

Workforce Development Board

UPPER SAVANNAH WDA INSTRUCTION NUMBER: PY'17-09

TO: Upper Savannah Grantees

ISSUANCE DATE: August 7, 2017

EFFECTIVE DATE: Immediately

SUBJECT: Priority of Service Under WIOA

Upper Savannah Council of Governments
430 Helix Road
Greenwood, SC 29646-2324
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The Workforce Innovation and Opportunity Act (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, training services, or both, priority must be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient.

Individuals who are 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 must be implemented regardless of the amount of funds available to provide services in the local area.

The priority requirement does not necessarily mean that services may only be provided to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. The Local WDB and the Governor may establish a process that also gives priority to other individuals eligible to receive such services, provided that it is consistent with priority of service for veterans.

Veterans and eligible spouses continue to receive priority of service for all DOL-funded job training programs, which include WIOA programs. However, when programs are statutorily required to provide priority for a particular group of individuals, such as the WIOA priority for Adult funds, priority must be provided in the order described below. A veteran must 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.

Priority must be provided in the following order:

- First.** 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 would receive first priority for services with WIOA Adult formula funds for individualized career services and training services.
- Second.** Non-covered persons (that is, individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
- Third.** Veterans and eligible spouses who are not included in WIOA's priority groups.
- Fourth.** Priority populations established by the Governor and/or Local WDB. Upper Savannah has established this priority to include adults who fall under the Upper Savannah Self-Sufficiency Guidelines (Upper Savannah WDA Instruction Number PY 17-08). The Upper Savannah Area will continue to use the "self-sufficiency" criteria adopted under WIA, which means employment that pays at least 100% of the LLSIL based on family size and income.
- Last.** Non-covered persons outside the groups given priority under WIOA. Eligible individuals who do not meet the above priorities may still be enrolled as participants in the WIOA adult program. However, effective July 1, 2016, seventy percent (70%) of newly enrolled adult participants must be low-income, to include public assistance recipients, or basic skills deficient. Upper Savannah has set a goal requiring ninety percent (90%) of newly enrolled adult participants to be low-income. This priority of service policy is not applicable to participants served as dislocated workers.

It is beneficial to capture all applicable priority of service categories to reflect efforts in serving those most in need. In addition, such characteristics will likely have a positive impact on future performance negotiations as the statistical adjustment model is implemented. Therefore, all applicable priority of service criteria should be recorded in SCWOS and the documentation required for each criteria recorded must be maintained in the participant's file.

ACTION:

Please distribute to all appropriate staff for review and implementation.

Questions regarding this instruction should be directed to the Workforce Development Staff at 864-941-8050.



Ann Skinner
Workforce Development Director

UPPER SAVANNAH COUNCIL OF GOVERNMENTS

/s/

Attachment

UPPER SAVANNAH WDA LOWER LIVING STANDARD INCOME LEVELS (LLSIL)

FOR ADULT SELF-SUFFICIENCY & PRIORITY OF SERVICES

FAMILY SIZE	100% LLSIL NON-METRO (Abbeville, Greenwood, McCormick, Newberry)	100% LLSIL METROPOLITAN (Edgefield, Laurens, Saluda)
1	\$12,968	\$13,166
2	\$21,245	\$21,573
3	\$29,159	\$29,609
4	\$35,995	\$36,555
5	\$42,478	\$43,144
6	\$49,676	\$50,459
7	\$56,874	\$57,774
8	\$64,072	\$65,089

For families larger than 8, add for each additional person in the family:

* \$ 7,198 for non-metropolitan * \$ 7,315 for metropolitan

NOTES:

The metropolitan areas of South Carolina include the following counties: Aiken, Anderson, Berkeley, Calhoun, Charleston, Darlington, Dorchester, Edgefield, Fairfield, Florence, Greenville, Horry, Kershaw, Lexington, Laurens, Pickens, Richland, Saluda, Spartanburg, Sumter, and York.

In WIOA, training services may be made available to employed and unemployed adults and dislocated workers who 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; and
- In need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment.

This issuance supersedes all previously issued Family Income Guidelines. WIOA Family Income Guidelines are updated periodically when national guidelines change. It is important that the previous copies of the guidelines are kept and are not discarded. The older versions, for example, would be used to review income levels in effect at the time an individual originally applied for WIA/WIOA.

Use to determine an individual's Self Sufficiency for receipt of training services in WIOA.
Do not use these Income Guidelines to determine an individual's
Low Income Status for WIOA services or Needs Related Payments.

FOR DISLOCATED WORKER SELF-SUFFICIENCY

Self-sufficiency is defined as having a job which pays more than 80% of dislocation wage. If a person finds a part-time job, weekly earnings will be considered rather than hourly earnings.

