

**COMMONWEALTH OF VIRGINIA
VIRGINIA COMMUNITY COLLEGE SYSTEM**

WORKFORCE INVESTMENT ACT

VIRGINIA WORKFORCE LETTER (VWL) #14-16

TO: LOCAL WORKFORCE INVESTMENT BOARDS

FROM: WORKFORCE DEVELOPMENT SERVICES
Research and Evaluation Division

SUBJECT: Use of Self-Attestation and Telephone Verification for Program Eligibility

EFFECTIVE DATE: December 1, 2013

REVISION DATE: November 8, 2013

REVISION DATE #1: December 1, 2014

RESCINDS: VWL 13-03

Purpose:

The purpose of this letter is to provide local workforce investment areas with guidance regarding the use of self-attestation for program eligibility. Self-attestation is used in those cases where a customer applying for WIA services is unable to produce any documentation to support an element or elements of program eligibility.

References:

Training and Employment Guidance Letter No. 28-11; Subject: Program year 2011/Fiscal Year 2012 Performance Reporting and Data Validation; Dated: May 9, 2012

WIA Eligibility Guidance dated October 2013 – section regarding self-attestation.

Use of Self-Attestation for Program Eligibility:

Self-attestation should be used as an exception rather than as the rule when completing the eligibility process. Self-attestation is not for the convenience of the individual conducting the eligibility process. Only in those cases where the customer applying for services is unable to provide documentation to support an element of program eligibility, then self-attestation can be used.

Staff involved in the eligibility process should avoid using self-attestation for items staff can obtain through outside sources (citizenship/right to work, TANF, SNAP and selective service compliance).

Staff should use the Self-Certification form contained in the WIA Eligibility Guidance; this document requires signatures and dates to be considered complete. Failure to properly complete the Self-Certification form could result in the customer being determined ineligible and the resulting costs questioned for possible disallowance.

Staff should not sign any document attesting to the truthfulness of the document. Staff serves as witnesses to the document being completed, not to the truthfulness of the customer applying for services.

VCCS Monitors review eligibility and will review customer files where self-attestation was used to determine the frequency of use and the completeness of the forms.

Additional Requirements Associated with the Use of Self-Attestation (Self-Certification):

The use of self-attestation requires LWIAs incorporate a random sampling methodology to determine the accuracy of the self-attestation method for determining WIA eligibility.

Self-Certification Accepted in Extreme Circumstances:

Staff members may accept self-certification from a client who has experienced a loss of documentation due to:

- Natural or man-made disaster such as fire, flood, tornado
- Eviction from residence resulting in loss of supporting documentation
- Client is fleeing or has fled an abusive or untenable home situation

This is not a comprehensive list; staff members must evaluate the client’s circumstances to determine if self-certification is allowable due to an extreme situation and document the client’s situation on the Self-Certification Form and in VaWC Case Notes.

It is determined that self-certification due to the client’s circumstances is appropriate; the client is still responsible for providing eligibility documentation that is available to them. If self-certification due to extreme circumstances is necessary, the staff member should refer the individual to the appropriate agencies to obtain his or her documentation.

The following list, while not comprehensive, may be useful in this effort:

Document	Agency
Driver’s License	Department of Motor Vehicles
Birth, Death, Marriage and Certificates	Bureau of Records (Vital Statistics) in the state where issued
Social Security or Medicare Cards	Local Social Security office, 1-800-772-1213 or TDD/TTY 1-800-325-0778
Government Issued ID	Contact the issuing authority
Citizenship Papers	U.S. Citizenship and Immigration Services, National Customer Service Center (NCSC): 1-800-375-5283 1-800-767-827-1000 or TDD/TTY 1-800-829-4833
Military Discharge	Department of Veterans Affairs, Papers 1-800-827-1000 or TDD/TTY 1-800-829-4833 or National Personnel Records Center 1-866-272-6272
Passports	U.S. State Department – Passport Services 1-202-955-0430 (24 hours)
Income Tax records	The IRS Center where return was filed or 1-800-829-1040

VIII.

Self-Certification Requirement

And

Telephone/Document
Inspection Verification
Requirements

Self-Certification Requirements

After review of the eligibility criteria, along with possible ways to verify the criteria, it was determined that much of the verification was readily available through a number of agencies or sources. In some cases, definitive verification is required; for example eligibility to work (I-9 requirements under IRCA) and Selective Service Registration or exemption for males.

