



WORKFORCE DEVELOPMENT BOARD
OF SOLANO COUNTY

POLICY ISSUANCE

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ARPA ELIGIBILITY AND ENROLLMENT POLICY

INTRODUCTION

This policy on eligibility ensures that every beneficiary of American Rescue Plan Act of 2021 (ARPA) funded services is eligible and registered to receive those services.

ARPA established the Coronavirus State and Local Fiscal Recovery Funds (SLFRF) to provide state, local, and Tribal governments with the resources needed to respond to the pandemic and its economic effects and to build a stronger, more equitable economy during the recovery.

ARPA provides that SLFRF funds may be used to respond to the public health emergency or its negative economic impacts, including assistance to households, small businesses, and nonprofits, or aid to impacted industries such as tourism, travel, and hospitality. The purpose of SLFRF funds is to respond to the public health emergency with respect to its negative impacts, including current and delayed negative economic impacts.

QUESTIONS

Questions relating to this policy should be directed to the Tracy White, One-Stop Manager, at twhite@solanowdb.org or at 707.863.3520.

ATTACHMENTS

- Attachment A: ARPA Eligibility Checklist
- Attachment B: Allowable ARPA Eligibility Documentation Sources
- Attachment C: Map of Solano County Qualified Census Tracts
- Attachment D: Definitions of Key Terms

ARPA ELIGIBLE BENEFICIARIES

To be eligible to receive ARPA services as a response to negative economic impacts of the COVID-19 public health emergency through the Workforce Development Board (WDB) of Solano County, the Solano-Napa Small Business Development Center (SBDC), or their subrecipients, a beneficiary must have experienced a negative economic impact or an economic harm (such as loss of earnings or revenue) that resulted from the COVID-19 public health emergency and meet one of the following eligibility criteria:

1. **Individuals** (economic impacts may be immediate or delayed),
2. **Small Businesses and Specific Industries**, or
3. **Non-Profit Organizations**

The SLFRF Final Rule defines that only “impacted” and “disproportionately impacted” individuals, small businesses, or non-profits are eligible to receive services under ARPA. The SLFRF final rule allows recipients to demonstrate a negative or disproportionate economic impact on a population or class. In such cases, staff and subrecipients need only demonstrate that an individual household, business, or nonprofit is within the class that experienced a negative or disproportionate economic impact, rather than requiring that each individual household or small business experienced a negative or disproportionate economic impact.

The Treasury presumes that the general public experienced public health impacts from the pandemic for the purposes of providing services for COVID-19 mitigation and behavioral health, as the stress of the pandemic and resulting recession have affected nearly all Americans. As such, staff and subrecipients may provide COVID-19 mitigation and prevention, as well as behavioral health services without the requirement of determining eligibility of the beneficiaries.

The WDB and SBDC may provide services to beneficiaries through subrecipients that did not experience a negative economic impact in order to implement a program or provide a service to beneficiaries on its behalf.

ARPA ELIGIBLE INDIVIDUALS

Solano County residents receive priority for enrollment into ARPA programs, with the exception of individuals whose enrollment may be based on the location of the business.

Impacted Individuals

Certain populations have been presumed to be economically impacted by the Treasury and are thus eligible for ARPA services. Households that experienced unemployment, increased food or housing insecurity, or are low- or moderate-income are presumed to have experienced a negative economic impact from the pandemic.

Individuals who experienced unemployment, per the SLFRF Final Rule, include three (3) eligible populations:

1. **Unemployed** – individuals who want and are available to work, who lost their job during the pandemic and resulting recession, as well as individuals who were unemployed when the pandemic began and saw further deterioration of their economic options due to the pandemic; including
2. **Underemployed** – individuals who have looked for work sometime in the past twelve (12) months or who are employed part-time that want and are available to work full-time; and those

3. **Seeking Economic Advancement** – individuals who are currently employed but are seeking to move to a job that provides better opportunities for economic advancement.

In addition, the Treasury allows categorical eligibility of impacted individuals based on their eligibility for other programs with similar income tests. Therefore, if an individual qualifies for the following programs, they will be recognized as an impacted household:

- Children’s Health Insurance Program (CHIP)
- Childcare Subsidies through the Child Care and Development Fund (CCDF)
- Medicaid

Disproportionately Impacted Individuals

Disproportionately impacted households are those that experienced a disproportionate, or meaningfully more severe, impact from the pandemic. The SLFRF final rule recognizes that disproportionate health or negative economic impacts during the pandemic have been amplified for certain populations with pre-existing disparities in their communities. Those households, communities, small businesses, and nonprofits that experienced disproportionate public health or negative economic impacts of the pandemic are considered “disproportionately impacted.”

