

**Determination of Dependency Status Policy for the  
Northeast Ohio Consortium Council of Governments  
Workforce Innovation and Opportunity Act Policy C-06**

**I. Purpose.**

The purpose of this policy is to outline the process for determining if an applicant or member of a family is dependent upon, or independent of, his/her parents(s) or guardian(s).

**II. Effective Date.**

July 1, 2015.

**III. Background.**

This policy is intended to help avoid uncertainty and/or inconsistency in making eligibility decisions regarding family size and the inclusion of income when relevant for all appropriate members of the applicant's family. The support provided by parents or guardians must be carefully considered when determining eligibility for WIOA adult and youth program services.

**IV. Requirements.**

**A. WIOA Youth Program.**

Dependent status must be documented for all WIOA eligible youth applicants, ages 14-24, as defined in section 129 (a)(1), (2), and (3) of WIOA. Verification of dependent status and means of support must be documented for each youth program participant by completion of checklist that incorporates, at a minimum, the categories listed in Attachment A. Self-attestation may be accepted to document parental support pursuant to self-attestation procedures outlined in Area Workforce WIOA Policy C-3, Source Documentation.

An individual under 18 years of age is always considered to be a dependent child, unless the youth is not living with parents or guardians and is not receiving any support from them.

The issue of guardianship concerning dependent children is determined either by decree of court or by a state or federal agency that has established or assumed guardianship.

Determination of dependent status must also occur for all WIOA youth, ages 18-24, who are applying for WIOA youth-funded individual training accounts (ITAs) as not all out-of-school youth enrolled in the youth program are low income individuals.

**B. WIOA Adult Program.**

Dependent status must be documented for all WIOA adults, ages 18-24, who are applying for WIOA adult-funded individual training accounts (ITAs). The determination of dependent status is driven by the following factors:

1. The amount of support provided by the applicant by his or her parent(s) or guardian(s);
2. The applicant's age;
3. The applicant's marital status;
4. The applicant's dependents (biological/adopted children, disabled adults, and others dependent on the applicant for more than 50% of the applicant's support; and
5. Veteran status.

Verification of dependent status and means of support must be documented for each WIOA adult participant, ages 18-24, who is applying for an ITA. This is done by completion of the attached checklist. **See Appendix One.**

Self-attestation may be accepted to document parental support when signed by a parent or guardian.

#### **V. Definitions.**

Dependent: an applicant who falls in any one of the following categories:

1. Under 18 years of age, living with parents or guardians, and is receiving support from them; or
2. Age 18-24 and parent(s) or guardian(s) pay(s) for more than 50% of the applicant's support.

Independent: an applicant who falls into any one of the categories below:

1. Under 18 years of age, not living with parents or guardians, and is not receiving any support from them;
2. Individuals, age 18-24, providing more than 50% of their own support;
3. Age 25 or older;
4. Married (including separated, but not divorced);
5. Has children that receive more than half of their support from the applicant;
6. Has dependents other than a spouse or children who live with the applicant and receive more than half of their support from the applicant;
7. Lives in own residence or in a residence without financial or other support from parents or guardians;
8. Is on active duty in the U.S. armed forces for purposes other than training; and/or
9. A veteran of the U.S. armed forces.

Support: as it relates to dependent, financial assistance from parents or guardians to help pay for food, clothing, shelter, utilities, education, medical and dental care, recreation, transportation, and any other living expenses; as well as government-provided cash public assistance and food assistance.

**VI. Monitoring.**

The Area will conduct oversight and monitoring of the implementation of all WIOA programming by all OMJ Center operators, partners, and/or providers pursuant to Area Workforce Policy D-3. Any issues discovered will be handled through the area’s monitoring resolution process.

**VII. Technical Assistance.**

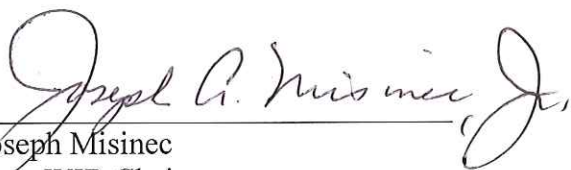
To get questions answered and technical assistance regarding this policy or issues regarding administration of WIOA, you are urged to contact the Executive Director of the NOC COG at [craigsernik@neohio.twcbc.com](mailto:craigsernik@neohio.twcbc.com).

The question/issue will be researched, analyzed, and a formal written response will be provided. If a second opinion is required, the director is not available, or there is no clear answer to the question/issue, either the Executive Director or any OMJ Center or provider staff may seek additional guidance by submitting the same to the Office of Workforce Development: [WIAQNA@jfs.ohio.gov](mailto:WIAQNA@jfs.ohio.gov); and by copying your request to the Executive Director of the NOC COG.

**VIII. References.**

- Workforce Innovation and Opportunity Act, Public Law 113-128.
- 29 U.S.C. 3101 et seq.
- ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 14-XX, Source Documentation for WIOA Eligibility, (date).

**IX. Signatures.**

  
 \_\_\_\_\_  
 Joseph Misinec  
 Area WIB Chair

9/16/15  
 \_\_\_\_\_  
 Date

  
 \_\_\_\_\_  
 Dan Claypool  
 Ashtabula County Commissioner  
 Northeast Ohio Consortium Council of Governments,  
 Chief Elected Official

8-5-2015  
 \_\_\_\_\_  
 Date

Original Version Approved: August 5, 2015

Subsequent Revisions:

**Appendix One  
Dependent Status Checklist**