

SNAPSHOT

Subject:	WIOA Priority of Service for Title I Adult Programs
Policy Number:	ADWDB-XX-2021

ALL FEBRUARY 2021 REVISIONS ARE HIGHLIGHTED IN YELLOW

The Workforce Innovation and Opportunity Act (WIOA) requires priority be given to public assistance recipients, other low-income individuals, and individuals who are basic skills deficient, when providing individualized career services and training services using WIOA Title I Adult program funds. In addition, Training and Employment Guidance Letter (TEGL) 9-16 specifies that priority is also applied to individuals that are both underemployed and low-income.

Consistent with the intent of WIOA, Colorado will also give equal priority to “individuals with barriers to employment” and New Americans for the Adult program. Local boards have authority to identify an additional local priority group if it is consistent with the intent of the law to serve adults with barriers to employment.

Priority Groups

There are three (3) groups of individuals targeted for statutory priority under WIOA when providing individualized career services and training services in the Title I Adult program:

1. Recipients of public assistance;
2. Other low-income individuals (including underemployed);
3. Individuals who are basic skills deficient.

Colorado’s policy adds two additional priority groups:

4. Governor’s Priority*;
5. Local Board Priority

*The Governor’s Priority also includes New Americans, defined as Coloradans who arrived in the U.S. as immigrants or their children, who are also eligible for the Adult program. This population may include refugees, asylees, Special Immigrant Visa holders, victims of trafficking, Deferred Action for Childhood Arrival (DACA) recipients, and all other immigrants and aspiring citizens seeking opportunity, safety, and/or reunification of family. New Americans and all other priority groups must still meet eligibility requirements for the Adult program.

WHAT IT MEANS TO PROVIDE PRIORITY OF SERVICE

Priority of service means that individuals in the statutory priority groups (public assistance recipients, other low-income individuals, individuals who are basic skills deficient, and underemployed who are also low-income) are given priority over other individuals for receipt of individualized career services and training services funded by the Title I Adult program. There are no restrictions to providing basic career services; they may be provided to any eligible adult.

3. “BASIC SKILLS DEFICIENT” is defined as an adult 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 participant’s family, or in society. Individuals who are English language learners meet the criteria for basic skills deficient. Individuals lacking basic computer skills also meet the criteria for basic skills deficient. The help screen definition of Basic Skills Deficient in Connecting Colorado is being modified to include individuals deficient in digital literacy.

➤ STATE MONITORING

USDOL expects that giving priority of service means ensuring that at least 75 percent of the state's participants receiving individualized career and training services in the Adult program are from the **statutory** priority groups (public assistance recipients, other low-income individuals including underemployed, and basic skills deficient), and expects this rate will be no lower than 50.1 percent in the state. PY20 will be a baseline year for local areas to meet this new goal of 75 percent.

Local areas' success in achieving priority of service for the targeted groups within the Adult program will be monitored by a formula comparing the percentage of individuals from at least one statutory priority group (public assistance recipients, other low-income individuals including underemployed, and basic skills deficient) receiving individualized career or training services who **exited** the Adult program versus the percentage of all other individuals receiving individualized career or training services who **exited** the program. This aligns with federal monitoring.

While the provision of services to priority populations established by the Governor or local area will receive a lower priority than the statutory groups, Workforce Development Programs (WDP) will also track local areas' progress by a formula comparing the percentage of individuals in all the priority groups (public assistance recipients, other low-income individuals including underemployed, basic skills deficient, Governor's Priority, and Local Priority) who exited the Adult program versus the percentage of all other individuals who exited the program.

Local areas must enter all priority of service groups (within statutory priority, Governor's priority, and local priority) that fit an individual in Connecting Colorado. If an individual is discovered to fit in a priority of service group after program entry but before program exit, the program registration may be updated in Connecting Colorado. The data must represent the individual's actual priority group status at the time of program entry. In addition to updating the program registration, the case manager must add any source documentation and add a case note to document the change. For example, if a participant did not disclose that they were on TANF in the intake process but then later in their participation disclose that they were receiving TANF at the time of enrollment, then local area staff can change the program registration screen and then validate to the standards outlined in Data Validation guidance (MIS-2020-02, Data Validation for WIOA Title I and TAA Programs).

RESTRICTING SERVICES TO LOCAL AREA RESIDENTS

WIOA does not either prohibit or require local residency for an individual to receive services from a local area. At this time, ADW! does not require local residency for an individual to receive services at Arapahoe/Douglas Works!.