



Arizona Department of Economic Security

1. **Question: Is WIOA Title I-B an essential service under Governor Ducey's stay at home order as per COVID-19 pandemic?**

Response: Essential services as defined in the Governor's Executive Order [2020-12](#) include human services operations and essential government functions. The order states that "Human Services Operations shall be construed broadly (to cover as many entities as possible) to avoid any impacts to the delivery of human services."

LWDAs, in consultation with their Boards, *have the authority and discretion to make decisions in the best interest of their agency*. Service delivery considerations should comply with CDC guidelines. DES continues to encourage individuals we serve to access services remotely (online or by phone) and continue to move our workforce to telework, where possible. Refer to [DES Announces Extension of Virtual Office Services Model](#) news.

Update as of 8/4/21: The stay at home order was lifted, however, LWDAs in consultation with their Boards, *have the authority and discretion to make decisions in the best interest of their agency*, in any situation.

2. **Question: Are individuals who have been furloughed eligible for the WIOA Title I-B Dislocated Worker Program? Can we serve individuals who have been furloughed due to the COVID-19 emergency under the WIOA Title I-B Dislocated Worker Program?**

Response: Individuals who are furloughed are considered laid off for purposes of WIOA Title I-B Dislocated Worker eligibility. Under the Dislocated Worker definition, Category II does not require that an individual be eligible for Unemployment Insurance or that the service provider staff determine that the individual is "unlikely to return to previous occupation". Many individuals who are currently not working due to business closures as a result of the COVID-19 emergency may qualify as Dislocated Workers under category II. DES is developing an Emergency WIOA Title I-B Dislocated Worker Program policy

which will provide guidance on serving individuals affected by the COVID-19 emergency through the WIOA Title I-B Dislocated Worker Program. The emergency policy will be available soon.

Update as of 8/4/21: The DW Emergency Policy was issued on April 17, 2020. The changes to the DW Emergency Policy are permanent and will be incorporated into the revised policy.

3. Question: Can rent be prepaid for up to two months as a support service, using WIOA Title I-B funds, provided there is a policy within the organization to support the pre-payment of rent?

Response: Per 20 CFR § 680.900-910, Supportive services may only be provided to individuals who are participating in career or training services...when they are necessary to enable individuals to participate in career or training services, as provided under locally approved policies. Because housing is on a month-by-month basis, these costs must not be prepaid, and must only be paid if the participant is still enrolled and active in training. The participant's needs must be reassessed on a monthly or weekly basis to ensure the participant is still in need of the support service.

Update as of 8/4/21: The Supportive Services Policy was revised on 12/4/20. To access it, click [here](#).

4. Question: What are the requirements for documentation of eligibility requirements for the WIOA Title I-B during the COVID-19 crisis?

Response Updated as 8/4/21: The WIOA Title I-B [Eligibility Checklist](#) allows WIOA Title I-B program applicants to self-attest to the below program eligibility elements as a last resort. Service provider staff should try to obtain hard copy documents, but may accept self-attestation for the elements listed below:

- Homeless Individuals or Runaway Youth
- Ex-offender status
- Individual Status/Family Size
- Individual Family Income
- Pregnant or Parenting Youth
- Single parent
- Youth who needs Additional Assistance
- Youth in Foster Care
- Education Status at time of participation
- Dislocated Worker Program
- Individuals with disabilities
- English Language Learner
- Migrant and Seasonal Farmworker status

Additionally, during the COVID-19 emergency, the WIOA Title I-B [Applicant Statement](#) may be used initially for the below eligibility elements in an effort to

expedite services to affected individuals regardless of the type of service being provided, including basic career, individualized career or training services. A signed WIOA Title I-B [Applicant Statement](#) with corroborating witness signature may be used as verification for eligibility purposes to enroll participants in the WIOA Title I-B programs and provide services as soon as possible. After the services have started, staff must request additional documents (within 90 days from participation) for participants who received individualized career and training services for each of the following eligibility elements shown below if used as part of the eligibility determination process. In addition, please refer to the WIOA Title I-B Data Validation [Checklist](#):

