

SECTION 18 – ELIGIBILITY DETERMINATION PROCEDURES

18.1 Purpose

This section establishes detailed operational procedures for determining, verifying, documenting, approving, and reviewing participant eligibility across all workforce programs administered or overseen by the Workforce Development Board.

These procedures are designed to:

- Prevent enrollment of ineligible individuals
- Ensure documentation exists prior to enrollment
- Maintain compliance with federal and state regulations
- Protect against disallowed costs
- Ensure uniform application of eligibility standards

Eligibility must be fully documented and approved prior to enrollment.

Eligibility policy standards are established in Section 1 – Participant Eligibility, while this section establishes the operational procedures used to implement those requirements.

18.2 Eligibility Determination Workflow

The following steps must occur in order:

- Step 1 – Initial Intake
- Step 2 – Eligibility Screening
- Step 3 – Document Collection and Verification
- Step 4 – Income and Priority Determination (if applicable)
- Step 5 – Selective Service Verification (if applicable)
- Step 6 – Self-Sufficiency Determination (if applicable)
- Step 7 – Exception Review (if applicable)
- Step 8 – Supervisory Review and Approval
- Step 9 – Enrollment Entry in Reporting System

No step may be skipped.

18.3 Step 1 – Initial Intake

Staff shall:

- Conduct preliminary eligibility screening
- Identify potential funding stream(s)
- Provide required program information
- Collect basic demographic information

No services may be authorized at this stage.

18.4 Step 2 – Eligibility Screening

Staff shall verify preliminary qualification based on:

- Age requirements
- Residency (if required)
- Work authorization
- Barrier category (if applicable)
- Income requirement (if applicable)

Screening must be documented in case notes or intake forms.

18.5 Step 3 – Required Documentation Checklist

Prior to enrollment, the following must be collected, as applicable.

Age Verification

- Birth certificate
- Government-issued identification
- Passport

Work Authorization

- Employment authorization document
- I-9 acceptable documentation

Income Verification (if required)

- Pay stubs
- Public assistance documentation
- Unemployment documentation
- Tax return
- Employer statement
- Self-attestation only where permitted

Residency (if required)

- Lease agreement
- Utility bill
- Government correspondence

Barrier Documentation (if applicable)

- School records
- Disability documentation (stored separately)
- Justice-involvement documentation
- Foster care documentation
- Homelessness verification

Selective Service Verification (if applicable)

- Registration confirmation
- Exemption documentation
- Status information letter

Self-Sufficiency Verification (if applicable)

- Household size documentation
- Wage documentation
- Income worksheet

All documentation must be legible, complete, and retained in the participant file consistent with Section 3 – Participant File Documentation and Section 9 – Privacy and Records Protection.

18.6 Step 4 – Income Determination Procedure

When income eligibility is required:

1. Determine household size.
2. Identify income sources for the required look-back period.
3. Calculate total gross income.
4. Compare income to the applicable poverty level or LLSIL standard.
5. Complete the standardized income calculation worksheet.
6. Attach all source documentation.

The income calculation worksheet must be signed and dated by the case manager.

Supervisory review is required prior to enrollment.

18.7 Step 5 – Priority of Service Determination

When applicable:

1. Determine veteran status.
2. Determine public assistance status.
3. Determine low-income status.
4. Determine basic skills deficiency (if required).
5. Apply priority order.
6. Document determination in the reporting system and participant file.

If priority applies, documentation must support the category selected.

Priority of service must be applied consistent with Section 1 – Eligibility and Priority of Service.

18.8 Step 6 – Selective Service Verification Procedure

For applicable male participants:

Under age 26

- Confirm Selective Service registration prior to enrollment.

Age 26 or older

- Obtain proof of registration; or
- Obtain status information letter; or
- Complete non-willful determination process where permitted.

Selective Service determination must be documented before enrollment.

18.9 Step 7 – Self-Sufficiency Determination

Where required:

1. Determine household size.
2. Determine current income.
3. Compare income to the self-sufficiency standard.
4. Document determination.

5. Attach income verification documents.

Calculation worksheet must be retained in the participant file.

18.10 Step 8 – Exception Category Tracking

If exception categories are permitted:

- Confirm participant qualifies under exception definition
- Confirm exception percentage cap has not been exceeded
- Log participant in the exception tracking log
- Obtain supervisory approval prior to enrollment

Exception logs must be reviewed periodically for compliance.

18.11 Step 9 – Supervisory Review and Enrollment Approval

Prior to enrollment:

- Case manager completes eligibility checklist
- Supervisor reviews documentation for completeness
- Supervisor signs eligibility approval form
- Enrollment is entered into the official reporting system

Enrollment date must be on or after supervisory approval.

Retroactive enrollment is prohibited.

18.12 Date of Eligibility Determination Control

The Eligibility Approval Form must include a clearly documented “Date Eligibility Determined.”

The official enrollment date entered into the reporting system must be on or after the documented Date Eligibility Determined.

Eligibility documentation must be finalized and approved prior to enrollment entry.

Once supervisory approval is granted, eligibility documentation may not be altered without written supervisory justification and documentation of the reason for modification.

Any discrepancy between eligibility determination date and enrollment date must be documented and reviewed by supervisory staff.

18.13 Prohibition on Retroactive Documentation

Documentation obtained after enrollment may not be used to cure eligibility deficiencies.

If documentation is missing prior to enrollment:

- Enrollment must be delayed until documentation is obtained.

Failure to comply may result in disallowed costs.

18.14 Enrollment Quality Assurance

Supervisory staff shall conduct periodic eligibility audits that include:

- Random file review
- Income recalculation
- Priority validation
- Selective Service validation
- Exception cap review

Findings must be documented.

Corrective action must be implemented for deficiencies.

Monitoring activities must align with Section 12 – Internal Monitoring and Quality Assurance.

18.15 Red Flags Requiring Escalation

The following require immediate supervisory review:

- Inconsistent income documentation
- Altered documents
- Conflicting household size information
- Unclear barrier documentation
- Exception cap nearing limit

Suspected fraud must be reported in accordance with organizational fraud reporting procedures.

18.16 Internal Control Alignment

Eligibility procedures must align with:

- Segregation of duties standards
- Documentation retention requirements

- Audit readiness expectations
- Financial obligation controls

Eligibility approval must occur prior to financial obligation or service authorization.