



Montana Department of LABOR & INDUSTRY

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

6 Title I Adult Program Policy

7 **Background:** In general, the Workforce Innovation and Opportunity Act (WIOA) Title I Adult program
8 provides resources to enable workers obtain or retain good jobs by providing them with workforce services such
9 as job assistance, career guidance, and training opportunities. The Adult program is designed to:

- 10 • Help employers meet their workforce needs by connecting them to skilled workers;
- 11 • Provide eligible adults with basic and individualized career services, training services, and the
12 supportive services necessary to obtain good jobs; and
- 13 • Prioritize provision of individualized career services and training services to recipients of public
14 assistance; other low-income individuals; and individuals who are basic skills deficient.

15 **Scope:** This policy applies to all service providers operating WIOA Title I Adult programs, WIOA Title I Adult
16 program manager(s), WIOA fiscal officers, and the WIOA monitoring team. This policy is effective February 1,
17 2024.

18 Policy:

19 Required for Adult Participants:

- 20 • Determination of eligibility. Please refer to the Adult Verification Worksheet (WIOA.10) for a complete list
21 of acceptable documentation.
- 22 • Comprehensive assessment;
- 23 • An Individualized Employment Plan (IEP) developed in partnership with the participant; and
- 24 • Case management (including follow-up services as applicable).

25 Adult Eligibility:

26 To receive Title I Adult services, an individual must:

- 27 • Be 18 years old or older;
- 28 • Be a U.S. Citizen or Registered Alien; and
- 29 • Meet Selective Service registration requirements (if applicable).

30 Service Priority for Individualized Career Services and Training Services:

31 To qualify for individualized career services and training services, an individual must meet at least one priority
32 of service category (veteran or eligible spouse, WIOA priority group, or individuals with a significant barrier to
33 employment). When funds are limited, service priority—detailed below—is required:

- 34 1. Veterans and eligible spouses who meet the WIOA priority group of public assistance recipient, low-income
35 individual, or basic skills deficient;
- 36 2. Other individuals (not veterans or eligible spouses) who meet the WIOA priority group of public assistance
37 recipient, low-income individual, or basic skills deficient;
- 38 3. Veterans and eligible spouses with a significant barrier to employment;
- 39 4. Other individuals (not veterans and eligible spouses) with a significant barrier to employment; and
- 40 5. All other veterans and eligible spouses.

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42 Definitions:

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44 **Veteran:** An individual who served in the active military, naval, air, or space service; and who was discharged or
45 released under conditions other than dishonorable.

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47 **Veteran Eligible Spouse:** The spouse of any of the following individuals (eligibility is lost if the veteran or service
48 member loses the status that is the basis for the eligibility)—

- 49 • Any veteran who died of a service-connected disability;
- 50 • Any veteran who has a total disability resulting from a service-connected disability as evaluated by the
51 Department of Veterans Affairs or any veteran who died while such a disability was in existence; or
- 52 • Any member of the Armed Forces serving on active duty who is currently listed in one or more of the
53 following categories and has been for more than 90 days:
 - 54 ○ missing in action;
 - 55 ○ captured in the line of duty by a hostile force; or
 - 56 ○ forcibly detained or interned in line of duty by a foreign government or power.

57 WIOA Priority Groups

58 WIOA priority groups include recipients of public assistance, low-income individuals, and individuals who are
59 basic-skills deficient. Individuals in these three priority groups must account for at least 75 percent of enrolled
60 individuals.

- 61 • Recipient of Public Assistance
 - 62 ○ Receives, or in the past 6 months has received (or is a member of a family that is receiving or in
63 the past 6 months has received):
 - 64 ▪ Supplemental Nutrition Assistance Program (SNAP)
 - 65 ▪ Temporary Assistance for Needy Families (TANF) – includes either the cash or non-cash
66 programs
 - 67 ▪ Food Distribution Program on Indian Reservations (FDPIR)
 - 68 ○ Receives, or in the past 6 months has received:
 - 69 ▪ Supplemental Security Income (SSI)
 - 70 ▪ ACA Medicaid (ACA Adult, ACA Adult Medicaid, ACA Pregnant Woman, ACA
71 Parent/Specified Caretaker)
 - 72 ▪ Refugee Cash Assistance (RCA)
 - 73 ▪ Tribal General Assistance (GA)
 - 74 ▪ Senior Commodities
- 75 • Low-income Individuals
 - 76 ○ Individuals with a total family income that does not exceed the income guidelines defined in the
77 Family Size and Income Determination Policy.
 - 78 ▪ Note: An individual with a qualified ADA disability may be deemed a household size of
79 one for income eligibility purposes and have only their own income included in the
80 income eligibility determination.
 - 81 ○ An individual who qualifies for free or reduced-price lunch.
 - 82 ○ A homeless individual who lacks a fixed, regular, or adequate nighttime residence, including one
83 who:
 - 84 ▪ Shares housing with other individuals due to loss of housing, economic hardship, or
85 similar reasons;

- 86 ▪ Lives in a motel, hotel, trailer park, or campground due to a lack of alternative, adequate
- 87 accommodations;
- 88 ▪ Lives in an emergency or transitional shelter;
- 89 ▪ Is abandoned at a hospital or awaiting foster care placement; or
- 90 ▪ Has a primary nighttime residence that is a public or place not designed for or ordinarily
- 91 used as regular sleeping accommodation for human beings.
- 92 • Basic Skills Deficient—to meet the WIOA definition of basic skills deficient, an individual is:
- 93 ○ Unable to solve or compute problems; or read, write, or speak English at a level necessary to
- 94 function on the job, in the individual’s family, or in society; or has substantial cultural barriers.

