



Montana Department of LABOR & INDUSTRY

1 **Division: Workforce Services Division**
2 **Category: WIOA**
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5 **Policy No.: 27-18**

Title I Adult Program Policy

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

13 **Scope:** This policy applies to all service providers operating WIOA Title I Adult programs, WIOA Title I Adult
14 program manager(s), WIOA fiscal officers, and the WIOA monitoring team. This policy is effective October 1,
15 2020.

16 **Policy:**

17 **Adult Eligibility:**

- 18 • To receive Title IB Adult individualized career and training services, an individual must:
 - 19 ○ Be 18 years old or older;
 - 20 ○ Be a U.S. Citizen or Registered Alien;
 - 21 ○ Meet Selective Service registration requirements (if applicable); and
 - 22 ○ Have a documented barrier to employment:
 - 23 ▪ Low Income (includes a recipient of public assistance); or
 - 24 ▪ Basic skills deficient.
- 25 • Low income status is determined by one of the following:
 - 26 ○ Having a total family income that did not exceed 70 percent of the lower living standard income
27 level.
 - 28 ▪ An individual with a qualified ADA disability may be deemed a household size of one (1)
29 for income eligibility purposes and have only their own income included in the income
30 eligibility determination.
 - 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 (this includes cash or non-cash
35 assistance); or
 - 36 ▪ Food Distribution Program on Indian Reservations (FDPIR).
 - 37 ○ Receives, or in the past 6 months has received assistance through:

- 38 ▪ ACA Medicaid (ACA Adult, ACA Adult Medicaid, ACA Pregnant Woman, ACA
- 39 Parent/Specified Caretaker);
- 40 ▪ Supplemental Security Income (SSI) established under Title XVI of the Social Security
- 41 Act;
- 42 ▪ Refugee Cash Assistance (RCA);
- 43 ▪ Tribal General Assistance (GA); or
- 44 ▪ Senior Commodities.
- 45 ○ Receives or is eligible to receive a free or reduced-price lunch under the Richard B. Russell
- 46 National School Lunch Act; or
- 47 ○ Qualifies as a homeless individual as defined in Section 41403(6) of the Violence Against
- 48 Women Act of 1994.

49 Adult Eligibility Verification:

- 50 • Verification of eligibility is used to ensure the reliability of the client information in the Management
- 51 Information System (MIS), to guarantee services are provided to persons most in need, and to avoid
- 52 potential disallowed costs. No individualized career services may be provided until the client has
- 53 furnished proof of eligibility to the enrolling service provider. Please refer to the Adult Verification
- 54 Worksheet for a complete list of acceptable documentation.
- 55 • If an applicant is unable to produce the necessary documents to prove eligibility, service providers have
- 56 two options to determine eligibility:
 - 57 ○ Verify information given via telephone contact using the Telephone Verification Form (WIOA.15)
 - 58 with a business or by document inspection using Verification of Documentation Form (WIOA.53);
 - 59 or
 - 60 ○ An Applicant Statement Form (WIOA.18) may be used. However, the case manager must ensure
 - 61 applicant statements and staff verifications are permitted by the federal data validation
 - 62 requirements.

63 Adult Initial Assessment:

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

70 Comprehensive Assessment Guidelines:

- 71 • A complete assessment is an independent, comprehensive evaluation of an individual designed to
- 72 identify information vital to the development of a service strategy and to set goals and objectives
- 73 leading to gainful employment.
- 74 • The assessment is a holistic, ongoing process and should not be viewed as a one-time event. It includes
- 75 a full array of options from which the program staff and client make informed decisions and select
- 76 appropriate services that enable the client to secure and retain long-term, self-sufficient employment.
- 77 • Providers will use the assessments and other tools that are most appropriate to determine the needs of
- 78 the individual client.

79 Individual Employment Plan (IEP) Description:

- 80 • An IEP is required for Adult clients in the WIOA Individualized Career and Training services. The IEP is
- 81 developed in partnership with the client. The IEP identifies where the client is, where the client wants to
- 82 be and the appropriate mix and sequence of services and support to reach a realistic employment goal.
- 83 The development of the IEP will be based upon the results of the comprehensive assessments.
- 84 • Service providers must use the IEP Form provided on MDLI's WIOA website.
- 85 • A signed copy (signed by program staff and client) must be maintained in the client's file. This signed
- 86 IEP is the acknowledgment that the client read and agrees to the responsibilities; and know where they
- 87 can file a grievance or complaint.
- 88 • Once the IEP form is complete and the client is enrolled in the WIOA Adult program, case managers
- 89 must open a MIS Employment Plan for the client. The goals and objectives, based on the information on

90 the IEP Form, will be recorded in the MIS Employment Plan. In addition, case managers will record on-
91 going, IEP-related services provided in the MIS Employment Plan.

