



<p align="center">WORKFORCE INNOVATION AND OPPORTUNITIES ACT POLICY & PROCEDURE</p>	<p align="center">PRIORITY OF SERVICE</p>	<p>EFFECTIVE/APPROVAL DATE: 5.10.17 REVISION DATE: APPROVED BY: RWDB EXEC COMM PAGES: 1-3</p>
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PURPOSE

The purpose of this policy is to recognize Workforce Alliance of the North Bay (The Alliance) Workforce Development Boards commitment to the Employment Development Departments WSD (Draft)-119 “WIOA Adult Program Priority of Service” directive covering Priority of Services (Public Law 113-128, sections 3 and 134). This policy will be effective on July 1, 2015. Each geographic subcommittee under the Workforce Alliance of the North Bay must develop local implementation policy and procedures to comply with WIOA and this policy. The policy currently addresses only the three designations of priority together with Veteran and eligible spouses, but has been left open for additional stratifications of participant characteristics. This policy is subject to change if and when Federal Regulations or state guidance are clarified, but will stay active until changed.

POLICY STATEMENT:

This policy applies only to Adult job seekers and does not apply to Dislocated Workers. The policy pertains to the number of enrolled participants and does not dictate the amount of funds expended for this group. Priority of Service status is established at the time of eligibility determination and does not change during participation.

Each WIOA Service Provider operating under contract with The Alliance will make certain that ***at a minimum, 51 percent*** of the enrolled WIOA Adult participants, that receive Individual Career Services and/or Training Services, meet the Priority of Service requirements as detailed in this policy. Although this policy sets a minimum percentage of participants meeting the Priority of Service definition(s), this policy does not intend to only reach that minimum. The spirit of WIOA is clear and intends Adult funds be used for the Priority of Service population. Accordingly, participants who do not qualify for Priority of Service will be served only when the pool of those who do is served. When Adult job seekers meet the criteria for Priority of Service, it is The Alliance WDB’s intent that they will be served prior to those who do not qualify. Non Priority of Service participants may be served with Individual Career Services and Training Services when the capacity of the One-Stop (AJCC) can serve them.

This policy does not expect that access to the AJCC is limited to any job seeker, but rather intends to focus the delivery of higher tier services to be provided to at least a majority of participants that qualify as priority members. Adult resources must be used as available to serve these priority participants. If an AJCC has

unexhausted funding to support higher tier services to non priority participants, it may do so. However, irrespective of the funding used, the count of clients entered into individual career services and into training services needs to be at least 51 percent. (Each category must be separately determined and met.) e.g., If 110 participants get individualized career services, at least 56 must be in the priority of service category. Also, if 40 receive training services, at least 21 must be from the priority of service category.

All WIOA Service Providers must operate under policies and procedures that not only target and outreach participants qualifying under this Priority of Service, but set up an ongoing tracking system that ensures the intent and minimums of this policy are met. Alignment with partner agencies that serve clients that have the characteristics that make up Priority of Service should be an integral part of AJCC outreach and service structure (e.g., Department of Health and Human Service, local Department of Education).

All Adult participants seeking Individual Career and/or Training services must first be screened for WIOA program eligibility. After determined eligible, they will be classified into one of two subsets, designating them as either meeting the Priority of Service Criteria or not. To qualify as meeting Priority of Services, the job seeker must be one of the following (defined in more detail later in this policy)

1. Basic Skill Deficient
2. Low-Income
3. Recipient of Public Assistance

Within the classification of those meeting the Priority of Service listed above, participants may be categorized into sub groups, as defined by the local subcommittee. This policy does not establish any additional sub groups for the Priority of Service population, but allows local subcommittees to create sub groups and create policies and procedures to account for and prioritize service delivery to those populations.

Within the classification of meeting Priority of Services, and within each sub group, Veterans and their qualifying spouses will receive priority. Veteran or qualifying spouse who do not meet the Priority of Service (or a sub level group) do not preempt services to non Veteran/qualifying spouses who do meet the Priority of Service or a sub level group. That said, within each group and sub group, Veteran's and their qualifying spouses will be served first.

Regardless of the group or sub group, the aggregate number of participant's enrolled in Individual Career Services and Training (non-duplicative counts) must meet the Priority of Service definition and be at or exceed the 51 percent threshold.

DEFINITIONS:

Basic Skills Deficient –

An individual that 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 (WIOA Section 3[5]). Criteria used to determine whether an individual is basic skills deficient includes the following:

- Lacks a high school diploma or high school equivalency and is not enrolled in post-secondary education.
- Enrolled in a Title II Adult Education/Literacy program.
- English, reading, writing, or computing skills at an 8.9 or below grade level.
- Determined to be Limited English Skills proficient through staff-documented observations.
- Other objective criteria determined to be appropriate by the Local subcommittee and documented in its required policy.

Low-Income –

An individual that meets one of the four criteria below:


- Receives, or in the past six months has received, or is a member of a family that is receiving, or in the past six months has received, assistance through the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance For Needy Families (TANF), program supplemental security income program, or state or local income-based public assistance.
- In a family with total family income that does not exceed the higher of the following:
 - a. The poverty line.
 - b. 70 percent of the Lower Living Standard Income Level.
- A homeless individual.
- An individual with a disability (treated as a family of one) whose own income does not exceed the income requirement, even if they are a member of a family whose total income does.

Public Assistance Recipient –

An individual that receives federal, state, or local government cash payments for which eligibility is determined by a needs or income test (WIOA Section 3[50]).

REFERENCES:

- WIOA (Public Law 113-128) Sections 3 and 134
- Title 20 Code of Federal Regulations (CFR) “WIOA, Notice of Proposed Rule Making, (NPRM)) sections 680.150, 680.600, 680.610, and 6780.650.
- Workforce Services Directive WSD08-10 “Final rule on Priority of Service for Veterans and Eligible Spouses”

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