



WIOA Title I Suitability Policy

I. PURPOSE:

The purpose of this policy is to provide guidance and direction to Workforce Innovation and Opportunity Act (WIOA) providers for determining suitability and "need" for intensive and training services; including WIOA Title I funded Individual Training Accounts (ITA) for participants served in the WIOA Adult, Dislocated Worker (DW), and Out-of-School Youth programs.

II. REFERENCES:

- Workforce Innovation and Opportunity Act (WIOA)
- Training and Employment Guidance Letter (TEGL) No. 19-16 and No. 21-16
- Workforce Solutions for North Central PA Board (NCWDB) Policies
- Workforce Solutions Grievance and Complaint Procedures for Customers
- Commonwealth Workforce Development System (CWDS) Help Center documents.

III. DEFINITIONS

Basic Career Services – Basic career services are universally accessible and must be made available to all individuals seeking employment and training services in at least one comprehensive PA CareerLink® per local workforce development area. Generally, these services involve less staff time and involvement and include services such as eligibility determinations, initial skills assessments, Labor Exchange services, provision of information on programs and services, and program referrals. Note: These services may be provided by the Adult and Dislocated Worker programs, as well as the Labor Exchange program.

Eligibility – WIOA (Workforce Innovation and Opportunity Act) eligibility involves meeting certain criteria or conditions and providing documentation to backup relevant data elements.

Fraud – Fraud is any deceitful act, by omission or willful deceit, used with the intent to obtain some advantage for one party, or to cause an inconvenience or loss to another party. For purposes of this policy, this includes, but is not limited to, indications of forgery, bribery, falsification of records, extortion, misuse of funds, misrepresenting information in official reports and applications.

Individualized Career Service – Individualized career services must be provided to participants after

PA CareerLink® staff determine that such services are required to retain or obtain employment, consistent with any applicable statutory priorities. Generally, these services involve significant staff time and customization to each participant's needs. These services may be provided by the Adult and Dislocated Worker programs, as well as the Labor Exchange program. Individualized career services include comprehensive and specialized assessments, development of an individual employment plan, group and individual counseling, career planning, short-term prevocational services, internships and work experiences, workforce preparation activities, financial literacy services, out-of-area job search and relocation assistance, and English language acquisition and integrated education and training programs.

Priority of Service – means that individuals in the targeted groups (public assistance recipients, other low-income individuals, individuals who are basic skills deficient, and underemployed who are also low- income) are given priority over other individuals for receipt of individualized career services and training services funded by the WIOA title I Adult program. Veterans within these groups receive priority over non-veterans. Adult priority is determined for the targeted groups during eligibility and enrollment. See Workforce Solutions' Priority of Service Policy for complete details on definition and application.

Self-Sufficiency – the financial ability of a person or household to attain an acceptable level of functioning and adequate quality of life without reliance on public or private assistance. Based on standards that includes the knowledge and skillsets necessary to cover the costs of needs such as housing, childcare, food, 1 healthcare, transportation, taxes, and emergency savings. Self-sufficiency encompasses multiple domains that include education, well-being, social capital, and finances at the individual, family, and community levels of society.

1. Self-sufficiency is the income level a person or family must be below to be eligible for certain WIOA services.
2. Eligibility for these services is determined by confirming that a participant is unlikely or unable to obtain or retain employment at the self-sufficiency wage or wages comparable to or higher than wages from previous employment through career services alone. (WIOA Sec. 134 (c)(3)(A)) Self-sufficiency)

Suitability – Suitability refers to a participant's qualifications and readiness to participate in a specific training program or service. It essentially assesses whether someone has the skills, experience, and motivation to succeed in the chosen program, which is often linked to employment opportunities in their area.

