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To: Local Workforce Development Area Administrators
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DEW Regional Managers
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Subject: **Validation of Data Element – Low Income Status at Program Entry**

Date: June 19, 2026

State Instruction Letter (SIL) 20-09, Change 1, *Performance Data Validation for DOL Workforce Programs*, provides performance data validation procedures for the Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser (WP), Jobs for Veterans' State Grants (JVSG), National Dislocated Worker Grants (DWG), and Migrant and Seasonal Farmworkers (MSFW) programs administered by the Department of Employment and Workforce (DEW). This SIL update was in alignment with the update of Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) 23-19, Change 3, *Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs*. This update removed the allowance of self-attestation for data element 802 – Low Income Status at Program Entry.

This memo outlines each low-income scenario, as defined according to the Workforce Innovation and Opportunity Act (WIOA) section 3(36), followed by examples of acceptable documentation for data validation. To identify and verify low-income, documentation for only one of the scenarios must be satisfied and retained. Absence of the allowable source documentation for the low-income data element will **not** pass data validation. If the information cannot be validated via the required methods, staff must record the attempts to obtain documentation to validate the information. Please refer to SIL 20-09, Change 1 for the full list of acceptable source documentation for data validation requirements for all data elements, including Low Income Status at Program Entry.

Scenario (a) — Federal, State, and Local Public Assistance Recipient

- Definition: Receives, or in the 6 months prior to application to the program has received, or is a member of a family that is receiving or in the past 6 months prior to application to the program has received:
 - Assistance through the supplemental nutrition assistance program (SNAP) under the Food and Nutrition Act of 2008
 - Assistance through the temporary assistance for needy families (TANF) program under part A of Title IV of the Social Security Act
 - Assistance through the supplemental security income program under Title XVI of the Social Security Act
 - State or local income-based public assistance
- Acceptable Documentation: Official program records that clearly define the individual as a recipient. This may include documentation collected during verification for public assistance.

Scenario (b) — Family Income

- Definition: An individual in a family with total family income that does not exceed the higher of the poverty line or 70% of the lower living standard income level.
- Acceptable Documentation: Documentation proving income.

NOTE: An absence of employment does not automatically classify someone as low income due to the variety of methods to obtain income. The attachment *WIOA Family Income – Inclusions & Exclusions* details what income must be included when calculating total income.

Scenario (c) — Free/Reduced Lunch Eligible Person or Recipient

- Definition: An individual who receives, or is eligible to receive, a free or reduced priced lunch under the Richard B. Russell National School Lunch Act.
- Acceptable Documentation: Official program documentation. Must be based on individual eligibility and not a universal free meal policy. Please refer to TEGl 21-16, *Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance*.

Scenario (d) — Foster Child Payments Are Made

- Definition: A foster child on whose behalf state or local government payments are made.
- Acceptable Documentation: Official documentation from administering agency showing child's name and indicator of payment disbursement.

Scenario (e) — Disabled Person's Personal Income Below Poverty Line or 70%

- Definition: An individual with a disability whose own income does not exceed the higher of the poverty line or 70% of the lower living standard income level.
- Acceptable Documentation: Documentation proving income. See note under **Scenario (b) — Family Income**.

Scenario (f) — Homeless/Runaway

- Definition: A homeless participant or a homeless child or youth or runaway youth.
- Acceptable Documentation: As noted in Data Element 800, which may include documentation collected during homeless verification such as third-party verification and self-attestation.

Scenario (g) — Youth Living in High Poverty Area

- Definition: A youth living in a high-poverty area.
- Acceptable Documentation: See the attachment *Directions for Determining High-Poverty Areas for WIOA Youth*.

Of the scenarios that qualify someone as low income, **Scenario (f) is the only situation in which self-attestation is allowable**. However, self-attestation should be used when all other sources of information have been exhausted.

Please refer to the attachment, *Data Validation Frequently Asked Questions*, for responses and clarification on specific circumstances for individuals during eligibility determination.

Attached to this memo are *Low Income Data Validation Templates* that may be used to obtain information regarding self-attestation in specific scenarios.

ATTACHMENTS

- WIOA Family Income – Inclusions & Exclusions
- Directions for Determining High-Poverty Areas for WIOA Youth
- Low Income Status at Program Entry - Data Validation Frequently Asked Questions
- Low Income Status at Program Entry Data Validation Templates

Questions may be directed to WorkforcePolicy@dew.sc.gov.

