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## Eligibility for State Funded Grant Programs

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### GENERAL INSTRUCTIONS

The attached Directive is being issued in draft to give the Workforce Development Community the opportunity to review and comment prior to final issuance.

Submit any comments by email no later than **March 23, 2024**.

All comments received within the comment period will be considered before issuing the final Directive. Commenters will not be responded to individually. Rather, a summary of comments will be released with the final Directive.

Comments received after the specified due date will not be considered.

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#### Email

[WIOAPolicy@edd.ca.gov](mailto:WIOAPolicy@edd.ca.gov)

Include “Draft Directive Comments” in the email subject line.

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If you have any questions, contact the Policy Unit at [WIOAPolicy@edd.ca.gov](mailto:WIOAPolicy@edd.ca.gov).

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## Eligibility for State-Funded Grant Programs

### Executive Summary

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This policy provides guidance on eligibility for state-funded grant programs and establishes procedures for making and documenting eligibility determinations. This policy applies to all grantees, subrecipients, contractors, and partners of a state-funded grant program, and is effective immediately.

Retain this Directive until further notice.

### References

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- *Section 1621(d) of Title 8 of the United States Code*

### Background

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The Employment Development Department (EDD) Workforce Services Branch (WSB) administers various state-funded grant programs. These programs prepare job seekers, including individuals with barriers to employment, with employment and training services for participation in the workforce. In managing multiple state-funded grant programs, the WSB aims at improving California's workforce programs and institutions to support a dynamic and globally successful state economy that offers all California residents an opportunity for a higher quality of life.

### Policy and Procedures

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#### Definitions

*California Resident* – The term "California Resident," includes (1) every individual who is in the state for other than a temporary or transitory purpose, and (2) every individual who is domiciled in the state who is outside the state for a temporary or transitory purpose. All other individuals are nonresidents.

*Grantee* – The direct recipient of a state-funded grant award from the Employment Development Department (EDD), responsible for overall management of a state-funded grant project. A grantee may be a Community Based Organization (CBO), adult education provider, California Community College district or college, other education or training provider, labor organization, labor management partnership, workforce intermediary, or a Local Workforce Development Area/Board or Administrator, or other type of organization as outlined in the applicant eligibility section of the respective Solicitation for Proposals (SFP).

*State-Funded Grant Program* – Funding provided by the California General Fund to the EDD to provide awards to grantees for a specific purpose as required by law.

### **Eligibility for State-Funded Grant Programs**

Eligibility for State Funded Grant programs is determined by California Residency and proof of identification. Additional eligibility criteria may apply to individual grants, as outlined in each grant's SFP. In accordance with Section 1621(d) of Title 8 of the United States Code, states have the authority to determine that individuals without right to work documentation are eligible to receive services from state funded grants through the enactment of state law. Contact your assigned project manager and/or review the specific grant's SFP to determine how this applies to a specific grant. For grants where this allowance applies, grantees shall not seek information that is unnecessary to determine eligibility including immigration status, citizenship status, or Selective Service registration.

### **Establishing California Residency**

To participate in a state-funded grant program, individuals must provide proof of California residency. Proof of California residency can include any of the documents included in attachment 1 of this Directive. Scanned copies or copies printed from a verifiable online account may be acceptable. California residency documents must list the applicant's first and last name, and a California street address.

For individuals experiencing homelessness, individuals dislocated as the result of a disaster, or individuals that frequently migrate for work purposes, other types of documentation or a signed self-attestation may be considered on a case-by-case basis. Grantees should make every effort to collect one of the acceptable residency documents in attachment 1 but may defer to other types of documentation or signed self-attestation with an accompanying case note in CalJOBS describing the participant's hardship in obtaining an acceptable residency document.

If California residency document(s) addressed to the California Resident are not readily available, a country of origin birth certificate, marriage license, or domestic partner registration certificate can be used to trace their relationship to the individual the acceptable California residency document(s) are addressed to. The name on the California residency document(s) must match the name on the tracing document.

If the California residency document(s) reflect a name that differs from the tracing document due to a name change (for example, marriage, divorce, or court order), additional documentation will be required as evidence of the name change.

### **Providing Proof of Identity**

A California Resident must provide proof of identity to participate in a state-funded grant program. Documentation of identity can include any valid form of photo identification listed in attachment 2 of this Directive. A photo identification must show the name, date of birth, and photograph of the California Resident. Scanned copies or copies printed from a verifiable online account may be acceptable.

For individuals experiencing homelessness, individuals dislocated as the result of a disaster, or individuals that frequently migrate for work purposes, other types of documentation or a signed self-attestation may be considered on a case-by-case basis. Grantees should make every effort to collect one of the acceptable identification documents in attachment 2 but may defer to other types of documentation or a signed self-attestation with an accompanying case note in CalJOBS describing the participant's hardship in obtaining acceptable proof of identity.

### **CalJOBS**

Participant data for individuals served with state-funded grants must be entered into CalJOBS. An SSN is required to create an account for an individual in CalJOBS. If an individual provides their SSN, it should be used as part of the registration process to assist with reducing the duplication of accounts in the system and wage record matching for performance outcomes. If an individual does not provide an SSN, Local Workforce Development Areas should follow the guidance in *Pseudo Social Security Number in CalJOBS<sup>SM</sup>* ([WSD20-11](#)). Other grantees should contact their assigned Project Manager for guidance.

When completing the program application, Not Disclosed and Not Applicable can be selected for the Citizenship Status and Selective Service questions. Please note that if the individual is or will be co-enrolled in a Workforce Innovation and Opportunity Act (WIOA) funded grant or program, these responses should be reviewed at the time of conducting eligibility for WIOA.

### **Action**

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Bring this Directive to the attention of all affected parties.

### **Inquiries**

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If you have any questions, contact your assigned Project Manager.

/s/ JAVIER ROMERO, Deputy Director  
Workforce Services Branch

Attachments:

1. [Documentation of California Residency \(DOCX\)](#)
2. [Documentation of Identity Documents \(DOCX\)](#)

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*The EDD is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.*

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