

SNAPSHOT

Subject:	Priority of Service for Veterans and Eligible Spouses
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PURPOSE

To provide information to support the implementation of Priority of Service for Veterans and Eligible Spouses by local workforce areas and other grantees that receive funds from the Colorado Department of Labor and Employment (CDLE) or the U.S. Department of Labor (USDOL) to operate qualified job training programs.

Specifically:

- To provide guidance on identifying and verifying veterans and eligible spouses and applying priority of service;
- To provide guidance on local policy requirements for priority of service; and
- To require updated local policies to be submitted to the State Veterans Coordinator and the WIOA Regional Coordinator within 90 days after [publication] [Deleted: receipt] of the corresponding PGL, and any time the local policy is updated going forward.

BACKGROUND

On November 7, 2002, the Jobs for Veterans Act (JVA) was signed into law (Public Law 107-288). A provision of the law established a priority of service requirement for covered persons (i.e., veterans and eligible spouses, as defined by this statute) in qualified job training programs.

Since the passage of the JVA, USDOL has provided policy guidance to the workforce system regarding the implementation of priority of service. Section 605 of the Veterans' Benefits, Health Care, and Information Technology Act of 2006 (P.L. 109-461) required the USDOL to implement priority of service for Veterans and other covered persons for all employment and training programs funded directly, in whole or in part, by USDOL.

The Final Rule took effect on January 19, 2009. While recipients of USDOL funds for qualified job training programs had been required to provide priority of service since 2002, the Final Rule signaled that those recipients of USDOL funds for qualified job training programs are subject to the priority of service regulations, and are required by law to provide priority of service to veterans and eligible spouses.

POLICY/ACTION

Definition: "**Veteran**" means a person who served [in the active military, naval, air, or space service] [Deleted: at least one day of active duty in the United States] military, in any branch including the Army, Marines, Navy, Air Force, or Coast Guard, and who was discharged or released under conditions other than dishonorable.

Identifying Veterans and Eligible Spouses

During intake, if two customers enter the workforce center at the same time, the covered person [must] [Deleted: should] be given priority attention over a non-covered individual.

Verifying Status and Documentation

Verification only needs to occur at the point at which a decision is made to incur direct costs for one individual over another. The commitment of program staff time does not require verification of status by a veteran or eligible spouse. If a veteran or eligible spouse self-identifies, program staff [must] [Deleted: should] be permitted to deliver appropriate services, including case management or individualized career services, while permitting the veteran or eligible spouse to follow-up subsequently with verification of his or her status.

Even in those instances in which eligibility determination and enrollment occur at the point of entry, a veteran or eligible spouse **[must]** **[Deleted: should]** be enrolled on the basis of self-attestation and provided immediate priority and then be permitted to follow-up subsequently with any required verification of his or her status as a veteran or eligible spouse.

On rare occasions, the veteran may receive a DD Form 215, which is a correction to the DD Form 214. The DD Form 215 **[must]** **[Deleted: should]** accompany the DD Form 214; however, the DD Form 214 must be used for documenting veteran status. JVSG staff are available as a resource to assist with determining the length and character of service.

Performance and Reporting

USDOL has established a Quarterly Reporting Analysis (QRA) data quality tool that will show on a quarterly basis the State's performance in Veterans Priority of Service. To improve compliance with this metric, local workforce areas must become familiar with the formula used to compile the percentage. The formula takes the total number of **[exited]** veterans who were served in Wagner-Peyser (PT) that received an individualized career service or training service and divides it by the total number of **[exited]** veterans who were served in Wagner-Peyser (PT). Within the Compliance section of the WIOA Federal Reports in Connecting Colorado, there is a Veteran Priority of Service report that uses this formula. Local workforce areas **[must]** **[Deleted: should]** modify their policies, programs, or allowable services to **[meet or exceed]** the USDOL/ETA **[target]** **[Deleted: standard]** of 48 percent.

1. Understand the formula that is used to measure this new Wagner-Peyser Priority of Service measurement
2. Develop an internal monitoring process
3. Modify internal processes as needed to achieve greater success

Performance and Reporting

[AJC staff members must contact Veterans and other eligible persons prior to being exited and document the attempt in Connecting Colorado. In the legacy system, if a person is identified on the Priority of Service report and the Potentials CVS list, AJC staff should attempt to provide additional services to each individual to ensure every effort is made to meet the needs of those individuals:]

- **Who were not employed at the time of registration, or**
- **Who received a staff assisted service, or**
- **Who are not in case management with a DVOP, WIOA, or a TAA Specialist]**

Relationship to Adult Priority of Service Policies

Local policies **[must]** **[Deleted: should]** address how the veterans' priority of service in Wagner-Peyser programs and the WIOA Adult priority of service policies impact each other. Priority of service for veterans always applies, regardless of program, while WIOA Adult priority of service only applies to the WIOA Title I program.

Only the Arapahoe/Douglas Works! Division Manager and/or the Workforce Center Administrator(s) may grant exceptions to provisions within this policy.