The Treasury notes that households presumed to be disproportionately impacted would also be presumptively impacted, as these households have not only experienced pandemic impacts but have experienced disproportionate pandemic impacts; as a result, these households are presumptively eligible for responsive services for both impacted and disproportionately impacted households.

Certain populations have been presumed to be economically disproportionately impacted by the Treasury and are thus eligible for ARPA services. Households that reside in Qualified Census Tracts (QCTs) or are receiving services provided by Tribal governments were disproportionately impacted by the pandemic. The Treasury also identifies that economic disparities existing prior to the pandemic amplified the impact of the pandemic specifically among low-income and minority groups. The Treasury additionally identifies that rate of unemployment was particularly severe among workers of color, low-wage workers, and workers with lower levels of educational attainment. Finally, the Treasury identifies that those who have experienced longer periods of unemployment earn lower wages over the long term once rehired, leading to longer-term economic challenges.

The WDB and County of Solano have additionally identified individuals under the age of 35 experienced meaningfully more severe impacts than the general population, based on Unemployment Insurance claims data provided by the California Employment Development Department. Labor market information shows that individuals under 35 represented half of the unemployed individuals in Solano County at the height of the pandemic.

Staff and sub-recipients can, therefore, consider the following populations who meet the unemployment eligibility as disproportionately impacted:

- Households that reside in Qualified Census Tracts (QCTs) within Vallejo and Fairfield (See Attachment C for Solano County QCTs);
- Individuals under the age of 35 at time of enrollment;
- Individuals who have experienced long-term unemployment at time of enrollment;
- Individuals whose current or last employment was considered low-wage;
- Individuals with lower levels of educational attainment;
- Individuals within minority groups; and
- Low-income households.

In addition, the Treasury allows categorical eligibility of disproportionately impacted beneficiaries based on their eligibility of other programs with similar income tests. If an individual qualifies for any of the following programs, they will be recognized as a disproportionately impacted household:

- Temporary Assistance for Needy Families (TANF)
- Supplemental Nutrition Assistance Program (SNAP)
- Free and Reduced-Price Lunch (NSLP) and/or School Breakfast (SBP) programs
- Medicare Part D Low-income Subsidies
- Supplemental Security Income (SSI)
- Head Start and/or Early Head Start
- Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)
- Section 8 Vouchers
- Low-Income Home Energy Assistance Program (LIHEAP)
- Pell Grants

ARPA ELIGIBLE SMALL BUSINESSES AND NONPROFITS

Impacted Businesses and Nonprofits

WDB staff and ARPA subrecipients may not provide assistance to small businesses, impacted industries, or nonprofits that did not experience a negative economic impact, although recipients can identify negative economic impacts for classes, rather than individual businesses or nonprofits, and may also presume that small businesses in certain areas experienced impacts.

Small businesses that face financial insecurity, substantial declines in gross receipts, or other economic harm due to the pandemic, such as challenges covering payroll, mortgage or rent are considered impacted small businesses. Businesses with less capacity to weather financial hardship, such as the smallest businesses, those with less access to credit, or those serving underserved communities are also presumed to have experienced a negative economic impact from the pandemic.

Certain classes of small businesses, impacted industries, or nonprofit organizations are presumed to have experienced a negative economic impact and are thus eligible for

ARPA services. The WDB, SBDC, and the County of Solano have identified the following classes of small businesses, impacted industries, and nonprofit organizations:

- Businesses and nonprofits that can demonstrate economic harm due to the pandemic;
- Businesses or nonprofits that were required to be closed more than three (3) consecutive months per California Public Health guidelines;
- Businesses or nonprofits who received Paycheck Protection Program (PPP) funds or small business grants based on economic hardship as a result of COVID-19 and the resulting economic impacts;
- Microbusinesses; and
- Moderate-income small businesses and nonprofits.

Disproportionately Impacted Small Businesses and Nonprofits

Disproportionately impacted small businesses and nonprofits are those that experienced a disproportionate, or meaningfully more severe, impact from the pandemic. The SLFRF final rule recognizes that disproportionate negative economic impacts during the pandemic have been amplified for certain populations of small businesses with pre-existing disparities in their communities and nonprofits providing COVID-related services. Those small businesses and nonprofits that experienced disproportionate negative economic impacts of the pandemic are considered “disproportionately impacted.”

The Treasury notes that small businesses, impacted industries, and nonprofits presumed to be disproportionately impacted would also be presumptively impacted, as these businesses and nonprofits have not only experienced pandemic impacts but have experienced disproportionate pandemic impacts; as a result, these businesses and nonprofits are presumptively eligible for responsive services for both impacted and disproportionately impacted small businesses, impacted industries, and nonprofits.

