



Local Policies – Title IB Programs

Priority of Service – Adult

Effective Date

4/22/2021 – Revision Date – 4/3/2023

Background

WIOA establishes a priority requirement with respect to funds allocated to a local area for adult individualized career services and employment and training activities; there is no priority applied for receipt of basic career services. Funds must give priority to recipients of public assistance, other low-income individuals, individuals who are basic skills deficient, and individuals with barriers to employment. Priority must be implemented regardless of the amount of funds available to provide services in the local area.

Scope

Priority of Service: Defined as the right of eligible covered persons to take precedence over eligible non-covered persons in obtaining DOL-funded services. It is important to understand that priority of service does not change the intended function of a program or service. Covered persons must meet all statutory eligibility and program requirements for participation in order to receive priority for a program or service.

AJC staff must prioritize services to these populations at all times, regardless of the amount of funds available to provide services in the local area.

- a) These priorities are in addition to the requirements in the WIOA regulations at 20 CFR 680.650 that veteran and their eligible spouses receive priority of service for all Department of Labor (DOL)-funded job training programs, including the WIOA Adult program.
- b) A veteran must meet each program's eligibility criteria to receive services under the respective employment and training program.

Policy

Adult Title I clients receive priority of service based upon need. Priority should be given to recipients of public assistance, other low-income individuals and individuals who are basic skills deficient. Services are to be provided to those who can benefit from and who are most in need of such opportunities. The Northeast Iowa LWDA gives priority to individuals who fit one of the three priority populations below. Additional priority groups are listed below who may be enrolled by approval from the **Executive Committee**. Acceptable documentation for verifying priority of service is provided in **Attachment A**.

1. Recipient public assistance:
 - a. Temporary Assistance to Needy Families (TANF)
 - b. General Assistance (GA)
 - c. Refugee Cash Assistance (RCA)
 - d. Supplemental Nutrition Assistance Program (SNAP)

Local Policies – Title IB Programs

- e. Other income based public assistance
2. Low-income individuals
 - a. Receives or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance To Needy Families (TANF), Supplemental Security Income (SSI) under Title XVI of the Social Security Act, or state or local income-based public assistance program
 - b. Receives an income or is a member of a family receiving an income that in relation to family size, is not in excess of the current U.S. DOL 70 Percent Lower Living Standard Income Level Guidelines and U.S. Department of Health and Human Services Poverty Guidelines or
 - c. Is a homeless individual, or
 - d. Is an individual with a disability whose own income meets the income requirements above, but who is a member of a family whose income does not meet this requirement.
3. Individuals who are basic skills deficient. The term “basic skills deficient” is defined to mean 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.
 - a. Lacks a high school diploma or equivalency and is not enrolled in secondary education; or
 - b. Is enrolled in Title II adult education (including enrolled for English Language Acquisition); or
 - c. Has poor English-language skills and would be appropriate for ESL, even if the individual isn’t enrolled at the time of WIOA participation; or
 - d. The career planner makes observations of deficient functioning, and, as justification, records those observations in the data management system; or
 - e. Scores below 9.0 grade level (8.9 or below) on the Test of Adult Basic Education (TABE); Comprehensive Adult Student Assessment Systems (CASAS) or other allowable assessments as per National Reporting System (NRS) developed by the U. S. Department of Education’s Division of Adult Education and Literacy; or
 - f. Individual does not earn the National Career Readiness Certificate (NCRC) (e.g. one or more of the scores are below a Level 3 on the Workplace Documents, Applied Math, or Graphic Literacy assessments
4. Additional Priority Groups

Individuals (non-covered persons) who do not meet the above priorities may be enrolled on a case-by-case basis with approval from the **Executive Committee**. The WIOA eligible adult must meet one or more of the following categories of an individual with a barrier to employment:

 - a. Individuals with disabilities, including youth who are individuals with disabilities
 - b. Older individuals (age 55 or older)
 - c. Ex-Offenders
 - d. Eligible migrant and seasonal farm workers
 - e. Single parents (including single pregnant women)
 - f. Individuals who are:
 - English language learners



Local Policies – Title IB Programs

- Have low levels of literacy (an individual is unable to compute or solve programs, or read, write, or speak English at a level necessary to function on the job, or in the individual’s family, or in society)
- g. Underemployed individuals. Underemployed individuals may include:
 - Not employed in a career of choice, or a low skilled position;
 - Individuals employed less than full-time who are seeking full-time employment;
 - Individuals who are employed in a position that is inadequate with respect to their skills and training;
 - Individuals who are employed who meet the definition of low-income individual in WIOA sec. 3(36); and
 - Individuals who are employed, but whose current job’s earnings are not sufficient compared to their previous job’s earnings from their previous employment. Must be at 80% or below previous earnings.

Individuals who are underemployed and meet the definition of a low-income individual may receive career and training services under the Adult program on a priority basis. Individuals who meet the definition of an individual with a barrier to employment (see WIOA sec. 3(24)) who are underemployed may also be served in the Adult program. Individuals who were determined eligible for the Dislocated Worker program who are determined by policy to be underemployed, may still be considered eligible for career and training services under this program.

