

SAN JOAQUIN COUNTY WORKNET EMPLOYMENT AND ECONOMIC DEVELOPMENT DEPARTMENT POLICIES AND PROCEDURES DIRECTIVE

DIRECTIVE NO.	EFFECTIVE DATE	APPLICABILITY	PAGE
25-24	April 8, 2026	CMD	1 of 9
SUBJECT: WIOA ADULT AND VETERAN PRIORITY OF SERVICE			

I. PURPOSE

The purpose of this directive is to provide San Joaquin County Employment and Economic Development Department (EEDD) guidance and establish procedures regarding the priority of service requirements for veterans and their eligible spouses for U.S. Department of Labor (DOL) funded programs and services in accordance with the Workforce Innovation and Opportunity Act (WIOA) of 2014.

II. GENERAL INFORMATION

The [WIOA Sec. 134\(c\)\(3\)\(E\)](#) establishes a priority requirement with respect to funds allocated to a local area for adult employment and training activities. Under this section, America's Job Center staff when using WIOA Adult funds to provide individualized career services, training services, or both must give priority to recipients of public assistance, other low-income individuals and individuals who are basic skills deficient.

In addition, [WSD24-15, Priority of Service for Eligible Veterans and Spouses](#) establishes that Veteran and eligible spouses who meet the WIOA Adult program eligibility criteria under [WIOA Section 134\(c\)\(3\)\(E\)](#) receive priority of service among all eligible individuals.

WIOA divides required employment and training activities into two categories: career services and training services.

This PPD supersedes PPD 24-10 WIOA Adult and Veteran Priority of Service, dated September 24, 2024.

Definitions

Public Assistance: Federal, State, or local government cash payments for which eligibility is determined by a needs or income test.

Low-Income Individual: An individual who:

1. receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the supplemental nutrition assistance program established under the [Food and Nutrition Act of 2008 \(7 U.S.C. 2011 et seq.\)](#), the program of block grants to States for temporary assistance for needy families program under [part A of title IV of the Social Security Act \(42 U.S.C. 601 et seq.\)](#), or the supplemental security income program established under [title XVI of the Social Security Act \(42 U.S.C. 1381 et seq.\)](#), or State or local income-based public assistance;
2. is in a family with total family income that does not exceed the higher of (I) the poverty line; or (II) 70 percent of the lower living standard income level;
3. is a homeless individual (as defined in section 41403(6) of the [Violence Against Women Act of 1994](#) H. R. 803—12(42 U.S.C. 14043e-2(6))), or a homeless child or youth (as defined under section 725(2) of the [McKinney-Vento Homeless Assistance Act](#) (42 U.S.C. 11434a (2)));
4. receives or is eligible to receive a free or reduced-price lunch under the [Richard B. Russell National School Lunch Act](#) (42 U.S.C. 1751 et seq.);
5. is a foster child on behalf of whom State or local government payments are made; or
6. is an individual with a disability whose own income meets the income requirement of clause (ii), but who is a member of a family whose income does not meet this requirement.

Basic Skills Deficient:

1. is a youth with English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
2. is a youth or adult, 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 in society.

Non-Covered Person: Any individual who neither meets the definition of veteran nor eligible spouse.

References

- [WIOA \(Public Law 113-128\) Sections 3 and 134](#)
- [Title 20 Code of Federal Regulations \(CFR\) "WIOA, Notice of Proposed Rule Making" \(NPRM\), Sections 680.150, 680.600, 680.610, and 680.650](#)
- [WSD24-06, WIOA Adult Program Priority of Service](#)
- [WSD24-15, Priority of Service for Veterans and Eligible Spouses](#)

III. POLICY

To ensure priority of service is given to the appropriate individuals, the Employment and Economic Development Department (EEDD) will ensure a minimum of 51% of all WIOA enrolled adults meet one or more of the categories for priority of service for activities requiring such determination. Priority of service will not apply to self-directed career services. Enrollments characteristics will be reviewed annually to ensure compliance with the policy.

