



## LOCAL INSTRUCTION LETTER 26-03

**To:** Local Workforce Area Signatory  
Officials Local Workforce Area Board  
Chairs  
Local Workforce Area Administrators

**Subject:** Delivery of WIOA Title I Adult Services

**Issuance Date:** August 6, 2026

**Effective Date:** August 5, 2026

**Purpose:** To establish Catawba Regional Council of Governments' local policy for the delivery and priority of services for the Workforce Innovation and Opportunity Act (WIOA) Title I Adult program in the Catawba Regional Workforce Development Area.

### **References:**

- Workforce Innovation and Opportunity Act, Public Law 113-128, §§ 3, 132, 134
- 20 CFR § 678.430; 20 CFR Part 680
- Training and Employment Guidance Letters (TEGLs) 10-09; 16-16; 16-16, Change 1; 19-16; 07-18; 23-19, Change 3; 07-20; 10-23, Change 3
- State Instruction Letters (SILs) 26-01

**Background:** WIOA is designed to help jobseekers secure the employment, education, training, and support services necessary to succeed in the labor market and to match employers with the skilled workers they need. Within the Catawba Regional Workforce Development Area, eligibility determination and documentation ensure that individuals access services that are needed, allowable, and aligned with federal, state, and local requirements.

**Policy:** Adults who receive services under WIOA Title I in the Catawba Regional Workforce Development Area, other than self-service or information-only activities, must be authorized, determined eligible, enrolled in the program, and considered a participant for WIOA Title I services.

### **Priority of Service**

Priority for individualized career and training services in the WIOA Adult program must be given to recipients of public assistance, low-income individuals, and individuals who are basic skills deficient regardless of the availability of funds.

At least 75% of Catawba Regional Workforce Development Area participants receiving individualized career and training services in the WIOA Adult program must be from at least one of the priority groups mentioned above.

The Catawba Regional Workforce Development Board (CRWDB) establishes a process that also gives priority to other individuals eligible to receive such services, provided that it is consistent with the priority provisions established in this policy. CRWDB & grantee is responsible for establishing local procedures to comply with this policy and for conducting outreach to these priority populations.

The following veterans' priority requirements must also be adhered to in determining the priority of service for the WIOA Adult program:

- I. First, to veterans and eligible spouses who are included in the group given priority in the WIOA Adult program (i.e., recipients of public assistance, low-income individuals, or individuals who are basic skills deficient).
- II. Second, to non-covered persons (i.e., individuals who are not veterans or eligible spouses) who are included in the group given priority in the WIOA Adult program.
- III. Third, to veterans and eligible spouses who are not included in the group given priority in the WIOA Adult program.
- IV. Fourth, priority populations established by the LWDB.
- V. Last, non-covered persons outside the groups given priority under WIOA.

Catawba Regional Workforce Development Area (CRWDA) priority of service criteria is to be recorded in SC Works Online Services (SCWOS) to reflect efforts to serve those most in need. The documentation required for each criteria recorded must be maintained in the participant's case file.

### **Low-Income Individual**

An individual who meets any one of the following criteria satisfies the low-income requirement for WIOA Adult services:

- a. Receives, or in the 6 months prior to application to the program has received, or is a member of a family that is receiving or in the past 6 months prior to application to the program has received:
  - o Assistance through the supplemental nutrition assistance program (SNAP) under the Food and Nutrition Act of 2008
  - o Assistance through the temporary assistance for needy families (TANF) program under part A of Title IV of the Social Security Act
  - o Assistance through the supplemental security income program under Title XVI of the Social Security Act

- State or local income-based public assistance
- b. An individual in a family with a total family income that does not exceed the higher of the poverty line or 70% of the lower living standard income level (LLSIL). Please see the most updated state instruction letter Updated Federal Income Guidelines for more information.
- c. An individual with a disability whose own income does not exceed the higher of the poverty line or 70% of the LLSIL.
- d. A homeless individual as defined in the McKinney-Vento Homeless Assistance Act or the Violence Against Women Act of 1994.

**NOTE: Each low-income scenario is detailed in the memorandum Validation of Data Element – Low Income Status at Program Entry.**

### **Basic Skills Deficient**

WIOA defines Adult basic skills deficiency as an individual who 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 society.

The South Carolina Department of Employment and Workforce (SCDEW) further defines basic skills deficiency as an individual who meets any one of the following indicators:

- Lacks a high school diploma or equivalent
- Scores a National Reporting System (NRS) level 4 or below on the TABE 13&14
- Scores less than 4 on any one or more of the following WIN Ready to Work assessments:
  - Applied Mathematics
  - Reading for Information
  - Locating Information; or
- Is enrolled in Title II Adult Education, including English as a Second Language (ESL), excluding stand-alone occupational skills training.

