

Phoenix Workforce Connection Youth Program

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BACKGROUND

Initial general and economic eligibility determinations are to be based on a review of the VOS application form signed by the WIA applicant and/or parent/guardian (in the case of a minor). The following procedures and guidelines have been developed for documenting program eligibility and economic eligibility. Youth providers must ensure that city of Phoenix youth are given priority to receive WIA-funded services.

POLICY

The Arizona Department of Economic Security/WIA Section recently issued WIA Guidance Letter #05-07, which supersedes WIA Guidance Letter #03-06, Change 1, dated October 17, 2006. Effective April 15, 2008, only the documents listed under “Acceptable Verification and Documentation” on the revised WIA Eligibility & Verification Checklist are acceptable verification of the data element in VOS. ***Please note the changes to the Self-Attestation criteria for the local area.***

DEFINITIONS

Family

Under WIA, the term “family” relates to two or more persons living in the same household who are related through blood, marriage, or court decree, and are included in at least one of federal law groups below. The state further defines family as an economic unit of one or more person, as described below. Family, as defined below, must be used in determining financial eligibility **where appropriate**:

- A husband, wife, and their dependent children
- A parent or guardian and his/her dependent children
- A Husband and wife
- An economic unit of one or more persons who receive at least 50% of their financial support from the economic unit.

Note:

If any family member included in definitions above is disabled, he/she is considered a family of one. Verification of disability must be documented.

Disability

Provision of this information by a participant is voluntary and may only be self-identified. The applicant must support any such claim with appropriate documentation.

In determining whether an individual without a disability can be considered to be a family unit of one, consideration is to be given to the following situations:

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- An individual 14 years of age or older, not living with his/her family, and receiving less than 50 percent maintenance from the family in a six month period previous to program application
- An individual 18 years of age or older living with his/her family who received less than 50 percent maintenance from the family in the six month period previous to program application and is not the principal earner nor the spouse of the principal earner

Citizenship/Right to Work

Participation in WIA Title IB programs or activities must be available to United States citizens, lawfully admitted permanent resident aliens, refugees, asylees, parolees, and other immigrants **authorized to work in the U.S.** There are numerous documents which Local Workforce Investment Agencies (LWIAs) can accept as verification for citizenship and right to work in the United States. These documents are listed under WIA Eligibility & Verification Checklist.

Self-Attestation

Self-attestation occurs when a participant states his or her status for a particular data element and then signs and dates a form acknowledging this status. In these instances, the state does permit self-attestation as an alternative means of verifying a **limited** number of factors related to the applicant status. The key elements for self-attestation are (1) the participant identifying his or her status for permitted elements, and (2) signing and dating a form attesting to this self-identification.

The WIA Eligibility and Verification Checklist is used by program monitors when conducting data validation checks. Some of the elements states that the WIA application is sufficient for proof; however, some require that if no document is provided, then the self-attestation form is used for validation. The checklist will enable easy identification of documents used to meet eligibility requirements.

The following youth element is the **only** instance where the **WIA Application** is a sufficient source for documentation:

1. School status at participation/Highest Grade Completed
2. Youth requires additional assistance

The following four elements are instances where **self-attestation** is permitted when efforts have been exhausted and it has been determined that the documentation is unavailable and obtaining the documentation will cause undue hardship for the individual:

1. Homeless individual and/or runaway
2. Youth Offender
3. Pregnant or parenting youth
4. Family Size

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For the pregnant or parenting youth observation is also listed as a source documentation requirement for this element, in which the caseworker would have to document they have observed that the participant is pregnant or parenting.

Coordination of Pell Grants with Other Education-Related Assistance

It is important that Local Workforce Investment Areas (LWIAs) leverage available funds for training, including Pell Grants and WIA Individual Training Accounts (ITAs), to ensure that the costs of training and support services are fully paid for WIA participants, and to reduce the likelihood of duplicate payments for such services. To date, the U.S. Department of Labor has not issued additional guidance regarding the *order of payments* for training costs for individuals eligible for both WIA and other educational assistance. However, the WIA Final Rule does emphasize that local area programs should assist each participant in establishing Pell Grant eligibility before a participant enrolls in a particular school or training program. A WIA participant may be enrolled into training with WIA funds while a Pell Grant application is pending. However, the Local Workforce Investment Area (LWIA) must put a process in place so that that LWIA can be reimbursed by a training institution for the “tuition” portion of the Pell Grant funds. Generally, Pell Grants provide both tuition and other types of assistance (e.g. living expenses, lab fees, books, etc.). **Only the portion of the Pell Grant that provides for tuition is subject to reimbursement.**

The Free Application for Federal Student Aid (FAFSA), which is used to establish Pell Grant eligibility, is readily available on-line at <http://www.fafsa.ed.gov>. When a participant completes the FAFSA on-line, it can be electronically submitted immediately to the U.S. Department of Education (DOE) for processing. Generally, the DOE makes a determination of Pell eligibility and notifies an applicant within 30 days of FAFSA submittal.