WIA allows for self-certification to verify those eligibility items that in rare cases are not verifiable or may cause undue hardship for applicants to obtain. Self-certification will also be allowed when customers have experienced a loss of documentation due to extreme circumstances.

Because most eligibility requirements can be verified by other sources, the use of self-certification, also known as “self-attestation”, is highly restricted. Self-certification is **not** allowed as a verifiable source of documentation for the following:

All Categories:

- TANF/Cash Public Assistance
- SNAP (Food Stamps)
- Selective Service
- Eligible to Work
- Supported Foster Child

Youth

- Pregnant or Parenting
- School Dropout
- Offender
- Homeless or Runaway
- Serious Barriers to Employment as Identified by Local Board (5% Exception)

Dislocated Worker

- Unlikely to Return
- General Announcement of Closure

NOTE: When using the “Self-Certification” form, the “Staff Signature/Date” found in the “Certification” block must be completed. It is a local decision as to the completion of the “Reviewer’s Signature/Date”.

SELF-CERTIFICATION FORM

IDENTIFYING INFORMATION			
Applicant's Name	_____		
	Last	First	MI
Address	_____		
Social Security Number	_____	Application Date:	_____

I HEREBY CERTIFY UNDER PENALTY OF LAW, THAT THE FOLLOWING INFORMATION IS TRUE.

I ATTEST THAT THE INFORMATION STATED ABOVE IS TRUE AND ACCURATE, AND UNDERSTAND THAT THE ABOVE INFORMATION, IF MISREPRESENTED, OR INCOMPLETE, MAY BE GROUNDS FOR IMMEDIATE TERMINATION AND/OR PENALTIES AS SPECIFIED BY LAW.

APPLICANT'S SIGNATURE and DATE

APPLICANT'S PHONE NUMBER

APPLICANT'S ADDRESS

SIGNATURE OF PARENT OR GUARDIAN (as needed)

The above Self-Certification is being utilized for verification of the following eligibility criteria:

CERTIFICATION	
I certify that the individual whose signature appears above provided the information recorded on this form.	
Staff Signature/Date:	_____

The following form can be used to address demographic characteristics at a One-Stop. This document needs to be signed by the customer and the Disability Resource Coordinator (DRC) or appropriate One-Stop staff.

Virginia DEI Data Elements

Print Customer Name: _____ Customer Signature _____
 Date completed: _____ Print Case Manager or DEI Rep Name _____

Answering the following questions may qualify you for other benefits or services. Your responses could help staff provide better job search assistance, training and referrals. This information will not be provided to employers.

Do you have a disability?

- Yes
- No

What type of disability? Check all that make it hard for you to get a job, keep a job or participate in training)

- Physical (examples: mobility, medical or health condition, such as, diabetes or heart condition)
- Mental (examples: anxiety or depression)
- Learning (examples: difficulty with reading, writing, math or staying on task)
- Sensory (examples: vision or hearing problems)
- Other (please specify) _____
- I would like to speak with someone privately regarding this question.

Please complete when a customer with a self-disclosed disability is registered with WP or WIA and receives staff assisted or intensive/training services

WIB, VEC, DARS, DRCs who provide services for a customer with a disability, can ask the following questions.

Please read to the customer:

The U.S. Department of Labor is evaluating the Disability Employment Initiative (DEI), to improve training and job placement services.

Answering the following questions will help them better understand the customers we serve. The information you provide is **private and will not be disclosed to anyone but the researchers conducting this evaluation**. This information will not be shared with employers. Your answers do not affect what services you receive from the Workforce (Career) Center. Answering these questions is voluntary.

