



Northern Middle Tennessee Workforce Board Inc.

June 10, 2020

Executive Summary

Adult Priority of Service Policy

1. What is the general purpose of this policy?

To provide guidance for American Job Center Staff on the implementation of priority of service for career and training services.

2. What are the notable guidelines conveyed within this policy?

- Describes the statutory priority for Adult funds
- Describes Veteran's priority of service and Adult priority and how to apply it

3. What are the modifications to this policy?

A fifth level of priority was added per Tennessee Department of Labor and Workforce Development's Adult Priority of Service Guidance.

Modified the definition of underemployed and removed the Adult eligibility guidelines, which is now described in a separate guidance memo.



Adult Priority of Service Policy

Purpose

This policy provides guidance for American Job Center staff on the implementation of priority of service for Individualized Career Services and Training Services.

Background

WIOA focuses on serving individuals with barriers to employment, as defined in WIOA Section 3(24), and seeks to ensure access to quality services for these populations. The WIOA Final Rule discusses priority and special populations for the Adult program at 20 CFR 680.600. WIOA implements priority of service to low-income individuals and those with barriers to employment regardless of availability of funds. However, veterans within these groups receive priority over non-veterans.

Policy & Instructions

A. Statutory Priority for Adult Funds

WIOA section 134(c)(3)(E) establishes a priority requirement with respect to funds for adult employment and training activities. Priority of service status is established at the time of eligibility determination and does not change during the period of participation. When providing individualized career and training services in the WIOA Title I Adult program, priority must be given to:

- Recipients of public assistance
- Other low-income individuals
- Individuals who are basic skills deficient

B. Definitions

1. **Low-Income Individual** – a person who meets any of the following criteria

- a) Recipient of public assistance includes individuals who receive, or in the past six (6) months have received, or are a member of a family that is receiving or the in the past six (6) months has received assistance through one or more of the following:
 - Supplemental Nutrition Assistance Program (SNAP)
 - Temporary Assistance for Needy Families (TANF)
 - Supplemental Security Income (SSI)
 - Other State or local income-based public assistance
- b) Individuals in a family with total family income below seventy percent (70%) of the lower living standard income level
- c) Homeless
- d) Foster youth
- e) Individuals with disabilities with an income below seventy percent (70%) of the lower living standard income level

Criteria and Procedure Used to Determine Low-Income Eligibility

American Job Center (AJC) Staff will utilize the Income Worksheet to determine low income eligibility. Please see ***Workforce Services Guidance – Income Guidelines for Persons Defined as Low-income Individuals*** for additional information on who qualifies as low-income.

2. **Basic Skills Deficient** – an individual who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

Criteria and Procedure Used to Determine Basic Skills Deficient

Basic skills deficiency will be determined by an objective, valid, and reliable assessment such as the Test for Adult Basic Education (TABE) or Comprehensive Adult Student Assessment Systems (CASAS) and must be maintained in the individual's electronic case file.

3. **Underemployed** – an individual who is employed full or part-time at an hourly wage of \$12.00 or less.

An underemployed individual must also meet the definition of a low-income individual in order to be eligible for the adult priority.

C. Veterans' Priority of Service and Adult Priority

Veterans and eligible spouses continue to receive priority of service for all WIOA programs. However, as described in TEGL 10-09, when programs are statutorily required to provide priority for a particular group of individuals, such as the WIOA priority for Adult funds described above, priority must be provided in the order described below.

Priority must be applied in the following order:

1. Veterans and eligible spouses who meet the statutory priority of public assistance recipients, other low-income individuals including the underemployed, or those who are basic skills deficient and Title I Adult program eligibility must receive first priority for services;
2. Other individuals (not veterans or eligible spouses) who meet the statutory priority of public assistance recipients, other low-income individuals including the underemployed, or those who are basic skills deficient and Title I Adult program eligibility then receive second priority for services;
3. All other veterans and eligible spouses who do not meet the statutory priority of public assistance recipients, other low-income individuals including the underemployed, or those who are basic skills deficient but do meet Title I Adult program eligibility then receive third priority for services;
4. Other individuals (not veterans or eligible spouses) who do not meet the statutory priority of public assistance recipients, other low-income individuals including the underemployed, or those who are basic skills deficient, but do meet Title I Adult program eligibility but, and is an individual with one of the following barriers to employment, receives fourth priority for services.
 - Indians, Alaska Natives, and Native Hawaiians;
 - Individuals with disabilities;
 - Older individuals (age 55 and older);