WIA ELIGIBILITY AND VERIFICATION CHECKLIST

Social Security Numbers must be documented. Documentation may be in the form of a Social Security card, W-2 form, Pay Stubs, Social Security Benefits Letter/Notice, DD-214 Report of Transfer or Discharge, UI Records, Letter from Social Services Agency, U.S. Passport or Pseudo Number.

Date of Birth & Age Verification must be documented. The documentation can be in the form of a copy of a AZ Driver’s License or AZ State ID, a copy of a Birth Certificate, Public Assistance or Social Service Records, a Federal, State or Local Government Identification Card, Passport, Hospital Record of Birth, Work Permit, School Records/ID Card, Baptismal Record (if date of birth is shown), Tribal Records and DD-214 Report of Transfer or Discharge Papers or Cross Match with Department of Vital Statistics.

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Selective Service Registration information must be documented for all males who were born on or after January 1, 1960, who are 18 years of age or older. Documentation can be in the form of a Selective Service Registration Card, a stamped Post Office Receipt of Registration, DD-214 Report of Transfer or Discharge, Selective Service Advisory Opinion Letter, Selective Service Registration Record (form 3A), Selective Service Verification Form, Telephone Verification (the selective service registration number may be obtained from the Selective Service Office at 1-(847)688-6888), the youth may register online at www.sss.gov, or copy of a letter indicating Selective Service Registration with WIA.

Citizenship or Eligible to Work must be documented. Documentation can be in the form of a copy of a Baptismal Certificate with Place of Birth, one verification source from List A (I-9 form/listed below), one verification source from List B **AND** one verification source from List C, or a DD214, Report of Transfer or Discharge (if place of birth is shown).

List A

- (U.S. Passport (unexpired or expired)
- Unexpired Foreign Passport with a temporary I-551 Stamp
- Permanent Resident Card or Alien Registration Receipt Card (Form I-551)
- Unexpired Employment Authorization Document that contains a photograph (Form I-766, I-688, I-688A, I-688B)
- Unexpired Foreign Passport with an unexpired Arrival-Departure Record, Form I-94, bearing the same name as the passport and containing an endorsement of the alien's nonimmigrant status, if that status authorizes the alien to work for the employer.

List B

When selecting from list 'B' there must also be a copy of one item from list 'C' as documentation in the participant file.

- Driver's License or ID Card issued by a state or outlying possession of the U.S. provided it contains a photograph or information such as name, date of birth, gender, height, eye color and address
- ID Card issued by federal, state or local government agencies or entities, provided it contains a photograph or information such as name, date of birth, gender, height, eye color and address
- School ID Card with a photograph
- Voter's Registration Card
- U.S. Military Card or Draft Record
- Military Dependent's ID Card
- U.S. Coast Guard Merchant Mariner Card
- Native American Tribal Document

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- Driver's license issued by a Canadian Government Authority

For persons under 18 who are unable to present a document listed above:

- School record or report card
- Clinic, doctor or Hospital Record
- Day-care or nursery school record

List C

When selecting from list 'C' there must also be a copy of one item from list 'B' as documentation in the participant file.

- U.S. Social Security Card Issued by the Social Security Administration (cannot state "not valid for employment")
- Certification of Birth Abroad Issued by the Department of State (Form FS-545 or DS-1350)
- Original or Certified Copy of Birth Certificate with Official Seal
- Native American tribal document
- U.S. Citizen ID Card (Form I-197)
- ID Card for use of Resident Citizen in the U.S. (INS Form I-179)
- Unexpired Employment Authorization Document issued by DHS (other than those listed under List A)

Employment Status at Participation must be documented. Documentation can be in the form of a Pay Stub or case notes showing information collected from participant.

