



Missouri Department of Higher Education and Workforce Development

FREQUENTLY ASKED QUESTIONS (FAQs) ABOUT...

OWD Issuance 04-2020: WIOA Adult and Dislocated Worker Programs Eligibility and Documentation Technical Assistance Guidance

(August 28, 2020)

Updated September 2020

Q: What are the allowable documents to prove "employment status at participation"?

A: The T.A.G was updated to include the source documentation requirements for this data element.

Updated August 28, 2020

Q: If an individual's DD-214 character of service states "other than honorable conditions", can they be enrolled with full Veteran status and priority of service?

A: Yes. It is appropriate to provide services to separating service members who will be imminently separating from the military, provided that their discharge will be anything other than dishonorable. Additionally, for WIOA Dislocated Worker eligibility determinations the individual must not be "retiring" from the military.

Q: When the Employment Tab of the WIOA Application reports that the participant has been referred by RESEA, can that be used to support DW eligibility?

A: No, this indicator is occurring as a default and is an error within the system. OWD and GeoSol are aware of the issue and are working on solution. This error is also occurring on the WP application. OWD will notify staff when the issue has been fixed. In the meantime, staff should look for posted RESEA services on the WP application when assessing individuals for WIOA Dislocated Worker eligibility.

Q: Are Boards and Subrecipients required to maintain hard-copy paper files for participant information?

A: No with one exception. As the organization moves towards a paperless approach, OWD is strongly encouraging Boards/Subs to utilize the upload feature in MoJobs. Once staff verify the upload was successful, there is no reason to keep hard-copy documentation and staff may return the documentation to the participant or properly dispose of it. The one exception is when the participant has a confidential or Equal Opportunity issue; all confidential information should be kept in separate and secure hard file.

Q: How are family size and income fields supposed to be completed when the information is not necessary to determine eligibility?

A: Family size and income fields must be completed, even if the information is not required for eligibility determination. Information entered must be true and as accurate as possible. Additionally, this documentation is not required to be maintained in the hard file. These fields are reported on the Participant Individual Record Layout (PIRL) reports to the US Department of Labor. Staff cannot continue to report individuals as being low-income, (using 1/\$0) when the participant is, in fact, not low-income.

Q: For "Citizenship/Eligible to Work in the US", do staff need to actually complete I-9 forms?

A: No, staff only need to obtain copies of the supporting documents that would be used in the I-9 verification process. Staff do not need complete an I-9 form when verifying documentation for eligibility purposes.

Q: Regulations state that WIOA funds should be the final, not the first, resort funding training. In a recent informational session at a college on the Fast Track Program, it was stated that those funds are the last resort. Are Fast Track funds considered first, just like the MO Access grant, along with PELL in determining WIOA funds for a participant?

A: No. WIOA funds should be used first and then Fast Track funds can be applied. This is language from the Fast-Track HB 225 (<https://www.senate.mo.gov/19info/pdf-bill/tat/SB68.pdf>)

Grants shall be awarded in an amount equal to the actual tuition and general fees charged of an eligible student **after all other federal and state aid is applied**. If a grant amount is reduced to

zero due to the receipt of other aid, the eligible student shall receive an award of up to \$500 or the remaining cost of attendance, whichever is less...

WIOA pays before FastTrack because WIOA is **federal aid that is not a loan**. There is a possibility that FastTrack funds could have to be re-paid.

Q: A participant presented two documents to complete Form I-9, each containing a different last name. One document matches the name she entered in Section 1. The participant explained that she had just gotten married and changed her last name, but had not yet changed the name on the other document. Can I accept the document with the different name? (This could also apply to the transgendered community)

A: You may accept a document with a different name than the name entered in Section 1 provided that you resolve the question of whether the document reasonably relates to the employee. You also may wish to attach a brief memo to Form I-9 stating the reason for the name discrepancy, along with any supporting documentation the employee provides. An employee may provide documentation to support their name change, but is not required to do so. If, however, you determine that the document with a different name does not reasonably appear to be genuine and to relate to her, you may ask her to provide other documents from the Lists of Acceptable Documents on Form I-9.

So, in other words if staff truly believe the documents belong to the person presenting them, then they can be accepted with the different names. However, if staff have a reason to doubt the documents then additional documentation will need to be provided.

Q: Who is considered a dependent when figuring income for WIOA eligibility?

A: Any child younger than 19, a "student" younger than 24, a child of any age that is permanently and totally disabled. If staff have person that would meet the definition of a dependent, but are claiming independent status then documentation must be provided to prove independent status (i.e. Tax Returns).

Q: What is OASDI and is it included in income calculations?

A: OASDI is the official name for Social Security. Social Security benefits based on Age or Disability status are considered "includable" income sources. Supplemental Security Income (SSI) is given only to low-income individuals and is "excludable".

Please direct all questions or comments regarding the Issuance or this FAQ document to dwdpolicy@dhewd.mo.gov. All active Issuances are available at jobs.mo.gov/dwdissuances. Expired/rescinded Issuances are available on request.

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