



# **EASTERN WORKFORCE INVESTMENT BOARD, INC.**

*Proudly serving Adair, Cherokee, McIntosh, Muskogee, Okmulgee, Sequoyah and Wagoner Counties in Oklahoma*

## **PRIORITY OF SERVICE POLICY**

EFFECTIVE AUGUST 19, 2008  
EFFECTIVE *FEBRUARY 4, 2009*

EWIB is an Equal Opportunity Employer/Program  
Auxiliary Aids and Services are Available upon Request to Individuals with Disabilities

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## **PURPOSE:**

This issuance provides policy, guidance and procedures for the administration and oversight of Priority of Services. It is the intention of Eastern Workforce Investment Board (EWIB) administration that this document conform to the pertinent legislation, regulation, state issued polices, and the Board's intent to provide quality customer services.

## **AUTHORITY:**

### **P.L. 105.220 The Workforce Investment Act §134(d)(4)(E) Priority states:**

In the event that funds allocated to a local area for adult employment and training activities under paragraph (2)(A) or (3) of section 133(b) are limited, priority shall be given to recipients of public assistance and other low-income individuals for intensive services and training services. The appropriate local board and the Governor shall direct the one-stop operators in the local area with regard to making determinations related to such priority.

**OETI 26-2000** states: *"Priority for intensive and training services funded with Title I adult funds must be given to recipients of public assistance and other low income individuals in the local areas.*

1. *Since funding is limited, local areas must establish criteria by which local areas can determine the availability of funds and the process by which priority will be applied under WIA Sec. 134(d)(E). The criteria may include availability of other funds for providing employment and training-related services in the local area, the needs of the specific groups within the local area and other appropriate factors.*
2. *Local areas must give priority to adult intensive and training services to recipients of public assistance and other low-income individuals, unless the local area has determined funds are not limited under the criteria established in paragraph (1) of this section.*
3. *The process to determine whether to apply the priority established under paragraph (1) does not necessarily mean that only the recipients of public assistance and other low income individuals may receive WIA adult funded intensive and training services when funds are determined to be limited in a local area. The local board may establish a process giving priority for services to the recipients of public assistance and other low income individuals and that also serves other eligible individuals."*

## **POLICY:**

The Eastern Workforce Investment Board, Inc. (EWIB) will review available funding within the region and determine when Priority of Service for WIA Intensive and Training Services will be declared.

Priority of service will be given to the following individuals:

- Eastern Workforce Investment Board has determined that **priority of service** will be given to **individuals who are serving or veterans of the US Armed Forces** regardless of the region's Priority of Service status for WIA Adult programs.
- **Individuals who are recipients of public assistance as defined in WIA §101(37) and are not eligible to receive any other services available in the community.**  
*Public assistance -The term "public assistance" means Federal, State, or local government cash payments for which eligibility is determined by a needs or income test.*
- **Individuals who are considered to be low income as defined by WIA §101(25):**  
*Low-income individual.-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, for the 6-month period prior to application for the program involved (exclusive of unemployment compensation, child support payments, payments described in subparagraph (A), and old-age 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-
- (i) the poverty line, for an equivalent period; or
  - (ii) 70 percent of the lower living standard income level, 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.

● **Individuals who are serving or veterans of the US Armed Forces.**

**PROCEDURE:**

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1. The EWIB Chief Fiscal Officer will notify the EWIB Program Managers when 60% of WIA client funds have been expended.
2. The EWIB Program Managers will notify the Operator by e-mail that 60% of client funds have been expended.
  - i. Depending when in the program year the client funds have been expended, EWIB may restrict any unobligated expenditures.
3. The Operator will prioritize funds and inform the One Stop Staff the area is in *Priority of Service* status when 60% of client funds have been expended.
  - a. The EWIB Staff will provide technical assistance to the One Stop staff as needed.
  - b. The Operator will communicate to the One Stop Staff the status of client funds and expenditures/obligations.
2. The Chief Fiscal Officer will notify the EWIB Program Managers and the Executive Director when client funds reach 80% expended.
  - a. The EWIB Program Managers will notify the Operator by e-mail that 80% of client funds have been expended.
    - i. At that point, EWIB may halt any unobligated customer expenditures.
3. After entering *Priority of Service*, the Chief Fiscal Officer (CFO) can determine if Adult funds are adequate for intensive and training services in the area and rescind *Priority of Service*.
  - a. The CFO will review the EWIB budget and make a recommendation to the EWIB Executive Director.
  - b. The EWIB Executive Director will review the CFO's recommendation and determine to rescind *Priority of Service*.
4. The Operator will be informed by the EWIB staff by e-mail if the EWIB staff determines to rescind *Priority of Service* status.
  - a. The EWIB Staff will provide technical assistance to the One Stop staff as needed.

