

| Name | Entity | Comments | WSID's Response |
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| Jordana Barclay | Southwest WDC | Is self-attestation form for core only? Attachment "A" shows that self-attestation form as an acceptable document for intensive and training service while the written text states differently (Section: B Documentation Requirement Sub-Section i-3 documentary evidence and self-attestation). | No, it is also for core and intensive/training services except for Date of Birth (age). Sub-section b.i.3 of the policy corresponds to Attachment A (page 3) of TEGL 28-11. This policy language attempts to clarify that the documentation requirements in Attachment A of the policy only speak to intensive and training services as outlined in TEGL 28-11. This section further clarifies that although not directly represented in Attachment A of the policy, self-attestation is <u>also</u> allowable for core services with an exception to the Date of Birth element. Age must be supported by hard or electronic case notes, not self-attestation. This policy language will be revised to avoid any confusion. |
| Jordana Barclay | Southwest WDC | Do we have to use this exact form for self-attestation if these questions are asked elsewhere in the registration process? All questions on self-attestation form are already asked on our WIA registration form, which is also signed, so this is a duplication of efforts by the participant, and also by the WorkSource staff for data entry. The participant is certifying they were dislocated on a certain date or they are a US Citizen, etc. | No, Workforce Development Councils (WDCs) may utilize other forms to promote self-attestation as long as the self-attestation statement and the key elements are included. If the key components are included (the individual identifies his or her status for permitted elements and signs and dates attesting to self-identification), the only additional requirement would be the self-attestation statement that is on the form (Attachment B). |
| Margret Graham on behalf of Marléna Sessions | Seattle-King WDC | <p>While we appreciate the additional flexibility, the WDC of Seattle-King County is likely to continue our current policy of requiring right-to-work documentation and using self-attestation as a last resort. Aside from the potential to leave us open to serving those who are not eligible, we need to ensure that customers will be able to (legally) obtain and keep employment in order to fulfill their, and our, goals.</p> <p>The new policy would require the WDC to locally define certain criteria and acceptable documentary evidence—including “unlikely to return to a previous industry or occupation,” what constitutes a “general announcement of plant closing” and “self sufficiency.” This requirement is a bit confusing. Since self-attestation is now allowed and the new policy’s list of documentation for these items in Attachment A is minimal, we are not sure of the reasoning behind requiring an additional process of defining criteria and documentation.</p> | <p>WSID’s goal was to outline the minimum documentation requirements according to guidance available from Department of Labor. These requirements do not necessarily reflect a recommended standard for documentation requirements, and WSID encourages WDCs to set appropriate requirements for their local areas.</p> <p>The policy section that requires definitions for criteria is not a new addition in this revision. This requirement existed in the original policy, and the intent of this requirement is to define the criteria prior to documentation validation. This language will be updated to more clearly make the distinction between criteria and documentary evidence. Local areas need to set a common understanding of Dislocated Worker criteria that makes an individual potentially eligible (qualifying circumstances) compared to local areas setting requirements for documentary evidence (utilizing Attachment A, including the potential use of self-attestation) to verify eligibility. Documentary evidence refers to “how” the defined eligibility criteria will be verified.</p> <p>Below is additional guidance, specifically regarding the need to set the criteria for “self-sufficiency”:</p> <p>§ 663.230 What criteria must be used to determine whether an employed worker needs intensive services to obtain or retain employment leading to “self-sufficiency”?</p> <p>State Boards or Local Boards must set the criteria for determining whether employment leads to self-sufficiency. At a minimum, such criteria must provide that self-sufficiency means employment that pays at least the lower living standard income level, as defined in WIA section 101(24). Self-sufficiency for a dislocated worker may be defined in relation to a percentage of the layoff wage. The special needs of individuals with disabilities or other barriers to employment should be taken into account when setting criteria to determine self-sufficiency.</p> |