



Montana Department of LABOR & INDUSTRY

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2 **Division: Workforce Services Division**
3 **Category: WIOA**
4 **Effective Date: 4/30/2018**
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6 **Policy No.: 27-18**

Title I Adult Program Policy

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8 **Background:** The Workforce Innovation and Opportunity Act (WIOA) provides for a customer-centered
9 workforce development system that offers all job seekers access to a continuum of career and job-driven,
10 training services. Under WIOA, Montana's local One-Stop Centers deliver the Title 1 Adult Program's career and
11 training services as a required partner. This collaborative effort integrates service delivery across programs to
12 increase, particularly for individuals with barriers to employment, access to an appropriate mix of services
13 needed to obtain, retain, and enhance skills and employment.

14 **Scope:** This policy applies to all service providers operating WIOA Title I Adult programs, WIOA Title I Adult
15 program manager(s), WIOA fiscal officers, and the WIOA monitoring team. This policy is effective July 1, 2019.

16 **Policy:**

17 **Adult General Eligibility:**

- 18 • To receive Title IB Adult individualized career and training services, an individual must:
 - 19 ○ Be 18 years old or older and meet at least one of the eligibility requirements.
 - 20 ○ Be a U.S. Citizen or Registered Alien; and
 - 21 ○ Meet Selective Service Registration requirements, if applicable.

22 **Adult Priority of Service:**

- 23 • Career services are universally available to all individuals entering a one-stop system facility. However,
24 covered persons (veterans and eligible spouses of veterans) are given priority of service over non-
25 covered persons.
- 26 • Priority of individualized career and training services will be given to individuals with barriers to
27 employment including recipients of public assistance or those who are determined to be low-income.
28 Individuals who are basic skills deficient have priority of service over those who are not basic skills
29 deficient.
- 30 • A low-income individual is an individual who:
 - 31 ○ Receives, or in the past 6 months has received, or is a member of a family that receives, or in
32 the past 6 months has received assistance through:
 - 33 ■ SNAP in accordance with the Food and Nutrition Act of 2008;
 - 34 ■ TANF under Part A of Title IV of the Social Security Act;
 - 35 ○ SSI (supplemental security income) established under Title XVI of the Social Security Act; or
 - 36 ○ State or local income-based public assistance. In Montana, this is General Assistance (GA);
37 Refugee Cash Assistance (RCA); and ACA Medicaid or Montana Medicaid
 - 38 ○ Received an income, or is a member of a family that received a total family income, that did not
39 exceed the higher of:
 - 40 ■ The poverty line; or

- 41 ▪ 70 percent of the lower living standard income level. Montana uses the 70 percent of
- 42 the lower living standard income level to determine low-income
- 43 ○ Qualifies as a homeless individual as defined in Section 41403(6) of the Violence Against
- 44 Women Act of 1994;
- 45 ○ Receives or is eligible to receive a free or reduced-price lunch under the Richard B. Russell
- 46 National School Lunch Act
- 47 ○ An individual with a disability whose own income meets the requirements of the poverty level
- 48 described above, but who is member of a family whose income does not meet this requirement.
- 49 ● Individuals who are recipients of public assistance (TANF, SNAP, SSI, ACA Medicaid, RCA, or GA) are
- 50 considered to meet Categorical Low Income Eligibility and may be automatically income eligible and no
- 51 further income eligibility and no further income verification is required if the individual has provided
- 52 acceptable documentation. Acceptable documentation includes:
- 53 ○ SNAP documentation dated within the last 6 months (excluding the current month) that verifies
- 54 the applicant receives or received SNAP benefits in the last 6 months; or is a member of a
- 55 household that receives or received SNAP benefits in the last 6 months.
- 56 ○ ACA Medicaid documentation dated within the last 6 months; Medicaid must be in the
- 57 applicant's name.
- 58 ○ Cash Public Assistance:
- 59 ○ TANF documentation dated within the last 6 months that verifies the applicant receives or
- 60 received TANF payments in the last 6 months; or is a member of a household that receives or
- 61 received TANF payments in the last 6 months.
- 62 SSI, RCA, and GA are payments made to a single recipient. The individual applying for a WIOA
- 63 program must have received a payment dated within the last 6 months.

64 **Adult Eligibility Verification:**

- 65 ● Verification of eligibility is used to ensure the reliability of the client information in the Management
- 66 Information System (MIS), to guarantee services are provided to persons most in need, and to avoid
- 67 potential disallowed costs. No individualized career services may be provided until the client has
- 68 furnished proof of eligibility to the enrolling service provider. Please refer to the Adult Verification
- 69 Worksheet for a complete list of acceptable documentation.
- 70 ● If an applicant is unable to produce the necessary documents to prove eligibility, service providers have
- 71 two options to determine eligibility:
- 72 ○ Verify information given via telephone contact using the Telephone Verification Form (WIOA.15)
- 73 with a business or by document inspection using Verification of Documentation Form (WIOA.53);
- 74 or
- 75 ○ An Applicant Statement Form (WIOA.18) may be used. However, the case manager must ensure
- 76 applicant statements and staff verifications are permitted by the federal data validation
- 77 requirements.

