



Policy Memorandum 2021-04

Title I Eligibility – Effective March 8, 2021

INTENDED AUDIENCE: Title I case management staff and supervisors
Contractors and subgrantees for service provision under Title I

SUBJECT: Title I Eligibility Requirements for Adults, Dislocated Workers, and Youth

LAST REVIEWED/UPDATED: December 2020

RESPONSIBLE OFFICE: Career Development and Community Services

POLICY CONTACT: Vice President, Career Development and Community Services

CANCELLATIONS

PPM 2019-02 – Title I Eligibility

Revision History

<u>Policy Number</u>	<u>Date of Revision</u>	<u>Significant Change</u>
2019-02 – Title I Eligibility	7/1/2018	To incorporate changes in state guidance
2017-02 – WIOA Title I Eligibility	12/1/2016	To incorporate initial guidance provided by state and to consolidate interim guidance policies
2016-05 (Revised) – WIOA Youth Program Eligibility	10/2/2015	Added additional eligibility parameters, references to local plan, and updated definition of low-income status
2016-03 – WIOA Adult Program Eligibility and Priority of Service	7/1/2015	Interim guidance document for Adult worker eligibility under new WIOA law
2016-04 – WIOA Dislocated Worker Program Eligibility	7/1/2015	Interim guidance document for Dislocated Worker eligibility under new WIOA law
2016-05 – WIOA Youth Program Eligibility	7/1/2015	Interim guidance document for Youth eligibility under new WIOA law
2013-02 – WIA Eligibility Requirements	2/20/2013	Requirements for program eligibility under the Workforce Investment Act

Approvals

President and CEO, AAWDC *Kirkland J. Murray*
[Kirkland J. Murray \(Mar 9, 2021 06:41 EST\)](#)

Introduction

The Workforce Opportunity and Innovation Act (WIOA) offers an integrated and comprehensive range of services for job seekers, including adults, dislocated workers, youth, incumbent workers, new entrants to the workforce, veterans individuals with disabilities, and employers. WIOA’s objective is to meet employers’ needs by increasing employment, job retention, earnings, and occupational skills among all job seeker populations. While the policy described in this Memorandum lays out eligibility guidelines for Title I services under WIOA, simply being determined eligible for service does not entitle or guarantee a participant will receive said services. Decisions on programmatic suitability are made on a case-by-case basis depending upon the needs of the individual and local economic circumstances.

Policy Statement

The Maryland Department of Labor enacted Policy Issuance (PI) 2018-06 on August 21, 2018. This policy established the State of Maryland’s Title I eligibility and source documentation requirements. AAWDC Title I staff must follow the guidelines and recommendations of PI 2018-06 with the exceptions noted below.

Exceptions

- PI 2018-06 requires that each local area define the youth eligibility barrier – “A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.”

The Anne Arundel County Local Workforce Development Plan defines this term to mean the following:

A low-income individual who has had intermittent, short-term employment or an inability to secure a wage at a self-sufficiency level for a single adult. Annually, AAWDC publishes the hourly wage for self-sufficiency in a policy memorandum. For more information, please see the current policy.

- AAWDC does not allow the enrollment of youth participants in the 5% exception without the consent of compliance staff. Staff will case note and acknowledge the exception at the time of enrollment. The 5% exception applies to any in-school youth (or an out-of-school where income is a requirement of the barrier) who would otherwise qualify if not for income. The total number of participants that may use exception is limited to 5% of all active youth participants at the time of enrollment.

For example, an in-school who is an offender or otherwise subject to the justice system may participate in youth services, regardless of his income, by utilizing the 5% exception.

- The Anne Arundel County Local Workforce Development Board has specified that all Title I participants must meet one of the following criteria for enrollment:
 - a. Living in Anne Arundel County for at least 60 days prior to enrollment;
 - b. Has a custodial relationship with an Anne Arundel County agency (such as the Department of Social Services);
 - c. Have a conditional job offer from an Anne Arundel County employer; or
 - d. Have been accepted into a cohort training that leads to employment in Anne Arundel County.

The source documentation for meeting the exception guidelines is in the chart below:

Data Element	Source Documentation	Notes
Living in Anne Arundel County	<ul style="list-style-type: none"> • Maryland-issued Driver’s License • Lease or Landlord statement • Voter Registration Card • Self-certification 	If utilizing a self-certification, such certification will require third-party verification.
Conditional job offer	<ul style="list-style-type: none"> • Bona fide job offer from an Anne Arundel County employer 	Bona fide offer means that the case manager has verified the offer.
Custodial relationship	<ul style="list-style-type: none"> • Letter from the agency showing the custodial relationship 	

Accepted into a cohort training	<ul style="list-style-type: none"> Case note indicating the cohort that the participant will be joining and demonstrating linkages to area employment 	
Youth requiring additional assistance	<ul style="list-style-type: none"> Case note indicating a review of the participant's resume and demonstrating youth is economically disconnected. 	

Related Policies and Other Resources

- Federal, state, or local policies
 - *TEGL 23-19* – Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor Workforce Programs, dated June 18, 2020
 - *Policy Issuance 2018-06* – Workforce Innovation and Opportunity Act Title I Program Eligibility, dated August 21, 2018






Title I Eligibility - Draft for Signature

Final Audit Report

2021-03-09

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