


Self-Certification and Telephone/Document Inspection Verification Policy #P-29-8.22

Date: August 26, 2022

Re: The use and submission of self-certification and telephone/document verification forms through the use of authorized, State-approved Self-Certification and Telephone/Document Inspection Verification processes for all WIOA, TANF Youth, and EARN participants within the SCPa Works region.

Approved: **November 11, 2022**
Effective: **November 11, 2022**

References: 20 C.F.R. Parts 603, 651, 652
20 C.F.R. Parts 676, 677, and 678
TEGL No. 35-14
TEGL No. 6-14
TEGL No. 12-01
Workforce System Guidance 04-2015
Workforce System Guidance on WIOA Eligibility Verification

Author: Saranne Miller 

Related Forms: Forms relating to this Statement of Purpose can be found in the CWDS Help Center by clicking the WIOA link under the *List of Policies and Procedures* heading.

I. **Definitions:**

- A. ***Self-Attestation:*** Self-attestation (also referred to as an applicant statement) occurs when an individual states his or her status for a particular data element, such as “runaway youth,” and then signs and dates a form acknowledging this status.
1. The key elements for self-attestation are:
 - a. The individual identifying his or her status for permitted elements;
 - b. Signing and dating a form attesting to this self-identification; and
 - c. A detailed case note to include all attempts to collect eligibility verification.
- B. ***Self-Certification:*** Self-certification means an individual’s signed attestation that the information said individual submitted to demonstrate eligibility for a program under WIOA/TANF is true and accurate.
1. Self-certification is also performed when an eligible migrant and seasonal farmworker (MSFW) signed attestation that the information he/she submits to demonstrate eligibility for the NFJP is true and accurate.
- C. ***Telephone/Document Inspection Verification:*** Is a means by which a service provider calls an agency or organization to verify program eligibility requirements over the telephone, in a verbal manner.
1. Telephone verifications can only be administered when a service provider makes a phone call to a formal agency or organization.
 2. Verbal verifications are recorded on a standardized form and detailed in a case note to include the name of the agency/organization, the name of the individual who was called, and the exact nature of the eligibility verification.

3. Document inspection occurs when a document is in the possession of an agency/organization and the data on the document is verbally verified over the telephone to the service provider to ensure that eligibility requirements are validated, and then detailed in a case note.
 - a. When applicable and feasible, documents should be acquired, copied, scanned, and/or maintained in a participant's physical file; however, when all attempts to do so have failed, document inspection will suffice.

II. Verification and documentation:

- A. It is important to note that verification is far different than hard-copy documentation.
 1. **Verification** means to confirm eligibility requirements through examination of documents (e.g., birth certificates or public assistance records) or speaking with representatives of authorized agencies.
 2. **Documentation** means to maintain physical evidence, which is obtained during the verification process, in participant files. Examples of such evidence are copies of documents (where legally permitted).

III. Self-Certification:

- A. Self-certification as an allowable source for documenting eligibility only under the circumstances and conditions listed below:
 1. Self-certification is a viable source for documenting eligibility, and is limited to and only available after all other sources of eligibility verification are exhausted as indicative of self-certification serving as the "last resort" for documenting WIOA/TANF program eligibility.
 2. SCPa Works allows for self-certification to verify those eligibility items requiring documentation that, in rare cases, may cause undue hardship for applicants to obtain, particularly those with barriers to employment.
 3. Self-certification may be accepted from an individual who has experienced a loss of documentation due to:
 - a. Natural or man-made disaster such as fire, flood, tornado;
 - b. Eviction from residence resulting in a loss of supporting documentation; or
 - c. Individual is fleeing or has fled an abusive or untenable home situation.
 4. Youth:
 - a. Self-attestation/certification for out-of-school youth is permitted for the purpose of WIOA/TANF eligibility determination.
 - b. In-school-youth participants should have access to their records through access to a school or institution database.
 5. Self-Certification List:
 - a. Service providers will use the self-certification method as a last resort, and only for use of verifying the following eligibility criteria elements:
 - i. Date of Actual Dislocation (Dislocated Worker)
 - ii. Displaced Homemaker (Dislocated Worker)
 - iii. Reemployment Opportunity is Poor / Unlikely to Return-to-Work (Dislocated Worker)
 - iv. Permanently or Temporarily Laid Off as a Consequence of a Disaster (Adult/DW)
 - v. Long-Term Unemployed (Adult/DW)
 - vi. English Language Learner (Youth/Adult)
 - vii. Homeless (Youth/Adult)
 - viii. In/Aged Out of Foster Care System (Youth)
 - ix. Offender (Youth)
 - x. Pregnant or Parenting (Youth)
 - xi. Requires Additional Assistance (Youth)

- xii. Runaway (Youth)
- xiii. School Status at time of Registration (Youth)

IV. Telephone/Document Inspection Verification:

- A. Local boards are required to address in their local plan strategies for assisting individuals with barriers, to include methods of validating eligibility for such individuals.
- B. SCPa Works encourages the use of *telephone verification* and *documentation inspection verification* to verify eligibility.
 - 1. Service providers should consider **the use of telephone verification prior to self-certification** to verify eligibility criteria when another agency or organization may have access to eligibility verification documents.
 - a. When applicable, eligibility criteria may be verified by telephone contacts with recognized governmental or social services agencies, or by document inspection.
 - b. The information obtained must be verified and recorded on the **Telephone Verification and Document Inspection Form** found in CWDS.
 - i. Information recorded must be adequate to enable a monitor or auditor to report back to the cognizant agency or able to confirm the data included on a verified document.
 - ii. The information provided by the agency through telephone contact may be sufficient to satisfy multiple eligibility criteria.
 - iii. Verification of eligibility through document inspection is appropriate when documents cannot or may not be copied.


V. Applicant Statement:

- A. A hand-written or printed applicant statement is a form of self-attestation and may be used to validate family size/family income, if all other means of collecting proof have been exhausted.
- B. If an applicant’s statement or self-attestation form is used in the eligibility-determination process, all workforce staff must adhere to the stringent SCPa Works case-noting practices to ensure that:
 - 1. The self-attestation case note includes all failed attempts to secure eligibility verification.
 - 2. The self-attestation case note includes a record of all phone calls and discussions that took place surrounding the attempt to acquire eligibility verification from an individual, agency, or organization.
 - 3. The self-attestation email references email correspondence when applicable, and that all email correspondence is copied (cut and pasted) into a separate case note.

VI. Standardized Forms:

- A. Standardized forms to assist in the verification of eligibility criteria and acceptable documentation sources, to include self-certification, telephone verification, and document inspection verification can be found in the *List of Policies and Procedures* under WIOA in the Help Center of CWDS.

VII. Summary of Changes: This Statement of Purpose is reviewed every 180 days by the SCPa Works Policy Department for necessary changes, edits, updates, and revisions.

Date of Change:	Changed by:	Summary of Change(s):	Effective Date
08/26/2022	Saranne Miller 	1. Re-wrote sections I, IV, V, and VI. 2. Reiterated WIOA, TANF Youth, and EARN relevancy under Purpose .	11/11/2022