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Nikki R. Haley
Governor

Cheryl M. Stanton
Executive Director

STATE INSTRUCTION NUMBER 15-17

To: Local Area Signatory Officials
Local Area Administrators

Subject: Adult Priority of Service Under WIOA

Issuance Date: June 22, 2016

Effective Date: July 1, 2016

Purpose: To outline key provisions and changes to priority of service in the Workforce Innovation and Opportunity Act (WIOA) adult program.

Background: Under the Workforce Investment Act (WIA), priority of service applied to low-income adults and public assistance recipients only when funds were limited in a local area. However, under WIOA priority for individualized career and training services must be given to recipients of public assistance, other low-income adults, and individuals who are basic skills deficient regardless of the availability of funds.

Policy: Adults who receive services from WIOA-funded staff beyond self-service and information must be determined eligible, enrolled and considered a participant for WIOA Title I services. Individualized career services and training services must be given on a priority basis, regardless of funding levels, to:

- First Priority: Veterans and eligible spouses who are low-income, to include recipients of public assistance, or who are basic skills deficient;
- Second Priority: Individuals who are low-income, to include recipients of public assistance, or basic skills deficient;
- Third Priority: Veterans and eligible spouses who are not low-income, or are not recipients of public assistance, and are not basic skills deficient; and
- Last: Individuals outside of the groups given priority.

Eligible individuals who do not meet the above priorities may still be enrolled as participants in the WIOA adult program. However, effective July 1, 2016, seventy percent (70%) of newly enrolled adult participants must be low-income, to include public assistance recipients, or basic skills deficient. Local Workforce Development Boards (LWDBs) are responsible for establishing local procedures to comply with this policy and for conducting outreach to these priority populations. This priority of service policy is not applicable to participants served as dislocated workers.

Low-income Individual

An individual who meets any *one* of the following criteria satisfies the low-income requirement for WIOA adult services:

- Receives, or in the past six months has received, or is a member of a family that is receiving or in the past six months has received, assistance through SNAP, TANF, or Supplemental Security Income (SSI), or state or local income-based public assistance;
- Receives an income or is a member of a family receiving an income that, in relation to family size, is not in excess of the most recent Family Income Guidelines issued via State Instruction;
- Is a homeless individual as defined in the McKinney-Vento Homeless Assistance Act or the Violence Against Women Act of 1994; or
- Is an individual with a disability whose own income meets the income requirement above, but who is a member of a family whose income does not meet this requirement.

Basic Skills Deficient

WIOA defines basic skills deficient as an adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the participant's family, or in society. The State further defines basic skills deficient as an individual who meets any one of the following indicators:

- Lacks a high school diploma or equivalent; or
- Scores 8.9 or below on the Test for Adult Basic Education (TABE) or <4 on the Reading for Information, Applied Mathematics, or Locating Information WorkKeys® assessments; or
- Is enrolled in Title II adult education, including English as a Second Language (ESL).

It is expected that basic skills deficiency will be determined using an objective, valid, and reliable assessment, such as the indicators listed above. However, when a formal evaluation is not available or practical, case manager observations, customer acknowledgement, and documented case notes are acceptable. For example, the case manager may observe that the adult is experiencing difficulty in reading or filling out an application form, or has poor English language skills and may be appropriate for ESL. However, an individual should not be determined as basic skills deficient merely because he/she lacks soft skills or the occupational skills needed for a particular job.

WIOA Title I funds cannot be used for assessment of basic skills deficiency prior to eligibility certification. Further, if not already a program participant, the use of funds for assessment will constitute enrollment in the program.

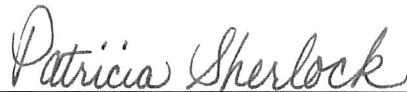
Documentation Requirements

It is beneficial to capture all applicable priority of service categories to reflect efforts in serving those most in need. In addition, such characteristics will likely have a positive impact on future performance negotiations as the statistical adjustment model is implemented. Therefore, all applicable priority of service criteria should be recorded in SC Works Online Services (SCWOS) and the documentation required for each criteria recorded must be maintained in the participant's case file.

State Instruction 15-17
Adult Priority of Service under WIOA
June 22, 2016
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Action: Ensure that all appropriate staff receive and understand this policy.

Inquiries: Questions may be directed to Scott Ferguson at 803-737-2671 or RSFerguson@dew.sc.gov.

A handwritten signature in cursive script that reads "Patricia Sherlock". The signature is written in dark ink and is positioned above a horizontal line.

Patricia Sherlock, Director
Policies and Procedures