

DEPARTMENT OF SOCIAL SERVICES  
744 P Street, Sacramento, CA 95814



April 25, 1996

ALL-COUNTY INFORMATION NOTICE NO. I-22-96

TO: ALL COUNTY WELFARE DIRECTORS  
ALL GAIN COORDINATORS

SUBJECT: JOB TRAINING PARTNERSHIP ACT (JTPA) ELIGIBILITY DOCUMENTATION FOR  
GREATER AVENUES FOR INDEPENDENCE (GAIN) PARTICIPANTS

REASON FOR THIS TRANSMITTAL

- State Law Change  
 Federal Law or Regulation Change  
 Court Order  
 Clarification Requested by One or More Counties  
 Initiated by CDSS

This letter is to inform county welfare departments (CWDs) that the California Department of Social Services (CDSS) and the Employment Development Department (EDD) have signed a Joint Policy Statement (copy attached) that enhances coordination between the Greater Avenues for Independence (GAIN) and Job Training Partnership Act (JTPA) programs. The Joint Policy Statement establishes guidelines by which CWDs and local JTPA administrative agencies, Service Delivery Areas (SDAs) can implement procedures to expedite the JTPA eligibility determination process for GAIN participants who are referred to JTPA service providers.

Background

EDD, in collaboration with CDSS and the local CWD, conducted a pilot project in Los Angeles County, to test if the JTPA eligibility determination process for GAIN referrals could be expedited while maintaining the needed documentation related to JTPA eligibility for monitoring and auditing purposes. To minimize paperwork involved with the referral of GAIN participants to JTPA programs, EDD and the Los Angeles County CWD developed a referral form that contained the necessary information, except Selective Service registration status, for JTPA service providers to determine eligibility. This form eliminated the need for service providers to ask GAIN clients for data/documentation (e.g., birth certificate, Alien Registration or "green" card, and income verification) that was already provided to the CWD. JTPA continued to be responsible for the verification of its participants' Selective Service registration status.

EDD believed the pilot project would demonstrate that JTPA programs could rely on the information from the CWD for eligibility purposes and that less paperwork was needed because of the following: 1) except for Selective Service registration status, the basic elements of eligibility for JTPA services (age, residency, citizenship/right to work in the United States, and economic disadvantage) are also required for Aid to Families with Dependent Children (AFDC) eligibility; and

2) for JTPA program monitoring/audit purposes, the documentation regarding these elements need not necessarily be contained in the GAIN participants' JTPA case files since they already are in the CWD case files.

EDD's review of the JTPA/GAIN pilot project determined that the project was successful in making the eligibility determination process simpler and less time consuming for clients and staff. Furthermore, although paperwork was reduced, adequate documentation was contained in CWD case files to substantiate that GAIN participants met JTPA eligibility criteria. As a result of these findings, the CDSS/EDD Joint Policy Statement was issued to allow other CWDs and SDAs to develop a similar referral process.

### Implementation

Counties that wish to establish an expedited JTPA eligibility determination process for their GAIN participants should contact local SDA staff to develop the necessary procedures. SDAs are authorized to establish/continue expedited eligibility determinations for GAIN participants under JTPD Directive D95-30, dated February 22, 1996.

### Standards for Documenting the Eligibility of GAIN Participants

The documentation required by CWDs to verify social security number, age, residency, citizenship/right to work in the United States, and economic status are considered acceptable, by EDD, for the purpose of determining eligibility for JTPA programs. For monitoring, audit, and hearing purposes, locally developed procedures should ensure that GAIN participants, who are referred to JTPA programs, authorize the exchange of pertinent GAIN and Aid to Families with Dependent Children information among CWDs, state/federal agencies, or their representatives.

As an option, CWDs and SDAs may utilize the GAIN Referral form (attachment to the Joint Policy Statement) to document a GAIN participant's eligibility for JTPA services, as well as the participant's authorization for the exchange of pertinent information. The GAIN Referral form may be reproduced by CWDs, or it may be revised to meet local needs, as long as information concerning JTPA eligibility factors on the existing form is not deleted.

SDAs remain responsible for documenting other eligibility factors, such as participant compliance with Selective Service registration requirements.

If you have any questions about this letter, please contact your GAIN Operations Analyst at (916) 657-3403.



BRUCE WAGSTAFF  
Deputy Director  
Welfare Programs Division

**JOINT POLICY STATEMENT  
REGARDING  
JTPA ELIGIBILITY DOCUMENTATION FOR GAIN PARTICIPANTS**

1. The documentation required by the County Welfare Departments (CWD) as evidence of residency, age, citizenship/right-to-work, and economically disadvantaged status is acceptable to the California Service Delivery Areas (SDA) for purposes of determining eligibility for programs authorized under the Job Training Partnership Act (JTPA).
2. The SDAs and CWDs may establish local procedures and forms/documentation for the referral and eligibility verification of Greater Avenues for Independence (GAIN) clients. As an option, SDAs and CWDs may utilize the attached standard referral form developed by the Employment Development Department (EDD) and the California Department of Social Services (CDSS). The SDAs may assume that adequate documentation is contained in the Aid to Families with Dependent Children (AFDC) case file to substantiate the information on the form. For the SDA's records, an appropriately completed referral form will constitute acceptable documentation of these eligibility factors. The SDAs and CWDs may revise and/or add to the form, provided that none of the eligibility factors are deleted.
3. The SDAs will be responsible for documenting applicable clients' Selective Service registration status, consistent with JTPA requirements.
4. Any other information required by the SDAs for Management Information System (MIS), reporting, or demographic purposes, will be obtained through the GAIN participant's self-attestation. This includes information such as number in household, number on grant, amount of grant, etc.
5. The CWDs will notify the SDAs on a timely basis of any change in the GAIN participant's status that could affect JTPA eligibility, including, but not limited to: a termination of GAIN status or information regarding eligibility later discovered to be false or in error.
6. In the event of questioned or disallowed costs, the CWDs will permit agents of the SDAs, EDD, or other state or federal agencies access to AFDC case records. This joint policy statement does not impose or imply any liability on the part of CWDs or CDSS for disallowed JTPA costs.
7. The CWDs will permit reasonable access to AFDC case records to agencies described in item 6 for the purpose of demonstration that AFDC records sufficiently and routinely document relevant JTPA eligibility factors.

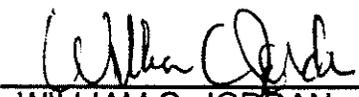
## Joint Policy Statement

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8. This policy will remain in effect until amended or rescinded. This policy statement may be terminated in whole or in part for convenience by either party with a 90 calendar day written advance notice. It may be terminated for cause in writing if either party has determined that there has been a substantial violation of any of its provisions. Both parties will attempt to resolve any alleged violations within a 30 day period of the alleged violation(s) before termination for cause is implemented.

  
VICKI J. JOHNSRUD  
Acting Chief  
Job Training Partnership Division  
Employment Development Department

12/26/95  
(date)

  
WILLIAM C. JORDAN  
Acting Chief  
Employment and Refugee Programs  
Branch  
California Department of Social  
Services

1/3/96  
(date)