Certain classes of small businesses, industries, and nonprofits have been presumed to be economically disproportionately impacted by the Treasury and are thus eligible for ARPA services. Small businesses and nonprofits that are operating in Qualified Census Tracts (QCTs) were disproportionately impacted by the pandemic. The Treasury also identifies that economic disparities existing prior to the pandemic amplified the impact of the pandemic specifically among low-income and minority groups. The Treasury additionally identifies that women-owned and very small businesses faced significant challenges during the pandemic.

The Treasury also recognizes that the pandemic has damaged the financial health of nonprofits, with small nonprofits reporting relatively larger declines in donations.

The Treasury recognizes that businesses in the travel, tourism, and hospitality industries were severely negatively impacted by the pandemic. Additional industries that have suffered an employment loss of at least eight (8) percent per the simplified industry test are presumed to be an “impacted industry” under the SLFRF Final Rule. The WDB, SBDC, and the County of Solano have determined through academic research conducted

on behalf of the North Bay Workforce Region that Wholesale Trade, Information, Educational and Health Services, and Other Services industries experienced over 8% employment loss from January 2020 to January 2022.

Staff and sub-recipients can, therefore, consider the following populations who meet the small business or nonprofit organization eligibility as disproportionately impacted:

- Businesses within the travel, hospitality and tourism industries, as well as businesses within the Wholesale Trade, Information, Educational and Health Services, and Other Services industries;
- Low-income small businesses and nonprofits;
- Nonprofit organizations offering educational-based programs due to the in-person, indoors nature of their work;
- Nonprofit organizations reliant on fees received for services, such as attendance fees;
- Nonprofit organizations with less than ten (10) employees prior to the onset of the pandemic;
- Small businesses and nonprofit organizations operating in Qualified Census Tracts (QCTs) within Vallejo and Fairfield (See Attachment C for Solano County QCTs);
- Small businesses owned by, and nonprofits led by, an individual of a minority group; and
- Women-owned small businesses.

ELIGIBILITY VERIFICATION

ARPA eligibility must be verified for every beneficiary. Depending on the level of service, documentation must be captured to show eligibility, in paper or digital form. An ARPA Eligibility Checklist for Individuals is included in Attachment A. Documentation sources for all data verification elements that may be used to verify eligibility are included in Attachment B. The applicant must be informed that all information is subject to verification and that false information is grounds for termination and possible prosecution under the law.

The order of priority for methods of verification is:

1. Documentary evidence identified in Attachment B.
2. Self-Attestation, where allowable.

Eligibility verification should be customer friendly and not add to the frustrations already experienced by potential beneficiaries. It is not the intention of ARPA to discourage participation by imposing difficult documentation and verification requirements.

Self-Attestation

Self-attestation is allowed as a viable source for documenting eligibility for certain ARPA data elements. Self-attestation should not be the first avenue for verification of data elements but may be used if documentary evidence is not available or if it cannot be provided when time is of the essence. The ARPA Intake or Registration Form used by the

WDB or SBDC can also count as a self-attestation form as long as the individual, business, or nonprofit identifies their status for the permitted criteria and signs and dates the form attesting to this self-identification.

The ARPA Intake or Registration Form may be used for the following eligibility elements:

Individuals

- Economic advancement
- Education status
- Employment status
- Family size
- Layoff or notice of layoff
- Language spoken at home
- Long-term unemployed
- Underemployed
- Veteran status

Small Businesses and Nonprofit Organizations

- Industry of business
- Employee count
- Closure for more than four (4) months
- Low-income small businesses and nonprofits
- Moderate-income small businesses and nonprofits
- Nonprofit organizations services
- Women-owned or minority-owned small businesses.

To qualify as self-attestation on the ARPA intake and registration, the applicable section must be completed and signed.

Primary Eligibility Review

It is staff or subrecipient's responsibility to ensure all registration paperwork is complete and accurate prior to ARPA enrollment. For any required documents collected, staff must maintain a secured paper or digital file. Enrolled participant files must be kept for three (3) years beyond the life of the grant. If individuals are not enrolled in ARPA, files must be maintained for six (6) months.

There is no limit on how much time is allowed between application date and enrollment date, but enrollment should be completed within 90 days. Once the enrollment process is started, it is the responsibility of staff or the subrecipient to enter the appropriate eligibility data into CalJOBS (for individuals) or NeoSerra (for small businesses) within 30 calendar days.

Determining Low-Income and Moderate-Income Status

The final rule defines a household as low income if it has

- (i) income at or below 185 percent of the Federal Poverty Guidelines (FPG) for the size of its household based on the most recently published poverty guidelines by the Department of Health and Human Services (HHS)
- (ii) income at or below 40 percent of the Area Median Income (AMI) for its county and size of household based on the most recently published data by the Department of Housing and Urban Development (HUD).

