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Office of Compliance Issuance

11-2026

Release Number-Program Year

Active Date: 02/09/2026
Effective Date: 02/09/2026
Expiration Date: Continuous, until further notice

Family and Workforce Centers of America (FWCA) is the fiscal agent and workforce support organization for Saint Louis County Workforce Development.

SUBJECT:

Priority of Services – Adults and Veterans

ATTACHMENTS (if any): N/A

This Issuance is an official policy of St. Louis County Workforce Development.

This Issuance Affects:

- Workforce Innovation and Opportunity Act (WIOA) Programs
Title I: Adult
Title I: Dislocated Worker
Title I: Youth

FOR THE ATTENTION OF:

All applicable WIOA staff or subcontractors—Implementation of this policy is immediate and continuous.

RESCISSIONS: N/A

REFERENCES:

- OWD Issuance 01-2023 – Statewide Enrollment and Exit Policy
OWD Issuance 11-2023 – Veterans Priority of Service
OWD Issuance 13-2025 – Federal Income Level Guidelines for Workforce Innovative and Opportunity Act (WIOA)
Title I Eligibility Determinations
TEGL 10-09
20 CFR 680.650

SUMMARY

This policy provides St. Louis County Development (STLCOWD) to Workforce Staff regarding priority of service for public-assistance, low income and other disadvantaged individuals.

This policy also provides requirements and procedures regarding providing priority of service for veterans and their eligible spouses who are individuals of Missouri Job Centers.

SUBSTANCE

The WIOA regulations require states and Local Workforce Development Areas (LWDAs) to establish priority of service criteria for Adult program-funded Individualized Career Services and Training Services. STLCOWD established tiered, local, priority-of-service policies. These policies assign top priority to:

1. Veterans and their eligible spouses
2. Public assistance recipients;
3. Low-income individuals;
4. Individuals who are basic-skills deficient (including English language learners);
5. Low-income and economically disadvantaged individuals, and individuals who do not qualify for other programs;
6. Up to 45% of the WIOA Title Adult funds may be used to serve those clients who have incomes not exceeding 250% of the Lower Living Standard Income Level or Missouri Poverty Guideline;
7. Missouri residents.

This is in addition to the mandate that requires veterans and their spouses receive priority of service for all DOL funded job training programs, including the WIOA Adult program. These policies must also allow other eligible individuals outside of the top-priority group to have access to these services. DOL's recommendation¹ is to give priority of service to these individuals, ensuring that at least 75% of a state's individuals receiving individualized career and training services, *in the Adult* program, are from at least one of the priority groups mentioned above. The priority of service rate must never be lower than 50.1%. An Individual who does not fall within these seven (7) categories may be approved on a case-by-case basis with approval by WIOA designated staff.

These priorities are in addition to the requirements in the WIOA regulations at 20 CFR 680.650 that mandate veterans and their eligible spouses receive priority of service for all DOL funded job training programs, including the WIOA Adult program.

Individuals who do not meet one of the above listed criteria may still be eligible for Individual Career Services and Training Services, with approval from designated WIOA Designated staff (Executive Director, Director of Compliance, FWCA Executive Leadership).

¹ TEGL 7-20, "Effective Implementation of Priority of Service Provisions for Most in Need Individuals in the Workforce Innovation and Opportunity Act (WIOA) Adult Program," November 24, 2020.

A. VETERANS PRIORITY OF SERVICE

Veterans defined under the Workforce Innovation and Opportunity Act (WIOA), receive priority of service in all Department of Labor-funded training programs. Priority of Service is the right of eligible, covered individuals to take precedence over eligible, non-covered individuals in obtaining services funded, in whole or in part, by the U.S. Department of Labor (DOL). This priority means:

- The covered individual receives access to the service or resource earlier in time than the non-covered individual; or
- If the service or resource is limited, the covered individual receives access to the service or resource instead of, or before, the non-covered individual. Priority of Service does not change the eligibility requirements or the intended function of a program or service. To receive priority for a program or service, covered individuals still must meet all statutory eligibility and program requirements for participation.

Every Missouri Job Center located in the STLCOWD area must identify veterans and eligible spouses, at the point of entry, to ensure they are aware of:

- Their entitlement to priority of service
- The full array of employment, training, and placement services available under priority of service; and
- Any applicable eligibility requirements for those programs and/or services that veterans and eligible spouses, including widows and widowers, as defined in the statute and regulations, are eligible for priority of service. The term “veteran” means a individual who served at least one day in the active military, naval, or air service, and who was discharged or released 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 often is 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 Federal authorities.

“Eligible spouse” 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 priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days
 - i. Missing in action;
 - ii. Captured in the line of duty by a hostile force; or
 - iii. Forcibly detained or interned in the line of duty by a foreign government or power;
- c) Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or

- d) Any veteran who died while a disability was in existence. A 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.

Priority of service means that veterans and eligible spouses are given priority over non-covered individuals for the receipt of employment, training, and placement services provided under a qualified job training program. Priority means that veterans and eligible spouses are entitled to precedence over non-covered individuals for services. This means that a veteran or an eligible spouse either receives access to a service earlier in time than a non-covered individual or, if the resource is limited, the veteran or eligible spouse receives access to the service instead of, or before, the non-covered individual. It is important to note that state and local program operators do not have the discretion to establish further priorities within the overall priority established by the regulations.

- For a service such as classroom training, priority of service applies to the selection procedure, as follows:
- First, if there is a waiting list for the formation of a training class, priority of service is intended to require a veteran or eligible spouse to go to the top of that list.
- Second, priority of service applies up to the point at which an individual is both: a) approved for funding; and b) accepted or enrolled in a training class.

Once a non-covered individual has been both approved for funding and accepted/enrolled in a training class, priority of service is not intended to allow a veteran or eligible spouse who is identified subsequently, to “bump” the non-covered individual from that training class. The WIOA Title I Adult program also provides priority services for public assistance recipients, other low-income individuals, or individuals who are basic skills deficient. States and local areas must apply priority of service in the order below:

- First, to veterans and eligible spouses who also are included in the groups given statutory priority for WIOA adult formula funds. This means that veterans and eligible spouses who also are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority for services provided with WIOA adult formula funds.
- Second, to non-covered individuals (individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
- Third, to veterans and eligible spouses who are not included in WIOA’s priority groups.
- Fourth, to any other populations identified by the Governor or Local Board for priority.
- Last, non-covered individuals outside the groups given priority under WIOA.

ADDITIONAL

Priority 6: Health and Human Services (HHS) Poverty Guidelines - Calculation at 250%

FAMILY SIZE	ANNUAL INCOME
1	\$39,900
2	\$54,100
3	\$68,300
4	\$75,000
5	\$96,700
6	\$110,900
7	\$125,100
8	\$139,300

For families with more than 8 persons, add \$14,200 for each additional family member.

INQUIRIES

Please direct all questions or comments regarding this Issuance document to compliance@fwca-stl.com. All active, expired, or rescinded Issuances are available upon request.