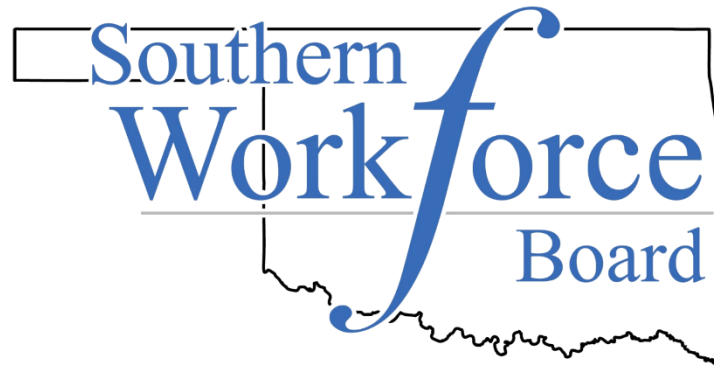


# SOUTHERN WORKFORCE BOARD



## **Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by Title III of WIOA**

**SWB – #109**

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SWB is an Equal Opportunity Employer/Program and Activities. Auxiliary aids and services are available upon request to individuals with disabilities.

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## **I. PURPOSE:**

Provides guidance to the workforce system on delivering services under WIOA Title I Adult and Dislocated Program and individual served by the Wagner-Peyser Act Employment Service Program in the Southern Workforce Development Area.

## **II. References:**

### **REFERENCES**

- **The Workforce Innovation and Opportunity Act of 2014, Titles I and III**
- **20 CFR §§ 678, 680 and 681**
- **TEGL No. 19-16**
- **TEGL 16-16**
- **TEGL 13-16 and TEGL 13-16, Change 1**
- **TEGL No. 10-09**
- **TEGL No. 10-16, Change 2**
- **TEGL No. 22-04 and TEGL 22-04, Change 1**
- **TEGL No. 15-12**
- **TEGL No. 4-20**
- **TEN No. 01-21**
- **OWDI #02-2019, Change 2**
- **OWDI #03-2019**
- **OWDI #04-2020**
- **OWDI #02-2022**
- **OWDI #04-2019**
- **38 U.S.C. 4213**
- **Section 101 of Title 10, United States Code**

## **III. BACKGROUND:**

The Workforce Innovation and Opportunity Act (WIOA) provides for a workforce system that is customer centered, accessible to all job seekers, and training that is job-driven. Oklahoma's workforce system delivers career and training services in the Oklahoma Works American Job Centers (AJCs) across the state. The Adult, Dislocated Worker, and ES programs, as required WIOA partners, provide training and employment services in the American Job Center network, known in Oklahoma as Oklahoma Works America Job Centers. Under WIOA, partner programs and entities that are jointly responsible for workforce and economic development, educational, and other human resource programs, collaborate to create a seamless customer-focused AJC network that integrates service delivery across all programs to make it easier for individuals to access the services they need to obtain skills and employment.

WIOA section 134 authorizes employment and training activities for adults and dislocated workers, as defined below.

**Adult**, defined at WIOA 3(2) means an individual who is age 18 and over.

**Dislocated Worker (DLW)** defined at WIOA 3(15), means an individual who meets the requirements of one of the following categories:

### Category 1: Recently Dislocated

An individual in this category:

1. Has been terminated or laid off, or has received a notice of termination or layoff, from employment, including a separation notice from active military service (under other than dishonorable conditions); and
2. (a) Is either eligible for or has exhausted entitlement to unemployment compensation or, (b) Has been employed for a duration sufficient to demonstrate attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a state's Unemployment Insurance (UI) law; and
3. [Is unlikely to return to a previous industry or occupation, as defined in TA 02-2021.](#)

### Category 2: Plant Closure or Substantial Layoff

An individual in this category:

1. Has been laid off or has received a notice of layoff from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility, military installation, or enterprise. A substantial layoff is defined as any reduction-in-force that is not the result of a plant closing that —
  - (a) results in an employment loss at a single site of at least 25 employees over a 30-day period, or
  - (b) is determined by the Local Rapid Response Team to be a substantial layoff based on other factors that indicate a significant, negative impact on the community and/or local economy. Such factors may include, but are not limited to:
    - i. The local unemployment rate,
    - ii. The employer size in comparison to the total number of jobs in the surrounding area,
    - iii. The business or enterprise has issued a Worker Adjustment Training Notice (WARN),
    - iv. For rural and small communities, the number of employees that lost employment at a single site may be set by the Rapid Response Coordinator and/or Local Rapid Response Team, or
    - v. Other determining factors as described in local policy.
2. Is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days, or
3. For purposes of eligibility to receive services other than training services described in WIOA section 134(c)(3), career services described in section 134(c)(2)(A)(xii) or supportive services, is employed at a facility at which the employer has made a general announcement that such facility or military installation will close.

### Category 3: Loss of Self-Employment Income

An individual in this category:

1. Was self-employed (including employment as a farmer, a rancher, a fisherman, or an independent contractor or a consultant not technically an employee of a firm or agency); and
2. Is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters.

### Category 4: Displaced Homemakers

The term "dislocated worker" means an individual who has been providing unpaid services to family members in the home and who—

1. (a) has been dependent on the income of another family member but is no longer supported by that income; or

(b) is the dependent spouse of a member of the Armed Forces on active duty, and whose family income is significantly reduced because of a deployment, a call or order to active duty, a permanent change of station, or the service-connected death or disability of the service member; and

2. is unemployed or underemployed and experiencing difficulty in obtaining or upgrading employment.

#### Category 5: Military Spouses

An individual in this category

1. Is the spouse of a member of the Armed Forces on active duty who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in the duty station of the active-duty member of the Armed Forces, or
2. Is the spouse of a member of the Armed Forces on active duty who is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

The WIOA Final Rule at 20 CFR 680.130(b) allows States and Local Workforce Development Boards (LWDBs) to define certain dislocated worker terms. Locally defined terms, where allowed, permit LWDBs to streamline services to reflect the needs of job seekers and employers in their communities. LWDBs may define in their policies the following terms, as they pertain to dislocated workers:

- “Recently dislocated”,
- “Employed for a duration sufficient to demonstrate attachment to the workforce”,
- “Significant, negative impact on the community”,
- “General announcement” of a plant closing, consistent with WIOA section 3(15)(B)(ii) or (iii),
- “Unemployed as a result of general economic conditions”,
- “The community in which the individual resides”, and
- “Natural disasters”.

LWDBs and/or service providers may not “redefine” dislocated worker terms set by Federal statute or by the State in this issuance, e.g., the WIOA definition of “family” defined in 20 CFR §675.300 and Attachment III to TEGL 19-16, Key Terms and Definitions. Additionally, each DLW’s file must document the factors upon which their dislocated worker status is based.

#### **Adult and DLW Eligibility and Program Enrollment Procedures**

The enrollment process begins when an individual self-registers in the virtual case management system. Once the self-registration has been completed, the demographic information entered will generate a potential eligibility determination. Staff must then meet with the applicant to review a snapshot of the information entered. Because the demographic snapshot will remain unchanged throughout program participation, information must be verified as accurate by the applicant’s virtual self-attestation prior to staff entering the program enrollment. All additional information needed to determine eligibility must be requested at this time. Appropriate documentation of all information used to qualify the individual as eligible for enrollment in a WIOA program must be uploaded into the participant’s virtual case file. Although Labor Exchange (LE) enrollments do not require supervisory approval, both Adult and DLW enrollments are automatically entered into a pending queue for supervisory approval when entered into the virtual case management system by front-line staff. All Adult and DLW enrollments must be approved by a supervisor to verify the client’s eligibility, and must include a review of uploaded documentation, self-attestation, and program notes, before there is any expenditure of funds. All Adult and DLW enrollments must be approved or denied by a supervisor within 30 days of the application for enrollment or the virtual case management system will automatically deny the enrollment. At this point, eligibility must be

redetermined and a new enrollment must be completed. If approved within the 30-day window, the enrollment date is the date the enrollment was entered into the pending queue.

### **The Individual Employment Plan**

Each individual enrolled in a Title I Adult and/or DLW programs must have an Individual Employment Plan (IEP). The IEP is an ongoing strategy jointly developed by the WIOA participant and their Title I case manager. The IEP must identify the employment goal(s), appropriate achievement objectives (including both long term and short-term goals), and the appropriate combination of services to achieve the employment success of the individual.

As adults and dislocated workers have diverse needs, each individual's IEP must target the specific needs of that individual. Therefore, each IEP starts with an objective, comprehensive assessment or evaluation of the participant's needs. The purpose of an assessment or evaluation is to identify an employment goal or career pathway for the individual, and to determine the skill levels and service needs necessary for the individual to obtain or retain employment.

Case managers are required to utilize the virtual IEP located in the case management system. The initial IEP requires an entry for each of the 14 components, as they pertain to the individual for whom the IEP is developed. The IEP must include resources and services funded by workforce partners and community-based organizations. Additional goals and services necessary for the attainment and retention of successful employment must be added to the IEP, keeping in mind that an IEP cannot be updated after the participant has exited the program. When the IEP cannot be updated due to program exit, information necessary to the participant's service delivery and career objectives must be entered in Program Notes, as addressed further in the Case Management section, below.

