

July 15, 2010

To: WIA Contractors of the Orange County
Workforce Investment Area

From: Andrew Munoz
Community Investment Division Administrator/
Workforce Investment Board Executive Director

Subject: WIA VERIFICATION AND DOCUMENTATION REQUIREMENTS FOR
CLIENT ELIGIBILITY
Policy and Procedure No. 10-OCWDA-04

PURPOSE:

The purpose of this policy is to reemphasize the requirement of verifying specific documents for client eligibility found in the Workforce Investment Act (WIA) Eligibility Technical Assistance Guide (TAG). In addition, it reiterates the requirement for maintaining proof of client eligibility documentation.

EFFECTIVE DATE:

This policy is effective on the date of issuance.

REFERENCES:

- WIA of 1998 (Pub. L. 105-220)
- Training and Employment Guidance Letter 31-09, Program Year (PY) 2009/Fiscal Year 2010 Performance Reporting and Data Validation Timelines (June 11, 2010)
- Employment Development Department (EDD) WIA Eligibility TAG, PY 2004-05
- WIA Directive WIAD04-18 dated March 29, 2005 (Title I Eligibility)
- WIA Directive WSD09-8 Job Training Automation (JTA) System Client Forms Handbook (February 2010); and, WIA Information Notice WSIN09-54 Job Training Automation (JTA) System Client Forms Handbook Update (April 2010)
- EDD Directive WSD09-18 dated June 17, 2010 (WIA Verification and Documentation Requirements for Client Eligibility)



BACKGROUND:

On January 20, 2010, the Department of Labor (DOL) communicated its decision that the paperless approach outlined in the two draft directives made available to the Workforce Development Community for review and comment on June 5, 2008 (LLDD-10) and June 16, 2008 (WSD-11), do not meet the requirement for maintaining proof of client eligibility documentation.

This policy reiterates the need to follow the eligibility determination and documentation requirements in the EDD WIA Eligibility TAG and makes reference to the WIA JTA System Client Forms Handbook which contains updated guidance regarding the use of JTA forms.

POLICY AND PROCEDURES:

The guidelines in this policy are intended to provide information to OCWIA Contractors to ensure compliance with the data collection and reporting requirements. Proper hard copies of documentation must be retained in the participant files.

Verification and Documentation of Client Eligibility

For the WIA Adult, Dislocated Worker, and Youth programs, the birth date and U.S. work authorization must be verified and hard copies must be retained and made available for subsequent review.

In addition, when applicable, the following data elements must be verified and hard copies must be retained and made available for subsequent review:

- Income Eligibility
- Selective Services
- Veterans Status
- Dislocated Worker Eligibility
- Youth Barriers

For a list of acceptable forms of documentation that must be retained, please refer to the EDD WIA Eligibility TAG and the EDD WIA JTA System Client Forms Handbook. *The WIA JTA System Client Forms Handbook, April 2010 is available on the Internet.*

[WIA JTA System Client Forms Handbook](#)

Program Accountability

All OCWIA Contractors are responsible for ensuring that adequate documentation is retained to minimize the risk of disallowed costs. The OCWIA supports the development of a balanced documentation and verification policy that is not excessively intrusive and burdensome and is, at the same time, a good faith and reasonable effort to establish WIA eligibility.

ACTION:

Distribute this policy to all appropriate staff.

INQUIRIES:

Inquiries involving the JTA system may be directed to the following:

- Norman Albances (714) 567-7535; Norman.albances@occr.ocgov.com
- Julissa Lazcano (714) 567-7536; Julissa.lazcano@occr.ocgov.com
- Milton Vasquez (714) 567-796-8351; Milton.vasquez@occr.ocgov.com
- Norisa Pascual (714) 567-7597; Norisa.pascual@occr.ocgov.com