The final rule defines a household as moderate income if it has

- (i) income at or below 300 percent of the FPG for the size of its household based on the most recently published poverty guidelines by HHS.
- (ii) income at or below 65 percent of the AMI for its county and size of household based on the most recently published data by HUD.

| 2021 Federal Poverty Guideline | |
|---------------------------------------|---|
| Household Size | 48 Contiguous States and the District of Columbia |
| 1 | \$12,880 |
| 2 | \$17,420 |
| 3 | \$21,960 |
| 4 | \$26,500 |
| 5 | \$31,040 |
| 6 | \$35,580 |
| 7 | \$40,120 |
| 8 | \$44,660 |

For families/households with more than 8 persons, add the following amounts for each additional person: \$4,540.

The following income sources should be included in an individual's income calculation:

- Alimony, military family allotments, or other regular support from an absent family member or someone not living in the household;
- Child support payments (including foster care child payments);
- College or university scholarships (not needs-based), grants, fellowships, and assistantships;
- Monetary compensation for services, including wages, tips, salary commissions, or fees before any deductions;
- Net gambling or lottery winnings;
- Net receipts from farm self-employment (receipts from a farm which one operates as an owner, renter, or sharecropper, after deductions for farm operating expenses);

- Net receipts from non-farm self-employment (receipts from a person's own unincorporated business, professional enterprise, or partnership, after deductions for business expense);
- Private pensions, government employee pensions (including military retirement pay);
- Regular insurance or annuity payments (including state disability insurance);
- Regular payments from railroad retirement, strike benefits from union funds, worker's compensation, and training stipends (e.g., wages from the California Conservation Corp);
- Severance payments;
- Social Security Disability Insurance payments;
- Social Security old age and survivors' insurance benefit payments;
- Terminal leave pay; **and**
- Unemployment insurance compensation.

The following income sources should not be included in an individual's income calculation:

- Need-based public assistance payments (including Temporary Assistance for Needy Families, supplemental security income, emergency assistance money payments, and non-federally-funded general assistance or general relief money payments);
- Financial assistance under Title IV of the Higher Education Act, i.e., Pell Grants;
- Supplemental Educational Opportunity Grants and Federal Work Study;
- Needs-based scholarship assistance;
- Loans;
- Veterans benefits;
- Income earned while the veteran was on active military duty and certain other veterans' benefits, i.e., compensation for service-connected disability, compensation for service-connected death, vocational rehabilitation, and education assistance;
- Capital gains;
- Any assets drawn down as withdrawals from a bank, the sale of property, a house or a car;
- Tax refunds, gifts, loans, lump-sum inheritances, one-time insurance payments, or compensation for injury;
- Non-cash benefits such as employer paid or union-paid portion of health insurance or other fringe benefits, food or housing received in lieu of wages;
- The value of food and fuel produced and consumed on farms;
- The imputed value of rent from owner occupied nonfarm or farm housing;
- Medicare, Medicaid, food stamps, school meals, and housing assistance; **and**
- Allowances, earnings and payments to individuals participating in programs under WIOA (except on-the-job training wages).

VETERAN PRIORITY OF SERVICE

The Jobs for Veterans Act (JVA) of 2008 and the Veterans' Benefits, Health Care, and Information Technology Act of 2006 provides that covered veterans and eligible spouses receive "Priority of Service." Staff must give first consideration for program participation to covered veterans and eligible spouses who meet the ARPA eligibility criteria.

Veterans' priority is required under federal law; however, it is not intended to displace existing eligibility requirements for ARPA. An individual must first qualify for ARPA before a priority of service can be applied. Staff must use the following guidelines when determining priority for ARPA-funded services:

- If the existing provisions are mandatory, a veteran must meet both the existing provisions and the veterans' provisions to receive priority. A non-veteran receives priority over a veteran who does not meet the mandatory provisions.
- If the existing provisions are optional, a veteran receives priority.

At the point of entry, staff will inform covered persons that by identifying as a veteran or an eligible spouse, they are entitled to Priority of Service. In addition, staff must inform covered persons of the full array of employment training and placement services available, as well as the applicable eligibility requirements for programs and services.

When a veteran does not have verifying documentation of veteran or eligible veteran status, the veteran or eligible spouse should be enrolled (providing other required documentation is provided) and provided immediate priority. They should be permitted to follow-up subsequently with any required verification of covered status. To receive priority training services under ARPA, veteran status must be verified.