The participant must virtually sign the IEP as acknowledgement that the plan was jointly developed with their case manager/career planner. Additionally, the IEP and/or program notes need to be modified to reflect any deviations from the individual's original employment and training goals. Modified IEPs require the signature/virtual attestation of the participant when:

- The employment or training goal has been revised,
- Extended training time is necessary,
- There a new training program or provider,
- There is a gap in service,
- There are newly identified needs or barriers, and
- There are any other significant change(s) to the participant's plan.

Additionally, documents must be uploaded to the case management system when necessary to support changes in the IEP, and the participant must always be given the option to receive a virtual or printed copy of the IEP when it is initially created and when the plan is modified. [Details on the development of the Individual Employment Plan are found at https://oklahomaworks.gov/wp-content/uploads/2019/07/OWDI-03-2019\\_10.11.19.pdf](https://oklahomaworks.gov/wp-content/uploads/2019/07/OWDI-03-2019_10.11.19.pdf).

OKJobMatch provides the ability for the participant to virtually sign the IEP to acknowledge the plan was jointly developed by the participant and their case manager/career planner. Documents must be uploaded to OKJobMatch, as necessary, to support changes in the IEP, and the participant must always be given the option to receive a printed copy of the IEP when initially created and when updated/modified. [Details on the development of the Individual Employment Plan may be found https://oklahomaworks.gov/wp-content/uploads/2019/07/OWDI-03-2019\\_10.11.19.pdf](https://oklahomaworks.gov/wp-content/uploads/2019/07/OWDI-03-2019_10.11.19.pdf).

The IEP must be modified to reflect any deviations from the individual's employment and training goals. This includes a revised employment goal, extended training time, a new training provider, any gap in service, newly identified needs or barriers, and other such significant changes to the participant's plan. Modified IEPs require the signature/virtual attestation of the participant.

A detailed, ongoing narrative to track and document case management activities and their related outcomes must be recorded in OKJobMatch in the virtual IEP, or as Client or Program A detailed narrative includes:

- Attempts to contact the participant and the result of the attempted contact;
- Steps taken to remove barriers listed in the IEP, including the provision of supportive services;
- The accomplishment of measurable skills gains;
- Training program completion;
- The attainment of employment, including:
  - Employer name;
  - Date employment started;
  - Wage at hire;
  - Benefits such as insurance and leave; and
  - How employment information was verified (pay stubs, employer contact, etc.);
- The provision of follow up services; and
- All other activities and information pertinent to the achievement of the IEP, as determined by SWB.

### **Case Management**

Case management is defined as the coordination of services on behalf of the participant, including coordinating and/or documenting services provided by an AJC partner or a community-based organization. Appropriate documentation of case management activities is essential to ensure provision of the comprehensive services necessary to achieve the participant's career objectives. All services and activities necessary for attainment and retention of successful employment must be described in the IEP. Additional client information related to eligibility, the need for WIOA Title I services, and case management activities and updates that have not been included in the IEP, including those that occurred after program exit, must be documented in Program Notes. The following information is also required to be addressed in Case/Program Notes, when applicable, for each WIOA eligible participant:

- The participant's employment status at program enrollment, such as:
  - Details pertaining to the participant's current or most recent employment, including the name of the employer and employment end date, if appropriate; and
  - For participants who were laid off, the name of the company from which they were laid off and the date of the layoff.
- Contacts with participants, including the purpose and outcome of the successful contact.
- Attempts to contact the participant, in accordance with local policy, and the result of the attempted contact.
- The attainment of employment, including:
  - The name of employer/business,
  - The date employment started,
  - The wage at hire,

- Benefits such as insurance and leave, and
- How employment information was verified (pay stubs, employer contact, etc.).
- All other activities and information pertinent to the achievement objectives in the IEP.
- Details regarding coordination of services and resources.

The use of funds from other sources for career or training services does not negate the responsibility of WIOA Title I staff to maintain and document contact with participants enrolled in the Adult and/or DLW Programs. The purpose of regular contact is to determine the need for additional services that are necessary for training program and success, to assess training progress, and to ensure performance measures are attained, even when the cost of training is paid by another entity or program. Services provided by other entities, including but not limited to Tribal entities, Trade Adjustment Assistance (TAA), Temporary Assistance for Needy Families (TANF), Department of Rehabilitation Services (DRS), and Adult Basic Education (ABE), must be documented in the IEP.

LWDBs must address in their policies timelines for contacting participants in training programs, including participants whose training is coordinated with or funded by partner entities. Procedures for more frequent contact for individuals enrolled in short-term training programs must also be included in local policies. This is particularly important for those in short-term training programs that are scheduled for completion in 30 days or less to help participants address any challenges they face during the short-term training.

## **Career Services**

### **Career Services**

Career services for adults and dislocated workers must be made available in all comprehensive American Job Centers (AJCs). WIOA distinguishes three levels of career services: basic career services, individualized career services, and follow-up services, with no sequential requirement for these services. Career services under this approach provide local areas with the flexibility to target services that meet the needs of the customer, recognizing that all individuals do not need all types of career services and may need different types of career services at different stages in their career pathways.

### **Basic Career Services**

Basic career services are accessible in all Oklahoma Works AJCs statewide and must be made available to all individuals seeking employment and training services. Basic career services include eligibility determinations, initial skill assessments, labor exchange services, provision of information on programs and services, and program referrals, all of which may be provided by both the Adult and DLW programs, as well as by the Wagner-Peyser (WP) Employment Services (ES) program.

### **Individualized Career Services**

Individualized career services must be made available to participants after it is determined by AJC staff that such services are required to obtain or retain employment. The provision of individualized career services must be consistent with any applicable statutory priorities, e.g., [Veterans and Eligible Spouses](#), the [Adult Priority of Services](#), and [Priority Populations under WIOA](#).

Individualized career services must be customized to each individual's needs, and therefore they generally involve significant staff time. Individualized career services are particularly important for individuals with barriers to employment as defined in WIOA 3(24). The provision of individualized career services must be based on the employment needs of the individual as determined jointly by the individual and the career planner/case manager. The provision of any individualized career service triggers participation and

therefore performance. All individualized career services must be documented in the IEP.

The following are individualized career services, as listed at 20 CFR §678.430(b)(1)-(11):

1. Comprehensive and specialized assessments of skill levels and service needs, which may include:
  - i. diagnostic testing and use of other assessment tools, and
  - ii. in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals
2. Development of the IEP to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve their employment goals, including information about eligible training providers
3. Group counseling
4. Individual counseling
5. Career planning
6. Short-term prevocational skills (for example, development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services to prepare individuals for unsubsidized employment or training)
7. Internships and work experiences (including transitional jobs) as described in 20 CFR §680.180
8. Workforce preparation activities
9. Financial literacy services, such as those described in WIOA sec. 129(b)(2)(D) and 20 CFR §681.500
10. Out-of-area job search assistance and relocation assistance
11. English language acquisition and integrated education and training programs.

If Oklahoma Works AJC staff or partners determine individualized career services are necessary for an individual to obtain or retain employment, these services must be made available to the individual, provided the individual meets the respective program eligibility requirements. Recent assessments, interviews or evaluations completed by workforce partner programs may be used by Oklahoma Works AJC staff to determine if individualized career services are appropriate or necessary for an individual. Assessments that are used to determine eligibility may include TABE, Tritify, Career Guide or other approved assessments that ensure eligibility determination procedures are consistent with SWB policy and state issuances. The provision of individualized career services must be based on the employment needs of the individual as determined jointly by the individual and the career planner, and must be documented in the IEP.

### **Individualized Career Services Provided by ES Staff**

OESC has specific obligations in serving unemployment insurance (UI) claimants and carrying out components of the State's UI program, which include:

- Coordination of basic career services, particularly LE services;
- Targeting UI claimants for job search assistance and referrals to employment;
- Administering UI work test requirements, including obtaining and documenting relevant information for eligibility assessments and providing job search assistance and referrals to employment;
- Provision of referrals to UI claimants for training and education resources and programs, including but not limited to Pell Grants, GI Bill, Post 9/11 Veterans Educational Assistance, WIOA, higher education assistance, and Vocational Rehabilitation;
- Provision of application assistance to UI claimants for training and education resources and programs, including but not limited to Pell Grants, GI Bill, Post 9/11 Veterans Educational Assistance, WIOA, higher education assistance, and Vocational Rehabilitation;
- Outreach, intake (including identification through the State's Worker Profiling and Reemployment



Services system of UI claimants likely to exhaust benefits and related programs, such as the Reemployment Services and Eligibility Assessment program), and orientation to information and other services available through the American Job Center network;

- Provision of application assistance to UI claimants for training and education resources and programs, including but not limited to Pell Grants, GI Bill, Post 9/11 Veterans Educational Assistance, WIOA, higher education assistance, and Vocational Rehabilitations; including meaningful assistance to individuals (including individuals with language or other program access barriers) seeking assistance in filing a claim.
- Meaningful assistance means providing assistance:
  - In the Oklahoma Works AJCs, using staff who are well trained in UI claims filing activities, the rights and responsibilities of claimants, and information necessary to file a claim, or
  - By direct linkage: via phone or other technology, such as live web chat and video conference, as long as the assistance is provided by appropriately trained and available staff and within a reasonable time;
  - Technology-based approaches to providing meaningful assistance must ensure Oklahoma Works AJC customers have access to appropriately trained staff within a reasonable time. The referral of customers to the OESC self-service website or public phone line where an individual is placed into a queue with all other UI claimants is not meaningful assistance; and
  - The cost associated in providing meaningful assistance may be paid for by OESC's UI administrative funding, the WIOA Adult or DLW programs, the ES program, or some combination of these funding sources.
  - OESC provides training to staff statewide ensuring they can answer basic questions about an individual's claim. In addition, the online filing system (ONICv2) allows individuals easily accessible self-service options such as PIN reset, claim balance and payment detail, ability to view fraud or claimant error overpayments, appeals filing, multiple browser compatibility, print or mail 1099, and ability to view non-monetary determinations. Claimants can access these options anywhere there is internet, but specifically at the Oklahoma Works office where staff will assist them in navigating the site and also answer questions about the claims process.

