



# 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:** 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:

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- Help employers meet their workforce needs by connecting them to skilled workers;
- Provide eligible adults with basic and individualized career services, training services, and the supportive services necessary to obtain good jobs; and
- Prioritize provision of individualized career services and training services to recipients of public 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:

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- Determination of eligibility. Please refer to the Adult Verification Worksheet (WIOA.10) for a complete list of acceptable documentation.
- An individual seeking Adult participant-level services must have their authorization to work in the U.S. verified prior to participation. Approved work authorization documentation must be provided by the customer before Adult services can begin. For a list of acceptable documentation, refer to the Work Authorization Verification Worksheet (WIOA.54).
- Comprehensive assessment;
- An Individualized Employment Plan (IEP) developed in partnership with the participant; and
- Case management (including follow-up services as applicable).

#### 29 Adult Eligibility:

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

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- Be 18 years old or older;
- Be a U.S. Citizen or legally authorized to work in the U.S.; and
- 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.

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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.

50 **Veteran Eligible Spouse:** The spouse of any of the following individuals (eligibility is lost if the veteran or service  
51 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.

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

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

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

#### 111 Comprehensive Assessment:

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

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

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

##### 132 Individualized Career Services

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

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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.

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 o 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 o 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.

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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](#)