Education Status at time of Participation must be documented. Documentation can be in the form of School Transcripts, GED Certificate, High School Diploma, School documentation, Dropout Letter, Attendance Record, Self Attestation, WIA Application or State MIS document.

Public Assistance Recipient must be documented. If the applicant is a person who is receiving or has received cash assistance or other support services from one of the following sources in the last six months prior to participation in the program:

- **Temporary Assistance to Needy Families (TANF)** must be documented. Documentation can be in the form of a Cross-Match with TANF Public Assistance Records.
- **General Assistance (GA)** must be documented. Documentation can be in the form of an Authorization to Receive Cash Public Assistance, copy of Public Assistance Check, Medical Card showing Cash Grant status, Public Assistance Records/Printouts, Agency award letter or Cross-Match with Public Assistance Database.
- **Refugee Cash Assistance (RCA)** must be documented. Documentation can be in the form of a Refugee Assistance Records/Printout, Authorization to

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- Receive Cash Public Assistance, a copy of Public Assistance Check, Medical Card showing Cash Grant status or Public Assistance Records/Printouts.
- **Food Stamps** must be documented. Documentation can be in the form of a Tribal Commodity Program Records/Printout, Public Assistance Records/Printouts, Cross-Match with Public Assistance Database or Agency award letter.
 - **Supplemental Security Income** must be documented. Documentation can be in the form of an Authorization to Receive Cash Public Assistance, copy of Public Assistance Check, Medical Card showing Cash Grant status, Public Assistance Records/Printouts, Agency award letter or Cross-Match with Public Assistance Database.

Individual Status/Family Size must be documented. Documentation can consist of the following items: Birth Certificates, Court decree, Divorce decree, Landlord Statement, Lease (if family size is given), most recent tax return, Public Assistance/Social Service Agency Records, Public Housing Authority (if resident or on waiting list) records, written statement from publicly supported 24 hour care facility, social security cards/numbers, Native American Tribal Document, Disability documentation (for family of 1), or Self-Attestation (if no other documentation is available).

“**Family of One**” designation of a participant must be documented if it is directly pertinent to eligibility. If an individual qualified as a “family of one” because of more than one reason, only ONE reason needs to be documented (e.g. an individual who has a disability or who has been determined to be “financially independent” needs to have either the disability status or the “financial independence” status documented).

Individual/Family Income must be documented. Documentation can consist of such items as: Pay Stubs, Alimony Agreement, Award Letter from Veterans Administration, Compensation Award Letter, Court Award Letter, Employer Statement/contact, Family/Business Financial Records, Housing Authority Verification, Pension/Annuity Statements, Quarterly Estimated Tax for Self-Employed Persons, Social Security Benefits, Unemployment Insurance Documents, Bank Statements or Public Assistance Records. An applicant statement can be used only in limited cases.

Pell Grant must be documented. Documentation can be in the form of a Copy of the Pell Grant check, Letter from School or Student Aid Report.

Veteran Status or Spouse of a Veteran must be documented. Documentation can be in form of a DD-214 or Cross-Match with Veterans Data. **Spouse of a Veteran**, documentation can be in form of a Cross-Match with Veterans Data, Military document (ID, other DD Form) indicating dependent spouse or documentation (such as DD214) that indicates status of veteran that meets the requirements for “spouse of a veteran”.

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UI Compensation Programs must be documented. Documentation can be in the form of UI Records (benefit history, wage, record, and letter).

Individuals with Disabilities must be documented. Documentation can be in the form of Medical Records, Physician's Statement, Psychologist's Diagnosis, School Records, Vocational Rehabilitation Letter, Worker's Compensation Record, letter from Drug or Alcohol Rehabilitation Agency, Sheltered Workshop Certification, Psychiatrist's Statement, Veterans' Administration letter/records, Rehabilitation Evaluation, Social Security Administration Disability Records, Social Service Records/Referral. Individuals claiming to be financially independent must complete an applicant statement attesting to their individual status. Such statements should be corroborated by the head of household in which that person resides, if possible.

Foster Care Youth must be documented. Proof can consist of such items as: Confirmation from Social Services Agency or Case Notes.

Homeless or Runaway Youth must be documented. Proof can consist of a written statement from a Shelter or Social Service Agency, a written statement from an individual providing temporary residence, a Self-Attestation or WIA Application.

Youth Offender must be documented. Proof can consist of documentation from Juvenile or Adult Criminal Justice System, documentation phone call with court representatives, a Self-Attestation or WIA Application.

