



INSTRUCTION LETTER

REGIONAL INSTRUCTION NUMBER: WIOA R18-06

TO: SC Works Operator

SUBJECT: Adult and Dislocated Worker Suitability Requirements for WIOA

DATE ISSUED: December 17, 2019 **DATE EFFECTIVE:** Immediately **DATE EXPIRES:** Indefinitely

PURPOSE: This instruction is to convey the process to be used by the Upstate Workforce Board (UWB) and Greenville County Workforce Development Board (GCWDB) One-Stop Operator for determining suitability and "need" for intensive and training services; including WIOA Adult and Dislocated Worker (DW) funded Individual Training Accounts (ITA) for clients served in the Adult and Dislocated Worker programs.

BACKGROUND: The WIOA program is designed to provide employment and training opportunities to those who can benefit from and who are most in need of such opportunities. However, WIOA is not an entitlement program. This requires that eligible individuals are determined to be suitable for program enrollment based upon a consistent and equitable assessment that is relevant to the level of services for which the individuals are applying.

Selection of customers for career/training services is based on both need and suitability. While persons may be fully eligible and in need of career services or training, they may not be suitable, pending resolution of an immediate problem or a personal barrier. Suitability is the assessed ability and the perceived personal commitment of the customer to attend career services or training activities, to successfully complete these activities and to acquire and retain employment at or leading to self-sufficiency. Suitability is determined by staff and the customer during orientations and other activities where the customer decides if WIOA training is right based on information provided.

A. Determining Suitability:

During Career Services, suitability is usually determined by the customer with assistance from Wagner-Peyser Staff. Wagner-Peyser Staff should identify, and refer to WIOA Orientation, those customers who may need and could benefit from WIOA Career Services. This need may be based on factors including, but not limited to:

1. Those utilizing the resource room on a continuous basis;
2. Customers attending multiple job fairs or recruiting events;

3. Customers attending multiple workshops;
4. Long-Term Wagner-Peyser registrants;
5. Customers who have received multiple unsuccessful job referrals;
6. Customers lacking high school diploma/GED;
7. Customers lacking consistent work history and/or marketable skills.

B. Individualized Career Services Suitability Determination:

Customers who are interested in pursuing Individualized Career Services (including training) must first attend a WIOA orientation. Following orientation, each customer has an appointment with WIOA staff to discuss the customer's goals. During this appointment, staff is encouraged to educate each customer on the types of trainings available in the Local Area, as well as the eligibility process and requirements (including low-income status and other barriers that contribute towards eligibility). The customer should also be educated on circumstances that make an individual not suitable for training through the WIOA program. At the end of this appointment, customers may choose to continue along with the eligibility process by scheduling an eligibility appointment with a case manager, or they may decide not to continue the process if they do not believe they fit the criteria or goals for the program. Because eligibility determination for the Adult, Dislocated Worker, and Youth programs is a Basic Career Service, it is available to all individuals seeking services in the one-stop delivery system. Regardless of what is discussed in this initial appointment, customers should always be given the opportunity for an eligibility determination.

During and after the WIOA application process, and while in further assessment, it is determined by the case manager and the customer exactly what WIOA services are indicated and if the customer has the ability to follow through with a reasonable hope for success. During the Individual Employment Plan (IEP) process, the customer and case manager together decide if the customer choices and services are compatible. Customers can choose which trainings they would like to pursue, but the Local Workforce Areas are only able to fund trainings from the Eligible Training Provider List. Case management staff will encourage clients to review provider performance data. Case management staff should thoroughly discuss with customers the pertinent LMI information and job opportunities related to trainings. The IEP process may continue through training as certain decision points are reached.

WIOA Adult and/or DW career services are intended for unemployed and under-employed individuals who are unable to obtain or retain employment. With the passage of WIOA, there is no longer a requirement for individuals to start with core services before moving to intensive services. If one-stop center staff determine that individualized career services are appropriate for an individual to obtain or retain employment, these services must be made available to the individual.

C. **Training Services Suitability Determination:**

Suitability must be determined through the assessed ability and the perceived personal commitment of the customer to attend training activities, to successfully complete these activities and to acquire and retain employment at or leading to self-sufficiency. While persons may be fully eligible and in need of training services, they may not be suitable pending resolution of an immediate issue (academic, personal, etc.) or a barrier. **Assessments, such as Career Pathways Explorer and WIN, are key to determining suitability.** Decisions relating to suitability will be made using total assessment results as part of the basis for the decision.

Suitability for training services involves determining if an eligible customer is reasonably able, based on assessment results, to complete training services at the level of success required by the customer's choice.