## **Veterans Priority of Services**

According to TEGL 5-03 “Implementing the Veterans Priority Provisions for the “Jobs for Veteran’s Act (PL 107-288)”, the law requires that the veteran receiving priority must meet the program’s existing eligibility requirements in order to obtain priority of service. Veterans who are eligible for WIA Adult and Dislocated Worker programs will be given priority over non-veterans for all available services regardless of EWIB’s priority of service status.

Status as a Veteran will be determined in the Welcoming Function and validated in the Skills or Job Getting Functions. Referrals to the One Stop Veterans’ representatives will occur through any of the functions.

## **Determining Priority of Service**

When EWIB establishes the area is in “Priority of Service” due to limited program funds, only WIA-Adult customers are required to prove they are in the Priority of Service categories prior to receiving the first WIA Intensive Service. Customers will receive their first WIA Intensive Service upon entering the Skills Development Function of the Integrated Service Delivery flow of the One Stop Integrated Center.

Copies of the original documentation must be placed in the customer’s file once the customer’s Priority of Service is established.

## **Acceptable Source Documentation for Priority of Service**

Support documentation must be dated within the last six (6) month prior to the first intensive service in order to determine if the customers is eligible for Priority of Service. Appropriate source documentation includes:

- Public assistance records
- Compensation award letter
- Bank statements
- Award letter from Veteran’s Administration
- Social security benefits
- Housing authority records
- Pay stubs
- Family or business financial records
- Employers statement
- Current unemployment insurance verification
- Alimony agreement
- Copy of authorization to receive cash public assistance
- Copy of public assistance check
- Medical card showing cash grant status
- Refugee assistance records
- Self-attestation with appropriate back up documentation
- DD Form 214
- Current Military ID

The chart on the following page can be used as a tool to assist staff in determining appropriate documentation for customers with low income.

<b>Low Income Documentation</b>	
<b>Criteria</b>	<b>Documentation</b>
<ul style="list-style-type: none"> <li>receives, or is a member of a family that receives, cash payments under a Federal, State, or local income-based public assistance program;</li> </ul>	<ul style="list-style-type: none"> <li>Public assistance records;</li> <li>Award letter from Veteran's Administration</li> <li>Compensation award letter;</li> <li>Social security benefits;</li> <li>TW-3 that documents TANF</li> <li>Housing authority records</li> </ul>
<ul style="list-style-type: none"> <li>received an income, or is a member of a family that received a total family income, for the 6-month period prior to application for the program involved (exclusive of unemployment compensation, child support payments, payments described in subparagraph (A), and old-age and survivors insurance benefits received under <b>section 202 of the Social Security Act (42 U.S.C. 402)</b>) that, in relation to family size, does not exceed the higher of-  <ul style="list-style-type: none"> <li>(i) the poverty line, for an equivalent period; or</li> <li>(ii) 70 percent of the lower living standard income level, for an equivalent period;</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Compensation award letter</li> <li>Bank statements</li> <li>Pay stubs</li> <li>Family or business financial records</li> <li>Employers statement</li> <li>Current unemployment insurance verification</li> <li>Alimony agreement</li> <li>Refugee assistance records</li> <li>Self-attestation with appropriate back up documentation</li> </ul>
<ul style="list-style-type: none"> <li>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 <b>Food Stamp Act of 1977 (7 U.S.C. 2011 et seq.)</b>;</li> </ul>	<ul style="list-style-type: none"> <li>TW-3 that documents Food Stamps</li> </ul>
<ul style="list-style-type: none"> <li>qualifies as a homeless individual, as defined in subsections (a) and (c) of <b>section 103 of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302)</b>;</li> </ul>	<ul style="list-style-type: none"> <li>Self-attestation with appropriate back up documentation</li> <li>Written statement from social service agency, shelter, or individual providing temporary shelter.</li> </ul>
<ul style="list-style-type: none"> <li>is a foster child on behalf of whom State or local government payments are made</li> </ul>	<ul style="list-style-type: none"> <li>Public assistance records</li> <li>Self-attestation with appropriate back up documentation</li> <li>Medical Card</li> <li>Court Documentation</li> </ul>
<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Medical card showing cash grant status</li> <li>Self-attestation with appropriate back up documentation</li> <li>Award letter from Veteran's Administration</li> <li>Social security benefits</li> <li>School records</li> <li>Physician's statements</li> </ul>

**Documentation in Oklahoma Service Link**

Data validation will be documented in accordance with **OETI #06-2006 change 1**.

<b>Instructions</b>	<b>Example</b>
<b>Data Validation in "Program Notes" field:</b> Staff must review acceptable source documents identified in this policy and record them in OSL.	<u>Priority of Service</u> – Validated 10/27/06 Public Assistance verified: DHS TW-3 dated 10/3/2006