If the customer chooses not to answer the questions check here

1. Are you currently receiving Social Security Disability Insurance?	<input type="radio"/> Yes <input type="radio"/> No
2. Are you a currently a "Ticket to Work" participant?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't Know
3. Have you ever received Social Security Disability Insurance?	*Only for those who answered NO to 'Are you currently receiving SSDI.' <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't Know
4. Which of the following things do you think will make it hard for you to get a job?	Check all that apply: <input type="radio"/> Limited education or training <input type="radio"/> Limited work history/experience <input type="radio"/> No child care <input type="radio"/> Substance use <input type="radio"/> Limited transportation <input type="radio"/> Language barrier <input type="radio"/> Ex-Offender <input type="radio"/> Housing/Homeless <input type="radio"/> Disability
5. When did you begin employment at your most recent job? MM/YYYY	
6. What is your most recent job title?	
7. What is your most recent hourly wage?	
8. In your most recent job, how many hours a week did you work?	
9. Did your most recent employer provide you...	Check all that apply: <input type="radio"/> Health Insurance <input type="radio"/> Vacation <input type="radio"/> Sick Leave <input type="radio"/> Flexible Hours <input type="radio"/> Working from home <input type="radio"/> Customized Employment <input type="radio"/> Job Sharing <input type="radio"/> None

Telephone/Document Inspection Verification Requirements

WIA eligibility criteria may be verified by telephone contacts with recognized governmental or social service agencies, or by document inspection. The information obtained must be verified and recorded on the Telephone/Document Inspection Verification form. Information recorded must be adequate to enable a monitor or auditor to trace back to the recognized agency or the document used. Telephone verification must include the name of the agency representative providing the verification information.

In some cases, the information provided by an agency through telephone contact may be sufficient to satisfy multiple WIA eligibility criteria. For example, verification that an applicant has been determined eligible to receive TANF can satisfy the requirement for Youth program eligibility.

Verification of eligibility through document inspection is appropriate when documents cannot or may not be machine-copied.

Agencies that may assist in verifying via telephone are as follows:

- Local Schools
- Social Security Administration
- Veterans Administration
- Social Services agencies
- Medical and health facilities
- Vocational rehabilitation facilities
- Drug and alcohol rehabilitation facilities
- Housing authorities
- Homeless shelters
- Judicial agencies and institutions
- Other State and local government agencies

When WIA eligibility verification is accomplished via telephone or document inspection, Local Workforce Investment Areas are required to use a standardized form, such as the example on page two for monitoring and audit purposes.

WIA TELEPHONE VERIFICATION/DOCUMENT INSPECTION FORM

IDENTIFYING INFORMATION			
Applicant's Name	_____	_____	_____
	Last	First	MI
Social Security Number	_____	Date:	_____

WIA ELIGIBILITY VERIFICATION BY TELEPHONE

NAME AND/OR NUMBER OF DOCUMENT _____

ELIGIBILITY ITEM(S) TO BE VERIFIED:	_____
INFORMATION VERIFIED:	_____
AGENCY PROVIDING VERIFICATION:	_____
AGENT VERIFYING ELIGIBILITY ITEM:	_____
DATE AND TIME OF VERIFICATION:	_____
TELEPHONE NUMBER OF AGENCY PROVIDING VERIFICATION:	_____

WIA ELIGIBILITY VERIFICATION BY DOCUMENT INSPECTION

NAME AND/OR NUMBER OF DOCUMENT _____

ELIGIBILITY ITEM TO BE VERIFIED:	_____
INFORMATION VERIFIED:	_____
DOCUMENT TO BE INSPECTED:	_____
ORIGINAL SOURCE OF DOCUMENT:	_____
REASON FOR DOCUMENT INSPECTION:	<input type="checkbox"/> REMOTE SITE ELIGIBILITY, NO COPIER AVAILABLE.
	<input type="checkbox"/> ON SITE ELIGIBILITY, NO COPIER AVAILABLE. . <input type="checkbox"/> DOCUMENT CANNOT BE COPIED

I ATTEST THAT THE INFORMATION RECORDED BY ME ON THIS DOCUMENT WAS OBTAINED THROUGH TELEPHONE CONTACT OR DOCUMENT INSPECTION ON THE ABOVE DATE. AS INDICATED BY THE AGENT, ALL INFORMATION WAS OBTAINED FROM DATA PREVIOUSLY DETERMINED AND RECORDED IN THE APPLICANT'S RECORDS AT THE AGENCY PROVIDING THE ELIGIBILITY VERIFICATION.	
OR	
I ATTEST THAT THE DOCUMENT INSPECTION VERIFIED THE PRIMARY/SECONDARY ITEMS REQUIRED TO DETERMINE ELIGIBILITY FOR THE WIA PROGRAM.	
ELIGIBILITY SPECIALIST'S SIGNATURE	_____
DATE:	_____