

**SOUTHERN ALLEGHENIES  
WORKFORCE DEVELOPMENT BOARD (SAWDB)**

**SAWDB EXECUTIVE COMMITTEE MEETING**

March 11, 2025

10:00 AM

Southern Alleghenies Planning and Development Commission, also available via Zoom Meeting Platform

Altoona, PA

**AGENDA**

<b><u>TOPIC</u></b>	<b><u>NAME</u></b>
Welcome and Introductions	Cory Sisto, SAWDB Chair
Approval of Minutes from January 14, 2025*	Cory Sisto
Director's Report	Jim Walker, SAWDB Staff
• Red/Green Report	
• Request for Support – Cambria Job Fair	
Policy Revisions*	Jim Walker, SAWDB Staff
• ITA Policy	
• TABE Assessment Waiver Policy	
• WIOA Self Attestation	
One-Stop Operator Report	Bradley Burger, Lead OSO Representative
Other Business	All
Adjournment	

**\*Requires Formal Action**

The Southern Alleghenies Workforce Development Board receives funding through the US Department of Labor and the PA Department of Labor and Industry. All costs associated with this meeting are funded 100% by the Workforce Innovation and Opportunity Act. For detailed information see <https://sapdc.org/stevens-amendment/>

**SOUTHERN ALLEGHENIES WORKFORCE DEVELOPMENT BOARD  
EXECUTIVE COMMITTEE MEETING  
Tuesday, January 14, 2025  
Southern Alleghenies Planning and Development Commission, also available via Zoom  
Meeting Platform  
Altoona, Pennsylvania**

**ACTION SUMMARY**

Following are the major actions taken by the SAWDB Executive Committee at its regular meeting held on January 14, 2025, via the Zoom meeting platform.

1. Approval of Minutes from December 10, 2024
2. Approval for Request for Support: Bedford, Blair, and Huntingdon Counties
3. AI Policy Approval

**SOUTHERN ALLEGHENIES WORKFORCE DEVELOPMENT BOARD  
EXECUTIVE COMMITTEE MEETING**

**Tuesday, January 14, 2025,**

**Southern Alleghenies Planning and Development Commission, also available via Zoom  
Meeting Platform  
Altoona, Pennsylvania**

**Members Participating**

Cory Sisto	IFC Services
Craig Shield	OVR
Jesper Nielson	Croyle-Nielsen Therapeutic Associates
Julia Brulia	Holiday Inn
Keith Baker	BWPO
Sharon Clapper	Clapper Industries
Wendy Melius	CCA

**Non-Members**

Amy Horwath	Goodwill
Amy Kimmel	Tableland Services
Barb Covert	E & T
Brad Burger	Goodwill
Gwen Fisher	Goodwill
Debbie Ankney	Tableland Services
Judy Lutz	E & T
Heather Saly	PACL Cambria/Somerset
Linda Straka	Career Planner for Somerset County
Lisa Phillips	Tableland Services
Sarah Helman	Goodwill
Jennifer Sklodowski	SAP&DC
Steven Howsare	SAP&DC
Jill Reigh	SAP&DC
Jim Walker	SAP&DC
Tim Baranik	SAP&DC
Carrie Fisher	SAP&DC

**Call to Order**

SAWDB Chair, Mr. Cory Sisto, called the meeting of the Southern Alleghenies Workforce Development Board Executive Committee to order at 10:00 a.m. The meeting was open to the public and available virtually using Zoom.

**Approval of Minutes from December 10, 2024**

Mr. Cory Sisto asked for a motion for approval of minutes from December 10, 2024, Executive Committee meeting. There were no questions, concerns, or discussions regarding the minutes.

Ms. Sharon Clapper entered a motion to approve the December 10, 2024 SAWDB meeting minutes as presented. Ms. Julia Brulia seconded the motion. The motion was carried.

## **Director's Report**

### Red/Green Report

Ms. Jennifer Sklodowski referred to the Red/Green Report and noted that invoices are due on the 12<sup>th</sup> of every month. Quarterly expenditure rates are measured against 80% expenditure requirement. This reflects five months of expenditures and there will be a clearer picture at the full board meeting in February. Ms. Sklodowski will be working with the fiscal department to review the budget for the board meeting and to push our funds from the reserve. While looking at the 2<sup>nd</sup> quarter target, the providers have not met the target. December's expenditures will give a better quarter two picture. The past has shown that providers should be at 42% of the goals spent to meet or exceed for the year, and at this time it has been met as a whole. Looking at Adults, Tableland has met the goal at 42%, moving to DW, Goodwill is behind at 40%, and with Youth, E&T is behind at 34%. It is important to continue watching the goals moving forward.

Ms. Sklodowski referred to page 2 of the Red/Green report and stated that it tracks expenditure rates as measured against the 20% and 75% WIOA expenditure requirements. February's meeting will show a more accurate reading and will show if the quarter target is complete. If we do not meet the requirements within a two-year span, we are subject to recapture. While talking to Fiscal, where we are supposed to be. Ms. Sklodowski feels hopeful that goals will be met.

### **Request for Support: Bedford, Blair and Huntingdon Counties**

Ms. Sklodowski has asked for support for the following.

Blair County has requested \$1500 of support for the Jaffa Shrine Hall rental for the Blair County PA CareerLink® Spring Job Fair which will be held on April 17<sup>th</sup>, 2025.

Bedford County has requested \$1,817 for the Fairgrounds Jordan Hall rental, along with tables and chair rentals for the Bedford County PA CareerLink® fall Job Fair being held on April 9<sup>th</sup>, 2025

Hunting County has requested \$650 for assistance for the Annual Spring Job Fair at the Smithfield Fire Hall which will be held on March 27, 2025.

Cambria County has requested \$500 to assist in the Penn Highlands Community College Career Fest which takes place on March 7<sup>th</sup>, 21<sup>st</sup> and April 11<sup>th</sup>. PA CareerLink® is a full planning partner for this event.

Mr. Cory Sisto asked for a motion to support each of the requests.

Ms. Julia Brulia entered a motion to approve the request for support: Bedford, Blair, Cambria and Huntingdon Counties, the motion was seconded by Mr. Keith Baker.

## **Update of the Board Local Plan**

Ms. Sklodowski wanted to update that her team has worked tirelessly over the holiday season to get the plan completed. The local plan is almost completed and will meet the deadline. There will be more information available in February.

## **AI Policy Approval**

Ms. Sklodowski shared the AI Policy has been discussed but has not been approved by the boards Executive Committee. It had been suggested that an addition to be added to 3.2 Equity and Inclusion stating assurance through on-going oversight and review that AI technologies must not exacerbate discrimination or bias. Ms. Sklodowski asked for approval.