### **Follow-up Services:**

The third type of individualized career services is Follow-up services. Which must be provided for no less than 12 months after the first day of employment for Adult and DLW participants who are placed in, or have attained, unsubsidized employment. Follow-up services for system-exited WIOA Title I Adult & DLW program participants can include, but are not limited to, two-way exchanges between the service provider or case manager and either the individual (or his/her advocate) or the individual's employer as follows:

Examples of appropriate follow-up services include, but are not limited to, workplace counseling (i.e., strategies for retaining employment), career pathway planning, referrals to workforce partners or community resources for supportive services necessary to retain employment, peer support groups, and the provision of information regarding career advancement, educational opportunities, or new employment opportunities, to name a few. Follow-up services must be more than an attempted contact, or a contact made only for obtaining information about a performance outcome. Follow-up services for adults and dislocated workers occur after program exit and do not change, delay, or extend the exit date (TEGL No. 10-16, Change 1) and SWB-#117.

## Training Services for Adults and Dislocated Workers

Training services are critical to the employment success of many adults and dislocated workers. When training is necessary to achieve the participant's employment goal(s), the training must be for an in-demand occupation as determined by SWB and, with certain exceptions, must be provided by an eligible training provider (ETP). The receipt of any training service triggers inclusion in participation for performance reporting purposes.

Types of training services that may be provided include:

- (1) Occupational skills training, including training for nontraditional employment;
- (2) On-the-job training; (§§680.700 – 680.730);
- (3) Incumbent worker training; (WIOA 134(d)(4), §§680.780 - 680.820, and OWDI #09-2019);
- (4) Programs that combine workplace training with related instruction, which may include cooperative education programs;
- (5) Training programs operated by the private sector;
- (6) Skill upgrading and retraining;
- (7) Entrepreneurial training;
- (8) Transitional jobs in accordance with WIOA 134(d)(5), §§ 680.190 and 680.195, and OWDI #22-2017;
- (9) Job readiness training provided in combination with the training services described in any of clauses (1) through (8), above;
- (10) Adult education and literacy activities, including activities of English Language acquisition and integrated education and training programs, provided concurrently or in combination with services provided in any of clauses (1) through (7); and
- (11) Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

The IEP must document the need for training services. With few exceptions, the need for training will be determined through an interview, evaluation, or assessment and career planning informed by local labor market information and training provider performance information, or through other career services the participant has received. However, there is no requirement for the provision of career services as a condition to receive training services. When career services are not provided prior to training, an interview with the participant must be documented to validate the reason why an upfront assessment or evaluation was not required. The interview should address any career planning activities completed by the participant that support direct placement in training services. Additionally, the need for training may be determined based on the provision of a partner entity's assessment(s) or when it has been determined that additional training is required to advance toward an established career pathway. Each step of a career pathway plan must be documented in the IEP.

As with the provision of career services, WIOA staff should Oklahoma use, previous assessments or evaluations that have been conducted by another education or training partner, to make training determinations, thus reducing duplication and developing enhanced alignment across partner programs. When an assessment completed by a workforce partner program is utilized to determine academic levels, skill levels, and service needs, the assessment scores must be entered in the appropriate enrollment section of OKJobMatch (Adult or DLW) for reporting purposes.

Under WIOA, training services may be made available to adults and dislocated workers who:

- After an interview, evaluation, or assessment and career planning activities by an

Oklahoma Works AJC staff member or partner, are determined:

- Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through career services alone;
- In need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; **and**
- Have the skills and qualifications to successfully participate in the selected program of training services;
- Select a program of training services directly linked to the employment opportunities in the local area or the planning region, or in another area to which the individual is willing to commute or relocate;
- Are unable to obtain other grant assistance for such services, including State-funded training funds, Tribal funds, Trade Adjustment Assistance (TAA), TANF, or Federal Pell Grants, or require assistance beyond that available through other workforce partners, educational entities or other grant assistance programs, including Federal Pell Grants, State-funded training programs, Tribal entities, scholarships, and other sources of education and/or training funds. LWDBs and service providers must ensure the coordination of funds available to pay for training, taking into consideration the following:
  - Pell grants and other grant assistance must be utilized first for the cost of training and mandatory fees;
  - Title I funds may be used to supplement a Pell grant and/or other grant assistance that does not cover the entire cost of tuition and mandatory fees, but may not supplant a Pell or other grant assistance;
    - Training services may be provided to an individual while an application for a Pell Grant is pending, as long as arrangements have been made with the training provider and the WIOA participant regarding allocation of the Pell Grant. If the individual is subsequently awarded a Pell Grant, the training provider must reimburse the local area the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including any tuition and education fees the training provider charged to attend training, from the Pell Grant award. Reimbursement is not required from the portion of the Pell Grant disbursed to the WIOA participant for other education-related expenses, per 20 CFR § 680.230;
      - The full cost of participation in training services maybe taken into consideration, including the cost of supportive service and other appropriate cost related to training program attendance, as defined by the SWB
- VA benefits for education and training services do not constitute “other grant assistance” under WIOA’s eligibility requirements. Therefore, eligibility for VA benefits for education or training do not preclude a veteran or the veteran’s eligible spouse from receiving WIOA funded services, including training funds. WIOA program operators may not require veterans or spouses of veterans to exhaust their entitlement to VA funded training benefits prior to allowing them to enroll in WIOA funded training;
- Individuals who are members of a group covered under a petition filed for TAA and are awaiting a determination may be co-enrolled in Adult and/or DLW programs. If the TAA petition is certified, the worker will transition to TAA approved training. If the petition is denied, the worker will continue training under WIOA; and
- For training services provided through the Adult funding stream, are determined eligible in accordance with the Adult Priority of Service as described in WIOA sec.134(c)(3)(E), as well as in the [Statutory Priority for Adult Funds](#) and [Veterans and Adult Priority](#) sections of this issuance.

## **Documenting the Coordination of Funds and Resources**

To ensure the coordination of funds LWDBs and service providers must take into consideration the following:

- Pell grants and other grant assistance must be utilized first for the cost of training and mandatory fees.
- Title I funds may be used to supplement a Pell grant and/or other grant assistance that does not cover all training costs but may not supplant a Pell or other grant assistance.
- Training services may be provided to an individual while an application for a Pell Grant is pending, as long as arrangements have been made with the training provider and the WIOA participant regarding allocation of the Pell Grant. If the participant is subsequently awarded a Pell Grant, the training provider must reimburse the local area the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including any education fees the training provider charged to attend training. Reimbursement is not required from the portion of the Pell Grant disbursed to the WIOA participant for other education-related expenses, per 20 CFR § 680.230.
- The full cost of participation in training services may be taken into consideration, including the cost of support services and other appropriate costs related to training program attendance, as defined by the LWDB.
- Entertainment and recreation, alcohol, tobacco products, and other such miscellaneous costs are not allowable as costs related to training attendance.
- VA benefits for education and training services do not constitute “other grant assistance” under WIOA’s eligibility requirements. Therefore, eligibility for VA benefits for education or training do not preclude a veteran or the eligible spouse of a veteran from receiving WIOA funded services, including training funds. WIOA program operators may not require veterans or spouses of veterans to exhaust their entitlement to VA funded training benefits prior to allowing them to enroll in WIOA funded training
- Individuals who are members of a group covered under a petition filed for TAA and who are awaiting a determination may be co-enrolled in Adult and/or DLW programs. If the TAA petition is certified, the worker will transition to TAA approved training. If the petition is denied, the worker will continue training under WIOA.

All local areas must implement policies that are in alignment with this issuance, ensuring coordination with Federal Pell Grants and all other types of grant assistance for education and training services. All funding streams and resources must be explored by the participant with the aid of the case manager and/or the training or educational provider. Efforts to verify the availability of other services or resources must be addressed in Program Notes.