WIOA Family Income – Inclusions & Exclusions

Inclusions	Exclusions
<ul style="list-style-type: none"> ● Wages and salaries (includes severance pay) before any deductions <ul style="list-style-type: none"> ○ Net receipts from non-farm self-employment ○ Net receipts from farm self-employment ● Railroad retirement, strike benefits from union funds, worker’s compensation, and training stipends ● Alimony ● Military pensions ● Pension, whether from a private or government employer ● Regular insurance or annuity payments (other than Social Security Income [SSI] or veterans’ disability) ● College or university grants, scholarships, and assistantships ● Dividends, interest, net rental income, net royalties, periodic receipts from estates or trusts ● Net gambling or lottery winnings ● Social Security Disability Insurance (SSDI) payments ● Unemployment compensation ● WIOA one-stop partner programs where income is not subsidized (e.g., OJT wages) ● Reemployment Assistance benefits ● Child support payments ● Old-age survivors insurance benefits received under the Social Security Act (42 U.S.C. § 402), including: <ul style="list-style-type: none"> ○ Social Security Survivor Benefits: paid to people up to age 18 who have had a parent die and the parent paid wages into the system ○ Social Security Retirement Benefits: paid to people who have reached their social security age and have paid wages into the system 	<ul style="list-style-type: none"> ● Public assistance (SNAP, TANF, etc.) cash payments ● Foster care child payments ● Financial assistance under Title IV of the Higher Education Act ● Needs-based scholarship assistance ● Amounts paid while on active duty or paid by the Department of Veterans Affairs (VA) for vocational rehabilitation, disability payments, or related VA-funded programs ● Capital gains ● Any assets drawn down as withdrawals from a bank, the sale of property, house, or car ● Tax refunds, gifts, loans, lump sum inheritances, one-time insurance payments, or compensation for injury ● Non-cash benefits such as employer paid fringe benefits, food or housing received in lieu of wages, Medicare, Medicaid, Food Stamps, school meals, and housing assistance ● Military pay and benefits, amounts and periods of time as follow: <ul style="list-style-type: none"> ○ Any amount received as pay or allowances by any person while serving on active duty ○ Any period of time during which such person served on active duty ○ Any amount received under 38 U.S.C. chapters 11, 13, 30, 31, 32, and 36 by an eligible veteran ○ Any amount received under 38 U.S.C. chapters 13 and 35 by an eligible person ○ Any amount received by an eligible member under 10 U.S.C. chapter 106

Directions for Determining High-Poverty Areas for WIOA Youth

Introduction

The Workforce Innovation and Opportunity Act (WIOA) Title I Youth Program contains a provision that allows for youth living in a high-poverty area to automatically meet the low-income eligibility criterion. This criterion applies to all in-school youth and some out-of-school youth in the WIOA Youth Program, and for youth in the Indian and Native American Supplemental Youth Services Program.

This document contains instructions for how to determine whether a youth lives in a high-poverty area for WIOA eligibility purposes. These instructions reference the layout of the Census Bureau's website as of July 2024. If you run into any problems with these instructions or if you have any questions, please email youth.services@dol.gov for technical assistance.

Background Information:

WIOA regulations at [20 CFR § 681.260](#) define high-poverty areas as a Census tract, a set of contiguous Census tracts, an American Indian Reservation, Oklahoma Tribal Statistical Area ([as defined by the U.S. Census Bureau](#)), Alaska Native Village Statistical Area or Alaska Native Regional Corporation Area, Native Hawaiian Homeland Area, or other tribal land as defined by the Secretary in guidance or county that has a poverty rate of at least 25 percent as set every 5 years using American Community Survey 5-Year data. (Please note that this definition does not include cities, towns, or sets of non-contiguous Census tracts.)

For more information about the low-income WIOA Youth eligibility criterion, please review [Training and Employment Guidance Letter \(TEGL\) 21-16](#).

INDIAN AND NATIVE AMERICAN SUPPLEMENTAL YOUTH SERVICES PROGRAM: The regulations at [20 CFR § 684.130](#) allow Indian and Native American Program grantees to use either the poverty rate of an area's total population or the poverty rate of an area's Indian and Native American population in determining whether the poverty rate of the area meets the 25 percent threshold.

For more information about the Indian and Native American Supplemental Youth Services Program poverty guidelines, please visit the [Youth Program Poverty Guidelines page on WorkforceGPS](#).