Mr. Cory Sisto asked Mr. Jesper Nielson if the verbiage captured was what was trying to be achieved. Different language was discussed with trying to get some flexibility and not be black and white with the language for something we can't really measure in a concrete way.

Mr. Nielson expressed his concern that AI is an extension of people and it has been documented that AI does have some elements of bias most likely inadvertently which does lead to some discriminator aspects of it. The question became how to control and it becomes difficult to utilize it then. That's where it becomes difficult as an organization that we need to make sure that discrimination or bias is not part of any of the programming or tools to administer programming. At the same time we can only control so much given that were not creating our own AI from scratch. He thinks it's a good aspirational statement, he's just concerned about our ability to enforce that. He suggested adding AI technology must not exacerbate intentional discrimination or bias.

Ms. Sklodowski confirmed that section 3.2 should read Assurance through on-going oversight and review that AI technologies must not exacerbate intentional discrimination or bias.

Mr. Nielson agreed and shared his concern that AI has been shown to include innate unintentional bias and discrimination. By putting intentional bias into the policy we can at least cover if someone puts intentional bias and were not in a position to eliminate any and all bias in systems that we don't design.

Ms. Julia Brulia agreed that AI is new, and that kind of language gives us a little wiggle room.

Mr. Sisto suggested that we amend the language to say on-going oversight review and mitigation of AI technologies for potential impact of discrimination and bias. We do our best to analyze, review and mitigate when we see anything intentional or unintentional that may come up, but it recognizes that it is an imperfect system and were doing our best to review and mitigate.

Mr. Nielson agreed and wanted to make sure that we aren't held accountable for some unintentional baked in bias because our policy language is too rigid.

Mr. Cory Sisto is seeking a motion to approve the policy with the amended language under bullet point 3.2 to say on-going oversight review and mitigation of AI technologies for potential impact of discrimination or bias.

Mr. Jesper Nielson entered a motion to pass the AI Policy, with the amended language under bullet point 3.2 to say on-going oversight review and mitigation of AI technologies for potential impact of discrimination or bias the motion was seconded by Mr. Keith Baker.

### **One-Stop Operator Report**

Mr. Brad Burger shared about database decision making and that they are continuing to tap different data sources, some are originally sources and some are sources that were relying on other partners. One that is being looked at is the correlation or lack thereof between library traffic and actual foot traffic into our CareerLink® centers. When we started down this road 7 years ago and we looked at libraries as the place to be where people went to look for jobs. We're not really seeing a direct correlation. What seems to be effective is our outreach programs, or anyone that interacts with the state CWDS system and were able to investigate and determine who has been poking around in the system and then doing outreach to those folks. Between July and November of 2024 we have reached out to 2130 individuals who have interacted with that system, of that we were able to contact 541, which is a 25% contact rate. Mr. Burger showed his gratitude to his team for the perseverance that it takes to achieve that success rate. Of the 541 contacts, 114 were referred for services and 24 of those individuals are enrolled in WIOA Title I and an additional 11 in TANF programming. It is a way of bridging that and he has checked with our teams and they feel that outreach effort does bare fruit enough to continue to put efforts into it.

Mr. Burger shared that the other thing they are really looking at is the satisfaction side and have been trying to do things regionally when they can, even though there are three providers and they are trying to bridge those different providers and provide consistent service and data tracking among those agencies. We were doing employer satisfaction surveys and customer satisfaction surveys, we are trying to get all of the providers to use the same tool across our system. We are continuing to see an evolution in our system. If you remember, years ago a lot of foot traffic was driven by one primary thing, and that was the UC telephone, and that telephone doesn't exist anymore and was a major driver of foot traffic in to our system. What we said was the only thing worse than having the UC phone is not having the UC phone because it was a vehicle to interact with that population that was in transition. Now customers have to come in that are focused solely on jobseeker or some related service which is changing the dynamic. Mr. Burger just met with Mr. Keith Baker due to Mr. Baker doing a great job sending out our digital intake data which is done statewide and gives us the regional data and the top three reasons for customers to come into our centers is resume prep, application assistance and vital documents.

Mr. Burger spoke of continuing to use the metrics to be able to steer the car, and the more we have on our instrument panel the more successful we're going to be.

### **Other Business**

Mr. Keith Baker wanted to follow up with what Mr. Burger said about the digital intake reports. There has been a need for documents, and initially when Mr. Baker was covering the Schuylkill workforce area there is a very high Hispanic population and that population was having difficulty with official documents, birth certificates in particular. BWPO started working with Vital Statistics and to come up with a way for them to show up or be called to job fairs or resource events to do on the spot birth certificates. Mr. Baker is happy to report that there is finally an MOU in place, and they are ready to start.

### **Adjournment**

There being no further business, the meeting was adjourned at 10:33 p.m.

*A motion was made by Ms. Sharon Clapper to adjourn the meeting. Mr. Keith Baker seconded the motion.*

The next meeting of the Southern Alleghenies Workforce Development Board Executive Committee will be held on **Tuesday, February 11, 2025, 10:00 a.m.**

PY24 TITLE I PROVIDER QUARTERLY EXPENDITURE RATES  
AS MEASURED AGAINST 80% EXPENDITURE REQUIREMENT

ON TARGET

SHORTFALL

Monthly Targets	Adult	Dw	Youth
Goodwill	\$ 40,000	\$ 37,667	\$ 33,333
E&T	\$ 19,878	\$ 17,925	\$ 18,207
Tableland	\$ 14,309	\$ 11,046	\$ 21,900
Fund Total	\$ 74,187	\$ 66,638	\$ 73,440

Quarterly Targets	Adult	Dw	Youth	Tanf
Goodwill	\$ 120,000	\$ 113,000	\$ 100,000	\$ 105,758
E&T	\$ 59,634	\$ 53,775	\$ 54,620	\$ 27,000
Tableland	\$ 42,926	\$ 33,137	\$ 65,701	\$ 44,293
Fund Total	\$ 222,560	\$ 199,912	\$ 220,321	\$ 177,051