78 **Adult Initial Assessment:**

- 79 ● All clients must have a complete assessment to evaluate basic skills, experience, the appropriateness
- 80 for service, and ability to benefit from WIOA. An assessment is part of the overall intake process and
- 81 includes the initial determination of the client's employability, aptitudes, abilities, interests, and need
- 82 for supportive services through interview and testing. When the assessment indicates that
- 83 Individualized Career Services are appropriate, an Individual Employment Plan (IEP) is completed for
- 84 adults.

85 **Comprehensive Assessment Guidelines:**

- 86 ● A complete assessment is an independent, comprehensive evaluation of an individual designed to
- 87 identify information vital to the development of a service strategy and to set goals and objectives
- 88 leading to gainful employment.
- 89 ● The assessment is a holistic, ongoing process and should not be viewed as a one-time event. It includes
- 90 a full array of options from which the program staff and client make informed decisions and select
- 91 appropriate services that enable the client to secure and retain long-term, self-sufficient employment.
- 92 WIOA service providers must use the assessment tools provided through the Montana Career
- 93 Information System (MCIS) when working with their clients in the comprehensive assessment
- 94 process. Through the use of this tool, the client will create a customized electronic portfolio, if

95 one hasn't already been established, which will guide their career planning and be accessible to
96 partner program operators such as Adult Basic Education and Vocational Rehabilitation in the
97 event the client needs to be referred to these partners for services. Providers will use the LMI
98 and MCIS tools that are most appropriate to assess the needs of the individual client. If a
99 portfolio has previously been established, the service provider must review the tools and
100 assessments available with the client to determine if additional activities are needed.

101 Individual Employment Plan (IEP) Description:

- 102 • An IEP is required for Adult clients in the WIOA Individualized Career and Training services. The IEP is
103 developed in partnership with the client. The IEP identifies where the client is, where the client wants to
104 be and the appropriate mix and sequence of services and support to reach a realistic employment goal.
105 The development of the IEP will be based upon the results of the comprehensive assessments.
- 106 • Service providers must use the IEP Form provided on MDLI's WIOA website.
- 107 • A signed copy (signed by program staff and client) must be maintained in the client's file. This signed
108 IEP is the acknowledgment that the client read and agrees to the responsibilities; and know where they
109 can file a grievance or complaint.
- 110 • Once the IEP form is complete and the client is enrolled in the WIOA Adult program, case managers
111 must open a MWorks Employment Plan for the client. The goals and objectives, based on the
112 information on the IEP Form, will be recorded in the MWorks Employment Plan. In addition, case
113 managers will record on-going, IEP-related services provided in the MWorks Employment Plan.

114 Adult Services and Activities:

- 115 • Career Services for Adults consist of 3 types: Basic, Individualized, and Follow-up. Training and
116 supportive services can be critical to the employment success of many participants enrolled in the Adult
117 Program.
- 118 • **Basic Career Services** are universally available to everyone. Other partner sites need only provide the
119 career services appropriate to their clients and funding source. Basic Career Services include:
 - 120 ○ All self-help services and basic career services requiring minimal staff assistance including:
 - 121 ■ Determination of eligibility to receive assistance from the Adult Program; and
 - 122 ■ Outreach, intake, and orientation to the information and other services available
123 through the one-stop delivery system;
 - 124 ○ Orientation – all individuals entering, or re-entering services are to be oriented to the program.
125 Orientation topics include:
 - 126 ■ An introduction to the program – purpose and goals;
 - 127 ■ Rules and regulations of the program;
 - 128 ■ Provider responsibilities;
 - 129 ■ Client responsibilities;
 - 130 ■ Program resources and supportive services available;
 - 131 ■ Job-related injury procedures; and
 - 132 ■ Wage and pay information;
 - 133 Orientation must include:
 - 134 ■ Information and documented acknowledgement of procedures for complaints,
135 grievances, and discriminatory practices.
 - 136 ■ Assessment of skill levels, aptitudes, abilities and supportive service needs;
 - 137 ■ Provision of performance information and program cost information on eligible providers
138 of education, training and workforce services by program and type of providers;
 - 139 ■ Provision of information relating to the availability of supportive services in the area and
140 referral to such services, as appropriate;
 - 141 ■ Provision of information regarding filing claims for unemployment compensation when
142 appropriate;
 - 143 ■ Assistance in establishing eligibility for programs of financial aid assistance for training
144 and education programs that are not funded under WIOA and are available in the local
145 area;
 - 146 ■ One-stop resource and workshop services.
- 147 • **Individualized Career Services** are available to enrolled Adults and will be provided in order for an
148 individual to obtain or retain employment.