Step-by-Step Instructions for Determining High-Poverty Areas

These instructions are divided up by section. Use:

- **Section A** to identify the youth’s Census tract and county;
- **Section B** to prepare the Census Bureau’s website for use in Sections C and D;
- **Section C** to identify whether the youth lives in a high-poverty Census tract, county, American Indian Reservation, Oklahoma Tribal Statistical Area (OTSA), Alaska Native Village Statistical Area (ANVSA), Alaska Native Regional Corporation (ANRC), or Native Hawaiian Homeland area; and
- **Section D** to check whether the youth lives in a high-poverty set of contiguous Census tracts if the youth does not qualify as low-income under Section C.

Section A: Use a youth’s street address to determine their Census tract and county.

1. Go to: <https://geocoding.geo.census.gov/geocoder/geographies/address?form>
2. Type in the youth’s residential address in the designated boxes.
3. Leave the default selections under Benchmark and Vintage (i.e., “Public_AR_Current” and “Current_Current,” respectively).
4. Click **Get Results**.
5. Scroll down. The two relevant sections are **Counties** and **Census Tracts**. Under each of these sections, take note of the output next to “**NAME**.”

Census Tracts:
STATE CODE: 27
CENTLON: -093.3134539
GEOID: 27053003200
CENTLAT: +44.9879128
COUNTY CODE: 053
TRACT CODE: 003200
AREAWATER: 1933
AREALAND: 646049
NAME: Census Tract 32

Section B: Set up the data table on the Census Bureau’s website.

1. Go to: <https://data.census.gov/>
2. In the search box, type “S1701” and select **S1701: Poverty Status in the Past 12 Months** from the dropdown menu that appears. You will be redirected to the table.
3. **Identify the menu** at the top of the page that contains a variety of icons, including Notes, Geos, Topics, Codes, etc. These instructions will reference this as “the toolbar.” Depending on the size of your screen, some of the icons referenced in these instructions may be under “More Tools” in the toolbar.



4. **Change the data source** for the table to the most recent ACS 5-Year Estimates. One way to do this is to click the icon for **Dataset** in the toolbar. In the dropdown that appears, select **2022: ACS 5-Year Estimate Subject Tables** or the most recent ACS 5-Year Estimates dataset that is available.
5. [OPTIONAL] Click the icon for **Margin of Error** (which may be under “More Tools”) in the toolbar to deselect it. This will clean up the table by hiding columns that you do not need for this process.

Section C: Determine whether a youth lives in a high-poverty county, Census tract, American Indian Reservation, OTSA, ANVSA, ANRC, or Native Hawaiian Homeland Area.

Follow the instructions in this section to determine whether a youth qualifies as low-income based on whether they reside in a high-poverty area. You may check the poverty rates of multiple types of geographic areas permitted under [WIOA regulations](#) to find one that qualifies as high poverty. For instance, if you find that the youth’s residential county does not have a poverty rate of at least 25 percent, then you can check their Census tract. If the youth lives on an American Indian Reservation or in an OTSA, ANVSA, ANRC, or Native Hawaiian Homeland area, then you may also check the poverty rates of those geographic areas.

It does not matter the order in which you check the types of geographic areas. As long as one of the types of geographic areas permitted under WIOA regulations has a poverty rate of at least 25 percent, then the youth who lives in that geographic area qualifies as low-income.

1. Use the table that you set up in **Section B: S1701: Poverty Status in the Past 12 Months**. Confirm that your dataset is the most recent ACS 5-Year Estimates.

S1701 | Poverty Status in the Past 12 Months

American Community Survey | 2022: ACS 5-Year Estimates Subject Tables

2. Select the **Geos** icon in the toolbar.



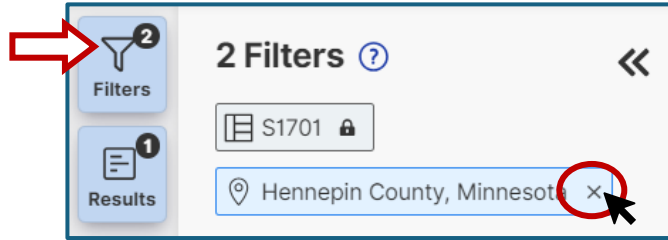
3. Select a type of geographic area in the dropdown to check. This may include:
 - a. County
 - b. Census Tract
 - c. Alaska Native Regional Corporation
 - d. American Indian Area/Alaska Native Area (Reservation or Statistical Entity Only)
 - e. American Indian Area/Alaska Native Area/Hawaiian Home Land

4. Navigate through the menu to select the youth’s residential geographic area.
5. Exit out of the Geos selector by clicking the **X** in the corner of the dropdown.
6. Confirm that your geographic area was correctly selected by checking that it is written in the header of the table (directly underneath the toolbar).
7. Identify the percent below poverty level for the geographic area. This is found in the top row of the table, “**Population for whom poverty status is determined,**” under the column header “**Percent below poverty level, Estimate**” for your selected geographic area.

