

Area 20/21

Hocking - Fairfield

Pickaway - Ross - Vinton

Suitability Requirements Policy

The WIOA program is designed to provide employment and training opportunities to those who can benefit from and who are most in need of such opportunities. However, WIA is not an entitlement program.

Enrollment into the WIOA adult program requires applicants to be at least 18 years of age, properly registered for Selective Service, and authorized to work in the U.S. Further, all employed individuals must demonstrate they are not self-sufficient as defined by Area 20 WIB policy in order to move from core to intensive services. Access to ITAs requires additional assessments in order to receive WIOA adult-funded training, including a determination of the "need" for training services. All available sources of funds (including grants such as Pell but excluding loans) shall be considered in determining an individual's need for WIOA funds.

Services available through the WIOA adult and dislocated worker programs are obtained through the delivery of core, intensive, and training services. Unregistered core services are available without regard to program eligibility or suitability. Determining an individual's suitability and "need" for intensive services requires one-on-one assistance with WIOA staff. The information must be obtained in order to identify if WIOA intensive services are appropriate for the eligible core serviced participant. A review of individual barriers, work history, existing skills, interests, expectations, and the availability of appropriate intensive services in the local area are factors which shall be reviewed in order to determine if the individual should be enrolled.

Access to training services requires even more information in order to determine if training is appropriate for the intensive services customer. The regulations state a customer, in order to receive training services, must:

- 1. Be unable to obtain or retain employment through intensive services;
- 2. Be determined to be in need of training after an individual interview, evaluation, or assessment;
- 3. Have the skills and qualifications to successfully participate in the selected program of training services;
- 4. Select a program of training services which are directly related to the employment opportunities in the local area involved or in other areas in which the individual is willing to relocate; and
- 5. Be unable to obtain other grant assistance for training or require assistance beyond the assistance made available under grant assistance programs including Pell Grant funds.



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Other relevant factors to be considered include the self-sufficiency standard and determination of any close relationships to immediate family or stakeholders in the WIOA workforce system. (Refer to Area 20's Conflict of Interest Policy) If a relationship exists between the customer and a stakeholder or relative in the WIOA system, case managers shall follow the local WIB policy which describes the mandatory procedures governing how the customers may be assessed and served. This information combined with the assessment data collected during intensive services help determines suitability for training assistance.

WIOA staff will gather information and assess suitability in a timely manner. A customer flow is established which allows an expedited path to needed services in order to maximize the amount of time a dislocated worker can receive financial support through Unemployment Compensation and/or Trade benefits while enrolled in services.

In order to be suitable for ITAs, adults, including dependent adults, must be below Area 20/21 established income guideline for family self-sufficiency. This information should be a combination of standardized tests, interviews, inventory of applicants' field of interest, skill assessments, career exploration, available labor market information, and more.

All individuals ages 18-23 which are applying for ITAs under the WIOA adult program are required to be screened for dependency status.

Two separate determinations must be made before an ITA can be issued for an adult customer: eligibility and suitability.

When determining eligibility for moving from core to intensive services Area 20 shall apply its self-sufficiency for employed adults. When determining suitability all individuals under WIOA adult program are required to be screened for dependency status. Dependency status will be determined by completing the Determination of WIOA Dependent Status Checklist. Since a determination is made as to a WIA adult program applicant's dependency status then the case manager must apply all appropriate individual income and/or family income and eligibility criteria.

Extenuating Circumstances are defined as an economic hardship which is beyond the reasonable control of the person(s) responsible for providing financial assistance to the WIOA customer for training. The costs related to the economic hardship must be the responsibility of the person or for his or her legal dependent, spouse, or parent. Those costs must be ongoing and expected to cause a financial hardship for the duration of the ITA.



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Economic hardships include:

- The portion of medical procedure or prescription medication costs which are not covered by insurance and are ongoing and determined to be medically essential;
- Health insurance premium payments which are not paid by private or public sources;
- Payments on past due or back mortgage, rent, or essential services (e.g. electric, water, natural gas, propane, and other utility arrearages) which accumulated because of involuntary unemployment or underemployment;
- Ongoing payments to a nursing home, home health care provider, elder care provider, or assisted living provider; and
- Payments toward debt which accumulated as a result of a natural disaster, severe illness, or disability.

Extenuating circumstances do not include normal rent, mortgage, utility, court ordered child support, court ordered spousal support, automobile, fuel, grocery, credit card, or "pay-day loan" payments.

An administrator/director may approve exceptions on a case by case basis for dependents whose parent or guardians' income falls above the family self-sufficiency standard. Documentation explaining the extenuating circumstances must be maintained in the participant file, along with the signature approval of the administrator/director.

Documentation shall be maintained in the participant file in order to justify the decision to enroll in intensive and training services and to justify the financial need of dependent adults with ITAs. The type of documentation will be driven by requirements at the local level which, at a minimum, meet the conditions described in this policy; including family self-sufficiency standard documentation.