Training services – services provided to equip participants to enter the workforce and retain employment. Under WIOA, a program of training services includes a structured regimen that leads to specific outcomes. (WIOA sec. 134(c)(3))

A program of training services is one or more courses or classes, or a structured regimen that leads to:

- Industry-recognized certificate or certification; a certificate of completion of a Registered Apprenticeship; or a license recognized by the state involved or the federal government.
- Postsecondary credential (an associate or baccalaureate degree).
- Secondary school diploma, or its equivalent, consistent with 20 CFR 680.350.

- Employment.
- Measurable skills gain toward such a credential or employment as described above in (a) or (b), or employment.

Training services are available for Adult or Dislocated Workers who, after an interview, evaluation or assessment, and career planning, are determined to be unlikely or unable to obtain or retain employment that leads to self-sufficiency or wages comparable to or higher than wages from previous employment through career services alone. The participant must be determined to need training services and possess the skills and qualifications to successfully participate in the selected training program.

IV. BACKGROUND:

The WIOA Title I programs are designed to provide employment and training opportunities to those who can benefit from and who are most in need of such opportunities. However, WIOA is not an entitlement program. Therefore, it is appropriate for participants to be assessed for suitability for program enrollment and services. Suitability determination must be based on a consistent and equitable assessment that is relevant to the level of services for which the participants are applying.

Selection of participants for career/training services is based on both need and suitability. While persons may be fully eligible and in need of career services or training, they may not be suitable, pending resolution of an immediate problem or a personal barrier. Suitability is the assessed ability and the perceived personal commitment of the participant to attend career services or training activities, to successfully complete these activities and to acquire and retain employment at or leading to self-sufficiency. Suitability is determined by staff and the participant during orientations, assessments, and other activities.

Under WIOA sec. 134(c)(3)(A), training services may be made available to employed and unemployed adults and dislocated workers who:

- A. A one-stop center or one-stop partner determines, after an interview, evaluation, or assessment, and career planning, are:
 1. 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;
 2. In need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
 3. Have the skills and qualifications to participate successfully in training services.
- B. Select a program of training services that is directly linked to the employment opportunities in the local area or the planning region, or in another area to which the individuals are willing to commute or relocate.

V. POLICY AND PROCEDURES:

A. Determining Suitability:

During Career Services, suitability is usually determined by the participant with assistance from Wagner-Peyser Staff or Workforce Navigator. Wagner-Peyser Staff should identify, and refer to WIOA Orientation, participants who may need and could benefit from WIOA Individualized Career Services. This need may be based on factors including, but not limited to participants who:

1. Utilize the resource room on a continuous basis.
2. Attend multiple job fairs or recruiting events.
3. Attend multiple workshops.
4. Are long-term Labor Exchange registrants.
5. Received multiple unsuccessful job referrals.
6. Lack high school diploma/GED.
7. Lack consistent work history and/or marketable skills.

A suitability checklist is available to support staff in making these decisions.

B. Individualized Career Services Suitability Determination:

Participants who are interested in pursuing Individualized Career Services (including training) should have the benefit of referral to WIOA orientation. During orientation, participants receive information on employment opportunities within the local area. The availability and types of training are discussed as well as the eligibility process and requirements (including low-income status and other barriers that contribute towards eligibility). Please reference the applicable training and eligibility policies for more information.

As part of the assessment process, the participant should be educated on circumstances that make a participant not suitable for individualized career services, such as training through the WIOA program. Participants may choose to continue with the eligibility process through scheduling a Title I enrollment, or they may decide not to continue the process if they do not believe they fit the criteria or goals of the program.

As eligibility determination for the Adult, Dislocated Worker, and Youth programs is a Basic Career Service, it is available to all participants seeking services in the PA CareerLink® system. Regardless of what is discussed in this initial appointment, participants should be given the opportunity for an eligibility determination.

WIOA individualized career services are intended for unemployed and underemployed participants who are unable to obtain or retain employment with basic career services alone.

During enrollment and assessment, it is determined with the participant what Title I services are indicated. Staff are to thoroughly discuss local labor market information and job opportunities available and compare this to participant's transferable skills.