SELECTIVE SERVICE

Males born on or after January 1, 1960 and residing in the U.S. are required by federal law to register with Selective Service within 30 days of their 18th birthday. Selective service registration is not required for ARPA eligibility but is a good practice to ensure participants can receive the full range of federal benefits.

Selective service registration is required for males who are:

- Citizens of the U.S.;
- Non-citizens, including undocumented individuals, legal permanent residents, seasonal agricultural workers, and refugees, who take up residency in the U.S. before their 26th birthday; **and/or**
- Dual nationals of the U.S. and another country regardless of whether they live in the U.S.

For U.S. citizens, Selective Service registration is not required if the man falls within one of the following categories:

- Men who are serving in the military on full-time active duty;
- Men attending the service academies;

- Disabled men who are continually confined to a residence, hospital or institution; **and/or**
- Men who are hospitalized, institutionalized, or incarcerated are not required to register during their confinement; however, they must register within 30 days after being released if they have not yet reached their 26th birthday.

For non-U.S. citizens, Selective Service registration is not required if the man falls within one of the following categories:

- Non-U.S. male who came into this country for the first time after his 26th birthday with documentation;
- Non-U.S. male who entered the U.S. illegally after his 26th birthday. He must provide proof that he was not living in the U.S. from age 18 through 25; **and/or**
- Non-U.S. male on a valid non-immigrant visa.

Individuals who are born female and changed their gender to male are not required to register. U.S. citizens or immigrants who are born male and changed their gender to female are still required to register.

CO-ENROLLMENT IN ARPA PROGRAMS

The WDB allows co-enrollment across multiple workforce programs, including the Workforce Innovation and Opportunity Act (WIOA) Title I programs, in order to leverage resources across programs for the benefit of the participant. Individuals who meet the respective program eligibility requirements may participate in ARPA programs concurrently. Such individuals must be eligible under the respective program's eligibility criteria applicable to the services received.

Staff may determine, for these individuals, the appropriate level and balance of services under the ARPA and concurrent programs. Staff must identify and track the funding streams which pay the costs of services provided to individuals who are participating in programs concurrently and ensure no duplication of services. When determining in which program(s) to enroll a participant, the decision should be based on the service needs of the participant.

DISCLAIMER

This policy is based on WDB's interpretation of the statute, along with the American Rescue Plan Act (2021), Final Rule released by the U.S. Department of Treasury, and federal and state policies relating to ARPA implementation. This policy will be reviewed and updated based on any additional federal or state guidance.

REFERENCES

Federal Guidance

- [American Rescue Plan Act of 2021](#).
- Department of the Treasury, [Coronavirus State and Local Fiscal Recovery Funds \(SLFRF\) Final Rule](#). 31 CFR Part 35.

- Health and Human Services [Poverty Guidelines for 2021](#).
- Training and Employment Guidance Letter WIOA (TEGL) 05-08 – [Policy for Collection and Use of Workforce System Participants' Social Security Numbers](#).
- TEGL 10-09 – [Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in whole or in part by the U.S. Department of Labor \(DOL\)](#).
- TEGL 11-11 and Changes 1 and 2 – [Selective Service Registration Requirements for Employment and Training Administration Funded Programs](#).

State Guidance

- Workforce Service Directive (WSD) 08-14 – [Final Rule on Priority of Service for Veterans and Eligible Spouses](#)
- WSD13-11 – [CalJOBS Participant Reporting](#)
- WSD16-18 – [Selective Service Registration](#)

Approved by

Workforce Development Board of Solano County
Napa-Solano Small Business Development Center
County of Solano

ATTACHMENT A: ARPA Eligibility Checklist

ELIGIBILITY CHECKLIST FOR ARPA INDIVIDUALS

| ARPA General Eligibility | |
|--|--------------------------|
| Requirement | Verified |
| Authorized to Work in the U.S. | <input type="checkbox"/> |
| Solano County residency or employed in Solano County | <input type="checkbox"/> |

AND Be One of the Following

| ARPA Eligibility Populations | |
|-------------------------------------|--------------------------|
| Requirement for Workforce Programs | Verified |
| Unemployed | <input type="checkbox"/> |
| Underemployed | <input type="checkbox"/> |
| Seeking Economic Advancement | <input type="checkbox"/> |

AND MAY Be One of the Following

| ARPA Eligibility Populations | |
|--|--------------------------|
| Impacted | Verified |
| Experienced unemployment or continued unemployment as a result of COVID-19 and its negative economic impacts | <input type="checkbox"/> |
| Experienced increased food or housing insecurity | <input type="checkbox"/> |
| Moderate-income household | <input type="checkbox"/> |
| Member of a categorically impacted population | <input type="checkbox"/> |
| Disproportionately Impacted | Verified |
| High-School level education or less | <input type="checkbox"/> |
| An individual belonging to a minority race or ethnicity | <input type="checkbox"/> |
| Living in Qualified Census Tract | <input type="checkbox"/> |
| Low-Income Household | <input type="checkbox"/> |
| Member of a categorical disproportionately impacted population | <input type="checkbox"/> |
| Under the age of 35 | <input type="checkbox"/> |