When the cost of training exceeds the amount of Pell grants and other federal grant assistance, state aid, institutional aid, or any other type of financial aid awarded, the student/trainee may benefit from a combination of their financial assistance with WIOA Title I training funds or WIOA-funded supportive services, including needs-related payments. To provide the most benefit to a participant without duplication of funding, each local area must have an established method to coordinate and braid resources. Braiding resources allows multiple funding streams to separately and simultaneously provide specific services to support a participant’s training and employment goals. All grant assistance provided to individuals for education or training purposes, including assistance from other workforce partners, educational entities, or other grant assistance, must be documented in the IEP and in the Educational Grants section of the case management system.

Except as stated in the preceding paragraph, other financial aid available to a WIOA Title I participant must be utilized prior to WIOA Title I funds.

All assistance provided to individuals for education or training purposes, including assistance from other workforce partners, educational entities or other grant assistance, must be documented in the IEP. Eligible training providers must enter other financial aid on the Coordination of Training Funds (COTF) form, which is addressed further in the Individual Training Account section if this issuance. However, as training providers may not always be aware of all resources available to every individual, other funding streams/resources must be explored to ensure the participant is unable to obtain grant assistance from other sources to pay for the cost of training. The local area must have a process in place to verify and document that no other resources or funding are available prior to the use of WIOA funds for training. When it has been verified that no other funding is available for training, a program note must be entered to document how the determination was made.

SWB has implemented local policies that are in alignment with State issuance, ensuring Federal Pell Grants and all other types of grant assistance for education and training services are utilized prior to WIOA Adult and DLW funds. WIOA funds utilized prior to a Pell or other grant assistance intended for education and or training will be determined disallowed cost.

### **Serving Individuals in Default Status**

WIOA programs and services must not be denied solely due to an individual's Federal Student Loan being in default status. However, workforce staff must counsel WIOA applicants and participants that training providers are not required to admit, enroll, or provide other financial assistance to individuals who are in default status. Therefore, workforce staff must require an acceptance letter and/or proof of enrollment from the educational entity prior to creating an individual training account (ITA) to utilize Title I training funds.

Although WIOA funds cannot be utilized to help individuals get out of default, financial literacy services and the provision of information regarding repayment of student loans are recommended services for individuals in default status, prior to and during training funded with WIOA funds. Information regarding financial planning may be found on the Oklahoma Money Matters website: <https://www.oklahomamoneymatters.org/>.

Additionally, student loan repayment information is located on the U.S. Department of Education site: <https://studentaid.ed.gov/sa/repay-loans>.

### **Individual Training Accounts**

Individual Training Accounts (ITAs) are the primary method to be used for procuring training services under WIOA. An ITA is a payment agreement with an eligible training provider (ETP), established on behalf of an Adult or DLW program participant. Training services must be linked to in-demand occupations and must be provided in a manner that maximizes the individual's choice in the selection of a training provider. To accomplish this, each center must make available an Eligible Training Provider List (ETPL) as described in <https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/>. Through consultation with the WIOA career planner, including discussion of program quality and ETP performance information, the program participant is able to make an informed choice when selecting a training provider and program. Once an individual has been determined eligible for training services and selects, in consultation with appropriate Oklahoma Works staff, an eligible training provider and program from the ETPL, a referral is

made to the training provider and arrangements for payment of the training services are made through an ITA, utilizing an ITA Training Voucher.

Every effort should be made to establish the ITA in a timely manner once the individual has been determined eligible for Adult or Dislocated Worker training services. Once program eligibility has been determined, training funds must not be prorated after the ITA has been established and signed by the case manager and the participant. Lack of case management follow-through, regardless of the reason (e.g., staff shortages, case management mistakes, delayed approvals by the Service Provider when all information for eligibility has been provided, delays in processing payments, etc.), is not an acceptable reason to prorate payments. However, when an individual has been participating in a program of training prior to applying for title I Adult or DLW training services, the cost of training must be prorated to the date the ITA was signed by the participant.

The service provider must, to the extent possible, coordinate funding for ITAs with funding from other Federal, State, local or private job training programs or sources to assist an individual in obtaining training services. Prior to the development of an ITA, an individual's "unmet need" must be determined.

SWB and/or service provider must assure that processes are in place to coordinate funding for ITAs with available funding from other Federal, State, local, or private job training programs or sources that assist individuals in obtaining training services. Prior to the development of an ITA, an individual's "unmet need" must be determined. Unmet need is defined as the direct cost of training not covered by other grant assistance, educational entities, foundations, or other workforce partners and is documented on the Coordination of Training Funds (COTF) form. Although SWB may consider the full cost of participating in training services, including supportive services and other appropriate costs related to attendance in a training program, only the costs of education/training listed in Section II of the COTF form that are paid directly to the training institution are considered unmet need. All other resources necessary to enable an individual's participation in training services are considered Supportive Services.

All assistance provided to individuals for education or training purposes, including assistance from other workforce partners, educational entities or other grant assistance, must be documented in the Universal Information section of OKJobMatch under Partner Provided Services, and in the IEP. The Coordination of Training Funds (COTF) form must also include all assistance provided, with the exception of loans and VA benefits for education and training. The completed COTF (or comparable, institution approved or validated documentation of the training period covered, the cost of training attendance broken down by cost category, and coordination of training funds) must be uploaded to OKJobMatch.

An ITA issuance date and amount must be documented in the Educational Grants section of OKJobMatch in the applicable program enrollment. If the participant receives any grant or financial aid such as a Pell or other Federal grant, state aid, institutional aid, or employer-funded financial aid, it must be documented in the Educational Grants section as well.

Eligible training providers (ETPs) offering short term training programs that are not Pell eligible generally document only the direct cost of training (i.e., tuition and mandatory fees, books, equipment, cost of exams and licenses, etc.) on the COTF form. In the event the COTF form indicates the training program is not Pell eligible and the unmet financial need equals the cost of attendance, the service provider may provide supportive services in excess of the amount documented as unmet financial need on the COTF as long as the supportive service(s) is required to allow the client to participate or continue in the approved program

of training and is documented as a need in the participant's IEP. It must be noted that all ETPs must complete Section II of the COTF form, as stipulated in The Coordination of Training Funds Form section, below.

Example ITA Agreement, ITA Voucher, and COTF forms are included as attachments to this policy. The COTF form and the approved ITA Agreement and ITA Voucher must be uploaded as Enrollment Documents in OKJobMatch.

### **The Coordination of Training Funds Form**

The COTF form, attachment C to this Policy, has been revised to reflect that local WIOA Title I staff are not authorized to change information entered by the financial aid officer (or the training facility's appropriate designee) in Section II. If corrections are needed, the training provider is required to complete a new COTF form or the financial aid officer/designee may make corrections to the original COTF, initial each correction, and provide a new signature.

The process for completion of the COTF form is explained below:

- Section I of the COTF form must be completed by the WIOA case manager, signed by the WIOA participant requesting training, and sent to the financial aid office of the appropriate training entity.
- Section II must be completed by the financial aid officer (or the training entity's designated staff) and returned to the case manager. Section II must include all known financial resources, with the exception of loans and VA benefits for education and training.
- Section III is then signed by the case manager, attesting that WIOA funds are necessary for the completion of the individual's employment goal(s).

### **Training Contracts**

Although ITAs are the primary method to be used for procuring training services, in certain circumstances a contract for training services may be developed instead of an ITA. Contracts for services may be used instead of ITAs when at least one of the circumstances below applies, and if the local area has fulfilled the consumer choice requirements of 20 CFR § 680.340. The contract exceptions to an ITA are:

- When the services provided are on-the-job training (OJT), customized training, incumbent worker training or transitional jobs;
- When SWB determines there are an insufficient number of eligible training providers in the local area to accomplish the purpose of a system of ITAs. The determination process must include a public comment period for interested providers of at least 30 days, and be described in the Local Plan;
- When SWB determines there is a training services program of demonstrated effectiveness offered in the area by a community-based organization or another private organization to serve individuals with barriers to employment. The LWDB must develop criteria to be used in determining demonstrated effectiveness, particularly as it applies to the individuals to be served and their particular barriers to employment. The criteria may include:
  - Financial stability of the organization;
  - Demonstrated performance in the delivery of services to individuals with barriers to employment through such means as:
    - program completion rates;
    - attainment of skills, certificates or degrees the program is designed to provide;
    - placement after training in unsubsidized employment; and

- retention in employment; and
- How the specific program relates to the workforce development needs identified in the local plan;
- When SWB determines it would be appropriate to contract with an institution of higher education or other provider of training services to facilitate the training of multiple individuals in in-demand industry sectors or occupations, provided the contract does not limit consumer choice; and
- When SWB is considering entering into a Pay-for-Performance contract and SWB ensures the contract is consistent with 20 CFR § 683.500 and § 683.510.

In addition to the contract exceptions to an ITA, a determination that a combination of ITAs and contracts is an effective approach for placement into programs such as Registered Apprenticeship (RA) and other work-based training.

***NOTE: Service Provider should make all requests for training contracts to the Board staff prior to commitment of any WIOA funds.***

### **Priority Populations under WIOA**

Across all titles, WIOA focuses on serving individuals with barriers to employment and seeks to ensure access to quality services for these populations. Priority and special populations for the Adult and DLW programs are addressed at 20 CFR §§ 680.600 through .660.

