

Questions for Performance Reporting Work Session  
As of 8/18/17

***1. If a client enters a CNA, Photovoltaic, etc. course and passes would that be counted as a credential? Or do they have to take the state/national exam to be considered a credential?***

In the case of a participant enrolled in a CNA training program, the participant needs to take and pass the appropriate state exam in order to be counted as having earned a credential. In the case of a participant enrolled in a Photovoltaic training program, the participant has the option of either pursuing an industry-recognized certificate or certification. An example of an industry-recognized certification would be when the certification is being granted by an entity such as the North American Board of Certified Energy Practitioners (NABCEP). Page 20 of the grant's FOA (FOA-ETA-16-02) references WIOA Section 3(52) "Recognized postsecondary credential. The term "recognized postsecondary credential" means a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree."

If the participant is successfully placed into an unsubsidized job upon completing the CNA, or Photovoltaic course, etc., prior to taking and passing the appropriate state/national exam, you can still count the participant as "Placed in Unsubsidized Employment" under Section II. Participant Outcomes.

***2. What can be used as verification for a homeless person when determining eligibility?***

TEGL 22-15, for WIA programs, states that a written statement from an individual providing residence, shelter or social service agency, WIA intake or registration form, and self-attestation serves as documentation. You should document your attempts to get the written statement, if you are unsuccessful. Until new guidance is issued, this remains in effect.

Grantees are expected to have a procedure for what constitutes adequate documentation as well as self-attestation.

The Department of Labor has identified the homeless as one of its targeted populations to be provided workforce training. DOL is a significant federal partner for serving homeless adults and youth. Complying with this act is a requirement for grantees. Grantees must review the definitions of homelessness in accordance with this law.

C. Is a homeless individual (as defined in Section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), or a homeless child or youth (as defined under Section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)));

**3. I would like clarification on the eligibility process. A participant will meet the "low income" status if they worked and in the 12-month eligibility period are over the income poverty guidelines, as long as they can demonstrate they are receiving SNAP, reduced lunch or homeless. Correct?**

Yes, it is automatic for proof of SNAP or reduced lunches. If there is written documentation of homelessness from the residence shelter or social service agency, then yes. If there is no written documentation, then the grantee will need to make the determination based on the information available and the definitions provided in the McKinney-Vento Act.

This is from the McKinney-Vento Act:

**(c) INCOME ELIGIBILITY.—**

**(1) IN GENERAL.—**A homeless individual shall be eligible for assistance under any program provided by this Act, only if the individual complies with the income eligibility requirements otherwise applicable to such program.

**(2) EXCEPTION.—**Notwithstanding paragraph (1), a homeless individual shall be eligible for assistance under title I of the Workforce Investment Act of 1998.

**(d) EXCLUSION.—**For purposes of this Act, the term "homeless" or "homeless individual" does not include any individual imprisoned or otherwise detained pursuant to an Act of the Congress or a State law.

According to TEGL 18-16, Low-Income Individual means an individual as defined in WIOA Section 3(36)(A) who:

- 1) Receives or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the supplemental nutrition assistance program (SNAP) established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.); the program of block grants to States for temporary assistance for needy families program (TANF) under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.); or the supplemental security income (SSI) program established under title XVI of the Social Security Act (42 U.S.C. 1381 et seq.); or State or local income-based public assistance; **or**
- 2) Is in a family with total family income that does not exceed the higher of:
  - a. The poverty line; **or**
  - b. Seventy percent of the Lower Living Standard Income Level; **or**
- 3) Is a homeless individual (as defined in Section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), or a homeless child or youth (as defined under Section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))); **or**

- 4) Receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.); **or**
- 5) Is a foster child on behalf of whom State or local government payments are made;  
**or**
- 6) Is an individual with a disability whose own income meets the income requirement of the B above, but who is a member of a family whose income does not meet this requirement (WIOA Section 3(36)(A)).

***4. Is a "break" in employment required in order for an individual to be considered seasonal? Or is that not a factor in terms of meeting the eligible seasonal farmworker definition?***

No, a break in employment is not required. For example, an "underemployed" individual working 20 hours per week without a break in employment meets the eligibility criteria.

According to NFJP Guidance, Eligible seasonal farmworker means a low-income individual who for 12 consecutive months out of the 24 months prior to application for the program involved, has been primarily employed in agricultural or fish farming labor that is characterized by chronic unemployment or underemployment, and faces multiple barriers to economic self-sufficiency. Dependents of the seasonal farmworker as described in WIOA Section 167(i)(3) are also eligible.

WIOA Section 3(61) also provides that to be considered unemployed, one must be without a job, be available for work and want work. Similarly, underemployed persons are those who are without full-time, year-round work, and who want and are available for full-time, year-round work.

***5. On the quarterly report. Should we adjust our total current participants "end of period" every quarter after participants exit from the program or when we realize they are exited. Retroactively we exit all participants 90 days after their last service, should we go back and adjust the prior quarter to reflect these exiters or report them in the current quarter? This would change our exits and current participants each quarter.***

No, for both WIPS and the Quarterly Narrative Report, it is not necessary to adjust total current participants for the prior quarter. Adjustments can be made at the end of each program year, as well as at the end of the grant's period of performance. (Note that this guidance is subject to change as WIPS continues to evolve)