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- **Follow-up Services** must be provided to Adult participants who exit to self-employment, agricultural, railroad, or federal government employment for a minimum of twelve months.
 - Clients placed in follow-up services must be contacted by the case manager at least once per quarter to obtain wage data.
 - Follow-up services include, but are not limited to:
 - Additional career planning and counseling;
 - Contact with the client's employer, including assistance with work-related problems that may arise;
 - Peer support groups;
 - Information about additional educational opportunities, and referral to supportive services available in the community; and
 - Case management administrative follow-up.
 - Financial assistance is not an allowable follow-up service.
 - **Supportive Services** are available to enable an enrolled Adult to participate in WIOA activities when a client is unable to obtain the services through other programs. Please refer to Montana Labor & Industry's (MDLI) Supportive Services Policy for details.
 - **Training Services** may be provided to enrolled Adults:
 - Who are unable to obtain other grant assistance for such services, including Federal Pell Grants; or
 - Who require assistance beyond that made available under other grant assistance programs, including Federal Pell Grants.
 - Who otherwise meet the requirements while an application for a Federal Pell Grant is pending, except that if such individual is subsequently awarded a Federal Pell Grant, the training provider must reimburse the service provider the WIOA funds used to pay the tuition portion of the training costs from the Pell Grant. Tuition is the sum charged for instruction. Fees, books, supplies and other training related expenses are not considered tuition.
 - Through providers listed on the Montana Eligible Training Provider List (ETPL) unless noted otherwise in the following list of training services. Further information regarding the ETPL may be accessed in the EPTL Policy.
 - May be WIOA- or non WIOA-funded.
 - Non WIOA-funded training does not require ETP.
 - Training services may include:
 - Occupational skills training, including training for nontraditional employment and for training programs operated by the private sector; (requires ETP)
 - Training programs operated by the private sector; (requires ETP)
 - Skill upgrading and retraining; (requires ETP)
 - Entrepreneurial training; (requires ETP)
 - Adult education and literacy activities provided in combination with services described in any clauses (i) through (vii) of WIOA Section 134 (d)(4); (does not require ETP)
 - Customized training conducted with a commitment by a business or group of business to employ an individual upon successful completion of the training; (does not require ETP)
 - Incumbent Worker Training (IWT); (does not require ETP)
 - On-the-Job Training (OJT); (does not require ETP)
 - Registered Apprenticeship or other programs that combine workplace training with related instruction.
 - WIOA funding may be used for training that leads to a goal of self-employment.
 - The service provider must verify and pay tuition and other training costs in accordance with the training provider's documented payment policy or terms. WIOA funding may be used for any expenses considered to be part of the Cost of Attendance that cannot be funded by the Pell or other grant assistance. In situations of co-enrollment with other WIOA or non-WIOA programs (e.g. TAA, etc.), the case manager will coordinate with the training provider and other programs to ensure the client's training needs are met and there is no duplication of services. WIOA funding will always be a supplement to other grant assistance.

203 **Case Management and Career Planning**

- 204 • Career planning offers client-centered service delivery designed to:
- 205 ○ Prepare and coordinate comprehensive IEP's, such as service strategies to ensure client access
- 206 to necessary workforce investment activities and services, using when feasible, computer-based
- 207 technologies;
- 208 ○ Provide job, education, and career counseling during program participation and after job
- 209 placement.
- 210 • Case Management responsibilities include:
- 211 ○ Providing testing of basic skills, comprehensive assessment and testing;
- 212 ○ Co-enrolling in all applicable programs as appropriate;
- 213 ○ Monthly contact with clients; and, if unable to make contact after repeated six (6) attempts in a
- 214 90-day period, closing all services and enrollments effective the date the services were last
- 215 provided;
- 216 ○ Developing and updating of an IEP;
- 217 ○ Determining if client requests for training services and supportive or other services are
- 218 allowable, appropriate and able to be funded;
- 219 ○ Coordinating joint training plans and employment services as appropriate;
- 220 ○ Monitoring the progress of clients in their approved plan;
- 221 ○ Recording all program services and case notes in MWorks within the required timelines and as
- 222 service/contact occurs, reflecting any significant issues or changes;
- 223 ○ Maintaining the client file;
- 224 ○ Ending the client's services and program enrollment when services are no longer being
- 225 provided; and
- 226 ○ Ensuring that clients are aware of their responsibilities.

227 **Administrative Requirements:**

- 228 • The WIOA Title I Adult program manager will provide technical assistance to case managers.

229 **Monitoring and Evaluation:**

- 230 • A formal monitoring will be conducted by the entity designated by SWIB.

231 **References:**

- 232 • [Violence Against Women Act of 1994](#)
- 233 • [Richard B. Russell National School Lunch Act](#)
- 234 • [20 CFR 678.430 Career Services](#)
- 235 • [20 CFR 680 Adult and Dislocated Worker Activities](#)
- 236 • [TEGL 19-16 Adult and Dislocated Workers Services](#)
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