The term “individual with a barrier to employment” means a member of one or more of the following populations:

- Displaced homemakers;
- Low-income individuals;
- Indigenous Americans, including individuals who identify as Native Americans or American Indians, Alaska Natives, and Native Hawaiians;
- Individuals with disabilities, including youth who are individuals with disabilities (as defined in sec. 3 of the Americans with Disabilities Act of 1990 (42 USC 12102) and individuals who are in receipt of Social Security Disability Insurance);
- Older individuals, defined as individuals who are (age 55 and older);
- Ex-offenders;
- Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)));
- Youth who are in or have aged out of the foster care system;
- Individuals who are:
  - English language learners (29 USC 3272(7));
  - Individuals who have low levels of literacy (for example, an individual who is unable to compute or solve programs, or read, write, or speak English at a level necessary to function on the job, or in the individual’s family, or in society); and
  - Individuals facing substantial cultural barriers;
- Eligible migrant and seasonal farmworkers (as defined in WIOA 167(i)(1-3));
- Individuals within two years of exhausting lifetime TANF eligibility;



- Single parents (including single pregnant women); and
- Long-term unemployed individuals (unemployed for 27 or more consecutive weeks).

Please note that it is imperative to accurately collect and report each barrier to employment that pertains to a participant in the Adult and/or DLW program. The information is required for federal reporting purposes not only to categorize individuals into priority groups, but also to indicate the types of services each individual receives.

Each priority/special population to which an individual belongs must be listed in the IEP to help ensure the provision of any services necessary for the individual to obtain or retain employment.

### **The Statutory Priority for Adult Funds**

Section 134(c)(3)(E) of WIOA establishes a priority requirement with respect to funds allocated to a local area for adult employment and training activities. When using WIOA Adult funds to provide individualized career services and/or training services, Oklahoma Works One-Stop Center staff must give priority to public assistance recipients, other low income individuals (as defined in WIOA section 3(36)), and individuals who are basic skills deficient (as defined in WIOA 3(5)). English language learners meet the criteria for “basic skills deficient” and must be included in the priority populations for the title I Adult program. Under WIOA, priority of service must be implemented regardless of the level of funds available to provide services in the local area.

The priority established in the previous paragraph does not necessarily mean that these services may only be provided to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. Service providers should see the SWB-#119 Priority of Service Policy and may find the most recent State guidance on self-sufficiency standards at <https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/>.

Under WIOA, there is no exclusion of payments for unemployment compensation, child support payments, and old-age survivors’ insurance benefits from the income calculations for determining if an individual is low-income. These exclusions, which were previously provided under WIA sec. 101(25), no longer apply.

### **Veterans and Adult Priority**

Veterans and eligible spouses continue to receive priority of service for all DOL-funded job training programs, which include WIOA programs. As for the DLW program, the only priority of service is the veteran’s priority of service. A veteran must, however, meet each program’s eligibility criteria to receive services under the respective employment and training program. For income-based eligibility determinations and for determining priority of service, military pay or allowances paid while on active duty or paid by the Department of Veterans Affairs (VA) for vocational rehabilitation, disability payments, or related VA-funded programs are not to be considered as income, in accordance with 38 U.S.C. 4213 and 20 CFR § 683.230.

When past income is an eligibility determinant for any Federal employment or training program, including the title I Adult and DLW programs, any amounts received as military pay or allowances by any person who served on active duty and certain other specified benefits, must be disregarded in making an eligibility determination. This applies to the veteran and to other individuals for whom those amounts would normally be applied, e.g., the military spouse.

Military earnings are not to be included when calculating income for veterans or transitioning service members for priority of service, in accordance with 38 U.S.C. 4213. To further clarify, VA benefits for education and training services do not constitute “other grant assistance” under WIOA’s eligibility requirements. Therefore, eligibility for VA benefits for education or training services do not preclude a veteran or the veteran’s eligible spouse from receiving WIOA funded services, including training funds. Similarly, WIOA program operators may not require veterans or spouses to exhaust their entitlement to VA funded training benefits prior to allowing them to enroll in WIOA funded training.

Due to the statutorily required priority for Adult funds, priority must be provided in the following order:

- First, to veterans and eligible spouses who are also included in the groups given statutory priority for WIOA Adult formula funding. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient receive first priority for services provided with WIOA Adult formula funds for individualized career services and training services.
- Second Non-veterans or eligible spouses who are low- income, recipients of public assistance and/or basic skills deficient/English Language learners
- Third, to veterans and eligible spouses who are not included in WIOA’s priority groups.
- Fourth, to priority populations established by the LWDB (for example, for non-covered persons who are not included in groups given priority for WIOA Adult formula funds, such as persons living within a designated Promise Zone).
- Last, to non-covered persons outside the groups given priority under WIOA.

Need to include Form D from TA- 05-2020 Dated 9/30/2020

This technical assistance is to be attached to the Adult and DLW Policy Attachment D supersedes all version of Attachment O, including the version attached to OWDI #2-2019 and local versions of the form.

### **Definition of Eligible Spouse**

“Eligible spouse” as defined at section 2(a) of the JVA (38 U.S.C. 4215[a]) includes the spouse of any of the following:

- a. Any veteran who died of a service-connected disability
- b. Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
  - i. Missing in action
  - ii. Captured in the line of duty by a hostile force
  - iii. Forcibly detained or interned in the line of duty by a foreign government or power
- c. Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs
- d. Any veteran who died while a disability was in existence

A spouse whose eligibility is derived from a living veteran or service member (i.e., categories b. or c. above) would lose his or her eligibility—

- if the veteran or service member were to lose the status that is the basis for the eligibility (e.g., if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level), or

- for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

### **Serving Separating Service Members and Military Spouses with Dislocated Worker Funds**

Service members exiting the military, including, but not limited to, those who receive or are eligible for Unemployment Compensation for Ex-Military members (UCX), generally qualify as dislocated workers. Dislocated Worker funds under title I can help separating service members to enter or reenter the civilian labor force. A separating service member needs a notice of separation, either a DD-214 from the Department of Defense, or other appropriate documentation that shows a separation or imminent separation from the Armed Forces, to meet the required dislocated worker definition. While in most instances an individual will have to be eligible for or have exhausted entitlement to unemployment compensation in order to receive dislocated worker services, separating service members on a terminal leave from the military may be provided career services while the service member is still part of the Active Duty military, but has an imminent separation date, provided that their discharge will be anything other than dishonorable. It must be noted, however, that federal policy requires a separating service member to meet the dislocated worker requirement of being unlikely to return to his or her previous industry or occupation in the military. Training services, including WIOA funded RA placements, may not be provided until actual separation from the military has occurred.

### **Employment Status Clarification**

Adult and DLW funds may provide career and training services to underemployed individuals according to the priority of service requirement described in the SWB-#120 Self-Sufficiency Policy. Individuals who are underemployed may include those who are:

- Employed less than full-time who are seeking full-time employment;
- Employed in a position that is inadequate with respect to their skills and training;
- Employed and meet the definition of a low-income individual; and
- Employed with current earnings that are insufficient when compared to the individual's previous earnings from previous employment, per SWB-#120 policy.

The board's self-sufficiency policy addresses the area's procedures for serving adults and dislocated workers determined to be underemployed by local area standards. NOTE: USDOL's Fair Labor Standards Act (FLSA) does not define full-time employment or part-time employment. The minimum number of hours that constitute full-time employment is generally defined by the employer, but may not be less than an average of at least 30 hours per week, or 130 hours per month. Full-time employment often includes benefits not typically offered to part-time or temporary workers, such as annual leave, sick leave and health insurance. The attainment of self-sufficiency often depends on the availability of sick leave and health insurance.

### **Work-based Training**

WIOA allows for additional work-based training options and flexibilities for adults and dislocated workers. Work-based training presents opportunities for fostering increased employer engagement, implementing sector strategies, and encouraging industry partnerships by allowing employers to train employees while continuing to be productive members of the workforce.

## **Transitional Jobs**

Up to 10 percent of their combined total of Adult and Dislocated Worker allocations for transitional jobs as described in §680.190. **Transitional jobs** are a type of work experience LWDBs may provide that are time-limited, wage-paid, and subsidized. Transitional jobs may be in the public, private, or non-profit sectors for those individuals with barriers to employment who are chronically unemployed or have an inconsistent work history, as determined by the LWDB. These jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment. Transitional jobs must be combined with comprehensive career services (§680.150) and supportive services (§680.900). Transitional Jobs policy is located at <https://oklahomaworks.gov/wp-content/uploads/2017/10/OWDI-22-2017-Transitional-Jobs.pdf>

## **Registered Apprenticeship (RA)**

Registered apprenticeship is a potential source for training and employment services local areas are encouraged to use as a career pathway for individuals seeking employment, and as a job-driven strategy for employers and industries. WIOA provides an opportunity for RA programs to be more directly connected to the public workforce system. RA programs automatically qualify to be placed on the Eligible Training Provider List (ETPL), if they so choose, allowing ITAs to support WIOA eligible participants in RA programs, and more directly connect those programs to Oklahoma Works American Job Centers.