Access to training services requires more information in order to determine if training is needed and appropriate for the career services participant. The regulations require that in order to receive training services, the participant must:

1. Be unable to obtain or retain employment at a sustainable wage;
2. Be determined to be in need of training after an individual interview, evaluation or assessment;
3. Have the skills and qualifications to successfully participate in the selected program of training services;
4. Select a program of study that is directly linked to the employment opportunities in the local area involved; and
5. Be unable to obtain other grant assistance for training or require assistance beyond the assistance made available under other grant assistance programs, including Pell Grant funds.

The information, combined with other assessment data collected (such as a review of barriers, dependency, employment history, interests, etc.), helps determine suitability and/or "need" for training assistance.

Further training suitability factors include:

1. Are immediate goals too ambitious for their current situation?
2. The customer's history of completing goals.
3. If barriers are present, what are they and how difficult are they to overcome?
4. How many agencies will be needed to provide interventions?
5. The length of time needed to provide interventions.
6. Will WIOA and other agencies make a **significant** difference in the customer's ability to attain self-sufficient employment?

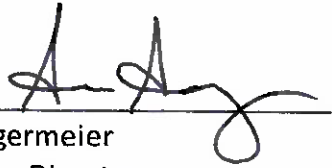
D. Considering the above, circumstances that may make a person not suitable for

Training Services include:

1. Ineligible WIOA applicants (automatically not suitable).
2. Persons requiring extensive support beyond the ability of WIOA.
3. Persons whose training needs are more appropriately served by another agency.
4. Persons whose training desires cannot be met by WIOA funding.
5. Persons whose lives are in immediate crisis and cannot participate in WIOA activities at this time.
6. Persons whose financial situation will not allow them to attend training, even with assistance.
7. Persons who cannot allocate sufficient time for the required commitment to WIOA training services.
8. Consistent failure to show for scheduled appointments, Career Service activities, assessments or other program services.
9. Persons lacking transportation to attend training even with WIOA or other agency assistance.
10. Persons who require or insist on services sooner than WIOA can provide them.
11. Persons who are admitted active substance abusers and who are not active in rehabilitation to overcome their dependency.
12. Applicants wanting a job now without regard to, or the desire for, vocational training.
13. Persons considered trained and ready for employment in a demand occupation with wages equal to, or better than, that which can be gained through WIOA training services.

ACTION: You are responsible for the immediate distribution and implementation of this instruction. Included with this instruction is a *Suitability Guide*. This form is to be completed for every customer interviewed by WIOA staff for suitability for WIOA Career Services or Training Services. If the customer is deemed "not suitable," the case management supervisor should file the form in a binder in that location's central file. If the customer is deemed "suitable," the form should be kept in the customer's file. There should also be case note documentation by WIOA staff of the suitability determination rationale. All case notes should be titled "WIOA Suitability Determination".

INQUIRIES: Should you have any questions regarding this instruction, please contact Eva Anagnostis at 864-467-8142, TTY:711, or at eanagnostis@greenvillecounty.org Dana Wood at 864-596-2028 ext. 100, TTY 711, or at wood@upstaterworkforceboard.org.



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Source: N/A

SUITABILITY GUIDE

Selection of customers for career services/training services is based on both need and suitability. While persons may be fully eligible and in need of career services or training, they may not be suitable. Suitability is the assessed ability and the perceived personal commitment of the customer to attend career services or training activities, to successfully complete these activities, and to acquire and retain employment at, or leading to, self-sufficiency. Suitability is determined by staff and the customer during orientations and other activities, where the customer decides if WIOA is the proper program based on information provided.

Use the following questions when assessing suitability.

- Are immediate goals too ambitious for the current situation?
- What is the customer's history related to completing goals?
- If barriers are present, what are they and how difficult are they to overcome?
- Will interventions be needed and if so how long will they take?
- Will WIOA make a significant difference in the customer's ability to attain self-sufficient employment?
- Will extensive support be needed?
- Is the customer interested in an in demand occupation?

In terms of interpretation of results, there are some items in the suitability scale that may on their own be sufficient for staff to conclude that the customer cannot be successful in career services or training. The factors mentioned above are meant to be guidelines for staff to consider when making a decision on WIOA suitability, but are not to be considered all-inclusive.

TO BE COMPLETED BY WIOA STAFF:

Customer Name: _____ SS# Last 4: _____

Determination (Circle):

Non-Suitable

Referred to Career Services

Referred to Training Services

Determination Rationale (Detailed Explanation Required):

Staff Name (Please Print): _____ Title: _____