Provider/Fund	Budget	Exp July	Exp Aug	Exp Sept	QTR Target	Exp Oct	Exp Nov	Exp Dec	QTR Target	Exp Jan	Exp Feb	Exp March	QTR Target	Exp Apr	Exp May	Exp June	Cumm. YTD	Available	80% Target	% of Budget Spent	% of Goal Spent	
<b>Adult</b>																						
Goodwill	\$ 600,000	50,150	48,814	43,532	YES	43,036	44,835	50,182	YES	55,329	-	-	NO	-	-	-	\$ 335,678	\$ 254,322	\$ 480,000	55.95%	69.83%	
E&T, Inc	\$ 298,171	21,668	20,373	21,515	YES	20,067	18,948	27,562	YES	21,625	-	-	NO	-	-	-	\$ 151,778	\$ 146,893	\$ 238,597	50.90%	63.63%	
Tableland	\$ 214,630	14,136	15,262	13,524	NO	16,026	12,872	11,345	NO	12,360	-	-	NO	-	-	-	\$ 95,525	\$ 119,105	\$ 171,704	44.51%	55.63%	
<b>Total</b>	<b>\$ 1,112,801</b>	<b>\$ 85,954</b>	<b>\$ 84,449</b>	<b>\$ 78,571</b>	<b>YES</b>	<b>\$ 79,129</b>	<b>\$ 76,455</b>	<b>\$ 89,109</b>	<b>YES</b>	<b>\$ 89,314</b>	<b>\$ -</b>	<b>\$ -</b>	<b>NO</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 582,981</b>	<b>\$ 529,520</b>	<b>\$ 890,241</b>	<b>52.39%</b>	<b>65.49%</b>	

Dw

Goodwill	\$ 565,000	31,445	37,713	35,156	NO	38,697	36,594	41,385	YES	45,912	-	-	NO	-	-	-	\$ 266,852	\$ 298,148	\$ 452,000	47.23%	59.04%
E&T, Inc	\$ 268,875	23,852	22,843	16,766	YES	20,256	18,985	26,379	YES	20,097	-	-	NO	-	-	-	\$ 149,178	\$ 119,697	\$ 215,100	55.48%	69.35%
Tableland	\$ 165,686	10,579	12,466	13,121	YES	15,750	12,377	13,065	YES	11,629	-	-	NO	-	-	-	\$ 88,987	\$ 76,699	\$ 132,549	53.71%	67.14%
<b>Total</b>	<b>\$ 999,561</b>	<b>\$ 65,876</b>	<b>\$ 73,022</b>	<b>\$ 65,043</b>	<b>YES</b>	<b>\$ 74,703</b>	<b>\$ 67,956</b>	<b>\$ 80,779</b>	<b>YES</b>	<b>\$ 77,638</b>	<b>\$ -</b>	<b>\$ -</b>	<b>NO</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 505,017</b>	<b>\$ 454,544</b>	<b>\$ 799,649</b>	<b>50.52%</b>	<b>63.15%</b>

Youth

Goodwill	\$ 500,000	43,252	49,486	38,335	YES	37,217	29,036	35,795	YES	33,497	-	-	NO	-	-	-	\$ 266,618	\$ 233,882	\$ 400,000	53.32%	66.65%
E&T, Inc	\$ 273,088	19,460	17,053	9,965	NO	15,646	11,564	17,270	NO	13,507	-	-	NO	-	-	-	\$ 104,465	\$ 168,633	\$ 218,478	38.25%	47.81%
Tableland	\$ 328,505	24,750	30,243	26,955	YES	35,766	27,235	19,541	YES	28,242	-	-	NO	-	-	-	\$ 190,732	\$ 137,773	\$ 262,804	58.06%	72.58%
<b>Total</b>	<b>\$ 1,101,603</b>	<b>\$ 87,462</b>	<b>\$ 96,782</b>	<b>\$ 75,255</b>	<b>YES</b>	<b>\$ 88,629</b>	<b>\$ 67,835</b>	<b>\$ 72,606</b>	<b>YES</b>	<b>\$ 73,246</b>	<b>\$ -</b>	<b>\$ -</b>	<b>NO</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 561,815</b>	<b>\$ 599,788</b>	<b>\$ 881,282</b>	<b>51.00%</b>	<b>63.75%</b>

TOTAL WIA

<b>Total</b>	<b>\$ 3,213,965</b>	<b>\$ 239,292</b>	<b>\$ 254,253</b>	<b>\$ 218,869</b>	<b>YES</b>	<b>\$ 242,461</b>	<b>\$ 212,246</b>	<b>\$ 242,494</b>	<b>YES</b>	<b>\$ 240,188</b>	<b>\$ -</b>	<b>\$ -</b>	<b>NO</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 1,649,813</b>	<b>\$ 1,584,152</b>	<b>\$ 2,571,172</b>	<b>51.33%</b>	<b>64.17%</b>
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Tanf

Goodwill	\$ 528,790	78,863	58,117	24,430	YES	29,079	28,577	26,212	NO	24,615	-	-	NO	-	-	-	\$ 269,893	\$ 258,897	\$ 423,032	51.04%	63.80%
E&T, Inc	\$ 135,000	50,010	5,511	2,924	YES	5,493	5,028	5,374	NO	3,404	-	-	NO	-	-	-	\$ 77,744	\$ 57,256	\$ 108,000	57.59%	71.99%
Tableland	\$ 221,463	24,225	42,159	2,891	YES	3,008	1,145	1,754	NO	3,728	-	-	NO	-	-	-	\$ 78,910	\$ 142,553	\$ 177,170	35.63%	44.54%
<b>Total</b>	<b>\$ 885,253</b>	<b>\$ 153,098</b>	<b>\$ 105,787</b>	<b>\$ 30,245</b>	<b>YES</b>	<b>\$ 37,580</b>	<b>\$ 34,750</b>	<b>\$ 33,340</b>	<b>NO</b>	<b>\$ 31,747</b>	<b>\$ -</b>	<b>\$ -</b>	<b>NO</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 426,547</b>	<b>\$ 458,706</b>	<b>\$ 708,202</b>	<b>48.18%</b>	<b>60.23%</b>



PY23 TITLE I PROVIDER QUARTERLY EXPENDITURE RATES  
AS MEASURED AGAINST 20% & 75% WIOA EXPENDITURE REQUIREMENTS

ON TARGET

SHORTFALL

WIOA YTH - Monthly Targets	WIOA YTH - Work Exp. (20%)	WIOA YTH - OSY (75%)
Goodwill	\$ 8,333	\$ 31,250
E&T	\$ 4,552	\$ 17,089
Tableland	\$ 5,475	\$ 20,532
Fund Total	\$ 18,360	\$ 68,871

WIOA YTH - Quarterly Targets	WIOA YTH - Work Exp. (20%)	WIOA YTH - OSY (75%)
Goodwill	\$ 25,000	\$ 93,750
E&T	\$ 13,655	\$ 51,205
Tableland	\$ 16,425	\$ 61,595
Fund Total	\$ 55,080	\$ 206,551