- Date of Birth/Age
- Veteran Status or Spouse of a veteran
- Employment Status at participation
- Unemployment Insurance (UI) compensation
- Pell Grants
- Temporary Assistance to Needy Families (TANF)
- Other Public Assistance recipient or Low-Income Status
- Basic Skills Deficiency (BSD)

Note:

- Social Security Number (Is not required to receive WIOA Title I-B services, and *is not required to be verified*)
- Selective Service (can be verified [online](#) or by calling 1-847-688-6888)

Update as of 8/4/21: Remove expired driver's licenses as documentation to be used when determining right to work as listed under list C of the USCIS I-9.

Please also note that while there is no requirement to verify the social security number for data validation, staff should be validating it as the SSN is used to determine median earnings. It is recommended that staff add to the case note that the number was reviewed and verified, which will eliminate the need to maintain a hard copy document.

5. Question: May staff accept expired Driver's Licenses between March 1 and September 1, 2020 as per the Governor's Executive Order due to COVID-19?

Update as of 8/4/21: For WIOA Title I-B program eligibility purposes, expired Arizona Driver's licenses are no longer acceptable. The Governor's Executive Order 2020-08 was [rescinded](#) as of 7/1/2021.

6. Question: How should staff document services that are currently on hold due to the COVID-19? We have participants that are currently not participating in their Work Experience (WEX) because the work site is closed due to the COVID-19 outbreak?

Response: DES recommends the WEX service be ended and reopened when the service resumes. A case note should also be added to the service

explaining why the service ended, and another note should be added when the service is reopened.

Update as of 8/4/21: Case notes need be entered anytime there is a change in the participants' circumstances, not just during the COVID emergency.

7. Question: Will DES accept non-original signatures of WIOA Title I documents?

Response: There is no requirement for a wet signature on documents in the WIOA Title I-B policies. Electronic signed, and signed documents that scanned, and emailed, or faxed to the WIOA Title I-B Programs are acceptable. For the Individual Service Strategy (ISS)/ Individual Employment Plan (IEP), these documents need to be signed when they are created and signed each time they are updated, but wet signatures are not required.

Update as of 8/4/21: No change from prior response. LWDB staff and service providers are reminded that documents with wet signatures are not required.

8. Question: Can you advise if WIOA Title I-B forms need to be signed by the participant during the COVID-19 outbreak?

Response: While the state-level WIOA Title I-B policies do require signatures from participants/employers on some documents, wet signatures are not required. Electronic signatures and signatures that are scanned and emailed, or fax to WIOA Title I-B programs are acceptable. The Local Workforce Development Board has discretion on signature requirements for forms that are developed at local level. Below I have indicated if the state-level policies require the document to be signed, or if the document is a form required at the local level only.

<u>Name of Form</u>	<u>Policy Response</u>
WIOA Title I-B Applicant Statement	This form must be signed.
Local WIOA Title I-B Application	This is a local form. Refer to local policy. An AJC system printout should be signed per USDOL and kept in the participant's file, but this is not currently a requirement in state-level WIOA Title I-B policy. State-level WIOA Title I-B policy is being updated to include this requirement.
IEP/ISS	Signatures are required when the IEP/ISS is developed and modified.
Contact Information	This is a local form. Refer to local policy.
Release of Information	This is a local form. Refer to local policy.

Equal Opportunity is the Law	This form is not required to be signed but must be provided to the participant and a copy must be maintained in the participant's folder.
WEX/ Internship Agreement	This document must be signed.
OJT agreement	This document must be signed.

Update as of 8/4/21: No change from prior response. However, staff are reminded that this response is applicable in all situations and is not limited to the COVID emergency.

9. New Question as of 8/4/21: May a WIOA Title I-B participant receive unemployment insurance and attend training?

Response: The Title I team cannot answer questions regarding any individual's eligibility for UI. WIOA Title I-B participants who are also unemployment insurance (UI) claimants must contact the UI administration at 1-877-600-2711 to discuss their specific claim. The individual will need to indicate the reason for the call to be routed to a special program once the issue for the approved training is set.