95 **Individuals with Significant Barriers to Employment:**

- 96 • Displaced homemakers
- 97 • Indians, Alaska Natives, and Native Hawaiians
- 98 • Individuals with disabilities
- 99 • Older individuals (55+)
- 100 • Ex-offenders
- 101 • Individuals who have aged out of the foster care system
- 102 • Eligible migrant and seasonal farmworkers
- 103 • Individuals within 2 years of exhausting lifetime eligibility for TANF
- 104 • Single parents (including single pregnant women)
- 105 • Long-term unemployed individuals

106 **Comprehensive Assessment:**

- 107 • Enrolled adults must be provided with a comprehensive assessment of their individual skill levels and
- 108 service needs using testing and other assessment tools. An in-depth interview and evaluation to identify
- 109 their employment barriers and appropriate employment goals must also be completed.
- 110 • Based on the assessment’s results, a complete Individual Employment Plan (IEP) is required for a
- 111 participant to access individualized career and training services.

112 **Individual Employment Plan (IEP):**

- 113 • An IEP must be developed in partnership with the participant, using the adult IEP form (WIOA.16).
- 114 • The IEP identifies the participant’s current circumstances, goals, and the appropriate mix of services
- 115 and support needed to reach a realistic employment goal.
- 116 • The original IEP (signed by program staff and participant) must be maintained in the participant’s file.
- 117 This signed IEP is the acknowledgement that the participant has read and agrees to the responsibilities;
- 118 and knows where to file a grievance or complaint. A signed copy must be given to the participant.
- 119 • Case managers must open an IEP service in the MIS Employment Plan. The goals, objectives, and
- 120 potential services, based on the information on the IEP Form, must be recorded in the MIS Employment
- 121 Plan as well. In addition, case managers will open and close on-going, IEP-related services provided in
- 122 the MIS Employment Plan.

123 **Adult Services and Activities:**

124 **Basic Career Services**

125 Universally available to all individuals without being enrolled in the Adult Program. Please refer to the WIOA

126 Operations Manual for details.

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128 **Individualized Career Services**

129 Available to individuals enrolled in the Adult Program. Please refer to the WIOA Operations Manual for details.

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131 **Supportive Services**

132 Available to enable an enrolled adult to participate in WIOA activities when they can not obtain services through

133 other programs. Please refer to the Supportive Services policy for details.

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Training Services

Training services may be provided to participants and must include the following considerations:

- Participants who are unable to obtain other grant assistance for such services, including federal Pell Grants; or
- Participants who require assistance beyond that made available under other grant assistance programs, including federal Pell Grants. In both cases:
 - The service provider must assist the participant with determining what financial assistance is needed; the application process; and any other necessary referrals.
 - Participants who obtain a Pell Grant must utilize the full Pell Grant for training costs and WIOA funds may assist with remaining needs. WIOA funds may also be used if the Pell Grant application is pending and training costs must be paid to begin training.
 - Once the Pell Grant is awarded, the training provider must reimburse the service provider for WIOA funds applied to training costs.
 - Training can be provided through a variety of contract processes or through Individual Training Accounts (ITAs). Unless otherwise noted in the following list, training services must be accessed through Montana's Eligible Training Providers (ETPs).
 - Occupational skills training, including training for nontraditional employment; (requires ETP)
 - Training programs operated by the private sector; (requires ETP)
 - Skill upgrading and retraining; (requires ETP)
 - Entrepreneurial training; (requires ETP)
 - On-the-Job Training (OJT); (does not require ETP)
 - Incumbent Worker Training (IWT); (does not require an ETP on Montana's list)
 - Adult education and literacy activities provided concurrently or in combination with training services listed on lines 151 through 156; (does not require ETP)
 - Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training; (does not require ETP);
 - Job readiness training in combination with: occupational training; OJT; IWT; programs that combine workplace training with related instruction, private sector training, skills upgrading and retraining, and/or entrepreneurial training;
 - Transitional jobs;
 - Programs that combine workplace training with related instruction, which may include cooperative education and Registered Apprenticeship programs.
 - WIOA training funds may be used to assist with training that builds upon the participant's current education level in the quickest route possible. For the purpose of post-secondary training, WIOA funds will not pay for any degree beyond a Bachelor's.

Follow-up Services

- Follow-up services must be provided to Adult participants who exit to self-employment, agricultural, railroad, or federal government employment for a minimum of 4 quarters.
- During the follow-up period, quarterly contact should be made with the participant to obtain wage and employment information for use with WIOA performance indicators.
- Additional examples can be found in the WIOA Operations Manual.

Case Management

Case Management responsibilities include but are not limited to:

- Monthly contact with participants. If unable to make contact after six (6) attempts in a 90-day period, closing all services effective the date the services were last provided;
- Maintaining the participant file by recording all program services and case notes in the management information system (MIS) and documentation in ECM (when applicable) within seven (7) working days and as service/contact occurs;
- Ensuring that a countable service is provided every ninety (90) days (please see form WIOA.49 for a list of countable services that extend exit) and ending participant services and program enrollment when services are no longer provided.

186 **Monitoring and Technical Assistance:**

- 187 ▪ A formal monitoring will be conducted by the entity designated by SWIB.
188 ▪ The WIOA Title I Adult program manager will provide technical assistance to case
189 managers.

190 **References:**

- 191 • [Violence Against Women Act of 1994](#)
192 • [20 CFR 678.430 Career Services](#)
193 • [20 CFR 680 Adult and Dislocated Worker Activities](#)
194 • [TEGL 19-16 Adult and Dislocated Workers Services](#)
195 • [TEGL 07-20 Priority of Service Provisions for Most in Need in WIOA Adult Program](#)