Provider/Fund	WIOA Youth Budget	Exp July	Exp Aug	Exp Sept	QTR Target	Exp Oct	Exp Nov	Exp Dec	QTR Target	Exp Jan	Exp Feb	Exp March	QTR Target	Exp Apr	Exp May	Exp June	Cumm. YTD	Available	20% Target	75% Target	% of Budget Spent	% of Goal Spent	
WIOA YTH - Work Exp																							
Goodwill	\$ 500,000	14,004	15,353	8,923	YES	2,897	1,804	358	NO	906	-	-	NO	-	-	-	\$ 44,245	\$ 455,755	\$ 100,000		8.85%	44.25%	
E&T, Inc	\$ 273,098	9,949	11,278	5,315	YES	7,998	7,097	9,170	YES	6,431	-	-	NO	-	-	-	\$ 57,298	\$ 215,800	\$ 54,620		20.99%	104.79%	
Tableland	\$ 328,505	5,427	8,160	4,594	NO	7,145	3,465	3,412	NO	3,722	-	-	NO	-	-	-	\$ 36,955	\$ 291,550	\$ 65,701		11.25%	56.25%	
Total WIOA Youth	\$ 1,101,603	\$ 29,853	\$ 35,791	\$ 18,832	YES	\$ 18,040	\$ 12,366	\$ 12,940	NO	\$ 11,059	\$ -	\$ -	NO	\$ -	\$ -	\$ -	\$ 133,011	\$ 963,165	\$ 220,321		12.07%	60.37%	

Provider/Fund	WIOA Youth Budget	Exp July	Exp Aug	Exp Sept	QTR Target	Exp Oct	Exp Nov	Exp Dec	QTR Target	Exp Jan	Exp Feb	Exp March	QTR Target	Exp Apr	Exp May	Exp June	Cumm. YTD	Available	20% Target	75% Target	% of Budget Spent	% of Goal Spent	
WIOA YTH - OSY																							
Goodwill	\$ 500,000	43,252	48,485	38,335	YES	37,217	29,036	35,795	YES	33,497	-	-	NO	-	-	-	\$ 266,618	\$ 233,382	\$ 375,000		53.32%	71.10%	
E&T, Inc	\$ 273,098	19,460	17,053	9,865	NO	15,646	11,564	17,270	NO	13,507	-	-	NO	-	-	-	\$ 104,465	\$ 168,633	\$ 204,824		38.25%	51.00%	
Tableland	\$ 328,505	24,750	30,243	26,955	YES	35,786	27,235	19,541	YES	26,242	-	-	NO	-	-	-	\$ 190,732	\$ 137,773	\$ 245,379		56.06%	77.41%	
Total WIOA Youth	\$ 1,101,603	\$ 87,462	\$ 86,782	\$ 75,255	YES	\$ 88,629	\$ 67,835	\$ 72,606	YES	\$ 73,246	\$ -	\$ -	NO	\$ -	\$ -	\$ -	\$ 561,815	\$ 598,768	\$ 828,202		51.00%	68.00%	

**Southern Alleghenies Workforce Development Board (SAWDB )  
Individual Training Account (ITA) Policy**

<b>POLICY</b>		ITA Policy
<b>NEW</b>	<b>X REVISION</b>	
<b>PURPOSE</b>		To ensure quality service to customers
<b>DATE APPROVED BY SAWDB</b>		February 11, 2020, Revised Sept 2023, <b>REVISED JANUARY 2025</b>

The Individual Training Account (ITA) is a primary funding mechanism through which eligible individuals can access quality training programs that appear on the Eligible Training Provider List (ETPL) to obtain employment in High Demand Occupations (HPOs). ITA's are also used to support the Related Technical Instruction (Classroom Instruction component) of State Approved Registered apprenticeships and State Approved Pre-apprenticeship programs in the Southern Alleghenies Workforce development area. ITA funding is not guaranteed to any participant and is contingent upon funding availability.

Any adult, dislocated worker or youth being considered for training services funded with WIOA Title I funds must have completed the process for determining eligibility and suitability. In the case of WIOA eligible Adult and Dislocated Worker participants, training services are available if it is determined by PA CareerLink® staff after an interview, evaluation or assessment, and career planning that the individual

- Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services alone;
- Is in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through career services alone;
- Is underemployed;
- Has the skills and qualifications to successfully participate in the selected program.

Procurement for Training services is through an Individual Training account (ITA), a training contract or a combination of an ITA and training contract. Adult customers who had begun attending post-secondary training prior to receiving Basic Career Services will not be eligible to receive ITA funds. However, if an employed individual had begun post-secondary education and then had his/her job eliminated, thus becoming a dislocated worker, they may be considered for ITA funding to complete their education assuming the course of study and training provider meet the other criteria established in this policy.

Guidelines governing the Individual Training Account System include:

- ITAs will only be established for training programs that are on the list of Eligible Training Providers authorized by the Pennsylvania Department of Labor and Industry (L&I).
- Customers are required to complete the Career Scope or other assessment consistent with L&I guidelines as the interest and aptitude assessment instrument. The results must show alignment with the career field they are pursuing.
- *The Test of Adult Education (TABE) is the standardized assessment instrument used to assess Basic Skills for customers of WIOA services in the Southern Alleghenies region. ITA candidates must achieve a minimum Reading Level "M" result using the current version of the Reading TABE Locator and score a minimum of a 577 scale score on the Mathematical skills test at the level prescribed by the TABE Locator\*.  
\*Individuals seeking CDL training are not required to take the additional TABE Mathematical skills assessment but are required to take the current version TABE Locator, scoring at least at the M level in Reading and Math.*
- Individuals with Associate, Baccalaureate or Advanced degrees are exempt from skill proficiency assessment requirements. *Exemptions from TABE and Interest Inventory assessments for ITA candidates must be approved on a case-by-case basis by staff to the Southern Alleghenies Workforce Board in accordance with the TABE Assessment Waiver Policy for the Southern Alleghenies Workforce Development Area.*
- Participants are required to obtain an acceptance letter of admission into the training program as part of the ITA funding request.
- ITAs will only be established for programs that support occupations that appear on the High Priority Occupation List for the Southern Alleghenies Workforce Development Area. If a chosen training program supports an occupation that appears on the High Priority Occupation List for another workforce development area and the customer indicates a willingness to relocate to that area, an ITA could be established.
- Customers must be able to complete an approved training program within two (2) years.
- If training funds are available, the maximum award is \$7,000.00\*
  - \* In the event that special training funds are secured these caps may be waived and financial support up to 100% of the cost of training may be provided.
- ITA funds must be used for expenses incurred in completing actual program curriculum coursework. Funds may not be used to cover any prerequisite, repeat, or remedial coursework.
- Employed customers may be eligible for an ITA under the following conditions:
  - Adults whose family income does not exceed 100% of the Lower Living Standard Income Level.
  - Dislocated Workers who have not obtained permanent full-time employment equal to 93% of their wage at dislocation **or 235% of the Poverty Guidelines**
  - In-School, Out of School youth or Older Youth (ages 18-24) who meet the Title I WIOA eligibility criteria.