Label	Hennepin County, Minnesota		
	Total	Below poverty level	Percent below poverty level
	Estimate	Estimate	Estimate
✓ Population for whom poverty status is determined	1,248,688	122,904	9.8%

8. If the percentage listed is **above 25%**, then the geographic area is considered to be high poverty under WIOA regulations. Document this for the youth’s file and you are done. If the percentage is 25% or below, move on to the next step.
9. If the percentage listed is **25% or below**, then you may repeat these steps in Section C to check other types of geographic areas. (For instance, if the youth’s county is not considered high poverty, you can check their Census tract, or vice versa.) Clear your existing geographic filter and go back to step #2 above to check another type of geographic area. To clear your geographic filters:

- a. Click the **Filters** icon on the far left of the screen.
- b. Select the **X** next to the geographic filter(s) you want to remove.
- c. Click the **Filters** icon again to hide the section.



If you have already repeated Section C and you have determined that the youth does not live in a high-poverty county, Census tract, American Indian Reservation, OTSA, ANVSA, ANRC, or Native Hawaiian Homeland area, then you can check if they live in a high-poverty set of contiguous Census tracts by following the instructions in [Section D](#) on the next page.

10. **FOR INDIAN AND NATIVE AMERICAN PROGRAM GRANTEES ONLY:** If the percentage listed for the **population for whom poverty status is determined** is **25% or below**, you may check the poverty level for the area’s American Indian and Alaska Native population alone. To do this:

- a. Scroll down in the table until you see the race and ethnicity breakdown under “RACE AND HISPANIC OR LATINO ORIGIN” in the left column.
- b. Find the “**Percent below poverty level, Estimate**” for the American Indian and Alaska Native population of your selected geographic area.

If the percentage below poverty level for the area’s American Indian and Alaska Native population alone is **above 25%**, then the youth qualifies as low income. Document this for the youth’s file and you are done.

If the percentage is **25% or below**, then you may repeat these steps in Section C to check other types of geographic areas. Clear your existing geographic filters and go back to step #2 above to check another type of geographic area.

If you have already repeated Section C and you have determined that the youth does not live in a high-poverty county, Census tract, American Indian Reservation, OTSA, ANVSA, ANRC, or Native Hawaiian Homeland area, then you can check if they live in a high-poverty set of contiguous Census tracts by following the instructions in [Section D](#) on the next page.

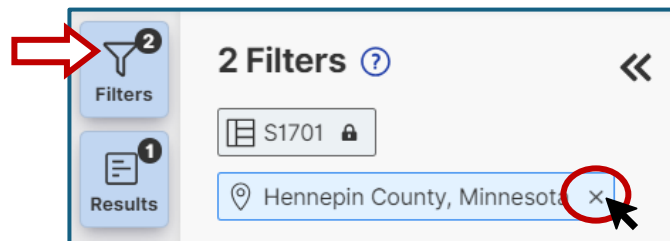
Section D: Identify a set of contiguous high-poverty Census tracts to determine eligibility or target recruitment and services.

A youth may be eligible for WIOA Youth services if they reside within a set of contiguous Census tracts that has a combined poverty rate of at least 25 percent. The instructions in this section describe how to identify a set of contiguous Census tracts and check their combined poverty rate.

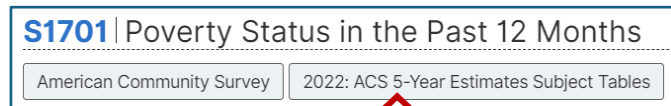
Identifying contiguous high-poverty Census tracts can also be helpful when creating and implementing a targeted recruitment strategy for WIOA programs.

1. Use the table that you set up in [Section B: S1701: Poverty Status in the Past 12 Months](#).
2. If applicable, clear any previously selected geographic filters you have from Section C.

- a. Click the **Filters** icon on the far left of the screen.
- b. Select the **X** next to the geographic filter(s) you want to remove.
- c. Click the **Filters** icon again to hide the section.



