.S. Internal Revenue Service (i.e., reportable income and wages). If those individuals choose to continue withholding their SSN, Local Workforce Development Boards (LWDBs) and their service providers may subsequently withhold those specific services.
 - Services and case notes connected to individuals who do not provide SSNs must be recorded and tracked in ETO. That is done by staff with Department Head permissions in ETO using procedures outlined in Attachment A – Efforts to Outcomes (ETO) No Social Security Number Procedure. (found in Pg. 4 of [WIN81 Change 4](#))
 - For all customers that refuse to provide a SSN, subrecipients must document in ETO case notes that an SSN was requested and the customer refused to provide.

Service delivery staff must explain to participants who receive services without providing SSN that they and possibly their future employers will be contacted in the future and asked about their employment and earnings outcomes. To that end, staff must ensure that full and extensive contact information is collected from such participants (primary and secondary phone numbers, e-mail addresses, mailing addresses, including the same for alternative and secondary contacts) and instruct such participants to provide updated contact information if anything changes. In following up with participants, staff should contact them as close as possible to the end of the second and fourth quarters after exit.

References:

- [Workforce Snohomish Service Plan and Case Notes Policy](#)
 - o [Workforce Snohomish Service Plan Procedure](#)
 - o [Workforce Snohomish Case Note Procedure](#)
- [Workforce Snohomish Eligibility, Registration and Enrollment Policy](#)
 - o [Workforce Snohomish Registration Procedure](#)
 - o [Workforce Snohomish Low Income and Self Sufficiency Procedure](#)
- [WorkSource System Policy 1009 Rev. 3 - priority of services](#)

- [Source System Policy 1019, Revision 6](#)
- [WIN 0081 \(Change 4\)- WIOA Title I and III procedures for creating accounts in Efforts to Outcomes \(ETO\) when individuals do not provide Social Security Numbers.](#)
- [WIN 0120- Procedures for Adding Participants to Efforts to Outcomes \(ETO\) When Individuals Are Unable to Create a WSWA Account](#)
- [Workforce Snohomish Protection of Personally Identifiable Information Policy.](#)