- If the cost of the training program selected is greater than \$5,500.00, the participant must indicate how the remaining cost of the training will be funded.
- An approved ITA supplements other funding sources for training. Program operators must coordinate the customer's funding arrangements with One-Stop partners and other entities such as but not limited to state-funded training, and Federal Pell grants. Program operators must ensure that all potential partner funding sources are included with an ITA application. Participants may enroll in an ITA funded program while an application for a Pell grant is pending as long as the operator has made arrangements with the training provider and the participant regarding allocation of the Pell Grant (tuition only), if it is subsequently awarded.
- A training program must be job specific and result in a license, certificate, diploma, associate degree or bachelor's degree. This includes individuals who previously started a degree program but did not complete it.
- Complete ITA packages should be submitted to the staff of the Southern Alleghenies Workforce Development Board (SAWDB) at least two weeks prior to the start of training. Any deviations to the timeline need to be coordinated directly with the SAWDB staff.
- Title I providers must not accept referrals from one-stop partners for training programs for adult and dislocated worker customers who have not been registered for WIOA services and who do not have a formalized Individual Employment Plan.
- If training funds are available, the following limits and restrictions are established for ITA's:

Programs less than one (1) year in length	= \$5,500*
Programs one (1) year up to two (2) years in length	= \$7,000*

\*In the event that special training funds are secured these caps may be waived and financial support up to 100% of the cost of training may be provided.

- Support for on-line training will be considered on a case-by-case basis. Candidates for ITA training funds in support of On-Line training programs are required to complete the modules associated with the NorthStar digital literacy "Standards for Essential Computer Skills" and "Standards for Essential Software Skills" within one month and prior to the completion and submission of the ITA packet.
- Confirmation that the Provider will remain in contact with appropriate PA CareerLink staff regarding the participant, as they progress through the training program. Regular communication is essential and a program requirement to monitor the progress of the participant for the attainment of WIOA performance objectives that includes credential attainment, employment, and other performance measures.

**Southern Alleghenies Workforce Development Board (SAWDB)  
Test of Adult Basic Education (TABE) Assessment  
WAIVER POLICY**

<b>POLICY</b>		TABE Assessment Waiver Policy for WIOA Individual Training Accounts (ITA's) and On-The Job Training
<input checked="" type="checkbox"/> <b>NEW</b>	<input type="checkbox"/> <b>REVISION</b>	
<b>PURPOSE</b>		To insure continuous service to customers
<b>DATE APPROVED BY SAWDB</b>		TBD

**Purpose**

The purpose of this policy is to establish the criteria and procedures for waiving the TABE (Test of Adult Basic Education) assessment requirement for participants seeking services under the Workforce Innovation and Opportunity Act (WIOA) Individual Training Accounts (ITAs) or On-The Job Training Program in the Southern Alleghenies Workforce Development Area.

The TABE assessment is an essential tool for determining participants' readiness for training programs under WIOA. However, under specific circumstances, a waiver may be granted to ensure equitable access to services while maintaining compliance with program goals.

**Eligibility for Waiver**

A waiver of the TABE assessment may be granted in the following cases:

**1. Documented Disability:**

- The participant has a documented disability (e.g., an Individualized Education Program [IEP], 504 Plan, or medical records) that may impact the validity of the TABE assessment results.
- A reasonable alternative assessment or accommodation is provided as per ADA requirements.

**2. Previous Academic Achievement:**

- The participant has attained a postsecondary degree, certificate, or diploma demonstrating adequate academic proficiency.
- Documentation (transcripts or diploma) must be noted in the participant training request packet the Individual Training Account (ITA) or the On-The-Job Training Request Packet and maintained in the participant file

### **3. Training Provider Assessment:**

The participant has been assessed by the training provider using an equivalent or superior tool to the TABE, with results accepted in lieu of TABE scores.

#### **Process for Requesting a Waiver**

##### **1. Submission:**

WIOA Title I staff must submit a written request for a waiver to the WIOA program administrator, including the reason for the request and supporting documentation referenced in the participant training request packet for the Individual Training Account (ITA) or the On-The Job Training Program.

##### **2. Review and Approval:**

All TABE Assessment waiver requests must be approved by designated staff to the SAWDB Board prior to participant approval and enrollment in the Individual Training Account Training Program or On-The-Job Training Program .

#### **Documentation**

All waiver requests which includes support documentation and decision must be documented and maintained in the participant case file and entered onto the Participant case progress notes and posted onto the participant record on CWDS.

#### **Monitoring and Compliance**

Waivers will be periodically reviewed by local Workforce Development board staff to ensure compliance with WIOA regulations and the effectiveness of alternative assessments or supports provided.

#### **Effective Date**

This policy is effective revised or rescinded.

## REVISED POLICY OVERVIEW-

### SAWDA WIOA INDIVIDUAL TRAINING ACCOUNT ITA -March 2025

#### **PURPOSE:**

The Individual Training Account (ITA) is a primary funding mechanism through which eligible individuals can access quality training programs that appear on the Eligible Training Provider List (ETPL) to obtain employment in High Demand Occupations (HPOs). ITA's are also used to support the Related Technical Instruction (Classroom Instruction component) of State Approved Registered apprenticeships and State Approved Pre-apprenticeship programs in the Southern Alleghenies Workforce development area. ITA funding is not guaranteed to any participant and is contingent upon funding availability.

#### **CHANGES:**

- Test of Adult Basic Education scoring requirements to qualify for ITA i.e. required use of Reading TABE Locator and a minimum score level of a 577 scale on the Mathematical skills test at the level prescribed by the TABE Locator
- ITA Applicants for CDL Training are exempt from taking the additional TABE Mathematical skills assessment but are required to take the current version TABE Locator scoring at least at the M level in Reading and Math, and the Career Scope Interest Inventory assessment. (Pg 2)
- Additional guidance as it pertains to are exemptions from skill proficiency assessment requirements for candidates of ITA's that includes reference to new TABE assessment Waiver Policy. Individuals with Associate, Baccalaureate or Advanced degrees are exempt from skill proficiency assessment requirements. *Exemptions from TABE and Interest Inventory assessments for ITA candidates must be approved on a case-by-case basis by staff to the Southern Alleghenies Workforce Board in accordance with the TABE Assessment Waiver Policy for the Southern Alleghenies Workforce Development Area.*
- Includes and additional income metric beyond 93% of wage at dislocation to include 235% of Poverty Guidelines for employed individuals to apply for ITA's ( For example 235% of Poverty Guidelines for a family of 1 is annual earnings of \$36,788.00 for a family size of 2 is annual earnings of \$49,703.00 and for a family size of (3) 235% of Poverty Income Guidelines is annual earnings of \$62,628.00. (Pg 2)
- Training Caps Increased- If training funds are available, the following limits and restrictions are established for ITA's:
  - Programs less than one (1) year in length up to \$5,500\*
  - Programs one (1) year up to two (2) years in length not to exceed \$7,000\*

\*In the event that special training funds are secured these caps may be waived and financial support up to 100% of the cost of training may be provided.

