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