



ANNE ARUNDEL
WORKFORCE DEVELOPMENT
CORPORATION

Policy and Procedure Memorandum 2018-AJC-01

WIOA Adult and Dislocated Worker Priority of Service – Effective August 1, 2017

TO: Anne Arundel Workforce Development Corporation (AAWDC) staff

FROM: Kirkland Murray
President and CEO
Anne Arundel Workforce Development Corporation

SUBJECT: Utilizing Priority of Service under WIOA

PURPOSE: To provide guidance to AAWDC staff on utilizing priority of service under WIOA Title I programs. **Revised to incorporate changes made in TEGL 19-16.**

ACTIONS: Directors will ensure that all employees are educated on and received copies of this policy. All AAWDC PPMs shall be posted on the Shared drive.

EXPIRATION: N/A

QUESTIONS: Jason W. Papanikolas, MBA
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CANCELLATIONS

2017-AJC-03 WIOA Adult and Dislocated Worker Priority of Service

AAWDC Approvals

 Office of Research, Performance and Compliance
 Fiscal Office
 Program Director
 President and CEO
 Workforce Development Board

General Information

The Anne Arundel County Workforce Development Board is committed to a priority service system where those individuals most in need, with additional barriers to employment, will be served first. The Workforce Innovation and Opportunity Act (WIOA or Opportunity Act) requires priority be given to public assistance recipients, other low-income individuals and individuals who are basic skills deficient, when providing individualized career services and training services using WIOA title I Adult program funds. In addition, Training and Employment Guidance Letter (TEGL) No. 3-15 specifies that priority should also be applied to individuals that are both underemployed and low-income. WIOA provides a focus on serving individuals with barriers to employment, and the intent of this priority in the law is to ensure access to these populations on a priority basis. Under the WIA priority was required for public assistance recipients and other low-income individuals when funds were limited. Under the WIOA, priority of service is required regardless of the funding levels and also is expanded to include individuals who are basic skills deficient.

In order for a participant to receive priority of service, the participant must meet the statutory definition of the eligibility requirement. These requirements are enumerated below and in PPM 2017-AJC-02 *WIOA Title I Eligibility*. Priority of service can be defined in many ways, but generally means that a participant with a service priority will receive services before a person lacking that priority. In other words, priority participants are served *first*. When resources are limited, the Board may, at its discretion, choose to serve only those participants with priority status.

Priority of Service in the Adult Worker Program

Within the Adult Worker program, the following priority service order must be followed:

Priority of Service for the WIOA Title I Adult Program	
First Priority	Veterans and eligible spouses who are low-income, recipients of public assistance, and/or basic skills deficient.
Second Priority	All other low-income individuals, recipients of public assistance, and/or those who are basic skills deficient.
Third Priority	Veterans and eligible spouse who do not meet "first priority" conditions.
Fourth Priority	Additional priority populations established by the Governor or Local Workforce Development Board
Fifth Priority	All other individuals who qualify for the Adult Worker program.

The State of Maryland and the Anne Arundel County Workforce Development Board have designated the following populations as "target populations," receiving fourth priority for purposes of WIOA¹:

- Displaced Homemakers
- Eligible migrant and seasonal farmworkers (MSFWs)
- Ex-offenders
- Individuals facing substantial cultural barriers
- Individuals, including youth, with disabilities
- Individuals within two years of exhausting lifetime eligibility for TCA benefits
- Individuals who are English language learners
- Individuals who are unemployed, including the long-term unemployed
- Individuals without a High School Diploma
- Native Americans, Alaskan Natives, and Native Hawaiians
- Older individuals (50 years of age or older)
- Single parents (including single pregnant women and non-custodial parents)
- Youth who are in or have aged out of the foster care system

Priority of service for adult workers is determined at the time of eligibility determination and enrollment. The priority category given to a participant will not change, even if a participant would move into a higher category, based upon a significant life event.

