



# BOARD POLICY

**POLICY  
NUMBER  
POL 100-2**

<b>Title:</b>	<b>Self-Attestation</b>		
<b>Effective:</b>	August 17, 2023	<b>Revised:</b>	N/A
<b>Supersedes:</b>	N/A	<b>Version:</b>	01

## I. OF INTEREST TO

This policy is applicable to Local Workforce Development Board (LWDB) 23, CareerSource South Florida (CSSF) American Job Centers (AJC), Youth Service Providers, and partners.

## II. PURPOSE AND SCOPE

The purpose of this policy is to provide guidance regarding the Workforce Innovation and Opportunity Act (WIOA) Title I eligibility determinations for Adult, Dislocated Workers, and Youth when self-attestation is used by an applicant. This policy addresses the appropriate self-attestation protocol for Title I program eligibility and data validation requirements. Self-attestation allows applicants to self-certify eligibility information when the ability to provide documentation becomes too burdensome to obtain for WIOA eligibility purposes.

## III. BACKGROUND

Definitive verification may be required in some cases when an individual cannot or does not have access to certain documents for eligibility purposes. As such, the WIOA allows for self-attestation to verify eligibility documents that, in rare cases, are not verifiable or may cause undue hardship for applicants to obtain. Further, the Department of Labor (DOL) establishes that self-attestation is an important option for populations with barriers to obtaining eligibility and reporting documents and helps to ensure such populations are able to equitably access WIOA services.

## IV. STATUTORY AUTHORITIES

- [Workforce Innovation and Opportunity Act \(WIOA\) of 2014, Public Law 113-128](#)
- [Training and Employment Guidance Letter \(TEGL\) 23-19, Change 1, Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor \(DOL\) Workforce Programs](#)
- [TEGL 09-22, WIOA Title I Youth Formula Program Guidance](#)
- [TEGL 07-18, Guidance for Validating Jointly Required Performance Data Submitted under the WIOA](#)

Approved By:  
Rick Beasley, Executive Director

- [Florida Statutes § 668.50](#), *Uniform Electronic Transaction Act*
- [CareerSource Florida Administrative Policy 095](#), *WIOA Youth Program Eligibility*

## V. DEFINITIONS

1. Adult – means an individual who is age 18 or older unless otherwise specified.
2. Basic Skills Deficient – means with respect to an individual--
  - (A) who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
  - (B) who is a youth or adult that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.
3. Case Note – means either paper or electronic statements made by the case manager in the appropriate case management information system (MIS) to identify, at a minimum, the following: (a) a participant's status for a specific data element, (b) the date on which the information was obtained, and (c) the name of the case manager who obtained the information.
4. Dislocated Worker (DW) – means an adversely affected individual that has been terminated, laid off, or notified of layoff, and is eligible for or has exhausted Unemployment Compensation benefits, and is unlikely to return to his or her previous occupation.
5. Electronic/Digital Signature or Declaration – means an electronic sound, symbol, or process attached to or logically associated with a record and executed or adopted by a person with the intent to sign the record.
6. Emergency Assistance – means a form of “related assistance” and means assistance provided by grantees that addresses immediate needs of eligible Migrant and Seasonal Farmworker (MSFW) and their dependents. An applicant's self-certification is accepted as sufficient documentation of eligibility for emergency assistance.
7. In-School Youth (ISY) – means an individual who is attending school (as defined under State law); not younger than age 14 or less (unless an individual with a disability who is attending school under State law) older than age 21; a low income individual; and one or more of the following: basic skills deficient, an English learner, an offender, a homeless individual (as defined by Federal law), pregnant or parenting, an youth who is an individual with a disability, or an individual who requires additional assistance to complete an educational program or to secure or hold employment.
8. Out-of-School Youth (OSY) – means an individual who is not attending school (as defined under State law); not younger than 16 or older than age 24; and one or more of the following: 1) a school dropout, 2) a youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter, 3) a recipient of a secondary school diploma or its recognized equivalent who is a low-income individual who is basic skills deficient or an English language learner.

9. Self-Attestation (also referred to as Applicant or Participant Statement) – means 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 applicant such as an email, text, or unique online survey response is considered an electronic signature or verification. The signature shall be participant generated and traceable to the participant. The form and signature can be on paper or in the State management information system, with an electronic signature. Documentation of the self-attestation shall be retained in the participant's file.
10. Self-Certification – 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. The individual's written statement attests that they are eligible to receive services under title I of WIOA.
11. Source Documents – means documentation provided by a participant, used for the data element validation process for eligibility.