The above list is used only for applying priority for the individual to receive individualized career services and training services. Certain individualized career services or training services may require pre-and post-test scores to measure skills gain for the specific activity; in this case the determination is made by administering an acceptable skills assessment or by using scores from any partner’s previous assessment.

All Parties certify that they will adhere to all statutes, regulations, policies, and plans regarding priority of service, including, but not limited to, priority of service for veterans and their eligible spouses, and priority of service for the WIOA Title I Adult program, as required by 38 U.S.C. §4215 and its implementing regulations and guidance, and WIOA sec. 134(c)(3)(E) and its implementing regulations and guidance.

A WIOA Adult Fourth Priority of Service Enrollment Request Form must be submitted for those participants that fall under the Adult Fourth Priority of Service. Approvals will be granted by the Executive Committee on a case-by-case basis. The Enrollment Authorization Request form must be submitted by the Monday prior to the next scheduled Executive Committee meeting to be considered. **(Attachment B)**



Local Policies – Title IB Programs

Attachment A

Adult Priority of Service Criteria Acceptable Documentation

Priority of Service Criteria	Acceptable Documentation
Recipient of Public Assistance	<ul style="list-style-type: none"> • TANF eligibility verification • TANF period of benefit receipt verification • Copy of authorization to receive cash public assistance • Copy of public assistance check • Medical card showing cash grant status • Public assistance eligibility verification • Refugee assistance records
Low-Income	<ul style="list-style-type: none"> • Award letter from veteran's administration • Public assistance records • Pay stubs • Bank statements • Housing authority verification • Social security benefits
Basic Skills Deficient	<ul style="list-style-type: none"> • Case notes (explain how defined as basic skills deficient) • Assessment test results (CASAS) • Applicable records from Education Institution (transcripts, academic assessments, or other school documentation)

Additional Priority Service Groups	Acceptable Documentation
Individuals with disabilities, including youth who are individuals with disabilities	<ul style="list-style-type: none"> • Self-Attestation • School 504 records provided by student • Assessment of test results
Older individuals (age 55 or older)	<ul style="list-style-type: none"> • Valid driver's license or State ID • Birth Certificate • Passport
Ex-Offenders	<ul style="list-style-type: none"> • Court documents • Letter of parole • Letter from a probation officer • Police records • Document from juvenile/criminal justice • Halfway house resident



Local Policies – Title IB Programs

<p>Eligible migrant and seasonal farm workers</p>	<ul style="list-style-type: none"> • Self-Attestation • Cross-match with public assistance records • Case notes • Cross-match with State MIS Database • Cross-match with H-1B records
<p>Single parents (including single pregnant women)</p>	<ul style="list-style-type: none"> • TANF Single parent eligibility verification • WIC eligibility verification • Case notes (must have verified status with appropriate entity) • Self-Attestation • Needs Assessment • Signed intake application or enrollment form • Medical records
<p>Individuals who are:</p> <ul style="list-style-type: none"> • English language learners • Have low levels of literacy (an individual is unable to compute or solve programs, or read, write, or speak English at a level necessary to function on the job, or in the individual’s family, or in society) 	<ul style="list-style-type: none"> • Case notes • Assessment test results • Applicable records from Education institution (transcripts, academic assessments, or other school documentation) • Self-Attestation • Signed intake application or enrollment form
<p>Underemployed individuals</p>	<ul style="list-style-type: none"> • Unemployment insurance records • Layoff letter/WARN Notice • Employer Statement • Documentation RES/RESEA • Pay stubs showing insufficient earnings to date • Unemployment denial letter • Employer records • W-2 and/or tax returns • Termination notice



Local Policies – Title IB Programs

Attachment B

Northeast Iowa Workforce Development Board WIOA Adult Fourth Priority of Service Enrollment Authorization Request

Fourth Priority of Service is a category of enrollment for WIOA eligible adults who do not meet the WIOA Adult Priority of Services categories one, two or three. Fourth Priority of Service Adults will be served on a case-by-case basis and upon approval by the NEIWDB Executive Committee for individuals whose barriers selected below present a barrier to obtaining employment that leads to self-sufficiency. There is no priority applied for receipt of basic career services and those should always be offered and available.

Enrollment Authorization Request form must be submitted by the Monday prior to the next scheduled Executive Committee meeting. The Executive Committee meets the first Monday of the month. Any requests submitted after the deadline will be considered for the next Executive Committee meeting.

Applicant Name:	Career Planner:

	Individuals with disabilities, including youth who are individuals with disabilities
	Older individuals (age 55 or older)
	Ex-Offenders
	Eligible migrant and seasonal farm workers
	Single parents (including single pregnant women)
	Individuals who are:
	English language learners
	Have low levels of literacy (an individual is unable to compute or solve programs, or read, write or speak English at a level necessary to function on the job, or in the individual’s family or in society)
	Underemployed individuals. Underemployed individual may include:
	Not employed in a career of choice, or a low skilled position
	Individuals employed less than full-time who are seeking full-time employment
	Individuals who are employed who meet the definition of low-income individual in WIOA sec. 3(36); and
	Individuals who are employed, but whose current job’s earnings are not sufficient compared to their previous job’s earnings from their previous employment. Must be at 80% or below previous earnings.

