



Montana Department of LABOR & INDUSTRY

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

Title I Adult Program Policy

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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 September 10,
17 2025.

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 • An individual seeking Adult participant-level services must have their authorization to work in the U.S.
23 verified prior to participation. Approved work authorization documentation must be provided by the
24 customer before Adult services can begin. For a list of acceptable documentation, refer to the Work
25 Authorization Verification Worksheet (WIOA.54).
- 26 • Comprehensive assessment;
- 27 • An Individualized Employment Plan (IEP) developed in partnership with the participant; and
- 28 • Case management (including follow-up services as applicable).

29 **Adult Eligibility:**

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

- 31 • Be 18 years old or older;
- 32 • Be a U.S. Citizen or legally authorized to work in the U.S.; and
- 33 • Meet Selective Service registration requirements (if applicable).

34 **Service Priority for Individualized Career Services and Training Services:**

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

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

45

46 **Definitions:**

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

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

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

61 **WIOA Priority Groups**

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

- 65 • Recipient of Public Assistance
 - 66 ○ Receives, or in the past 6 months has received (or is a member of a family that is receiving or in
67 the past 6 months has received):
 - 68 ■ Supplemental Nutrition Assistance Program (SNAP)
 - 69 ■ Temporary Assistance for Needy Families (TANF) – includes either the cash or non-cash
70 programs
 - 71 ■ Food Distribution Program on Indian Reservations (FDPIR)
 - 72 ○ Receives, or in the past 6 months has received:
 - 73 ■ Supplemental Security Income (SSI)
 - 74 ■ ACA Medicaid (ACA Adult, ACA Adult Medicaid, ACA Pregnant Woman, ACA
75 Parent/Specified Caretaker)
 - 76 ■ Refugee Cash Assistance (RCA)
 - 77 ■ Tribal General Assistance (GA)
 - 78 ■ Senior Commodities
- 79 • Low-income Individuals
 - 80 ○ Individuals with a total family income that does not exceed the income guidelines defined in the
81 Family Size and Income Determination Policy.
 - 82 ■ Note: An individual with a qualified ADA disability may be deemed a household size of
83 one for income eligibility purposes and have only their own income included in the
84 income eligibility determination.

- 85 ○ An individual who is co-enrolled in the WIOA Youth program qualifies for free or reduced-price
- 86 lunch.
- 87 ○ A homeless individual who lacks a fixed, regular, or adequate nighttime residence, including one
- 88 who:
- 89 ▪ Shares housing with other individuals due to loss of housing, economic hardship, or
- 90 similar reasons;
- 91 ● Lives in a motel, hotel, trailer park, or campground due to a lack of alternative, adequate
- 92 accommodations;
- 93 ● Lives in an emergency or transitional shelter;
- 94 ● Is abandoned at a hospital or awaiting foster care placement; or
- 95 ● Has a primary nighttime residence that is a public or place not designed for or ordinarily used as regular
- 96 sleeping accommodation for human beings.
- 97 ● Basic Skills Deficient—to meet the WIOA definition of basic skills deficient, an individual is:
- 98 ○ Unable to solve or compute problems; or read, write, or speak English at a level necessary to
- 99 function on the job, in the individual’s family, or in society; or has substantial cultural barriers.

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

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

111 **Comprehensive Assessment:**

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

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

- 118 ● An IEP must be developed in partnership with the participant.
- 119 ● The IEP identifies the participant’s current circumstances, goals, and the appropriate mix of services
- 120 and support needed to reach a realistic employment goal.
- 121 ● The IEP must be maintained in the participant’s file. This IEP is the acknowledgement that the
- 122 participant has read and agrees to the responsibilities; and knows where to file a grievance or
- 123 complaint. The EEO copy must be given to the participant.
- 124 ● Case managers must open the IEP service in the Management Information System (MIS). The work
- 125 history, strengths, goals, and assessments must be recorded. Case managers must record and update
- 126 IEP activities as needed.

127 **Adult Services and Activities:**

128 **Basic Career Services**

129 Universally available to all individuals without being enrolled in the Adult Program. Please refer to the WIOA
 130 Operations Manual for details.

131
 132 **Individualized Career Services**

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

134

135 Supportive Services

136 Available to enable an enrolled adult to participate in WIOA activities when they can not obtain services through
137 other programs. Please refer to the Supportive Services policy for details.