ALLOWABLE ELIGIBILITY AND DATA VERIFICATION SOURCES
ARPA Programs

| Eligibility Criteria | Acceptable Documentation |
|------------------------------|---|
| Authorization to Work | <p>I-9 Form List A Documents:</p> <ul style="list-style-type: none"> • Employment Authorization Document with Photograph (Form I-766) • Foreign Passport and Form I-94 or I-94A with status endorsement and matching names • Foreign Passport with I-551 stamp or notation • Micronesia or Marshall Islands Passport with Form I-94 or I-94A indicating nonimmigrant admission • Permanent Resident Card or Alien Registration Receipt Card (Form I-551) • U.S. Passport or U.S. Passport Card <p>OR a Document from I-9 Form List B and C:</p> <ul style="list-style-type: none"> • List B Documents: <ul style="list-style-type: none"> ○ Driver's License with photograph or identifying information ○ Federal, State, or Local Government ID with photograph or identifying information ○ Military Dependent's ID Card ○ Native American Tribal Document ○ School ID card with photograph ○ Voter's Registration Card ○ U.S. Military Card or Draft Record ○ U.S. Coast Guard Merchant Mariner Card • List C Document: <ul style="list-style-type: none"> ○ Certificate of Report of Birth issued by Department of State ○ Department of Homeland Security Employment Authorization Document ○ Native American Tribal Document ○ Original or Certified Copy of Birth Certificate Issued by a State, County, Municipal Authority or U.S. Territory with official seal ○ Resident Citizen ID Card ○ Social Security Account Number Card with no work restrictions ○ U.S. Citizen ID Card |
| Birth Date/Age | <ul style="list-style-type: none"> • Baptismal Record • Birth Certificate • Cross-Match with Department of Public Health vital records • DD-214, Report of Transfer or Discharge Paper • Driver's License • Federal, State or Local Government Identification Card • Hospital Record of Birth • Public Assistance/Social Service Records • School Records/Identification Card • Tribal Records |

ATTACHMENT B: Allowable ARPA Eligibility Documentation Sources

| Eligibility Criteria | Acceptable Documentation |
|---|---|
| | <ul style="list-style-type: none"> • U.S. Passport or U.S. Passport Card (unexpired) • Work Permit |
| Economic Harm to Business or Nonprofit | <ul style="list-style-type: none"> • Bank Statements • Quarterly Estimated Tax for Self-Employed Persons • Staff Verification that Business is in Impacted Industry • Staff Verification that Business is within an Industry required to close for more than three (3) months • Staff Verification that Business received Paycheck Protection Program funds or small business grants • Tax Statements |
| Education Status | <ul style="list-style-type: none"> • School records • Self-Attestation Statement |
| Employment Status/Wage | <ul style="list-style-type: none"> • Case Notes Showing Information Collected from Participant • Pay Stub • Self-Attestation Statement |
| Layoff or Notice of Layoff | <ul style="list-style-type: none"> • DE 8406 Personalized Job Search Assistant (PJSA) Appointment Notice Form • DE 8530 Reemployment Eligibility Assistance (REA) Letter • DE 1106/Z Appointment Notice to an Initial Assistance Workshops (IAW) • Invitation Letter to Self-Employment Assistance (SEA) Orientation • Layoff Letter/Statement from Employer or Union Representative • Media Article or Announcement Describing Layoff with name and date of publication • Reemployment Plan Generated from IAW • Screen Print of IAW Schedule • Self-Attestation Statement • WARN Notice <p>* <i>Dislocation date must be on the documentation</i></p> |
| Low Income | <ul style="list-style-type: none"> • Alimony Agreement • Award Letter from Veterans Administration • Bank Statements • Compensation Awards Letter • Court Award Letter • Employer Statement/Contact • Family or Business Financial Records • Pay Stubs • Pension Statement • Quarterly Estimated Tax for Self-Employed Persons • Refugee Assistance Records • Self-Attestation Statement • UI Documents and/or Printout • Authorization to obtain, or documents showing receipt of: <ul style="list-style-type: none"> ○ Temporary Assistance for Needy Families (TANF) ○ Supplemental Nutrition Assistance Program (SNAP) |