**Southern Alleghenies Workforce Development Board (SAWDB)  
Test of Adult Basic Education (TABE) Assessment  
WAIVER POLICY**

<b>POLICY</b>		TABE Assessment Waiver Policy for WIOA Individual Training Accounts (ITA's) and On-The Job Training
<input checked="" type="checkbox"/> <b>NEW</b>	<input type="checkbox"/> <b>REVISION</b>	
<b>PURPOSE</b>		To insure continuous service to customers
<b>DATE APPROVED BY SAWDB</b>		TBD

**Purpose**

The purpose of this policy is to establish the criteria and procedures for waiving the TABE (Test of Adult Basic Education) assessment requirement for participants seeking services under the Workforce Innovation and Opportunity Act (WIOA) Individual Training Accounts (ITAs) or On-The Job Training Program in the Southern Alleghenies Workforce Development Area.

The TABE assessment is an essential tool for determining participants' readiness for training programs under WIOA. However, under specific circumstances, a waiver may be granted to ensure equitable access to services while maintaining compliance with program goals.

**Eligibility for Waiver**

A waiver of the TABE assessment may be granted in the following cases:

**1. Documented Disability:**

- The participant has a documented disability (e.g., an Individualized Education Program [IEP], 504 Plan, or medical records) that may impact the validity of the TABE assessment results.
- A reasonable alternative assessment or accommodation is provided as per ADA requirements.

**2. Previous Academic Achievement:**

- The participant has attained a postsecondary degree, certificate, or diploma demonstrating adequate academic proficiency.
- Documentation (transcripts or diploma) must be noted in the participant training request packet the Individual Training Account (ITA) or the On-The-Job Training Request Packet and maintained in the participant file.



### **3. Training Provider Assessment:**

The participant has been assessed by the training provider using an equivalent or superior tool to the TABE, with results accepted in lieu of TABE scores.

#### **Process for Requesting a Waiver**

##### **1. Submission:**

WIOA Title I staff must submit a written request for a waiver to the WIOA program administrator, including the reason for the request and supporting documentation referenced in the participant training request packet for the Individual Training Account (ITA) or the On-The Job Training Program.

##### **2. Review and Approval:**

All TABE Assessment waiver requests must be approved by designated staff to the SAWDB Board prior to participant approval and enrollment in the Individual Training Account funded Training program or On-The-Job Training Program .

#### **Documentation**

All waiver requests which includes support documentation and decision must be documented and maintained in the participant case file and entered onto the Participant case progress notes and posted onto the participant record on CWDS.

#### **Monitoring and Compliance**

Waivers will be periodically reviewed by local Workforce Development board staff to ensure compliance with WIOA regulations and the effectiveness of alternative assessments or supports provided.

#### **Effective Date**

This policy is effective revised or rescinded.

## POLICY OVERVIEW

### SAWDA TABE ASSESSMENT WAIVER POLICY FOR ITA'S AND ON-THE-JOB TRAINING SERVICES -March 2025

**PURPOSE:** To establish the criteria and procedures to waive the TABE (Test of Adult Basic Education) assessment requirement for participants seeking services under the Workforce Innovation and Opportunity Act (WIOA) Individual Training Accounts (ITAs) or the On-The Job Training Program in the Southern Alleghenies Workforce Development Area.

#### **Eligibility for Waiver**

A waiver of the TABE assessment may be granted in the following cases:

#### **Documented Disability:**

- The participant has a documented disability (e.g., an Individualized Education Program [IEP], 504 Plan, or medical records) that may impact on the validity of the TABE assessment results.
- A reasonable alternative assessment or accommodation is provided as per ADA requirements.

#### **Previous Academic Achievement:**

- The participant has attained a postsecondary degree, certificate, or diploma demonstrating adequate academic proficiency.
- Documentation (transcripts or diploma) must be noted in the participant training request packet, the Individual Training Account (ITA) or the On-The-Job Training Request Packet and maintained in the participant file.

#### **Training Provider Assessment**

- The participant has been assessed by the training provider using an equivalent or superior tool to the TABE, with results accepted in lieu of TABE scores.

### **Process for Requesting a Waiver**

**Submission:** WIOA Title I staff must submit a written request for a waiver to the WIOA program administrator, including the reason for the request and supporting documentation referenced in the participant training request packet for the Individual Training Account (ITA) or the On-The Job Training Program.

**Review and Approval:** All TABE Assessment waiver requests must be approved by designated staff to the SAWDB Board prior to participant approval and enrollment in the Individual Training Account funded Training program or On-The-Job Training Program.

**Southern Alleghenies Workforce Development Board (SAWDB)  
WIOA SELF ATTESTATION**

<b>POLICY</b>		WIOA Self Attestation
<b>NEW</b> <input checked="" type="checkbox"/>	<b>REVISION</b>	
<b>PURPOSE</b>		Quality Assurance/ Continuous Improvement
<b>DATE APPROVED BY SAWDB</b>		

The purpose of this guidance is to provide technical assistance to local workforce system stakeholders regarding the Workforce Innovation and Opportunity Act (WIOA or Opportunity Act) title I eligibility determinations when self-certification is used by an applicant in the Southern Alleghenies region. This guidance addresses the appropriate use of self-certification for title I program eligibility and the fulfillment of WIOA data validation requirements. The information reflected in this policy is subject to change based on the issuance of U.S. Department of Labor (USDOL) regulations, guidance and State Policy and the PA Department of Labor & Industry’s determinations.

To ensure data integrity across the Commonwealth, the Code of Federal Regulations (CFR) Section 677.240 require states to establish processes and guidelines for maintaining a valid and reliable data validation system as required by WIOA Sec. 116(d)(5). When determining eligibility for WIOA Title I program funding, the local workforce development boards (local boards) must adhere to this eligibility policy to ensure proper collection of required documentation is entered into the system of record, as to validate the accuracy of the participant’s eligibility and to reduce the risk of enrolling ineligible participants. By allowing the process of self-attestation as a form of eligibility determination, participants are provided with an opportunity to overcome barriers to employment without a significant delay in services. However, self-attestation should not be used as a primary source of verification if other documentation can be obtained without a significant delay or undue hardship to the participant.