OOWD is committed to fully integrating RA programs as an employment and training solution for State's Oklahoma Works AJCs. Local areas have maximum flexibility in serving participants and supporting their placement into pre-apprenticeship training and RA programs, including making arrangements with RA programs to initiate applications to become an apprentice on behalf of participants. There are several ways in which training services may be used in conjunction with RA programs for individuals determined eligible for WIOA title I services:

- An ITA may be utilized for a participant to receive all or a portion of the related instruction (RI) component of the RAP.
- A contract may be utilized for a participant to receive all or a portion of the on-the-job learning (OJL) component of the RAP.
- A contract may be utilized to support the RI component of a cohort of apprentices. (This is the only time an ITA would not be utilized to support the RI component.)
- A contract may be utilized to support all or a portion of the OJL component of a cohort of apprentices.
- A combination of an ITA to cover the RI along with an OJT contract to cover the OJL of the RAP is allowable.
- Incumbent worker training may be used for upskilling apprentices or journey workers who already have an established working/training relationship with the RAP, provided the requirements of WIOA 134(d)(4) are met.
- LWDBs may include supportive services, in conjunction with career and/or training services, to facilitate a participant's success in a RAP, particularly in the first year when those services can make a critical difference in completion, provided the supportive services are consistent with WIOA section 134(d)(2), section 14 of TEGE No. 19-16, this issuance, and local policies. Supportive services must be tied to the OJL or RI portion of a RAP and cannot be provided as a standalone service.

In all instances, a participant's eligibility for WIOA must be properly established and documented prior to the commitment of funds for RAPs

Complete and accurate reporting of RA participation is vital to both the State's sector strategy and career pathways approaches. Participants who are placed into an RA with WIOA funds or individuals in an RA at the time of program entry must be clearly identified. An individual in an RA at the time of program entry must identify at the time of registration in their demographic as a registered apprentice. If an on-the-job training or skill upgrading is provided as part of a RA program, the Registered Apprenticeship must be entered as the training service in the participant's Service & Training Plan in OKJobMatch must be utilized. It is important to note that RAP Sponsors must opt-in for their programs to be included on the ETPL in accordance with TEGL 8-19 and the WIOA regulations.

### **On-the-Job Training (OJT)**

OJT continues to be a key method for delivering training services to adults and dislocated workers. Locals may provide up to 50 percent of the wage rate of the participant to employers for the costs of training while the participant is in the program. For local areas to increase the reimbursement level up to 75 percent, the following factors must be taken into account:

- The characteristics of the participants, taking into consideration whether they are individuals with barriers to employment as defined in WIOA 3(24);
- The size of the employer, with an emphasis on small businesses;
- The quality of employer-provided training and advancement opportunities (for example, if the OJT contract is for an in-demand occupation and will lead to an industry-recognized credential); and
- Other factors SWB may determine appropriate such as, the number of employees participating in the training, wage and benefit levels of the employees, including both pre- and post-participation earnings, and relation of the training to the competitiveness of the participant.
- The service provider must document the factors used in either Case or Program notes, when deciding to increase the wage reimbursement levels above 50% and up to a maximum of 75%.

LWDBs must document the factors used in program notes, when deciding to increase the wage reimbursement levels above 50% and up to a maximum of 75%.

OJT contracts must not be entered into with an employer who has received payments under previous WIOA or WIA contracts if the employer exhibited a pattern of failing to provide OJT participants with continued long-term employment as regular employees with wages and employment benefits (including health insurance or benefits) and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same work.

An OJT contract must be limited to the period required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's IEP.

OJT contracts may be written for eligible employed workers when:

- The employee is not earning a self-sufficient wage or wages comparable to or higher than wages from previous employment, as determined by LWBD policy.
- The requirements in this section and § 680.700 are met; and
- The OJT relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes identified by the LWDB in their OJT policy.

### **Incumbent Worker Training (IWT)**

Incumbent Worker Training is designed to meet the special requirements of an employer, or a group of employers within the same industry, to retain a skilled workforce or avert the need to lay off employees. Incumbent workers benefit by acquiring the skills necessary to retain employment and/or advancement within the company, or by acquiring the skills necessary to avert a layoff. IWT must be conducted with a commitment by the employer to retain or avert the layoff of the incumbent worker or workers participating in the training. IWT is governed by 20 CFR 680.780 – 680.820. State guidance on incumbent worker training is located at <https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/>.

### **Customized Training**

Customized training is designed to meet the specific requirements of an employer or group of employers with the commitment that the employer(s) hire a participating individual or individuals upon successful completion of the training. The employer must pay for a significant portion of the cost of training, as determined by SWB. SWB has identified in their policy what constitutes the employer payment, taking into account the size of the employer and other factors SWB has determines are appropriate, which may include the number of employees participating in the training, wage and benefit levels of those employees (at present and anticipated upon completion of the training), relation of the training to the competitiveness of a participant, and other employer-provided training and advancement opportunities.

OJT and customized training are excluded from the credential attainment performance indicator because they rarely result in a credential. However, SWB will consider OJT and customized training programs that do result in a credential, whenever possible.

### **Supportive Services and Needs-Related Payments**

A key principle in WIOA is to provide local areas with the authority to make policy and administrative decisions and the flexibility to tailor the workforce system to the needs of the local community. To ensure maximum flexibility, the States guidance provides local areas the discretion to provide the supportive services they deem appropriate, subject to the limited conditions prescribed by WIOA. Supportive services are designed to provide a participant with the resources necessary to participate in career services and/or and training services.

Supportive services may be made available to anyone participating in title I career services (excluding follow up career services) or training services.

Service Providers, in consultation with Oklahoma Works AJC partners and other community service providers, have developed written policies and procedures for the provision of supportive services that:

- ensures the services are necessary to participate in title I activities;
- ensures the supportive services are WIOA-funded only when these services are not available through other agencies or partners;
- addresses how supportive services will be funded when they are not otherwise available from other sources;
- addresses procedures for referrals to supportive services;
- addresses how duplication of resources and services will be prevented;
- establishes limits on the amount and duration of these services; and
- describes any exceptions to the limits on the amount or duration of supportive services.

- address procedures for referrals to supportive services, including how such services will be funded when they are not otherwise available from other sources.

To ensure the highest quality, most comprehensive service provision possible, supportive services funds may be utilized in coordination with career and training services provided by other partner programs and entities jointly responsible for workforce and economic development, educational, and other human resource programs. For example, title I supportive services funds may be utilized when the cost of training is borne by a workforce partner if the partner entity does not have available funds for supportive services, and the supportive services are not otherwise available from other sources, as per policy.

When all other avenues have been explored for necessary supportive services, it may also be appropriate for WIOA title I supportive services funds to be coordinated with a partner entity's supportive services, if the partner indicates their supportive services funding is in danger of depletion prior to the end of the time period for which the funds are intended. This practice will help ensure that neither the local workforce development area nor the community partner exhausts their supportive services funds during their respective periods of funding. The details of this arrangement must be documented in the Combination of Services to Overcome Needs/Barriers section of the IEP, as well as in program notes.

When WIOA funds are utilized for supportive services, details of the type(s) of supportive services provided and why the services were necessary for the individual's participation in career or training services must be documented in the Supportive Service Needs section of the virtual IEP. There must also be an entry in the Service and Training (S&T) section of OKJM when supportive services are provided. Additionally, uploaded support documentation must include the supportive service request/voucher, the local area's verification or certification that no other services are available, and any other documentation required by the SWB. SWB may establish limits on the amount and duration of supportive services, including a maximum amount of funding and maximum length of time for supportive services to be available to participants. SWB may also establish when exceptions may be made to the amount and duration limits set in local policy and should be approved by SWB Staff.

Supportive Services may include, but are not limited to:

- Assistance with transportation;
- Assistance with child care and dependent care;
- Linkages to community services;
- Assistance with housing;
- Assistance with educational testing;
- Reasonable accommodations for individuals with disabilities;
- Referrals to health care;
- Assistance with uniforms or other appropriate work attire and work-related tools, including items such as eye glasses and protective eye gear;
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes;
- Payments and fees for employment and training-related applications, tests, and certifications;
- Legal aid services; and
- Needs-Related Payments (available only to individuals enrolled in training services and must be consistent with specific criteria as indicated in 20 CFR § 680.940 for Adult program participants and

in § 680.950 for DLW program participants).

When supportive services are provided to a WIOA participant, the type(s) of supportive services provided and why the services are necessary for the individual's participation in career or training services must be documented in the Supportive Service Needs section of the virtual IEP. There must also be an entry in the Service and Training (S&T) section of the virtual case management system to document the provision of the supportive service(s), including when supportive services are provided by a partner entity or community-based organization. Although supportive services provided by funding sources other than WIOA need to be documented as services in the S&T, the budget and payment section of the S&T is only completed when Title I funds are utilized for supportive services costs.

### **Needs-related payments**

Needs-related payments are a form of supportive services designed to provide a participant with financial assistance for the purpose of enabling them to participate in training services. Many individuals in need of training services lack the resources to meet their non-training expenses and therefore cannot participate in the training that they need to attain employment. Needs-related payments can help individuals meet their non-training expenses and help them to complete training successfully. The maximum levels of needs-related payments for Adult program participants has been established by SWB and is consistent with 20 CFR § 680.970.

