



**WORKFORCE INNOVATION AND  
OPPORTUNITY ACT POLICY  
MANUAL**

**CHAPTER 2 – SECTION 1100**

**SUBJECT: Veterans' Priority of Service**

**1100 VETERANS' PRIORITY OF SERVICE**

This section contains Veterans' Priority of Service (VPOS) requirements for the Workforce Innovation and Opportunity Act (WIOA) Title I-B Adult, Dislocated Worker, and Youth Programs.

References: WIOA of 2014 ([P.113-128](#)), WIOA Final Rules, 20 Code of Federal Regulations (CFR) [652.100](#), [20 CFR 651.10](#), [20 CFR 1010](#), U.S. Department of Labor Training and Employment Guidance Letter (TEGL) [19-13](#) ([Change 1](#) and [2](#)), [TEGL 10-09](#), [TEGL 19-16](#) and Veteran's Program Letter (VPL) No. [07-09](#).

**1101 DEFINITIONS**

For VPOS, "covered person" includes a veteran and eligible spouse. Definitions for terms in this policy include the following:

- A. *Veteran* means a person who served in active military, naval or air service, and who was discharged or released under conditions other than dishonorable as specified in 38 U.S.C. 101(2).
- B. *Active Service* includes full-time duty in the National Guard or a Reserve component. Active service does not include full-time duty for training programs.
- C. *Eligible Spouse* as described in section 2(a) of the Jobs for Veterans Act (JVA) (38 U.S.C. 4215(a)), is a spouse of any of the following individuals:
  - 1. Any veteran who died of a service-connected disability;
  - 2. Any member of the armed forces serving on active duty who, at the time of application for priority of service, is listed in one or more of the following categories and has been listed as such for a total of more than 90 days:
    - a. Missing in action;

- b. Captured in line of duty by a hostile force; or
    - c. Forcibly detained or interned in the line of duty by a foreign government or power.
  - 3. Any veteran who has a total disability (100 percent) resulting from a service-connected disability, as determined by the Department of Veteran Affairs; or
  - 4. Any veteran who died while a disability was in existence.
- D. *Non-covered* means any individual who does not meet the definition of a veteran in A, or an eligible spouse in C of this section.
- 1. A spouse whose eligibility is derived from a living veteran or service member (i.e., categories b. or c. above) would lose their eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with total service-connected disability were to receive a revised disability rating at a lower level).
  - 2. A spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

## **1102 INDIVIDUALS COVERED BY VETERANS' PRIORITY OF SERVICE**

- A. Staff must provide qualified veterans or eligible spouses with VPOS for the WIOA Title I-B Adult, Dislocated Worker, and Youth Programs. VPOS includes:
  - 1. The covered person receives access to the service or resource before a non-covered person; and
  - 2. If the service or resource is limited, the covered person receives access to the service or resource instead of or before the non-covered person.
- B. Covered persons must meet all statutory eligibility and program requirements for participation in order to receive priority for a program or service.

### **1103 IMPLEMENTATION OF VETERANS' PRIORITY OF SERVICE POLICY**

The Local Workforce Development Boards (LWDBs) must address VPOS in their local plans and develop policies and procedures for the implementation of VPOS for employment and training services.

- A. The policies must include processes in place to ensure that covered persons are identified at the point of entry. Points of entry may include:
  - 1. Intake via an ARIZONA@WORK Job Center, as part of the application process for the WIOA Title I-B Adult, Dislocated Worker or Youth Programs, or
  - 2. Any other method in which covered persons announce their interest in receiving services either in-person or virtually at ARIZONA@WORK Job Centers.
  
- B. The process for identifying covered persons at the point of entry must:
  - 1. Permit the individuals to make known their covered person status; and
  - 2. Permit the WIOA Title I-B Adult, Dislocated Worker, and Youth Programs to initiate data collection for covered persons at the ARIZONA@WORK Job Center point of entry or virtually through the Arizona Job Connection (AJC) webpage.
  
- C. The policies and procedures must ensure that covered persons are made aware of:
  - 1. Their entitlement to VPOS;
  - 2. The full array of employment, training, and placement services available under VPOS; and
  - 3. Any applicable eligibility requirements for the WIOA Title I-B Adult, Dislocated Worker, and Youth Programs.

### **1104 VETERANS' PRIORITY OF SERVICE AND WIOA TITLE I-B PROGRAMS**

- A. For the WIOA Title I-B Adult and Dislocated Worker Program, covered persons receive the highest priority of service for the provision of basic

career services *as described in Section 1104 B*. The collection of documentation is not required for a covered person to receive VPOS prior to the provision of basic career services. However, documentation for VPOS must be collected prior to providing the individual with individualized career or training services.

- B. For the WIOA Title I-B Adult Program, in addition to VPOS, WIOA establishes priority of service for individuals who are public assistance recipients, low income, or basic skills deficient to receive individualized career and training services. The WIOA Title I-B Adult and Dislocated Worker policy, Section 102, describes the priority of service order that must be followed. Covered persons who are low income, recipients of public assistance, or basic skills deficient receive the highest level of priority of service. [WIOA sec. 3\(36\)](#) defines “low-income individuals” and [WIOA sec. 3\(5\)](#) defines “basic skill deficient.”

Priority must be provided in the following order:

1. First, to veterans and eligible spouses who are also included in the groups given statutory priority for WIOA Adult formula funding. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority for services with WIOA Adult formula funds for individualized career services and training services.
2. Second, to non-covered persons (that is, individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
3. Third, to veterans and eligible spouses who are not included in WIOA’s priority groups.
4. Fourth, priority populations established by the Governor and/or Local WDB.
5. Last, to non-covered persons outside the groups given priority under WIOA.

- C. Both WIOA Title I-B Adult and Dislocated Worker programs focus on serving individuals with barriers to employment, as defined in [WIOA sec. 3\(24\)](#). Covered persons who have at least one barrier to employment must receive a higher priority of service than non-covered individuals who have at least one barrier to employment. For the WIOA Title I-B Youth Program, the highest priority of service will be provided to covered persons who meet the definition of out-of-school youth, as defined in the WIOA Title I-B Youth Program policy, Section 205.01.