As part of the Individual Employment Plan (IEP)/Individual Service Strategy (ISS) process, service selections are documented along with assessment of the participant's ability to be successful. Based on the requested services, additional assessments may be required or recommended.

C. Title I Training Services Suitability Determination:

1. Availability of other funding or training.
2. Assessment of the participant's current skill level and ability.
3. Career assessment aligns with training services in an in-demand occupation.
4. Previous education or training.
5. Previous WIOA Training services provided.
6. Aptitude level in the requested training and career.
7. Current availability and work abilities.
8. Previous employment and wage history.
9. Legal restrictions related to the chosen career path.
10. Interests, goals, aspirations.
11. Participant's history of completing goals.
12. Participant's documented willingness to follow recommendations and participate in services.
13. Assessment of participant's commitment to attend training activities.
14. Assessment of participant's likelihood to successfully complete activities and acquire and retain employment at or leading to economic self-sufficiency.
15. Assessment of barriers to employment.
16. Supportive service needs.
17. Follow through with pre-requisites, academic assessment requirements, remediation plan, workshop recommendations, and other career service recommendations.
18. History of participation periods, funding, and resources provided.
19. Meet eligibility for Training as indicated in Workforce Solutions Individual Training Account, Short-Term and On-the-Job Training Policies.

D. Circumstances that may make a participant not suitable for Training Services include:

1. Ineligible for WIOA Title I.
2. Do not have skills to complete the training program.
3. Require support services and individualized career services beyond what can reasonably be provided within available WIOA Title I resources.
4. Training needs more appropriately served through another agency.
5. Training desires cannot be met by WIOA funding.
6. In immediate crisis which would affect ability to participate in services.
7. Financial situation will not allow for training attendance even with WIOA assistance.
8. Does not have sufficient time to devote to training services.

9. Consistent failure to avail themselves to scheduled appointments, career services activities, assessments, or other program services.
10. Lacks transportation, or technology/technology skills to attend training as presented even with assistance.
11. Requires or insists on services sooner, or services outside of what WIOA can provide to them.
12. Active substance dependency that substantially impairs ability to participate in services and is not currently being addressed through treatment.
13. Documented legal restrictions that would prevent licensure or employment in the selected occupation.
14. Commission of fraud, including misrepresentation.
15. Wants or needs employment now without regard or desire for training.
16. Those with credentials or experience in an in-demand occupation able to become employed with wages equal to, or better than, that which can be gained through training.
17. Do not meet eligibility for Training as indicated in Workforce Solutions Individual Training Account, Short-Term and On-the-Job Training Policies.

VI. POLICY EXCEPTIONS:

Any discrepancies arising between Workforce Solutions policy and/or procedures with federal and state provisions due to current or future revisions will default to the current minimum federal and state regulations and guidance available. Workforce Solutions policy/or procedures may set forth stricter requirements than provided by federal and state guidance, but in no case will local policy and/or procedures not meet minimum federal and state policy.

VII. RESCISSIONS:

None

VIII. EXPIRATION:

Ongoing

IX. INQUIRIES:

Questions shall be directed to:

Pam Streich, Executive Director at pstreich@ncwdb.org; or
Tonya Mauk, Oversight and Project Manager at tmauk@ncwdb.org; or

Donna Hottel, Strategic Planning and Project Manager at dhottel@ncwdb.org

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VII. POLICY HISTORY:

This policy is reviewed annually (at a minimum), typically during the first week of July, by Workforce Solutions' staff to assess and implement any necessary changes, edits, updates and revisions.

Name of Policy Reviewer	Date of Review	Description of Change	Effective Date
Pam Streich, Tonya Mauk & Donna Hottel	March 2026	Date Issued	January 1, 2026

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<https://www.workforcesolutionspa.com/categories/resources/pages/stevens-amendment>