92 **Adult Services and Activities:**

- 93 • Career Services for Adults consist of 3 types: Basic, Individualized, and Follow-up. Training and
94 supportive services can be critical to the employment success of many clients enrolled in the Adult
95 Program.
- 96 • **Basic Career Services** are universally available to everyone. Other partner sites need only provide the
97 career services appropriate to their clients and funding source. Basic Career Services include:
 - 98 ○ All self-help services and basic career services requiring minimal staff assistance including:
 - 99 ■ Determination of eligibility to receive assistance from the Adult Program; and
 - 100 ■ Outreach, intake, and orientation to the information and other services available
101 through the one-stop delivery system;
 - 102 ○ Orientation – all individuals entering, or re-entering services are to be oriented to the program.
103 Orientation topics include:
 - 104 ■ An introduction to the program – purpose and goals;
 - 105 ■ Rules and regulations of the program;
 - 106 ■ Provider responsibilities;
 - 107 ■ Client responsibilities;
 - 108 ■ Program resources and supportive services available;
 - 109 ■ Job-related injury procedures; and
 - 110 ■ Wage and pay information;
 - 111 Orientation must include:
 - 112 ■ Information and documented acknowledgement of procedures for complaints,
113 grievances, and discriminatory practices.
 - 114 ■ Assessment of skill levels, aptitudes, abilities and supportive service needs;
 - 115 ■ Provision of performance information and program cost information on eligible providers
116 of education, training and workforce services by program and type of providers;
 - 117 ■ Provision of information relating to the availability of supportive services in the area and
118 referral to such services, as appropriate;
 - 119 ■ Provision of information regarding filing claims for unemployment compensation when
120 appropriate;
 - 121 ■ Assistance in establishing eligibility for programs of financial aid assistance for training
122 and education programs that are not funded under WIOA and are available in the local
123 area;
 - 124 ■ One-stop resource and workshop services;
 - 125 ■ Labor Market Information related to their employment goal.
- 126 • **Individualized Career Services** are available to enrolled Adults and will be provided for an individual to
127 obtain or retain employment.
- 128 • **Follow-up Services** must be provided to Adult clients who exit to self-employment, agricultural, railroad,
129 or federal government employment for a minimum of 4 quarters.
 - 130 ○ Clients placed in follow-up services must be contacted by the case manager at least once per
131 quarter to obtain wage data.
 - 132 ○ Follow-up services include, but are not limited to:
 - 133 ■ Additional career planning and counseling;
 - 134 ■ Contact with the client's employer, including assistance with work-related problems that
135 may arise;
 - 136 ■ Peer support groups;
 - 137 ■ Information about additional educational opportunities, and referral to supportive
138 services available in the community; and
 - 139 ■ Case management administrative follow-up.
 - 140 ○ Financial assistance is not an allowable follow-up service.
- 141 • **Supportive Services** are available to enable an enrolled Adult to participate in WIOA activities when a
142 client is unable to obtain the services through other programs. Please refer to Montana Labor &
143 Industry's (MDLI) Supportive Services Policy for details.