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139 Training Services

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

- 141 • Participants who are unable to obtain other grant assistance for such services, including federal Pell
142 Grants; or
- 143 • Participants who require assistance beyond that made available under other grant assistance
144 programs, including federal Pell Grants. In both cases:
 - 145 ○ The service provider must assist the participant with determining what financial assistance is
146 needed; the application process; and any other necessary referrals.
 - 147 ○ Participants who obtain a Pell Grant must utilize the full Pell Grant for training costs and WIOA
148 funds may assist with remaining needs. WIOA funds may also be used if the Pell Grant
149 application is pending and training costs must be paid to begin training.
- 150 • Once the Pell Grant is awarded, the training provider must reimburse the service provider for WIOA
151 funds applied to training costs.
- 152 • Training can be provided through a variety of contract processes or through Individual Training Accounts
153 (ITAs). Unless otherwise noted in the following list, training services must be accessed through
154 Montana's Eligible Training Providers (ETPs).
 - 155 ○ Occupational skills training, including training for nontraditional employment; (requires ETP)
 - 156 ○ Training programs operated by the private sector; (requires ETP)
 - 157 ○ Skill upgrading and retraining; (requires ETP)
 - 158 ○ Entrepreneurial training; (requires ETP)
 - 159 ○ On-the-Job Training (OJT); (does not require ETP)
 - 160 ○ Incumbent Worker Training (IWT); (does not require an ETP)
 - 161 ○ Adult education and literacy activities provided concurrently or in combination with training
162 services listed on lines 151 through 156; (does not require ETP)
 - 163 ○ Customized training conducted with a commitment by an employer or group of employers to
164 employ an individual upon successful completion of the training; (does not require ETP);
 - 165 ○ Job readiness training in combination with: occupational training; OJT; IWT; programs that
166 combine workplace training with related instruction, private sector training, skills upgrading and
167 retraining, and/or entrepreneurial training;
 - 168 ○ Transitional jobs;
 - 169 ○ Programs that combine workplace training with related instruction, which may include
170 cooperative education and Registered Apprenticeship programs.
 - 171 ○ WIOA training funds may be used to assist with training that builds upon the participant's
172 current education level in the quickest route possible. For the purpose of post-secondary
173 training, WIOA funds will not pay for any degree beyond a Bachelor's.
 - 174 ○ In situations of co-enrollment with other WIOA and non-WIOA programs, the case manager will
175 coordinate with the training provider and other programs to ensure the participant's training
176 needs are met and there is no duplication of services. WIOA funding will always be a
177 supplement to other grant assistance.

178 Follow-up Services

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

184 **Case Management**

185 Case Management responsibilities include but are not limited to:

- 186 • Documenting monthly contact or contact attempts with participants.
- 187 • Providing a countable activity every 90 days. Refer to form WIOA.49 for a list of activities/services.
- 188 • Maintaining the participant file by recording all program services, case notes, and documentation in MIS
- 189 within seven (7) working days and as service/contact occurs;
- 190 • For individuals whose work authorization is temporary, verifying continuing work authorization as per
- 191 the following guidelines:
 - 192 ○ Verify their continued work authorization at a reasonable interval determined by the date their
 - 193 temporary authorization is expected to expire, but no less than once every three months.
 - 194 ○ If a participant’s employment authorization has expired or been revoked outside that 3-month
 - 195 check, then the participant must be exited.
- 196 • Entering program services and start and end dates.

197 **Monitoring and Technical Assistance:**

- 198 • A formal monitoring will be conducted by the entity designated by SWIB.
- 199 • The WIOA Title I Adult program manager will provide technical assistance to case managers.
- 200 • Service providers are required to verify eligibility for the Adult Program. Guidance on the program’s
- 201 eligibility and related timelines for reporting participant information is available in the WIOA Operations
- 202 Manual.

203

204 **References:**

- 205 • [20 CFR 678.430 Career Services](#)
- 206 • [20 CFR 680 Adult and Dislocated Worker Activities](#)
- 207 • [TEGL 19-16 Adult and Dislocated Workers Programs, Attachment II](#)
- 208 • [TEGL 07-20 Priority of Service Provisions for Most in Need in WIOA Adult Program](#)
- 209 • [TEGL 10-23, Change 2 Work Authorization Verification in Grant Programs](#)