Priority Order:

1. **1st Priority** – Veterans and eligible spouses who are:
 - o Low income, or
 - o Recipients of public assistance, or
 - o Basic skills deficient
2. **2nd Priority** – Individuals who are:
 - o Low income, or
 - o Recipients of public assistance, or
 - o Basic skills deficient
3. **3rd Priority** – Veterans and eligible spouses who are:
 - o Not low income, and
 - o Not recipients of public assistance, and
 - o Not basic skills deficient
4. **4th Priority** – Individuals who are not veterans and any other person outside of the groups given priority

Local Resident Consideration:

In addition to the federal priorities above, when WIOA Adult or Dislocated Worker funds are limited, priority for enrollment into individualized career services and

training services shall be given to individuals whose primary residence is within San Joaquin County, after applying the priorities listed above.

For purposes of applying local resident priority, “when funds are limited” means any time the local area determines that available WIOA Adult or Dislocated Worker program funds are insufficient to serve all eligible participants requesting individualized career services or training services. This determination may be based on factors such as the percentage of funds already obligated, projected fund availability for the remainder of the program year, or the need to establish a waiting list. When this condition exists, local resident priority is applied **after federally required veteran and low-income priority categories**. Staff must document the application of this priority in CalJOBS, including verification of residency and any non-resident exceptions, along with the rationale for fund limitation determination.

Non-San Joaquin County residents should first be encouraged to request WIOA services through their LWDA of residence. Case managers shall document that the individual was advised to seek services from their home LWDA prior to pursuing enrollment in San Joaquin County.

Non-San Joaquin County residents may be enrolled only when:

- Funding is sufficient after serving residents in required priority categories;
- The participant demonstrates strong employment, training, or other ties to San Joaquin County; or
- Enrollment supports regional workforce strategies or performance outcomes.

If the home LWDA declines to serve the individual, or if both parties mutually agree that service delivery in San Joaquin County is in the best interest of the participant, services may be provided in accordance with this directive, eligibility requirements, funding availability, and all applicable federal and state regulations.

If a participant is proposed for an OJT placement with an employer located outside San Joaquin County, staff must follow the coordination procedures outlined in the EEDD On-the-Job Training PPD prior to enrollment.

Nothing in this policy shall obligate the EEDD to enroll individuals who reside outside its jurisdiction. Enrollment decisions remain subject to local priority of service provisions, performance considerations, and available funding.

IV. PROCEDURE

Priority of service must be given to individuals enrolling as an Adult who are veterans, recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient.

All Policies and Procedures Directives (PPDs) are available to the public on the EEDD website (<https://www.sjcworknet.org/WIOAresources.asp>). A binder including all PPDs is maintained at each AJCC for easy public access. Posters are displayed throughout the AJCC's identifying the full array of employment, training, and placement services available to veterans and eligible spouses and where to find the eligibility requirements for these programs and services.

In the event training funds become limited or restricted and a waiting list is necessary, veterans and eligible spouses are given priority when funds become available. Priority of service criteria and documentation will be recorded in the CalJOBS system during the eligibility process and verification of priority factors will be maintained in the client case management file.

All staff checking in customers are trained and instructed on proper ways of asking customers if they are a veteran or eligible spouse to ensure they can take full advantage of priority of service.

Staff will review all applicants for priority of service factors when registration and eligibility determination is needed for receipt of adult funded employment and training services. Priority of service criteria and documentation will be recorded in the CalJOBS system during the eligibility process. Verification of priority factors will be maintained in the client's case management file.

Career Services and Training Services

WIOA divides required employment and training activities into two categories: career services and training services.

Required career services include:

1. Determinations of whether the individuals are eligible to receive assistance;
2. Outreach, intake (which may include worker profiling), and orientation to the information and other services available through the one-stop/America's Job Center of California (AJCC) delivery system;
3. Initial assessment of skill levels (including literacy, numeracy, and English language proficiency), aptitudes, abilities (including skill gaps) and supportive service needs;
4. Labor exchange services including:
 - a. Job placement assistance and, in appropriate cases, career counseling, including:
 - i. Provision of information on in-demand sectors and occupations; and