- 144 • **Training Services** may be provided to enrolled Adults:
- 145 ○ Clients who are unable to obtain other grant assistance for such services, including Federal Pell
- 146 Grants; or
- 147 ○ Who require assistance beyond that made available under other grant assistance programs,
- 148 including Federal Pell Grants.
- 149 ○ To help determine what financial assistance is needed the Service Provider must assist the
- 150 client in applying for financial aid and make the necessary referrals.
- 151 ○ Clients who can obtain a Federal Pell Grant must utilize the full Pell Grant toward training costs
- 152 and WIOA funds may assist with any need after the Pell has been applied;
- 153 ○ Service Providers may utilize WIOA funding to assist a client whose training costs must be paid
- 154 in order to begin training while the application for a Federal Pell Grant is pending.
- 155 ○ Clients who can obtain a Federal Pell Grant must utilize the full Pell Grant toward training costs
- 156 and WIOA funds may assist with any need after the Pell has been applied. Service Providers may
- 157 utilize WIOA funding to assist a client whose training costs must be paid to begin training while
- 158 the application for a Federal Pell grant is pending.
- 159 ○ if such individual is subsequently awarded a Federal Pell Grant, the training provider must
- 160 reimburse the service provider the WIOA funds used to pay the training costs.
- 161 ○ Through providers listed on the Montana Eligible Training Provider List (ETPL) unless noted
- 162 otherwise in the following list of training services. Further information regarding the ETPL may
- 163 be accessed in the ETPL Policy.
- 164 ○ May be WIOA- or non WIOA-funded.
- 165 ▪ Non WIOA-funded training does not require ETP.
- 166 ○ Training services may include:
- 167 ▪ Occupational skills training, including training for nontraditional employment and for
- 168 training programs operated by the private sector; (requires ETP)
- 169 ▪ Training programs operated by the private sector; (requires ETP)
- 170 ▪ Skill upgrading and retraining; (requires ETP)
- 171 ▪ Entrepreneurial training; (requires ETP)
- 172 ▪ Adult education and literacy activities provided in combination with services described in
- 173 any clauses (i) through (vii) of WIOA Section 134 (d)(4); (does not require ETP)
- 174 ▪ Customized training conducted with a commitment by a business or group of business
- 175 to employ an individual upon successful completion of the training; (does not require
- 176 ETP)
- 177 ▪ On-the-Job Training (OJT); (does not require ETP)
- 178 ▪ Registered Apprenticeship or other programs that combine workplace training with
- 179 related instruction.
- 180 ○ WIOA funding may be used for training that leads to a goal of self-employment.
- 181 ○ The service provider must verify and pay tuition and other training costs in accordance with the
- 182 training provider's documented payment policy or terms. WIOA funding may be used for any
- 183 expenses considered to be part of the Cost of Attendance that cannot be funded by the Pell or
- 184 other grant assistance. In situations of co-enrollment with other WIOA or non-WIOA programs
- 185 (e.g. TAA, etc.), the case manager will coordinate with the training provider and other programs
- 186 to ensure the client's training needs are met and there is no duplication of services. WIOA
- 187 funding will always be a supplement to another grant assistance.

188 Case Management and Career Planning

- 189 • Career planning offers client-centered service delivery designed to:
- 190 ○ Prepare and coordinate comprehensive IEP's, such as service strategies to ensure client access
- 191 to necessary workforce investment activities and services, using when feasible, computer-based
- 192 technologies;
- 193 ○ Provide job, education, and career counseling during program participation and after job
- 194 placement.
- 195 • Case Management responsibilities include:
- 196 ○ Providing testing of basic skills, comprehensive assessment and testing;
- 197 ○ Co-enrolling in all applicable programs as appropriate;

- 198 ○ Monthly contact with clients; and, if unable to make contact after repeated six (6) attempts in a
- 199 90-day period, closing all services effective the date the services were last provided;
- 200 ○ Developing and updating of an IEP;
- 201 ○ Determining if client requests for training services and supportive or other services are
- 202 allowable, appropriate and able to be funded;
- 203 ○ Coordinating joint training plans and employment services as appropriate;
- 204 ○ Monitoring the progress of clients in their approved plan;
- 205 ○ Recording all program services and case notes in MIS within the required timelines and as
- 206 service/contact occurs, reflecting any significant issues or changes;
- 207 ○ Maintaining the client file;
- 208 ○ Ending the client's services and program enrollment when services are no longer being
- 209 provided; and
- 210 ○ Ensuring that clients are aware of their responsibilities.

211 Administrative Requirements:

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

213 Monitoring and Evaluation:

- 214 ● A formal monitoring will be conducted by the entity designated by SWIB.

215 References:

- 216 ● [Violence Against Women Act of 1994](#)
- 217 ● [Richard B. Russell National School Lunch Act](#)
- 218 ● [20 CFR 678.430 Career Services](#)
- 219 ● [20 CFR 680 Adult and Dislocated Worker Activities](#)
- 220 ● [TEGL 19-16 Adult and Dislocated Workers Services](#)
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