

SNAPSHOT

Subject:	COVID-19 Emergency Policy (WIOA Eligibility Determination and Documentation)
Policy Number:	ADWDB-XX-2020

During the COVID-19 pandemic, Arapahoe/Douglas Works! has transitioned to a teleworking environment with minimal to no customer contact. This has increased the use of technology and remote access procedures in order to continue service provision to current and prospective participants. This policy provides guidance on maximizing the use of technology to obtain eligibility documentation to assure program compliance.

Additionally, this policy will identify the temporary suspensions of WIOA Title I eligibility documentation delineated as allowable in the Colorado Department of Labor & Employment (CDLE) Program Guidance Letter (PGL) WIOA-2020-05 COVID-19 emergency Policy Relief.

- Veterans and eligible spouses, who otherwise meet the eligibility requirements for enrollment, are to be given priority over non-veterans regarding enrollment in any Arapahoe/Douglas Works! program.
- In an effort to assure continuity of service provision for prospective WIOA Title I customers, CDLE has temporarily suspended the requirement of customer's completing the Affidavit of Immigration form. This will remain in effect until CDLE has rescinded the suspension or the Arapahoe Douglas Workforce Board (ADWDB) or Arapahoe/Douglas Works! Director determines good cause to do so, whichever is first.
- Documentation verifying the eligibility of participants in WIOA is mandatory. The following procedures to obtain eligibility documentation are determined as allowable:
 1. Completion of the Attachment 1: COVID-19-Emergency-Policy- Self-Attestation Form (WIOA Eligibility Determination and Documentation) in lieu of the required eligibility or vets priority of service documentation.
 2. Staff should, to the best of their ability, ensure that eligibility is determined based on information provided by and attested by applicants.
 3. Use of electronic means to obtain eligibility intake documentation to include cell phone pictures and email attachments.
 4. E-Signatures can be obtained using Adobe Acrobat, other electronic signature software programs or the utilization of the '/s/' signature block as prescribed in Training and Employment Notice 18-19.
 5. Staff should avoid receiving Personally Identifiable Information from personal computers, tablets, or cell phones, if not encrypted.
 6. Staff may enroll applicants in WIOA Title I programs and may provide staff-assisted services, pending receipt of the signed Self-Attestation Form. Direct customer costs (e.g., training or supportive services) are not allowed until the signed self-attestation form has been received and not prior to the signature date of the self-attestation form.
 7. Enrolled customers being considered for work experiences or other work-based training activities, must have a completed and signed I-9 document on file prior to the start activity. The I-9 form must not be received electronically, but may be mailed via the US Postal Service.

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