



Larimer County Workforce Center Policies and Procedures

Subject: **WIOA Adult Priority of Service Policy**

Policy No: **P&P-03-104**

Issue No: **1**

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Reviewed: **N/A**

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Reviewed by: **D. Jardine**

I. POLICY

- A. The Workforce Innovation and Opportunity Act (WIOA) Adult program provides a priority focus on serving individuals with barriers to employment. The intent of this priority is to ensure WIOA service access to these populations as funding permits.
- B. The WIOA Adult program statute requires priority of service be given to (1) public assistance recipients, (2) other low-income individuals, (3) individuals who are basic skills deficient, and (4) individuals who are both underemployed and low income.
- C. At least 51% of WIOA eligible adults served under the WIOA Adult program at the Larimer County Workforce Center (LCWC) must meet one or more of the four (4) priorities of service categories outlined by WIOA.
- D. The LCWC has implemented residency as a local priority of service category for customers, with the exception of veterans and their eligible spouses. Residency within Larimer County will be required for all non-veterans and eligible spouses along with one of the four identified priority of service categories.
- E. The priority of service for veterans and eligible spouses applies across all United States Department of Labor (USDOL) employment and training programs. In consultation with the LCWC's Workforce Development Board, priority of service for the WIOA Adult program will be applied in the following order.
1. Veterans and eligible spouses who meet the statutory priority and Adult program eligibility. Local residency not required.
 2. Non-veterans or eligible spouses who meet the statutory priority, and meet local residence priority and Adult program eligibility
 3. All other veterans and eligible spouses who meet Adult program eligibility. Local residency not required.
 4. Non-veterans or eligible spouses who do not meet the statutory priority but do meet local residence priority and Adult program eligibility
 5. Non-veterans or eligible spouses who do not meet statutory priority and do not meet the local residency priority, but do meet Adult program eligibility.
- F. Modifications to our local priority of service may occur in conjunction with the Larimer County Workforce Development Board, after a review of federal funding and regional priorities.

II. SCOPE OF POLICY

- A. This policy applies to the Workforce Innovation and Opportunity Act (WIOA) Adult program

III. DEPARTMENTS AFFECTED

- A. Larimer County Workforce Center WIOA Adult program

IV. REFERENCES

- A. Colorado Department of Labor and Employment Policy Guidance Letter #15-12-WIOA
- B. Larimer County Workforce Center Local P&P-00-102 Veterans and Eligible Spouses Priority of Service in all Qualified job Training Programs
- C. United States Department of Labor, Employment and Training Administration, Lower Living Standard Income Level Guidelines 2015: <http://www.doleta.gov/lisil/2015/>
- D. Colorado Department of Labor and Employment Policy Guidance Letter #15-09-WIOA, Attachment#1: WIOA Adult Eligibility Criteria, Glossary, and Documentation Checklist

V. DEFINITIONS

- A. **Priority of Service:** Individuals in the targeted groups are given priority over other individuals for receipt of individualized career services and training services that are funded by the WIOA Adult program. Additionally, veterans within these groups receive priority over non-veterans.
- B. **Receiving Public Assistance:** Individuals who receive, or in the past 6 months have received, or are a member of a family that is receiving or in the past 6 months has received, assistance through one or more of the following:
 - 1. Supplemental Nutrition Assistance Program (SNAP)
 - 2. Temporary Assistance to Needy Families (TANF) program
 - 3. Supplemental Security Income (SSI)
 - 4. State or local income-based cash public assistance such as Aid to the Needy Disabled (AND), Old Age Pension (OAP)
- C. **Other Low-Income Individuals:**
 - 1. Recipients of public assistance (defined above)
 - 2. Individuals in a family with a total income below 70% of the Lower Living Standard Income (LLSIL)
 - 3. Homeless
 - 4. Individuals with disabilities with an individual income below 70% of the lower living standard income level
- D. **Basic Skills Deficient:** An 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 participant's family, or in society. Lacking soft skills needed for a particular job may not be used to determine otherwise high-functioning individuals as basic skills deficient.

An adult may be assessed as basic skills deficient through case manager observations as long as sufficient documentation is provided in case notes. A case manager may also document basic skills deficient with one of the following:

- 1. Basic skills assessment questions
- 2. School records
- 3. Referral or records from an Adult Basic Education program

4. Referral or records from an English Language Learner program

E. **Underemployed:** Adults who are employed full- or part-time and meet the definition of a low-income individual.

VI. APPLICABLE FORMS

A. WIOA Adult

1. Career Transition Program Application
2. Connecting Colorado WIOA Application
3. Income Assessment Worksheet (when applicable)
4. Self-Attestation (when applicable)

VII. PROCEDURES

A. The Career Transition Program application contains a series of questions that staff use to determine if an applicant may fall within one of the Adult Priority of Service groups.

B. If an applicant appears to meet one of the criteria for Adult Priority of Service, additional documentation that appropriately verifies this status will be requested from the applicant. Please see Colorado Department of Labor and Employment Policy Guidance Letter #15-09-WIOA, Attachment#1: WIOA Adult Eligibility Criteria, Glossary, and Documentation Checklist for a complete list of acceptable documentation.

C. The Income Assessment worksheet will only be utilized when income calculations are necessary to document low-income for Adult Priority of Service.

D. As a method of last resort, self-attestation may be used to document Larimer County residency, and low-income and/or underemployed. Veteran status, public assistance, and basic skills deficiency must be verified via an acceptable document source. Please see Colorado Department of Labor and Employment Policy Guidance Letter #15-09-WIOA, Attachment#1: WIOA Adult Eligibility Criteria, Glossary, and Documentation Checklist for a full list of acceptable document sources.

E. The Adult Priority report in Connecting Colorado will be accessed regularly to monitor progress toward the goal of serving 51% of Adult participants from the priority targeted groups.

VIII. RESPONSIBLE PARTY

A. Joni Friedman, Larimer County Workforce Center Director or her designee.