Basic skills deficiency must be determined using an objective, valid, and reliable assessment, such as the indicators listed above. When a formal evaluation is not available or practical, case manager observations, customer acknowledgement, and documented case notes are acceptable. For example, a case manager may observe that an adult is having trouble reading or filling out an application form. However, an individual may not be determined as basic skills deficient merely because of a lack of soft skills or the occupational skills needed for a particular job.

WIOA Title I funds **are not to be used** for the assessment of basic skills deficiency prior to eligibility certification. Further, if an individual is not already a program participant, the use of funds for assessment will constitute their enrollment in the Adult program.

### **Career Services**

WIOA Adult career services are broken down between basic career services, individualized career services, and follow-up services. The distinction in levels of service is not intended to imply a sequence of services; they may be provided in any order. This approach provides CRWDA and its service providers with flexibility to target services that meet the needs of the customer, while still allowing for tracking of outcomes for reporting purposes. See the attachment, **WIOA Career Services**, for a further breakdown of each career service type.

**Basic Career Services.** These services are universally accessible and must be made available to all individuals seeking employment and training services in at least one Comprehensive SC Works center in each LWDA.

**Individualized Career Services.** These services must be provided to participants after SC Works center staff determine that such services are required to retain or obtain employment, consistent with any applicable statutory priorities. CRWDB must identify the assessments to be used to determine eligibility and ensure eligibility determination procedures are consistent with state policies.

**Follow-up Services.** These services must be provided to participants who are placed in unsubsidized employment, for up to 12 months after the first date of employment.

### **Training Activities**

Training services may be provided to employed and unemployed adults who:

- SC Works center staff determines, after conducting an interview, an evaluation, or assessment, and career planning, are:
  - 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
  - Need training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment
  - Have the skills and qualifications to successfully participate in the selected program of training services
- Selected a training service program that is directly linked to the employment opportunities in the CRWDA
- Are unable to obtain grant assistance from other sources to pay the costs of such training
- Are determined eligible in accordance with state and local priority system in effect for adults under WIOA § 134(c)(3)(E) – if training services are provided through the WIOA Adult funding stream

Training services must be provided either through an Individual Training Account (ITA) or through a training contract. Except in certain instances listed in 20 CFR § 680.320, training services must be provided by an Eligible Training Provider (ETP) in accordance with WIOA

§ 122(d). See the most updated local policy on the **Eligible Training Provider List** for more information on eligibility requirements.

**Work-Based Training.** WIOA provides additional training options and flexibility for adults. The allowed types of work-based training, including registered apprenticeships (RA), on-the-job training (OJT), and customized training, are outlined in TEGL 19-16, section 12.

**Incumbent Worker Training (IWT).** IWT provides both workers and employers with the opportunity to build and maintain a quality workforce. Under WIOA § 134(d)(4), a LWDB may use up to 20% of their Adult and Dislocated Worker funds to provide for the federal share of the cost of providing IWT. Participants in IWT are only required to meet the eligibility requirements for participation in the Adult program if they are also enrolled in the adult program. See the most updated state instruction letter on Incumbent Worker Training for further guidance.

### **Supportive Services**

Supportive services may be made available to any adult participating in career services or training activities who are unable to obtain such services through other programs. These services must be necessary to enable participation in career services or training activities. Supportive services may not be used to extend the date of exit for performance accountability purposes.

Follow-up career services are not a qualifying service for the receipt of supportive services; an individual who is only receiving follow-up services may not receive supportive services. To receive ongoing supportive services, an individual must continue to participate in career services (other than follow-up), training activities, or both.

LWDBs, in consultation with SC Works center partners and other community service providers, must develop a policy on supportive services that ensures resource and service coordination, including procedures for referral to such services and how such services will be funded when they are not otherwise available from other resources. Supportive services are outlined at 20 CFR §§ 680.900-680.970.

**NOTE: CRWDA must indicate whether needs-related payments (NRPs), consistent with 20 CFR §§ 680.930-680.970, are available in their supportive services policies.**

### **Data Validation and Self-Attestation**

**Data Validation.** Data validation is a series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data. The purpose of validation procedures and required performance data are to:

- Verify performance data are valid, accurate, reliable, and comparable across programs

- Identify anomalies in the data and resolve issues that may cause inaccurate reporting
- Improve program performance accountability through the results of data validation
- Outline source documentation required for common data elements

**Self-Attestation.** Self-attestation occurs when a participant states his or her status for a particular data element, signing and dating a form to acknowledge this status. An electronic/digital signature can include an email, text, or unique online survey response, so long as the response is participant generated and traceable to the participant. Where self-attestation is listed as an option for source documentation in TEGl 23-19, Change 3, Attachment II, the lack of source documentation must not delay or prevent enrollment and receipt of services.