➤ **ELIGIBILITY VERIFICATION**

The Southern Alleghenies Workforce Development Board in alignment with the Pa Department of Labor and Industry is responsible to maintain and monitor the data validation system pursuant to the United States Department of Labor instruction pertaining to the Workforce Innovation and Opportunity Act (WIOA) service tracking

reporting, and performance. It is the responsibility of the SAWDB to ensure to the maximum extent feasible the accuracy of the data entered into the state's system of record, the Commonwealth Workforce Development System (CWDS). The elements required for data element validation focus on eligibility, outcomes, services, and program follow-up. For the purposes of determining eligibility, documentation may be required as evidence for participation in a particular WIOA-funded program. Staff to the Southern Alleghenies Workforce Development Board are required to confirm eligibility for certain programs and services through an examination of provided documentation. Once data is verified and entered in CWDS, such information is validated by L&I.

**NOTE: Grantees cannot deny services if an individual chooses not to share a Social Security number (SSN).** While the SSN is no longer required for eligibility, obtaining it remains important as it allows for accurate and efficient collection of wage data. This data is essential for performance reporting. All workforce staff should continue to implement SSN collection best practices that include:

- Requesting SSN from all customers during intake
- Assisting customers in obtaining their SSN
- Revisiting collection of the SSN at various points after intake for customers who did not initially provide it
- Utilizing resources to reduce customer resistance located in CWDS Help Section

1. **Verification before program participation.** During intake, grant recipients should limit collection of documentation only to those items required for eligibility rather than trying to collect all the documentation necessary for data validation purposes. Procedures should include opportunities to request documentation after intake and initial service provision.

**NOTE:** The process for gathering information must be done efficiently to administer services in a timely manner and collection of documentation may be gathered at a later date or be substituted with equivalently acceptable documentation

2. **Bridging the gap until eligibility is determined.** As Employment Services (Labor Exchange) or WIOA title III services are universally available (i.e., there are no eligibility requirements to receive such services), individuals whose eligibility is not yet determined may receive services associated with this funding. These services may serve as a bridge to ensure individuals have access to services (until such time as the individual's title WIOA Title I-B program eligibility is determined). Upon determination, participants (once eligible and participating in a program) may continue to receive Employment Services (Labor Exchange) services, as well as services associated with the applicable title I programs.

**NOTE:** It is encouraged that referrals be made to Employment Services (Labor Exchange) for assessment services particularly in the case of the youth population, while eligibility for WIOA Title I services is determined

- **Verification and Documentation** It is important to note that verification is different than hard copy documentation.
  - a) **Verification** means to confirm eligibility requirements through examination of documents, by verification through relevant website, direct communication with representatives of authorized agencies, or other authorized methods.
  - b) **Documentation** means to maintain physical evidence, which is obtained during the verification process, in participant files. Examples of such evidence include uploading documents to CWDS for data validation purposes or maintaining copies of documents in hard-copy files (where legally permitted) in compliance with Personally Identifiable Information (PII) regulations and guidelines.

**NOTE:** Grantees cannot deny services if an individual chooses not to share a Social Security number (SSN)

- **SELF-ATTESTATION:** Self-Attestation is an acceptable source for documenting eligibility. Self-attestation is a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. Electronic signatures or a submission from the participant such as an email, text, or unique online survey response are considered an electronic signature or verification; it must be participant generated and traceable to the participant. Documentation of the self-attestation must be retained by the provider. (TEGL 23-19, Change 1, Attachment II)

### **GENERAL USES OF SELF ATTESTATION**

Self-attestation is a viable source for documenting eligibility and data validation. A submission from the participant, such as an email, text, or unique online survey response, is considered an electronic signature or verification and is an acceptable form of self-attestation. While the overuse or exclusive use of self-attestation is not promoted, grantees should consider it as a viable alternative, particularly among certain populations whose life circumstances may preclude immediate access to certain documents

- Self-attestation may be used when document collection would delay or prevent a customer from enrollment in a program and moving ahead with services.
- Self-attestation is participant-generated. The participant must use their own words to certify a statement.
- Other acceptable documentation or verification for the participant must be used if readily available or reasonably attainable. In those instances when Self-Attestation is applied (See Attachment A)
- **A case progress note must document the circumstances that necessitated the use of the self-attestation including what action steps were taken to obtain other primary sources of documentation.**

- Blanket self-attestation cannot be used.

**Youth.** To ease burdens on both applicants and providers and serve out-of-school youth who are most in need, it's recognized that self-attestation as a viable alternative for the purpose of WIOA eligibility determination, consistent with DOL guidelines.

### **PERMITTED USES OF SELF ATTESTATION**

Workforce staff must use self-attestation in a manner reflective of this policy. Self-Attestation may be used for criteria including, but not limited to, the following:

- Date of birth
- Individual with Disability
- Veteran Status
- Low Income Status at Program Entry
- Date of Actual Dislocation (Dislocated Worker)
- Displaced Homemaker (Dislocated Worker)
- Reemployment Opportunity is Poor / Unlikely to Return-to-Work (Dislocated Worker)
- Permanently or Temporarily Laid Off as a Consequence of a Disaster (Disaster Grant DWG)
- Long-Term Unemployed (Disaster Grant DWG)
- English Language Learner (Youth)
- Homeless (Youth and Adult)
- Runaway (Youth)
- In/Aged Out of Foster Care System (Youth)
- Offender (Youth)
- Pregnant or Parenting (Youth)
- Requires Additional Assistance (Youth)
- School Status at time of Registration (Youth)

### **PROHIBITIVE USE OF SELF-ATTESTATION**

Provided below are the PIRL data elements or WIOA Title I eligibility criteria including Adult Priority of Service that *must not be verified by self-attestation*.