To be eligible to receive needs-related payments, Adult program participants must:

- Be unemployed;
- Not qualify for, or have ceased to qualify for, unemployment compensation; and
- Be enrolled in a training program described in this issuance and section 134(c)(3)(D) of WIOA.

To receive needs-related payments, dislocated workers must:

- Be unemployed, and:
  - have ceased to qualify for unemployment compensation or trade readjustment allowance under TAA; and
  - be enrolled in a training program described in section 134(c)(3) of WIOA by the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility for employment and training activities for dislocated workers; or if later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months; or
- Be unemployed and:
  - did not qualify for unemployment compensation or trade readjustment assistance under TAA; and
  - be enrolled in a program of training services under WIOA 134(c)(3).

Needs-related payments for dislocated workers, needs-related payments must not exceed the greater of:

- the applicable weekly level of the unemployment compensation benefit, for participants who were eligible UI as a result of the qualifying dislocation; or
- for participants who did not qualify for UI benefits as a result of the qualifying layoff, an amount equal to the poverty level for an equivalent period, which must be adjusted to reflect changes in total family income, as determined by SWB policies.

### **Career and Training Services Performance Accountability**

In order to align service delivery across the core WIOA programs and ensure a comprehensive approach across all partners, core performance measures and reporting elements are described in current guidance found at <https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/>.



## **Coordination with Trade Adjustment Assistance (TAA)**

The TAA program, coordinated by OESC, provides additional benefits for dislocated workers laid off by companies that are directly affected by increased imports or certain shifts of production to other countries. Upon notification that USDOL has certified a business as “trade impacted”, affected individuals should contact the local Oklahoma Works AJC for TAA information.

DOL requires WIOA/TAA dual enrollment and the development of IEPs for TAA participants. Coordination between the title I case manager and OESC’s TAA staff is essential to ensure successful training completion, and allows for the timely provision of individualized career services while improving the effectiveness of the TAA Program. Therefore, the TAA program will utilize the virtual IEP located in the TAA Enrollment Details page of OKJobMatch and will follow the WIOA IEP policy, with a few exceptions. As with IEPs developed for all adults and dislocated workers, all significant changes to the initial plan require the IEP to be updated/modified. The revised IEP must be signed/acknowledged by the participant.

TAA covers 100% of tuition, course fees, books, required supplies, and equipment for eligible participants.

TAA can also pay training-related mileage above 50 miles (one way) when the participant must travel outside their commuting area, as well as required tolls. However, mileage costs and toll fees must be considered as part of the training approval process to ensure the costs do not result in more than the maximum allowed/approved for training.

The TAA program utilizes the virtual IEP located in virtual case management system. As with IEPs developed for all adults and dislocated workers, all significant changes to the initial IEP require the IEP to be updated/modified and must be signed by the participant.

More information on TAA, including who may qualify for a job search allowance or a relocation allowance, may be found on the Oklahoma.gov website at <https://oklahoma.gov/oesc/individuals/programs/taa.html>.

Additional information regarding TAA and DLW co-enrollment may be found in the following documents:

- [https://www.doleta.gov/tradeact/taa-data/participant-reporting/docs/Co-Enrollment\\_FAQ-1.pdf](https://www.doleta.gov/tradeact/taa-data/participant-reporting/docs/Co-Enrollment_FAQ-1.pdf) and
- [https://www.doleta.gov/tradeact/taa-data/participant-reporting/docs/Co-Enrollment\\_FAQ-2.pdf](https://www.doleta.gov/tradeact/taa-data/participant-reporting/docs/Co-Enrollment_FAQ-2.pdf)

A trade-affected worker has the option of declining co-enrollment with the WIOA DLW program. However, AJC staff must thoroughly explain the benefits of co-enrollment to individuals whose employment is affected by foreign trade. It is recommended that AJC staff obtain a written statement from trade-impacted workers who wish to decline enrollment in the WIOA Dislocated Worker program. The statement should be uploaded to the virtual case management system. Regardless of whether a written statement to decline co-enrollment was provided, AJC staff must document in case/program notes that the benefits of co-enrollment were explained, as well as the individual’s stated reason for declining DLW services (i.e., co-enrollment).

## **Other Permissible Local Activities**

WIOA provides significant flexibility to local areas when providing services with Adult and DLW funds. In addition to the required career and training services, local areas may use these funds to provide additional job seeker services and business services, as well as to facilitate enhanced coordination between other

partner programs and entities at the State and local level. Local areas may also use these funds to develop new types of technical assistance, develop new intake procedures, test new procurement methods which may lead to better outcomes for jobseekers, and ensure provision of robust services for businesses throughout the workforce system. A list of permissible local activities is found in WIOA 134(d) and section 17 of TEGL No. 19-16. Oklahoma's Business Services policy may be found at <https://oklahomaworks.gov/wp-content/uploads/2020/02/OWDI-01-2020-Business-Services-policy-w-Business-Engagement-Attachment.pdf>.

### **Rapid Response**

The purpose of Rapid Response is to promote economic recovery and vitality by developing ongoing, comprehensive approaches to identifying, planning for, or responding to layoffs and dislocations, and preventing or minimizing their impacts on workers, businesses, and communities. Rapid Response encompasses the strategies and activities necessary to plan for and respond as quickly as possible following an announcement of a closure or layoff, or to a natural or other disaster which results in mass job loss. Rapid Response delivers services to enable dislocated workers to transition to new employment as quickly as possible. Oklahoma's Rapid Response Activities and Layoff Aversion policy may be found at <https://oklahomaworks.gov/wp-content/uploads/2019/07/OWDI-14-2017-Change-1-Rapid-Response-Activities-and-Layoff-Aversion.pdf>.

**EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT:** All Recipients, and Sub recipients/Sub grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

### **ATTACHMENTS:**

**Attachment A:** Individual Training Account Form

**Attachment B:** Individual Training Account Voucher Form

**Attachment C:** Coordination of Training Funds (COTF) Form

**Attachment D:** Eligibility Form

## Individual Training Account (ITA) Agreement

Participant: \_\_\_\_\_

ID# \_\_\_\_\_

ITA Start Date: \_\_\_\_\_

ITA End Date: \_\_\_\_\_

Amount of Individual Training Account (ITA): \$ \_\_\_\_\_

Training Provider: \_\_\_\_\_

Demand Occupation: \_\_\_\_\_

### **ACKNOWLEDGEMENT AND AGREEMENT**

- The amount of my Individual Training Account (ITA) has been awarded based on individual factors including cost of attendance, coordination of other funding sources, and needs identified in my Individual Employment Plan (IEP).
- ITA funding may be used to assist with tuition and fees as well as books, uniforms, tools, equipment, or supplies required for training/degree plan.
- This ITA is limited to the amount and the scheduled start and end date stated above. Any modification to the ITA Agreement must be approved per Workforce Development Board policy and only for exceptional circumstances.
- It is my responsibility to budget and track my ITA expenditures to insure that the funds available to me are not depleted prior to completion of training. I will coordinate with my Career Manager and verify my ITA balance as necessary.
- I understand that I must meet or exceed attendance and academic requirements of the school/training provider.
- I understand that I am not required to access student loans or incur personal debt as a condition of participation. However, if I chose to do so, I understand the responsibilities associated with such indebtedness, including loan repayment. My Career Manager has counseled me in regard to this issue.
- Continued participation is subject to continued availability of funding by the Department of Labor.
- I agree to monthly contact with my Career Manager to discuss my training progress and any other issues, whether academic, personal, or financial, which may affect the successful completion of my training.
- I will immediately inform my Career Manager of changes of name, address, phone number, email address or back-up contact information.
- Prior to the beginning of each new semester I will schedule an appointment with my Career Manager to complete a voucher for the upcoming semester. I agree to provide any documentation necessary for completion of the voucher, which may include class schedule, enrollment sheet, grade report from previous semester, and Financial Aid Award letter.
- In the event that I drop or add a class, I will notify my Career Manager immediately.
- ITA funding may be used to pay only for classes or training directly related to my training/degree plan. ITA funding will not be used to pay for the same class more than once. If I fail a class, I will be responsible for paying for such class the second time.
- Upon completion of my training, I agree to provide my Career Manager with information concerning my employment and copies of any diplomas, credentials, or licenses earned.

**I have read this document and hereby understand and agree to comply with the terms herein described. I am receiving a copy of this agreement for my records.**

\_\_\_\_\_  
ITA Participant's Signature

\_\_\_\_\_  
Date

**I have established this ITA and reviewed the terms of this Agreement with the client.**

\_\_\_\_\_  
WIOA Service Provider's Signature

\_\_\_\_\_  
Date

ITA # \_\_\_\_\_

## INDIVIDUAL TRAINING VOUCHER FORM

Training Institution/Provider: \_\_\_\_\_

Mod #: \_\_\_\_\_

Participant Name: \_\_\_\_\_

ID #: \_\_\_\_\_

WIOA Program/Funding Stream:  TAA  Adult  DLW  Other: \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_ (WIOA Service Provider) agrees to sponsor the above named student in the course(s) or program(s) listed below and pay the training costs listed (based on off-the-shelf catalog prices) for the time period of: \_\_\_\_\_ through \_\_\_\_\_ . Refunds or returns for non-compliance will be made to \_\_\_\_\_ (WIOA Service Provider) .