Self-attestation, or self-reported supplemental wage data information from participants through post-exit follow-up, may only be used when all efforts to collect other allowable source documentation have been exhausted. The use of self-attestation, or self-reported supplemental wage data information from participants through post-exit follow-up must be limited.

The collection of source documentation for data validation will often take place at the same time as the determination of an individual's program eligibility; however, these actions serve different purposes. CRWDA is encouraged to use WIOA funding to assist participants in acquiring documentation needed for employment when unavailable through other means.

See the most updated policy on Performance Data Validation for DOL Workforce Programs for further information on source documentation and data validation.

**Action:** Catawba Regional Council of Governments WIOA staff, SC Works center staff, contracted service providers, and applicable partners must implement this local policy and maintain documentation in accordance with WIOA, SCDEW guidance, and local monitoring requirements.

**Inquiries:** Questions regarding this local policy may be directed to Amanda Baker at [abaker@catawbacog.org](mailto:abaker@catawbacog.org).



Amanda Baker  
WIOA Administrator

**ATTACHMENT**

## **WIOA CAREER SERVICES**

Career services, as identified in WIOA § 134(c)(2), are categorized as basic career services, individualized career services, and follow-up services. The distinction in levels of services is not intended to imply a sequence of services; they may be provided in any order.

### **BASIC CAREER SERVICES**

Outlined at 20 CFR § 678.430(a), basic career services must be made available and, at a minimum, must include the following services, as consistent with allowable program activities and Federal cost principles:

1. Determinations of whether the individual is eligible to receive assistance from the adult, dislocated worker, or youth programs
2. Outreach, intake (including worker profiling), and orientation to information and other services available through the SC Works delivery system
3. Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive services needs
4. Labor exchange services, including:
  - a. Jobs search and placement assistance, and, when needed by an individual, career counseling, including:
    - i. Provision of information on in-demand industry sectors and occupations (as defined in WIOA § 3(23))
    - ii. Provision of information on non-traditional employment
  - b. Appropriate recruitment and other business services on behalf of employers, including information and referrals to specialized business services other than those traditionally offered through the SC Works delivery system
5. Provision of referrals to and coordination of activities with other programs and services, including programs and services within the SC Works delivery system and, when appropriate, other workforce development programs
6. Provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including:
  - Job vacancy listings in labor market areas
  - Information on job skills necessary to obtain the vacant jobs listed
  - Information related to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for those jobs

7. Provision of performance information and program cost information on eligible providers of education, training, and workforce services by program and type of providers
8. Provision of information, in usable and understandable formats and languages, about how the local area is performing on local performance accountability measures, as well as any additional performance information relating to the area's SC Works delivery system
9. Provision of information, in usable and understandable formats and languages, relating to the availability of supportive services or assistance, and appropriate referrals to those services and assistance
10. Provision of information and meaningful assistance to individuals seeking assistance in filing a claim for unemployment compensation
  - a. "Meaningful assistance" means:
    - i. Providing assistance on-site using staff who are well-trained in unemployment compensation claims filing and the rights and responsibilities claimants, or
    - ii. Providing assistance by phone or via other technology, as long as the assistance is provided by trained and available staff and within a reasonable time
  - b. The costs associated in providing this assistance may be paid for by South Carolina Unemployment Insurance (UI) program, or the WIOA Adult or Dislocated Worker programs, or some combination thereof
11. Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA

## **INDIVIDUALIZED CAREER SERVICES**

Outlined at 20 CFR § 678.430(b), individualized career services must be made available if determined appropriate for an individual to obtain or retain employment. These services include the following, as consistent with program requirements and Federal cost principles:

1. Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which may include—
  - a. Diagnostic testing and use of other assessment tools, and
  - b. In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals.
2. Development of an individual employment plan, to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve their employment goals, including the list of, and information about, the eligible training providers (as described in 20 CFR § 680.180)
3. Group counseling
4. Individual counseling
5. Career planning

6. Short-term pre-vocational services including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services to prepare individuals for unsubsidized employment or training
7. Internships and work experiences that are linked to careers (as described in 20 CFR § 680.170)
8. Work preparation activities
9. Financial literacy services as described in WIOA § 129(b)(2)(D) and 20 CFR § 681.500
10. Out-of-area job search assistance and relocation assistance
11. English language acquisition and integrated education and training programs

### **FOLLOW-UP SERVICES**

Follow-up services must be provided in accordance with the most updated local instruction 23-19 Follow-up Services.