### **WIOA Title I Eligibility Verification by Program (Adult, Dislocated Worker, Youth, Disaster Grant)**

#### **WIOA Title I General Eligibility**

- Social Security Number
- Citizenship Status or Eligible-to-Work
- Selective Service Registration

#### **WIOA Youth Eligibility or Adult Priority of Service**

- Other Cash Public Assistance (SSI, RCA, etc)

- Supplemental Nutrition Assistance Program (SNAP)
- Youth Living in High Poverty Area
- Youth Free or Reduced Lunch
- Basic Skills Deficient

**PROHIBITED USE OF SELF-ATTESTATION (Cont.)**

**WIOA Dislocated Worker or Disaster Grant Eligibility**

- Permanent Closure or Substantial Layoff
- Spouse of Active Service Member
- Formerly Self-Employed

**WIOA Common Measures Data Validation** – per *Pennsylvania WIOA Common Measures Data Validation Guide* located in CWDS Help Center

- Data Element 401 – UC Eligible Status (**Note:** Self-attestation can be used for validating “Claimant, Not Referred” and “Exhaustee”)
- Data Element 600 – Temporary Assistance to Needy Families (TANF)
- Data Element 602 – Supplemental Security Income (SSI)/Social Security Disability Insurance (SSDI)
- Data Element 603 – Supplemental Nutrition Assistance Program (SNAP)
- Data Element 604 – Other Public Assistance Recipient
- Data Element 804 – Basic Skills Deficient at Common Measures Entry

➤ **SELF-CERTIFICATION:** Self-Certification is a type of self-attestation and means an individual’s signed attestation that the information they submit to demonstrate eligibility for a program under title I of WIOA is true and accurate. (20 CFR 675.300). Information obtained through this method of validation must be documented using the “Self-Certification” Form.

➤ **Case Note Requirements, and Documentation when using Self Certification**

As noted, overuse or exclusive use of self-attestation which includes usage of Self Certification is not promoted, however its encouraged that its use be considered as a viable alternative, particularly among certain populations whose life circumstances may preclude immediate access to certain documents

If self- Attestation is used, a rationale must be provided via case notes describing that no other verification method is possible and that the provider is using self-certification as a last resort. The case note must describe why self-certification is the only available method of verification for the specific data element. Case notes must be entered into the state’s sole system of record system, the Commonwealth Workforce Development System (CWDS).



In addition, as it pertains to WIOA Title I services, the “Source Documentation Index” (ATTACHMENT A) is required to be completed by staff and maintained in the participant file in support of the accuracy of the data element validation.

Sample case note:

*The WIOA self-certification form was submitted to verify date of dislocation. The participant did not have any other documentation available to prove the date of dislocation. The self-certification form was used as the last possible method to verify this eligibility point.*

#### ❖ TELEPHONE VERIFICATION\*

Providers are encouraged to utilize telephone verification prior to self-certification for Adult and Dislocated Worker participants where possible, including methods of eligibility in consideration of individuals with barriers to employment. Telephone verification involves verification of eligibility criteria through phone calls with recognized governmental or social services agencies or by document inspection. Information obtained through this method should be documented on the “WIOA Telephone Verification/Document Inspection” form. The information recorded must be adequate to enable a monitor or auditor to report back to the cognizant agency or the document used. (In some cases, the information provided by the agency through contact may be sufficient to satisfy multiple eligibility criteria. Verification of eligibility through document inspection is appropriate when documents cannot or may not be copied). The Telephone Verification form and other additional standardized forms such as Statement of Family Size and Income and WIOA Self-Attestation are also options. The forms and other guidance on the use of self-attestation are posted on the CWDS Help Center

#### ❖ APPLICANT STATEMENT\*

An applicant statement is a form of self-attestation. The Statement of Family Size and Income may be used to validate family size/family income if other means are not available. If an applicant’s statement or self-attestation is used in the eligibility-determination process, all workforce staff must adhere to current guidance from the Pa Department of Labor and Industry Bureau of Workforce Partnership and Operations.

#### ❖ WIOA SELF ATTESTATION FORM\*

A standardized self-attestation form, WIOA Self-Attestation Form, is available to assist staff in collecting the information necessary to verify title I programs eligibility criteria and verify acceptable documentation sources.

\*The Telephone Verification form and other additional standardized forms such as “Statement of Family Size and Income” and “WIOA Self-Attestation forms” and other guidance on the use of self-attestation are posted on the CWDS Help Center

## ATTACHMENT A

### WIOA Data Elements- Source Documentation Efforts

Self Attestation is an allowable documentation source and is intended to be used with discretion in those instances where it is permitted. The following is a list of the major types of documentation sources that may be utilized from 1<sup>st</sup> to last priority. Please use this as a guide in determining the order in which source documents are pursued in support of WIOA data element validation.

#### Priority of Documentation Sources:

Priority#1- Actual document provided by the client

Priority #2-Records or documentation from another agency or organization

Priority #3- Telephone Verification

Priority #4- Statement of Family Size/Income

Priority#5- Self Attestation

WIOA Data Elements- Source Documentation Efforts

In those cases where self attestation is used as the source document, please describe efforts to secure higher priority sources, if applicable. This form will be completed and retained in the client's file.

Priority #1- Actual document provided by the client Ex. Birth Certificate, pay stubs, Social Security Card, etc.

Describe Effort:

---

Priority #2-Records or documentation from another agency or organization Ex. school transcripts, public assistance records, etc.

Describe Effort:

---

Priority #3- Telephone Verification

Describe Effort:

---

Priority #4- Statement of Family Size/Income

Describe Effort:

---

Priority#5- Self Attestation

Describe Effort:

---

Client Name: \_\_\_\_\_

Date: \_\_\_\_\_

Staff: \_\_\_\_\_

Office: \_\_\_\_\_

## POLICY OVERVIEW

### WIOA SELF ATTESTATION POLICY-SAWDA

March 2025

**PURPOSE:** This guidance addresses the appropriate use of self-certification for title I program eligibility and the fulfillment of WIOA data validation requirements in the Southern Alleghenies region.

- **Eligibility Verification-** It is the responsibility of the SA WDB to ensure to the maximum extent feasible the accuracy of the data entered into the state's system of record, the Commonwealth Workforce Development System (CWDS)
- **Verification and Documentation -**During intake, grant recipients should limit collection of documentation only to those items required for eligibility rather than trying to collect all the documentation necessary for data validation purposes. Procedures should include opportunities to request documentation after intake and initial service provision.
- **Grantees cannot deny services if an individual chooses not to share a Social Security number (SSN).**
- **Self-Attestation-** Self-attestation is a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant and is an acceptable source for documenting eligibility. Included in the policy are allowable and prohibitive uses of Self-Attestation.
- **Self-Certification-** Self-Certification is a form of self-attestation and means an individual's signed attestation that the information they submit to demonstrate eligibility for a program under title I of WIOA is true and accurate. (20 CFR 675.300). Information obtained through this method of validation must be documented using the "Self-Certification"
- **The use of Self-Attestation, which includes the use of Self Certification is encouraged as a viable alternative, particularly among certain populations whose life circumstances may preclude immediate access to certain documents; however, its overuse or exclusive use of self-certification which includes the use of Self Certification is not promoted**

- Other alternatives should be explored prior to the use of Self Certification when possible which include Telephone Verification, and Applicant Statement, which is a form of self-attestation and can be used to validate family size and income if other means are not available.