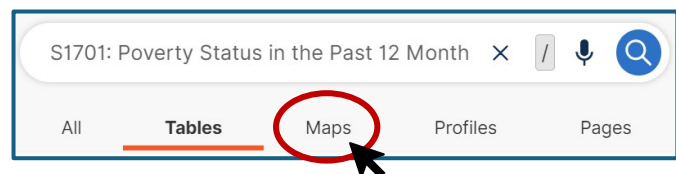
3. Confirm that the data source is the most recent ACS 5-Year Estimates by looking underneath the table title, **S1701: Poverty Status in the Past 12 Months**.



4. Select the **Geos** icon in the toolbar.
5. Select **Census Tract** from the dropdown and select the correct state, county, then Census tract for the youth. (See [Section A](#) if you need help identifying the youth's Census tract.)

If you see “No results found” here, your data source may be incorrectly set to the ACS 1-Year Estimates. Check that your data source is set to the most recent ACS 5-Year Estimates and try again.

6. Exit out of the Geos selector by clicking the **X** in the corner of the dropdown.
7. Select the **Maps** tab directly above the toolbar (in between “Tables” and “Profiles”). This option may also show up as an icon in the toolbar under “More Tools.”

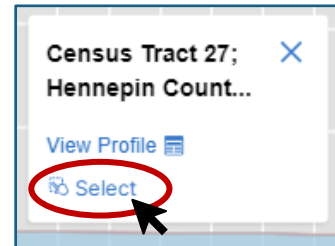


8. The map that appears should automatically be centered and zoomed in on the youth’s Census tract. The Census tract should be shaded, indicating that it is selected. (If this is not the case, check that your Geos are selected correctly and try again.)

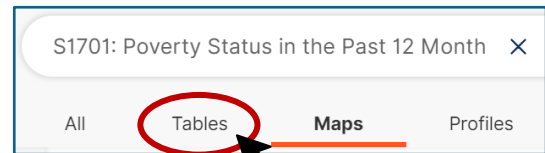
TIPS FOR USING THE MAP:

- ▶ To zoom in and out, you can use your mouse, trackpad, or touchscreen to scroll, or you can use the plus and minus buttons in the top right corner of the map.
- ▶ To move across the map, you can click the map and drag in any direction or use your arrow keys after you have selected the map.
- ▶ Adjust the color scheme of the map for improved visibility by selecting the **Colors** icon in the toolbar and selecting your preferred color scheme.

9. Select one or more additional Census tracts.
 - a. Click on Census tracts that are contiguous to (i.e., **share a border with**) the youth’s residential Census tract.
 - b. When you click on a Census tract, a small pop-up will appear. Click **Select** on the pop-up. The Census tract will become shaded indicating that it has been selected.
 - c. Click on the Census tract again to view the individual tract’s poverty rate or to deselect it by clicking **Deselect** in the pop-up.



10. Once you have selected one or more additional Census tracts and you are ready to check if their combined poverty rate is at least 25 percent, select **Tables** at the top of the screen between the search bar and the toolbar.



11. [OPTIONAL] Click the icon for **Margin of Error** (which may or may not be under “More Tools”) in the toolbar to deselect it. This will clean up the table by hiding columns that you do not need for this process.
12. Data for each Census tract that you selected on the map will appear in the table. The data you need are in the top row of the table: **Population for whom poverty status is determined**. You may need to scroll to the right to see all of the data.
13. Calculate the total poverty rate for the set of contiguous Census tracts. To do this:
 - a. Add together the **Total, Estimate** for all Census tracts.
 - b. Add together the number **Below poverty level, Estimate** for all Census tracts.
 - c. Divide the total below poverty level from part (b) by the total population from part (a) to find the proportion of the population that is below the poverty level. Multiply this number by 100 to get the percentage.

TIPS FOR CALCULATING THE TOTAL POVERTY RATE:

- ▶ Check out the last page of these instructions for [an example of how to calculate the combined poverty rate of a set of contiguous Census tracts](#).
- ▶ For this calculation, you can [download the Excel worksheet from WorkforceGPS](#), which will do this calculation for you based on the numbers you enter.
- ▶ If you would prefer to do the calculations yourself in Excel, you may download the Table from the Census website to Excel by selecting the **Excel** icon in the toolbar.