- ii. Provision of information on nontraditional employment and
- b. Appropriate recruitment and other business services on behalf of employers, including small employers, in the local area, which services may include providing information and referral to specialized business services not traditionally offered through the AJCC system;
- 5. Provision of referrals to and coordination of activities with other programs and services, including programs and services within the AJCC system and, in appropriate cases, 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:
 - a. Job vacancy listings in such labor market areas;
 - b. Information on job skills necessary to obtain the jobs described in (a); and
 - c. Information relating to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for such occupations;
- 7. Provision of performance information and program cost information on eligible providers of training services as described in [WIOA Sec. 122](#), provided by program, and eligible providers of youth workforce investment activities described in [WIOA Sec. 123](#), providers of adult education described in title II, providers of career and technical education activities at the postsecondary level, and career and technical education activities available to school dropouts, under the [Carl D. Perkins Career and Technical Education Act of 2006](#) (20 U.S.C 2301 et. Seq.), and providers of vocational rehabilitation services described in [title I of the Rehabilitation Act of 1973](#) (29 U.S.C. 720 et seq.);
- 8. Provision of information, in formats that are usable by and understandable to AJCC customers, regarding how the local area is performing on the local performance accountability measures and any additional performance information with respect to the AJCC system in the local area;
- 9. Provision of information, in formats that are usable by and understandable to AJCC customers, relating to the availability of supportive services or assistance, including:

- a. Childcare, child support, medical or child health assistance under title XIX or XXI of the [Social Security Act](#) (42 USC. 1396 et seq. and 1397aa et seq.);
 - b. Benefits under the supplemental nutrition assistance program established under the [Food and Nutrition Act of 2008](#) (7 U.S.C. 2011 et. seq.);
 - c. Assistance through the earned income tax credit under section 32 of the [Internal Revenue code of 1986](#);
 - d. Assistance under a State program for temporary assistance for needy families funded under part A of title IV of the [Social Security Act](#) (42 U.S.C 601 et seq.); and
 - e. Other supportive services and transportation provided through funds made available under such part, available in the local area.
- 10. Referral to the supportive services described above, as appropriate;
 - 11. Provision of information and assistance regarding filing claims for unemployment compensation;
 - 12. Assistance in establishing eligibility for programs of financial aid assistance for training and education programs that are not funded under WIOA;
 - 13. Services, if determined to be appropriate for an individual to obtain or retain employment, that consist of:
 - a. Comprehensive and specialized assessments of the skill levels and service needs, which may include:
 - i. Diagnostic testing and use of other assessment tools; and
 - ii. In-depth interview and evaluation to identify employment barriers and appropriate employment goals;
 - b. Development of an individual employment plan, to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve the employment goals;
 - c. Group counseling;

d. Individual counseling.

Required training services as defined by WIOA Sec. 134(c)(3)(D) include:

1. Occupational skills training, including training for nontraditional employment;
2. On-the-job training;
3. Incumbent worker training;
4. Programs that combine workplace training with related instruction, which may include cooperative education program;
5. Training programs operated by the private sector;
6. Skill upgrading and retraining;
7. Entrepreneurial training;
8. Transitional jobs;
9. Job readiness training provided in combination with the other services in this list;
10. Adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with any of the other services in this list; and
11. Customized training conducted with a commitment by an employer or a group of employers to employ an individual upon successful completion of the training.

Residency Verification and Application of Priority

At enrollment, staff must verify that participants are residents of San Joaquin County using a government-issued ID, utility bill, lease agreement, or other official documentation. Verified residency and any exceptions for non-residents must be recorded in CalJOBS, with supporting documentation maintained for audit purposes.

Non-San Joaquin County residents should first be encouraged to request WIOA services through their LWDA of residence. Case managers shall document that the individual was advised to seek services from their home LWDA prior to pursuing enrollment in San Joaquin County.

Case notes must clearly indicate when a non-resident is enrolled and the reason for approval, for example:

Non-Resident Exception: "Participant resides outside San Joaquin County and was advised to request services through their home LWDA prior to seeking services in San Joaquin County. Participant requested enrollment with EEDD due to [document reason such as employment ties, training opportunity, or regional strategy]. Enrollment approved consistent with WIOA Adult and Veteran Priority of Service policy."

Enrollment of non-residents or out-of-area participants must comply with:

- Local eligibility verification requirements;
- Priority of Service policy;
- Available funding; and
- Applicable federal and state WIOA regulations.

All verification documents, correspondence with home LWDA's, and case notes regarding residency exceptions must be maintained in the participant's case file and entered into CalJOBS for audit and monitoring purposes.

V. QUESTIONS REGARDING THIS DIRECTIVE

May be referred to the Executive Director of EEDD via Managers or designee.

VI. UPDATE RESPONSIBILITY

The Executive Director of EEDD and/or designee will be responsible for updating this directive, as appropriate.

VII. APPROVED



PATRICIA VIRGEN
EXECUTIVE DIRECTOR

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