



CITY AND COUNTY OF SAN FRANCISCO  
GAVIN NEWSOM, MAYOR

OFFICE OF ECONOMIC  
AND  
WORKFORCE DEVELOPMENT

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**DIRECTIVE NO:** 27-07  
**TO:** WIA Service Providers  
**EFFECTIVE:** July 1, 2007  
**SUBJECT:** Documentation of Eligibility

**REFERENCES:**

- Workforce Investment Act (WIA) Regulations 20 CFR 663.105
- Employment Development Department (EDD) WIA Eligibility Technical Assistance Guide
- Title 8 CFR 274a.2
- Section 9601.5 of the California Unemployment Insurance Code

**POLICY:**

Customer flow through the San Francisco Office of Economic and Workforce Development (OEWD) One-Stop System is based on the WIA concept of customer choice and the provision of Core, Intensive and Training Services. All three of these activities are directed at the ultimate outcome of placement into unsubsidized employment. Customers accessing Core "A" Services are considered to be the universal customer and therefore a formal determination of eligibility is not required. However, those customers who are determined unable to obtain employment without the individual services available through Core "B", Intensive, or Training services must be determined WIA eligible and enrolled to receive such services

**WIA ELIGIBILITY:**

Minimum eligibility for all customers using the services available through the WIA program is:

- **Citizenship/Eligible to Work** - Participation shall be open to citizens and nationals of the United States, lawfully admitted permanent resident aliens,

lawfully admitted refugees and parolees, and other individuals authorized by the Attorney General to work in the United States; and

- **Selective Service/Military Status** - All customers must be in compliance with the Selective Service Act requirements. All males who are at least 18 years old and born after December 31, 1959, and who are in the armed services on active duty must be registered.

Additional standards to be implemented for eligibility verification of WIA customers funded by the OEWD and any service provider authorized to provide Core “B”, Intensive, or Training Services follow.

### **100% Up Front Verification of Eligibility**

100% up front eligibility determination is required of all WIA customers funded by the OEWD and any service provider authorized to provide Core “B”, Intensive, or Training Services. Verification of customer eligibility will be reviewed on the date of eligibility determination and maintained in each customer's case file.

Eligibility will be verified for all funding sources that, at the time of intake, the customer has been determined eligible on the WIA Registration Form.

### **Acceptable Evidence of Eligibility**

The following criteria should be adhered to when collecting eligibility verification.

**Documentation** means to maintain physical evidence, which is obtained during the verification process, in customer case files. Such evidence may be in the form of copies of documents, recording eligibility verification information on a standard form or, in specified cases, customer statements.

**Document Inspection/Telephone Verification** - For cases where documentation cannot or may not be copied, and/or is not readily obtainable, a Telephone Verification/Documentation Inspection shall be recorded to document any WIA eligibility criteria. Use is as follows:

Document Inspection - used in cases when documents cannot or may not be copied (e.g. Certificate of U.S. Citizenship (INS Form N-560 or N-561) U.S. Passport (unexpired or expired) or Unexpired Temporary Resident Card (INS Form I-688)), and/or if program recruitment is being conducted in the field. Staff inspecting the form will note the form number and include a “note to file” describing the document reviewed and any numerical or alpha designation.

**Telephone Verification** - used to verify eligibility information through governmental, private and/or social service agencies (e.g. Public Assistance Status, Selective Service Registration Status, etc.). Information must include all the applicable information to enable a monitor

and/or auditor, to adequately verify eligibility, i.e. document name, contact name, telephone numbers, addresses, etc.

**Customer Statement** - This policy allows for limited use of Customer Statements (Self Certification) to document those items that, in some cases, are not verifiable or may cause undue hardship for individuals to obtain. A customer statement may be used only in the cases described below and **only after all practicable attempts to secure documentation have failed. When the customer statement is used, service providers must indicate what attempts have been made (and failed) to obtain documentation. This must be indicated on the Evidence to Support Eligibility and in the Contact Sheets.**

Customer statements must be supported by a documented corroborative contact or reliable witness attesting to the accuracy of the statement. In order to use the applicant statement as documentation, the following requirements must be adhered to:

- The applicant statement form, or facsimile, must be used.
- A corroborative contact or witness must be indicated on the statement. The corroboration may be via witness signature or supporting telephone verification form. In those rare instances when a customer cannot obtain a satisfactory witness or provide a telephone contact, the applicant needs to explain why such corroboration is not possible.

Use of the applicant statement is limited to the following instances:

#### General Eligibility

- Residency for homeless individuals not residing at a shelter.
- Residency for runaway youth who do not have a permanent place to reside.

#### Economic Eligibility

- Family Size - when birth certificates or 1040 and IRS Letter 1722 are not available.
- Individual Status - Persons ordinarily included in the definition of family, but claiming to be no longer dependent, must complete an applicant statement attesting to their individual status. The head of household in which that person resides, if possible should corroborate such statements. Individual must also show source of his/her support.
- Proof of income for individuals who claim little or no income - Statement should indicate means of support, e.g., unemployment compensation, for previous six-month period. Statement should also indicate corroborative witness to verify indicated means of support.

- Individuals with Disabilities - When condition is observable or obvious. All other circumstances must be documented.
- Long Term Unemployed – When UI printouts or other documentation are unobtainable.

### Hard-to-Serve

- Dropout Status – Customer statement is to be used only for out-of-state and/or applicants 16 years of age or older when documentation from the school district cannot be obtained.
- Offenders - When court records or other documentation are unobtainable.
- Pregnant.
- Individuals with Disabilities - When condition is observable or obvious.

### Authorizing Minors to Participate in WIA -"Other Responsible Adult"

For purposes of authorizing a minor to participate in WIA programs, the signature of a parent, guardian or other responsible adult is required.

This provision allows the workforce investment areas to enroll minors into the program with the authorization of individuals other than a parent or guardian.

The definition of "other responsible adult" includes:

- An Adult relative, other than a parent or guardian, with whom the individual resides.
- An adult who has been delegated custodial or administrative responsibilities in writing, either temporarily or permanently, by the parents (e.g., a family friend) or by an appropriate agency (e.g., foster parent).
- A representative of an agency that is providing support services to the individual and who is aware of the individual's circumstances, a child protective worker, or a group or foster home official.

### **ACTION:**

Please ensure that the policies and procedures described herein are established in writing and followed.

**INQUIRIES:**

Inquiries should be addressed to the WIA Program Manager at 581-2314 or [marc.majors@sfgov.org](mailto:marc.majors@sfgov.org).

Rhonda Simmons  
Director of Workforce Development  
Office of Economic and Workforce Development