- 14.** If the calculated percentage is **above 25%**, the set of contiguous Census tracts is considered high poverty under WIOA. Document this by downloading the Table to Excel by clicking the **Excel** icon in the toolbar under “More Tools” and saving it to the youth’s file. At this point, you are done.
- 15.** If the calculated percentage is **25% or below**, you may continue reworking the set of contiguous Census tracts if you think there is another combination that will yield a total poverty rate that is above 25%. To return to the map and continue selecting and deselecting Census tracts, click the **Maps** tab between the search bar and the toolbar or select the icon under “More Tools” in the toolbar.

If you have already reworked the set of contiguous Census tracts and you do not find a combination that yields a combined poverty rate of at least 25%, then the youth does not qualify as living in a high-poverty area for WIOA.

- 16. FOR INDIAN AND NATIVE AMERICAN PROGRAM GRANTEES ONLY:** If the percentage listed for the set of contiguous Census tracts is **25% or below**, you can check the poverty level for the area’s American Indian and Alaska Native population alone. To do this:
- a. Scroll down in the table until you see the race and ethnicity breakdown under “RACE AND HISPANIC OR LATINO ORIGIN” in the left column.
 - b. Use the **Total, Estimate and Below poverty level, Estimate** for the American Indian and Alaska Native alone population to calculate the combined poverty rate for the set of contiguous Census tracts.

If the percentage below poverty level for the area’s American Indian and Alaska Native population alone is **above 25%**, then the youth qualifies as low income. Document this for the youth’s file and you are done.

If the percentage is **25% or below**, you may continue reworking the set of contiguous Census tracts if you think there is another combination that will yield a total poverty rate that is above 25%. To return to the map and continue selecting and deselecting tracts, click the **Maps** tab between the search bar and the toolbar or select the icon under “More Tools” in the toolbar.

If you have already reworked the set of contiguous Census tracts and you do not find a combination that yields a combined poverty rate of at least 25%, then the youth does not qualify as living in a high-poverty area for WIOA.

Example: Calculating the Combined Poverty Rate for a Set of Contiguous Census Tracts

This is an example of how to calculate the combined poverty rate of a set of contiguous Census tracts using data for Census tract 27 and Census tract 32.

Label	Census Tract 27; Hennepin County; Minnesota			Census Tract 32; Hennepin County; Minnesota		
	Total	Below poverty l...	Percent belo...	Total	Below poverty l...	Percent belo...
	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
✓ Population for whom poverty sta...	2,820	889	31.5%	2,136	482	22.6%

The table below is a recreation of the table in the image above:

Label	Census Tract 27, Total, Estimate	Census Tract 27, Below poverty level, Estimate	Census Tract 27, Percent below poverty level, Estimate	Census Tract 32, Total, Estimate	Census Tract 32, Below poverty level, Estimate	Census Tract 32, Percent below poverty level, Estimate
Population for whom poverty status is determined	2,820	889	31.5%	2,136	482	22.6%

- a. Add together the **Total, Estimate** for all Census tracts.

$$2,820 + 2,136 = 4,956$$

- b. Add together the number **Below poverty level, Estimate** for all Census tracts.

$$889 + 482 = 1,371$$

- c. Divide the total below poverty level from part (b) by the total population from part (a) to find the proportion of the population that is below the poverty level. Multiply this number by 100 to get the percentage.

$$1,371 / 4,956 = 0.277 \text{ or } 27.7\%$$

The total combined poverty rate for the set of two contiguous Census tracts in the table above is **27.7%**. Because this is greater than 25%, a youth who resides in Census tract 32 would qualify as living in a high poverty set of contiguous Census tracts under WIOA.

LOW INCOME STATUS AT PROGRAM ENTRY DATA VALIDATION FREQUENTLY ASKED QUESTIONS

An individual is only required to meet one of the following scenarios through acceptable documentation to be considered low income at program entry.

Scenarios Classifying Low-Income Status	SCWOS Program Application Tab
Federal, State, and Local Public Assistance Recipient	Public Assistance tab
Family Income Below Poverty Line or 70%	Household and Income tab
Free/Reduced Lunch Eligible Person or Recipient	Public Assistance tab
Foster Child of Which Payments are Made	Public Assistance tab
Disabled Person’s Personal Income Below Poverty Line or 70%	Barriers tab + Household and Income tab
Homeless/Runaway	Barriers tab
Youth Living in High Poverty Area	Public Assistance tab

1. SC Works Online Services (SCWOS) doesn’t always indicate that family income is required. When is family income required to be verified?

If the “Household and Income tab” is listed as the location of the question to determine low-income status, family income must be evaluated. SCWOS automatically considers a participant as low income based on a “Yes” response to questions related to the low-income scenarios and completion of the “Verify” for the related field.