ATTACHMENT B: Allowable ARPA Eligibility Documentation Sources

| Eligibility Criteria | Acceptable Documentation |
|---|---|
| | <ul style="list-style-type: none"> ○ Free and Reduced-Price Lunch (NSLP) and/or School Breakfast (SBP) programs ○ Medicare Part D Low-income Subsidies ○ Supplemental Security Income (SSI) ○ Head Start and/or Early Head Start ○ Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) ○ Section 8 Vouchers ○ Low-Income Home Energy Assistance Program (LIHEAP) ○ Pell Grants |
| Member of Minority Group | <ul style="list-style-type: none"> ● Self-Attestation Statement |
| Moderate Income | <ul style="list-style-type: none"> ● Alimony Agreement ● Award Letter from Veterans Administration ● Bank Statements ● Compensation Awards Letter ● Court Award Letter ● Employer Statement/Contact ● Family or Business Financial Records ● Pay Stubs ● Pension Statement ● Quarterly Estimated Tax for Self-Employed Persons ● Refugee Assistance Records ● Self-Attestation Statement ● UI Documents and/or Printout ● Authorization to obtain, or documents showing receipt of: <ul style="list-style-type: none"> ○ Children’s Health Insurance Program (CHIP) ○ Childcare Subsidies through the Child Care and Development Fund (CCDF) Program ○ Medicaid |
| Recipient of Public Assistance Program (used for any categorical eligibility) | <ul style="list-style-type: none"> ● Card showing case grant status ● Copy of authorization to receive cash public assistance ● Copy of public assistance check ● Cross-match with public assistance database ● Public assistance records ● Signed Statement from Public Assistance Office |
| Residence in Qualified Census Tract | <ul style="list-style-type: none"> ● Staff verification of address within Qualified Census Tract boundaries |
| Selective Service Registration | <ul style="list-style-type: none"> ● DD-214, Report of Separation ● Screen Print-Out of the Selective Service Verification Site: http://www.sss.gov/RegVer/wfVerification.aspx ● Selective Service Acknowledgement Letter ● Selective Service Registration Card ● Selective Service Verification Form (Form 3A) |

ATTACHMENT B: Allowable ARPA Eligibility Documentation Sources

| Eligibility Criteria | Acceptable Documentation |
|---|---|
| | <ul style="list-style-type: none"> • Stamped Post Office Receipt of Registration <i>(See staff if not registered and no exemption exists)</i> |
| <p>Social Security Number (SSN) <i>(Staff should request a SSN from all applicants, but services cannot be denied to anyone refusing to provide their SSN when status can be documented via other means)</i></p> | <ul style="list-style-type: none"> • Cross-match with UI Records • DD-214, Report of Transfer or Discharge (if SSN is listed) • Employment Records (if full SSN is listed) • Federal or State ID (if full SSN is listed) • IRS Form Letter 1722 • Military Identification • Passport • Pay Stub (if full SSN is listed) • Social Security Card • W-2 Form |
| <p>Underemployed</p> | <ul style="list-style-type: none"> • Case Notes Showing Information Collected from Participant • Self-Attestation Statement |
| <p>Unemployed</p> | <ul style="list-style-type: none"> • Case Notes Showing Information Collected from Participant • Self-Attestation Statement |
| <p>Veteran Status</p> | <ul style="list-style-type: none"> • Cross-Match with Veterans Data • DD-214 Copy 4, "Veteran's Certificate of Release or Discharge from Active Duty" • Letter from the Veterans' Administration Certifying Veteran Status |

DEFINITION OF KEY TERMS

Beneficiary – as defined in SLFRF Final Rule 210 – an individual or entity (small business or nonprofit organization) experiencing a public health impact or negative economic impact of the pandemic.

Class – as defined in SLFRF Final Rule 21 – a population or group of individuals experiencing a public health impact or negative economic impact of the pandemic.

Disproportionately Impacted – as defined in SLFRF Final Rule 17 – those households, communities, small businesses, and nonprofits that experienced disproportionate public health or negative economic impacts of the pandemic due to pre-existing disparities in their communities as “disproportionately impacted.”

Eligible Spouse of a Veteran – as defined in 38 U.S.C. 4215(a) and TEGL 10-09 – an eligible spouse of purposes of job counseling, training, and placement services for veterans pursuant to Title 38, Chapter 41 of the United States Code means the spouse of any of the following:

- (A) any veteran who died of a service-connected disability,
- (B) any member of the Armed Forces serving on active duty who, at the time of application for WIOA assistance is listed for a total of more than ninety days:
 - i. missing in action,
 - ii. captured in the line of duty by a hostile force, or
 - iii. forcible detained or interned in the line of duty by a foreign government or power,
- (C) any veteran who has a total disability permanent resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs, or
- (D) any veteran who died while a disability so evaluated was in existence.