¹ The Anne Arundel County Workforce Development Board reserves the right to apply priority of service and target population requirements to any program within its jurisdiction wherein the Board is neither required to nor prohibited from making such a requirement.

Case managers/intake staff are responsible for making determination of service priority through the AAWDC WIOA Priority of Service form. This form assigns priority on the basis of a points system, similar to the veteran hiring preference system used by the federal government. Points shall be applied as follows:

Priority of Service Points Determination	
First Priority	4 points – Staff member will check the First Priority box and indicate the appropriate barrier
Second Priority	3 points – Staff member will check the Second Priority box and indicate the appropriate barrier.
Third Priority	2 points – Staff member will check the Third Priority box
Fourth Priority	1 point – Staff member will check the Fourth Priority box and indicate the appropriate barrier.
Fifth Priority	0 points – Staff member will not check any boxes.

Priority of Service in the Dislocated Worker Program

If a participant who is a veteran meets the definition of a Dislocated Worker, then the participant should receive priority of service under the Dislocated Worker Program. As with the Adult program, priority of service is determined at the time of eligibility determination and enrollment. Priority participants should receive services first. However, once a priority participant has been enrolled into the Dislocated Worker Program, the participant shall receive services on an individualized basis. Therefore, the participant may not receive priority at that point.

Veterans are not required to document status at enrollment through anything other than self-certification. Case managers/intake staff are encouraged to collect proof of veteran status as enumerated in the *WIOA Title I Eligibility PPM*, but cannot compel a participant to do so. Should a veteran utilize outside resources (such as occupational training), proof of veteran status must be collected at that time. For purposes of cohort training, veteran dislocated workers will receive a two-point preference (consistent with Third Priority Adult workers). Case managers are urged to consider co-enrolling veterans in both the Adult and Dislocated Worker Programs in order to ensure that veterans receive all benefits for which they are eligible under WIOA Title I.

Performance Accountability

Case Management Standards

The Office of Research, Performance and Compliance has established the following case management guidelines:

1. The use of the AAWDC Priority of Service Form will provide all information necessary to determine service priority.
2. The maintenance of adequate documentation to ensure accuracy of priority determination shall (at a minimum) include the above-mentioned forms, plus copies of documentation used to make said determination.
3. Signature and dates of signatures for the applicant must be signed in ink.
4. All data related to eligibility must be entered into the Maryland Workforce Exchange (MWE) within fourteen (14) days of eligibility verification. A master file must be sent to the WIOA Adult Program Assistant at the same time.

Performance Standards

Management shall ensure that a minimum of 70% of all Adult clients served in the WIOA program fall within one of the top four service priority categories for FY 2018. AAWDC management has also determined that Adult training dollars shall be spent according a formula that emphasizes service priority categories in the WIOA system.

Operational Standards

The RPC Office has established the following operational guidelines:

1. For veterans self-attesting to priority status (i.e. the participant is identified as a veteran by the MWE system) shall receive first choice of appointment time with WIOA Title I intake staff at time of orientation.
2. All priority participants identified at enrollment (i.e. all Adult priority of service and veterans) shall receive first choice of appointment time with WIOA Title I case management staff.
3. In the event that several eligible Adult (and/or veteran Dislocated Worker) clients are requesting training through a cohort training program established by AAWDC, clients shall be admitted according to their service priority.

4. All participants who are not admitted to a cohort training *on the basis of priority alone* will be offered the opportunity to pursue training through an Individual Training Account (ITA) agreement.

Reporting and Monitoring

The Office of Research, Performance, and Compliance (RPC Office) will utilize the reporting capabilities of the MWE to monitor WIOA Adult service priority determinations. Additionally, the RPC Office may review service priority determination during regularly scheduled and desk audits by compliance staff. The RPC Office shall analyze these audit for compliance with the procedures enumerated here and may require corrective action if found deficient.

Each Program Year, the RPC Office will conduct a risk management assessment of the WIOA Adult program to determine what level of monitoring is necessary beyond the reporting noted above.