Pregnant or Parenting Youth must be documented. Documentation can be in form of a child's Baptismal Record, case notes regarding observable condition, child's Birth Certificate, Doctor's note confirming Pregnancy or Self-Attestation.

Basic Skills Deficient must be documented. Proof can consist of a copy of School Records or a Standardized Assessment Test.

Youth who Needs Additional Assistance must be documented. Documentation can be in form of Case Notes, Individual Service Strategy (ISS), Local Area Policy & Plan, State Management Information System, Self-Attestation or WIA Application.

INCLUSIONS IN FAMILY INCOME

Income that is considered when determining low-income status for the six (6) months prior to the date of application:

- Alimony
- College or university grants (excluding Pell Grants), fellowships, assistantships
- Dividends, interest, net rental income, net royalties, and periodic receipts from estates or trusts

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- Gross wages/salaries paid, and military pay while on active duty and severance pay
- Military family allotments or other regular payments from an absent family member but not child support
- Net gambling or lottery winnings
- Net receipts from
 - Non-farm self-employment (receipts from an individual's own unincorporated business, professional enterprise, or partnership after deductions for business expenses)
 - Farm self-employment (receipts from a farm which one operates as an owner, renter, or sharecropper, after deductions for farm operating expenses)
- Pensions, whether private or government (including military retirement pay)
- Regular disability insurance or annuity payments
- Regular payments from the following:
 - Railroad retirement
 - Strike benefits from union funds
 - Worker's compensation
 - Training stipends
 - Supplemental unemployment benefits paid by the union or employer
 - Work-study wages **not** issued on low-income status
- Tribal Per Capita payments per US Department of Labor DINAP Bulletin No. 00-11. According to this bulletin, per capita payments, regardless of the title attached to these payments, are considered “family income” with the exception of those payments “derived from an exercise of the trust responsibility”.

EXCLUSIONS IN FAMILY INCOME

The income that is not considered when determining low income status:

- Any assets drawn down as withdrawals from a bank, the sale of property, a house or a car
- Capital gains
- Child support payments (paid or received), **including foster care child payments**
- Veterans' benefits, i.e., compensation for a service-connected disability, compensation for service-connected death, vocational rehabilitation and education assistance
- WIA payments: training stipends, support, and wages
- Non-cash benefits such as employer-paid fringe benefits, food or housing received in lieu of wages, Medicare, Medicaid, Food Stamps, school meals, and housing assistance

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- Pell Grants, Federal Supplemental Educational Opportunity Grants and Federal Work Study, PLUS, Stafford and Perkins loans (These are like any other type of loan, they represent debt and not income)
- Scholarships based on need
- Tax refunds, gifts, loans, lump-sum inheritances, one-time insurance payments, or compensation for injury
- Unemployment compensation
- Welfare payments (including TANF, SSI, RCA, and GA)
- Work-study wages issued on low-income status
- Social Security (old age and survivors' insurance or disability insurance).

The 70% Lower Living Standard Income Levels (LLSILs) are published by the Secretary of Labor annually. They represent maximum annual income levels, adjusted for metropolitan and non-metropolitan areas, as well as family size, that are used as a criterion for eligibility under WIA. Specifically, **the 70% LLSILs are used to determine annual income eligibility for adults when local area funds are *limited*, and for all eligible youth, with the exception of those served under the 5% annual income exception rule (See WIA Final Rule, Section 664.220).** The 70% LLSIL annual income levels are indicated in the chart below for PY 2008. The chart will be updated annually, and VOS has a link to the updated LLSIL.

FAMILY SIZE	70% LLSIL* METRO AREA	100% LLSIL METRO AREA	SELF-SUFFICIENCY For employed Adults* 450% LLSIL METRO AREA	SELF-SUFFICIENCY For employed DW 450% LLSIL METRO AREA
1	\$10,400	\$13,200	\$59,400	\$59,400
2	\$15,142	\$21,632	\$97,344	\$97,344
3	\$20,790	\$29,700	\$133,650	\$133,650
4	\$25,665	\$36,664	\$164,988	\$164,988
5	\$30,285	\$43,264	\$194,688	\$194,688
6	\$35,422	\$50,603	\$277,714	\$277,714
7	\$40,559	\$57,942	\$260,739	\$260,739
8	\$45,696	\$65,281	\$293,765	\$293,765
Additional per Person >8	\$5,137	\$7,339	\$33,026	\$33,026