Explanation if this is a Modification:

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## TRAINING

Course #	Course Title	Hours

## AUTHORIZED TRAINING COSTS

Items	Amount	Items	Amount
Tuition	\$	Uniforms	\$
Fees	\$	Tools:	\$
Supplies	\$	Books:	\$
Books	\$	Other:	\$
			<b>TOTAL \$</b>

As the recipient of Workforce Innovation & Opportunity Act (WIOA) Program assistance with tuition, books, fees, or other required supplies, I hereby authorize the training institution listed above to release information regarding my attendance, grades, schedules, personal conduct and/or other information as needed to the \_\_\_\_\_ (WIOA Service Provider) .

\_\_\_\_\_  
Participant Signature\_\_\_\_\_  
WIOA Service Provider Signature\_\_\_\_\_  
Date\_\_\_\_\_  
Date

**COORDINATION OF TRAINING FUNDS**

**SECTION I**

TO: FINANCIAL AID OFFICE

ATTENTION: \_\_\_\_\_

FROM: \_\_\_\_\_

SCHOOL: \_\_\_\_\_

ATTENTION: \_\_\_\_\_

FAX OR E-MAIL ADDRESS: \_\_\_\_\_

FAX OR E-MAIL ADDRESS: \_\_\_\_\_

PARTICIPANT NAME: \_\_\_\_\_

ID NUMBER: \_\_\_\_\_

I hereby authorize the exchange of information between the WIOA Case Manager and the Financial Aid Office at the above named School regarding the awarding of any financial aid from any source.

\_\_\_\_\_

\_\_\_\_\_

Participant's Signature

Date

**SECTION II: The following section is to be completed by the financial aid office.**

Start Date: \_\_\_\_\_ PERIODS COVERED \_\_\_\_\_ End Date \_\_\_\_\_

- |                                       |  |  |
|---------------------------------------|--|--|
| <input type="checkbox"/> Fall _____   | <input type="checkbox"/> Trimester I   | <input type="checkbox"/> Full Length of Short Course |
| <input type="checkbox"/> Spring _____ | <input type="checkbox"/> Trimester II  |  |
| <input type="checkbox"/> Summer _____ | <input type="checkbox"/> Trimester III |  |

**COST OF ATTENDANCE \***

**STUDENT'S FINANCIAL AID**

Tuition and Fees \$ \_\_\_\_\_  
 Books, Supplies and Tools \$ \_\_\_\_\_  
 Uniforms \$ \_\_\_\_\_

PELL Grant Eligibility \$ \_\_\_\_\_  
 \_\_\_\_\_ Student or Program is not PELL eligible

**OTHER EXPENSES RELATED TO TRAINING \*\***

**OTHER FINANCIAL RESOURCES EXCLUDING LOANS AND VA BENEFITS**

\_\_\_\_\_ \$ \_\_\_\_\_  
 \_\_\_\_\_ \$ \_\_\_\_\_  
 \_\_\_\_\_ \$ \_\_\_\_\_  
 \_\_\_\_\_ \$ \_\_\_\_\_  
 \_\_\_\_\_ \$ \_\_\_\_\_  
 \_\_\_\_\_ \$ \_\_\_\_\_  
**TOTAL COST OF ATTENDANCE** \$ \_\_\_\_\_

\_\_\_\_\_ \$ \_\_\_\_\_  
 \_\_\_\_\_ \$ \_\_\_\_\_  
 \_\_\_\_\_ \$ \_\_\_\_\_  
 \_\_\_\_\_ \$ \_\_\_\_\_  
 \_\_\_\_\_ \$ \_\_\_\_\_  
 \_\_\_\_\_ \$ \_\_\_\_\_  
**TOTAL FINANCIAL AID** \$ \_\_\_\_\_

Total Cost of Attendance \$ \_\_\_\_\_ minus Student's Financial Aid \$ \_\_\_\_\_ equals Unmet Financial Need \$ \_\_\_\_\_

**By signing below, the financial aid officer (or those personnel who perform those duties) agrees to inform the local WIOA program operator of the amounts and disposition of financial aid to each participant awarded after the enrollment of the participant, as part of a continuing, regular information sharing process.**

\_\_\_\_\_ Financial Aid Officer

\_\_\_\_\_ Date

\*As defined by the Higher Education Act Section. 472

\*\*Other expenses related to training may include transportation, room and board, vehicle insurance, and other items necessary for attendance as defined by local policy.

**SECTION III: The following section is to be completed by the WIOA Case Manager.**

After a comprehensive review of services provided by partner agencies, other social service agencies, and other community resources, I have determined that WIOA funds are necessary for attainment of the participant's employment goal. I certify that WIOA funds will be coordinated with other funds and there will be no duplication of resources.

\_\_\_\_\_ WIOA Service Provider's Signature

\_\_\_\_\_ Date

An Equal Opportunity Employer / Program; Auxiliary aids and services are available upon request to individuals with disabilities.

## Adult and Dislocated Worker Eligibility Form

IDENTIFYING INFORMATION		
Applicant's Name:	<div style="display: flex; justify-content: space-between;"> <span>Last</span> <span>First</span> <span>MI</span> </div>	
Participant ID:		Application Date: _____
General Eligibility Criteria <i>Verify all of the following criteria:</i>	Eligibility Criteria	Documentation Uploaded
1. Age / Date of Birth	<input type="checkbox"/>	
2. Citizenship / Eligible to Work	<input type="checkbox"/>	
3. Selective Service Registration	<input type="checkbox"/> <input type="checkbox"/> N/A – <input type="checkbox"/> female N/A – male <input type="checkbox"/> under 18	
Statutory Adult Priority of Service for WIOA Funds <i>WIOA 3(24), TEGL 19-16, OWDI #07-2020</i> Priority must be given in the following order:	Eligibility Criteria	Documentation Uploaded
<u>Priority 1:</u> Veterans and Eligible Spouses who are low-income, recipients of public assistance and/or basic skills deficient, including English language learners	<input type="checkbox"/>	
<u>Priority 2:</u> Non-veterans or eligible spouses who are low-income, recipients of public assistance and/or basic skills deficient/English language learners	<input type="checkbox"/>	
<u>Priority 3:</u> Veterans and Eligible spouses who are not low-income, recipients of public assistance, or basic skills deficient	<input type="checkbox"/>	
<u>Priority 4:</u> Priority Populations established by the LWDB, if applicable.	<input type="checkbox"/>	
<u>Priority 5:</u> Individuals outside the groups given statutory priority for WIOA funds ( <i>i.e., Individuals with Barriers to Employment as listed in the section below</i> )	<input type="checkbox"/>	
Priority and Special Populations for Adult Programs WIOA 3(24) <i>Must check each barrier to employment as it pertains to the applicant and as listed in the demographic section of the virtual case management system.</i>	Eligibility Criteria	Documentation Uploaded
1. Low-income Individuals, <i>as defined at WIOA 3(36)</i>	<input type="checkbox"/>	
2. Individuals with disabilities, <i>defined at WIOA 3(25) and includes individuals in receipt of Social Security Disability Insurance (per TEGL 19-16)</i>	<input type="checkbox"/>	
3. Homeless Individuals ( <i>Attachment III of TEGL 19-16</i> )	<input type="checkbox"/>	
4. Native Americans, Alaska Natives, and Native Hawaiians ( <i>WIOA sec. 166(b)</i> )	<input type="checkbox"/>	
5. Older Individuals ( <i>age 55 and older</i> )	<input type="checkbox"/>	
6. Ex-offenders	<input type="checkbox"/>	
7. Individuals who are English language learners ( <i>WIOA sec. 203 (7)</i> )	<input type="checkbox"/>	
8. Individuals who have low levels of literacy ( <i>WIOA sec. 203</i> )	<input type="checkbox"/>	
9. Individuals facing substantial cultural barriers	<input type="checkbox"/>	
10. Eligible migrant and seasonal farmworkers	<input type="checkbox"/>	
11. Individuals within two years of exhausting lifetime TANF eligibility	<input type="checkbox"/>	
12. Single Parents ( <i>including single pregnant women</i> )	<input type="checkbox"/>	
13. Long-term unemployed individuals ( <i>27 or more consecutive weeks</i> )	<input type="checkbox"/>	
14. Displaced homemakers, <i>as defined at WIOA 3(16)</i>	<input type="checkbox"/>	

Equal Opportunity Employer/Program

Auxiliary Aids and Services Are Available upon Request to Individuals with Disabilities

Dislocated Worker Program Criteria		Eligibility Criteria	Documentation Uploaded
Date of Dislocation (required):			
Recently Dislocated		<input type="checkbox"/>	
Plant Closure or Substantial Layoff		<input type="checkbox"/>	
Loss of Self-Employment		<input type="checkbox"/>	
Displaced Homemaker		<input type="checkbox"/>	
Military Spouse ( <i>WIOA 3(16)</i> )		<input type="checkbox"/>	

**Instructions:** This form supersedes all versions of Attachment O to OWDI #02-2019, Data Validation and Source Documentation, as well as local versions of the form. The form must be uploaded into the virtual case management system as an Enrollment Document.