2. How do we validate low-income status if family income was not used to designate an individual as low income?

SCWOS auto-determines an individual’s low-income status based on a “Yes” response to any of the questions that are relevant for the low-income scenarios. To validate low-income status, validate the documentation provided to support the applicable scenario. For example, if a participant is classified as low income due to a “Yes” response to SNAP benefits, staff must ensure the SNAP documentation is present, relevant, and meets the time requirements at enrollment. The individual must be listed in the documentation, and the information must be documented in the program application accurately.

3. If a participant is no longer employed with a company and no longer has access to pay stubs, would self-attestation be an acceptable form of documentation?

Self-attestation is not an acceptable form of source documentation for validating income. Employers are required to retain payroll records for a minimum of three years. If the individual’s employer issues paystubs, they may be able to obtain the documentation virtually via their employer’s HR portal. Otherwise, they should request the documentation from their employer.

4. For gig workers, or people who get paid on apps, the amount of the pay will be shown but the individual's name will not. What if they only provided screenshots?

Mobile payment and gig applications/websites generate account and earnings statements, which include the individual's identifying information. The following are instructions on generating and downloading the statement for common resources:

- Cash App: [How to access your Cash App account statements](#)
- PayPal: [How to View and Download Statements and Reports | PayPal US | PayPal AI](#)
- Venmo: [Transaction History | Venmo](#). Note: Because it's editable, it's recommended to instruct individuals to put the email address of the case manager for enrollment.
- Door Dash: [Dasher Earnings Statements | Dasher Support | DoorDash Help Center](#)
- Uber: [Understand your weekly earnings statements | Driving & Delivering | Uber Help](#)

5. An individual lives with their partner, hasn't worked for the past six months, and has no documentation to prove low-income status. What do we do?

If the individual does not receive any form of income listed in the attachment *WIOA Family Income – Inclusions & Exclusions*, and no records can be accessed or presented to support this, the low-income status cannot be validated. Staff should document every attempt to obtain documentation and the reasons why documentation couldn't be obtained. Please see the *Low-Income Data Validation Templates* attachment.

6. What do we do for individuals who have worked in the past six months, but do not have paystubs or a bank account?

For employment that is paid in cash, a signed employer statement is sufficient to verify employment income. If the employer issues paystubs, the individual may either obtain documentation virtually via their employer's HR portal or request the documentation from their employer. If the individual is paid via mobile applications or websites for providing goods or services, see the answer to question four. Employers are required to retain payroll records for a minimum of three years. Please see the *Low-Income Data Validation Templates* attachment.

7. An individual is paid in cash but their employer refuses to write a statement verifying income, and they do not have a bank account.

Staff should attempt to obtain third-party verification, such as a letter from a landlord, caseworker, or community organization. If third-party verification cannot be obtained, the low-income status cannot be validated. Staff should document every attempt to obtain documentation and reasons why documentation couldn't be obtained. Please see the *Low-Income Data Validation Templates* attachment.

8. How do we determine youth income?

The **Validation of Data Element – Low Income Status at Program Entry** memo provides examples of acceptable documentation for the numerous ways to determine youth low-income status. The

low-income scenarios that are exclusive to youth are (c) Free/Reduced Lunch Eligible Person or Recipient and (g) Youth Living in a High Poverty Area.

9. The parents of a youth don't want to provide household income. What do we do?

First, determine if the youth is considered low income via a scenario that doesn't rely on financial documentation. If they would only be considered low income based on calculating family income, the low-income status cannot be validated. Staff should document every attempt to obtain documentation and reasons why documentation could not be obtained. Please see the *Low-Income Data Validation Templates* attachment.

10. A youth lives with an aunt or uncle and hasn't worked in six months but doesn't have any acceptable source documentation. What do we do?

First, determine if the youth is considered low income via a scenario that doesn't rely on financial documentation. If they would only be considered low income based on calculating family income, the low-income status cannot be validated. Staff should document every attempt to obtain documentation and reasons why documentation couldn't be obtained. Please see the *Low-Income Data Validation Templates* attachment.

11. An 18-year-old lives with a parent. We can get the parent's paystub, but the child has never worked or doesn't have acceptable source documentation. What do we do?

If the individual doesn't receive any form of income listed in the *WIOA Family Income – Inclusions & Exclusions* attachment, and no records can be accessed or presented to support this, the low-income status cannot be validated. Staff should document every attempt to obtain documentation and reasons why documentation couldn't be obtained. Please see the *Low-Income Data Validation Templates* attachment.