The spouse whose eligibility is derived from a living veteran or service member (i.e., categories b or c above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

Impacted – as defined in SLFRF Final Rule 16 – households, communities, small businesses, nonprofits, and industries that experienced public health or negative economic impacts of the pandemic as “impacted.”

Impacted Industries – as defined in SLFRF and locally-defined – impacted industries include the travel, hospitality and tourism industries, as well as businesses within the Wholesale Trade, Information, Educational and Health Services, and Other Services industries.

ATTACHMENT D: DEFINITION OF KEY TERMS

Long-term Unemployed – as defined in the Federal Register 2015-007 PIRL – an individual who has been unemployed for 27 or more consecutive weeks.

Low-income Individual – as defined in SLFRF Final Rule – means an individual who:

- (i) income at or below 185 percent of the Federal Poverty Guidelines (FPG) for the size of its household based on the most recently published poverty guidelines by the Department of Health and Human Services (HHS)
- (ii) income at or below 40 percent of the Area Median Income (AMI) for its county and size of household based on the most recently published data by the Department of Housing and Urban Development (HUD).

Lower Levels of Educational Attainment – as defined locally – means an individual with an educational attainment equal to, or less than, a high school diploma or equivalency.

Low Wage Worker – as defined locally – means an individual whose wage in their current or last employment was less than the self-sufficiency wage as defined by the Massachusetts Institute of Technology (MIT) [Living Wage Calculator](#) for Solano County.

Minority Groups – as defined locally – means an individual who identifies as a member of a race or ethnicity that is a minority in Solano County. Minority race/ethnicity groups include African-American, American Indian/Alaskan, Asian, and Hawaiian/Other Pacific Islander.

Moderate-income Individual – as defined in SLFRF Final Rule – means an individual who:

- (i) income at or below 300 percent of the FPG for the size of its household based on the most recently published poverty guidelines by HHS.
- (ii) income at or below 65 percent of the AMI for its county and size of household based on the most recently published data by HUD.

Non-Profit Organization – as defined in SLFRF Final Rule 154 – a tax-exempt organization under Section 501(c)(3) and 501(c)(19) of the U.S. Internal Revenue Code.

Qualified Census Tracts (QCTs) – as defined in SLFRF Final Rule 38 – a designation of geographic areas by U.S. Department of Housing and Urban Development (HUD) that are based on low incomes or high poverty rates of households in the community, used by recipients providing geographically targeted services. [Low-Income Housing Tax Credit Qualified Census Tracts](#) must have 50 percent of households with incomes below 60 percent of the Area Median Gross Income (AMGI) or have a poverty rate of 25 percent or more.

Seeking Economic Advancement – as defined in SLFRF Final Rule – individuals who are currently employed but are seeking to move to a job that provides better opportunities for economic advancement.

ATTACHMENT D: DEFINITION OF KEY TERMS

Self-attestation – as defined by TEGL 06-14, Attachment A – occurs when an individual states his or her status for a particular data element and then signs and dates a form acknowledging this status. Self-attestation must include a statement that the information submitted to demonstrate eligibility for a program is true and accurate. The form and signature can be on paper or in the Local Area management information system with an electronic signature.

Small Business – as defined by SLFRF Final Rule 148, using the Small Business Administration’s (SBA) definition – a business with fewer than 500 employees, or per the standard for that industry, as defined by SBA. This definition includes businesses with very few employees, self-employed individuals, and Tribally owned businesses.

State MIS – as defined in TEGL 22-15, Attachment A – refers to specific, detailed information that is stored in the state’s information system that supports an element. An indicator, such as a checkmark on a computer screen, is not acceptable source documentation in and of itself. For example, State MIS is an acceptable source of documentation for date of training service, but should have information about the type of training and the organization providing that training.

Unemployed – as defined in SLFRF Final Rule 116 – individuals who want and are available to work, who lost their job during the pandemic (after December 2019) and resulting recession, as well as individuals who were unemployed when the pandemic began and saw further deterioration of their economic options due to the pandemic.

Underemployed – as defined in SLFRF Final Rule 116 – individuals who have looked for work sometime in the past 12 months from time of enrollment or who are employed part time (less than 32 hours a week on average) but who want and are available for full-time work.

Veteran – as defined in WIOA Sect. 3(63), 38 U.S.C. Sect. 101, and TEGL 10-09 – an individual who served as least one day in the active military, naval, or air service, and who was discharged or released therefrom under conditions other than dishonorable. Active service includes full-time federal service in the National Guard or a Reserve component. This definition of “active service” does not include full-time duty performed strictly for training purposes (i.e., that which is often referred to as “weekend” or “annual” training), nor does it include full-time active duty performed by National Guard personnel who are mobilized by state rather than by federal authorities.