## **VI. SELF-ATTESTATION**

Self-attestation shall be used only when other allowable documentation sources for WIOA eligibility criteria are not available. The key elements for self-attestation are that the individual: 1) identifies their status; and 2) signs and dates a form (hard copy or virtual) attesting to their status. Self-attestation shall also be used to clarify documentation that is considered insufficient by itself.

### **A. Initial Eligibility**

Self-attestation documentation shall be in addition to the source documentation previously established for the identified criteria for WIOA eligibility, as indicated in the SFWIB Self-Attestation Procedures. Self-attestation shall take place when an applicant acknowledges, signs and dates the SFWIB Self-Attestation form to attest to his or her status for an eligibility criterion or set of eligibility criteria. The lack of source documentation beyond self-attestation shall not delay or prevent enrollment and receipt of WIOA services.

The self-attestation shall be initially accepted from an applicant who has experienced a loss of documentation due to natural or man-made disasters (i.e., fire, flood, hurricane, or tornado); eviction from residence resulting in a loss of supporting documentation; or the applicant is fleeing or has fled an abusive or an untenable home situation.

### **Re-Verification**

Eligibility of the participant shall be re-verified to obtain the actual documentation based on the situation(s) following a disaster, but shall not exceed six months or extend beyond the grant closure date and shall be documented in the Employ Miami Dade (EMD) management information system.

Self-attestation shall serve as sufficient evidence when other options of documentation or third party corroboration are not available.

### **B. Authorized Agency Eligibility Verification**

When appropriate, WIOA eligibility criteria shall be verified via telephone contact or document inspection with recognized governmental or social service agencies. The information obtained must be verified and recorded on the Telephone/Document

Inspection Verification section of the SFWIB Self-Attestation form. Information recorded shall be sufficient to enable a monitor or auditor to trace back to the governmental or social service agency or the document used at the time the information was verified. Telephone verification shall include the name of said agency's representative providing the verification information. Verification of eligibility via document inspection is appropriate when documents cannot or may not be machine-copied. The standard Telephone/Document Inspection Verification section of the SFWIB Self-Attestation form shall be required when this method is used.

### **C. Documentation**

The process of collecting source documentation for data validation may, in some circumstances, take place at the same time as the determination of an individual's program eligibility even though said actions serve different purposes. Eligibility determination shall only need to confirm that an individual meets the requirements of a program before becoming a participant in the program.

Self-attestation shall be an acceptable source of documenting almost all program elements related to WIOA Youth eligibility. Documentation is not required to prove low-income status for eligibility determination for the majority of out-of-school youth (OSY). There shall be only three instances when documentation is required to determine OSY eligibility:

1. Basic skill deficient;
2. English language learner; or
3. An individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

The documentation shall be used to verify OSY low-income status. Other OSY do not need to be low-income or document their income.

Individuals who receive or are eligible to receive free or reduced lunch, foster youth, homeless youth, and youth living in a high-poverty area shall automatically be considered low income.

Basic skills deficient is the only source documentation that shall not be used for self-attestation.

### **D. Self-Attestation Form**

The SFWIB Self-Attestation form shall be completed for every applicant that is experiencing difficulty in obtaining the established source documents. The form shall be used to document the key elements for self-attestation, which are (a) the applicant identifying his or her status for permitted elements, and (b) signing and dating a form attesting to self-identification.

### **E. Case Notes**

A case note shall be added to EMD detailing the reason and/or circumstance that prevented the applicant from obtaining source documentation established for WIOA

eligibility purposes. Case notes shall be recorded in EMD by the AJC and Youth Service Provider staff when conducting WIOA services.

#### **F. Monitoring**

In addition to any federal or state monitoring activities, the SFWIB Office of Continuous Improvement shall conduct monitoring of the Self-attestation requirements. Said monitoring activities shall include, but are not limited to:

- a. Reviewing data in EMD and any other pertinent management information system.
- b. Reviewing electronic or hard copy case files and source documentation.
- c. Reviewing corrective actions, when applicable.

#### **VII. LIMITATIONS**

When a natural disaster has been declared by a federal agency, the following items shall be restricted from the use for self-attestation:

- a. Proving identity.
- b. Social security number.
- c. Residential address.
- d. Selective Service registration.
- e. Citizenship / Right to Work status.
- f. Family Size.
- g. Basic skills deficient.
- h. Youth requiring additional assistance.

#### **VIII. EXCEPTIONS**

Exceptions to this policy, or any part thereof, must be approved in writing by the SFWIB Executive Director.