12. A foster child, placed with a relative without legal guardianship, is considered a household of one. If the child has no earned income, how should staff verify both household and income without self-attestation?

If it has been verified that foster care payments are made on the foster child's behalf, or via another low-income scenario, it is not necessary to obtain family (i.e. the relative's) income.

13. Does SCWOS auto-classify someone as low income based on a "Yes" response to federal or state public assistance resources if the individual is a foster child or if they are homeless?

For a foster child to be declared low-income, foster care payments must be made on their behalf, or at least one of the other low-income scenarios must be attributable to this individual.

14. Can local workforce development areas (LWDAs) be granted access to the unemployment insurance (UI) wage records in SCUBI for WIOA income verification purposes?

Though Eligibility Specialists were previously able to access this system, the WED/WIA Portal was decommissioned. Individuals can obtain their UI claim/payment history via [MyBenefits](#).

15. Are staff allowed to have individuals present their Medicaid card since low income is part of the Medicaid qualification process.

Being in a Medicaid program may be an acceptable form of public assistance as long as the Medicaid program has the same or more strict income restrictions. This must be determined and verified on a case-by-case basis.

16. For customers certified after April 1, 2026 (the effective date of SIL 20-09, Change 1), and for whom self-attestation was used, should staff go back and remove the self-attestation from those sections?

No, staff do not need to go back and remove self-attestation that was used to certify low-income status after April 1, 2026. DEW's Internal Audit team will consider the change in instruction for low income to be effective as of the date of publication of the **Validation of Data Element – Low Income Status at Program Entry** memo.

17. If a customer is employed or has worked within the past six months and is receiving one of the listed benefits (for example SNAP), is it not necessary to collect income documentation?

It is not necessary to collect and verify family income if the individual is classified as low-income as a result of being attributed to one of the other low-income scenarios.

18. Staff use an employment verification form to verify continued employment. It may be completed with verbal verification from the participant or it may be sent to an employer (who may use a third-party verification software). Is this sufficient for compliance? Also, would a combination of employer verification forms and other allowable documentation sources be sufficient for compliance when a third-party is not used?

The following are allowable source documentation for verifying follow-up employment:

- UI wage match/administrative wage match, such as the National Directory of New Hires
- Signed post-exit survey (self-reported) from program participants
- Copy of pay stubs, payroll slip, or leave and earnings statements (minimum of two)
- Income tax records, W-2 form, or other state department of revenue or taxation records
- Railroad retirement system
- Quarterly tax payment forms (such as IRS Form 941)
- A signed letter from an employer on company letterhead (attesting to an individual's employment status and earnings)
- Self-employment or sales commission worksheets signed and attested to by program participants
- Cross-match with partner program administrative databases (such as TANF, SNAP or other public assistance programs)
- Detailed case notes verified by employer and program staff

LOW INCOME STATUS AT PROGRAM ENTRY
DATA VALIDATION TEMPLATES

Self-Attestation of Homeless Status

Participant Name: _____

Date of Birth: _____

Program Entry Date: _____

I attest that I am currently experiencing homelessness as defined by federal guidelines.

Living in a shelter or transitional housing

Living in a place not meant for habitation

Temporarily staying with others due to loss of housing or hardship

Other: _____

Participant Signature: _____ Date: _____

Staff/Witness Signature: _____ Date: _____

Employer Statement for Cash-Paid Income

Employee Name: _____

Employer Name: _____

Employer Address/Phone: _____

This letter verifies that the above individual is/was employed:

Position: _____

Employment Dates: _____ to _____

Paid in cash: Yes _____ No _____

Pay Rate: \$ _____ per _____

Average hours per week: _____

Estimated 6-month income: \$ _____

Employer Signature: _____ Date: _____

Contact Information: _____

Third-Party/Collateral Contact Verification

Participant Name: _____

Third-Party/Organization: _____

Relationship to Participant: _____

Contact Phone/Email: _____

I verify that the participant receives cash income and lacks financial records.

Estimated 6-month income: \$ _____

Additional Notes: _____

Third-Party Signature: _____ Date: _____

Case Notes Template – Documentation Attempts

Case Notes – Verification Attempts

Participant Name: _____

Date: _____

Attempts Made:

- Paystub request: _____
- Employer contact attempt: _____
- Third-party/collateral attempt: _____
- Other: _____

Barriers Encountered:

Next Steps:

