

WIA Title I and Related Activities Manual

Chapter 13: Dislocated Worker Program

Section 13.5: Eligibility for Dislocated Worker Programs

Effective Date: July 1, 2008

Issue Date: September 11, 2008

Required Action

Action:

To establish criteria necessary to determine whether an individual is eligible for either state or federally funded dislocated worker services.

Who:

Dislocated Worker Program Services Providers

Background:

The state is establishing modified eligibility criteria for the state and the WIA federally funded dislocated worker programs. These criteria will allow program operators to serve those individuals most in need of such programs.

Policy and Procedures

NOTE: Unless specifically indicated (“federal only” or “state only”), the eligibility requirements for the federal and state Dislocated Worker (DW) programs are identical.

I. Definitions

The following definitions apply to the entire eligibility policy.

- A. ***Long attachment to the labor force*** means having been employed, at twenty or more hours per week, for at least six of the most recent thirty-six months in a single occupation. That occupation may be the applicant’s *primary occupation*. The six months need not be consecutive. See the *military service exception* for how to treat returning reservists serving in active duty.

An employee of a temporary employment agency, in order to demonstrate a *long attachment to the labor force*, must have worked on the same assignment for the hours and duration noted above.

- B. ***Primary occupation*** is the occupation the applicant has worked for the last thirty-six months. If the applicant has held more than one occupation in that time period, he or she must choose which occupation the program will establish in its records, as long as he or she can establish a *long attachment to the labor force* in that occupation. The service provider must confirm official titles of occupations using labor market information.

- C. A **termination of employment** is a permanent situation in which the employer lays off and does not plan to rehire the individual. For purposes of this policy, the following are not considered terminations of employment: (a) seasonal unemployment; (b) an end to an assignment through a temporary employment agency, unless the individual can demonstrate the temporary employment agency's inability to make subsequent placements in a similar industry or occupation; or (c) a *notice of termination* that includes a certain or tentative recall date within 180 days of the initial layoff date. Any non-seasonal layoff projected to last 180 or more days is a termination of employment.

A retirement or other voluntary separation from the labor force does not constitute a termination of employment, for purposes of this policy. The intent of this definition is to include only those terminated workers who wish to return to permanent, full-time work.

- D. A **notice of termination** from employment means a written notification from the employer, naming one or more individuals and indicating that employment will cease for the individual(s) at a specific future date.
- E. A **public announcement** means an official communication by an employer stating intent to close a business at a planned future date. This may be a written or verbal acknowledgement of the fact that the business will close. The closure may include a single site of employment, or one or more facilities or operating units within a single site of employment.

For such announcements, program providers must document the impending dislocation event and support a determination that the facility plans to close. State Rapid Response information resources are available for this purpose.

- F. **Eligible for unemployment insurance** means an individual who has applied for unemployment insurance and may receive benefits under state or federal unemployment insurance laws. An individual need not actually draw down benefits. Individuals who have exhausted unemployment insurance have already proven eligibility for unemployment insurance, and are included in this definition.

The intent of including unemployment insurance terminology in DW eligibility policy is to ensure service to those who have truly lost their job through no fault of their own, rather than those voluntarily leaving employment or those discharged from employment for cause.

- G. An individual is **unlikely to return** to a prior occupation or industry if job opportunities in that occupation or industry are significantly diminished for that individual. The service provider must consider any or all of the following in determining likelihood of return: (a) official assessments of market demand for the products or services in that occupation or industry; (b) local labor market conditions for that industry or occupation; (c) the evolution of skill requirements in that occupation or industry, and whether the individual's skills have kept pace over time; (d) the impact of technology or trade on the industry or occupation; and/or (e) the impact of a *military service exception* (see below).

A service provider must use all reasonable skill assessments, labor market information, and other reliable and established information sources in generating data to support their determination.

- H. **Long-term unemployed** means unemployed for at least fifteen of the last fifty-two weeks, with limited opportunity in the individual's local labor market for reemployment in a similar occupation. Such an individual must still be able to demonstrate a *long attachment to the labor force*, prior to the point of unemployment.

The fifteen weeks need not be consecutive.

- I. A **self-employed** individual means an individual who may not report to an authority that can lay him or her off, but whose business circumstances put the individual in a position similar to a *termination of employment*. Such circumstances may include, but are not limited to:
1. Failure of one or more businesses to which the self-employed individual supplied a substantial proportion of products or services; and/or
 2. Failure of one or more businesses from which the self-employed individual obtained a substantial proportion of products or services; and/or
 3. Substantial layoff(s) from, or permanent closure(s) of, one or more plants or facilities that support a significant portion of the relevant state or local economy; and/or
 4. Failure of the self-employed individual's farm or business due to general, relevant economic conditions.

Self-employed individuals may include both those leaving the enterprise permanently, and those who are in a transition period as a result of a prolonged effort to save the farm or business. A *self-employed* individual need not be physically removed from the enterprise, nor must he or she necessarily be in bankruptcy or foreclosure proceedings, in order to be considered under this definition. Family members (spouse or adult offspring) and farm or ranch hands who were active participants and derived their primary income from the enterprise may also fall under this definition.

- J. A **displaced homemaker** has slightly different definitions, depending on whether the service provider plans on using federal or state funding.

A **displaced homemaker (federal only)** is an individual who has been providing unpaid services to family members in the home and who both: (a) has been dependent on the income of another family member but is no longer supported by that income; **and** (b) is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment (see WIA Section 101(10)).

A **displaced homemaker (state only)** is an individual who has spent a substantial amount of years in the home providing homemaker services **and** (a) has been dependent upon the financial support of another; and now due to divorce, separation, death, or disability of that person, must find employment to self-support; **or** (b) derived the substantial share of support from public

assistance on account of dependents in the home and no longer receives such support.

K. A **military service exception** in this policy refers to military reservists returning from active duty within the last three years prior to program application. Such individuals shall not have any time spent on active duty counted against them, when calculating time parameters anywhere in this policy. For example, a reservist who spent the last four years in active duty, may look back as long as seven years (instead of the usual three) to determine their *primary occupation* and *long attachment to the labor force*.

L. **Interim employment** is a job that provides essential, transitory income while a person participates in the DW program. *Interim employment* must **not** be with the employer that originally dislocated the worker, nor with that employer via third party contract or any other basis, except for *temporary recalls*. Interim employment must be temporary, with a clear intent to leave the work at the completion of the program, in favor of permanent, unsubsidized employment. Interim employment does not have to be part-time; but service providers must be cautious in allowing participants to engage in employment that may preclude effective program participation, particularly if training is involved.

There is no strict policy for defining the wage rate for interim employment. However, the state recommends service providers question any interim employment that earns the individual more than 80 percent of what they previously earned.

M. **Temporary recalls** are requests from an employer for their former workers, who have either received a *notice of termination* or been *terminated from employment*, to return to work for 180 days or less. In a temporary recall, the employer still clearly intends to terminate the worker.

II. General Eligibility Requirements:

To be eligible for the DW program, an individual must meet **all** general requirements.

A. **Requirement of Determination and Timing.** Prior to providing DW program services to an individual, a service provider must determine that individual eligible. That determination must adhere to the parameters set within this eligibility policy. A service provider determines the eligibility of a potential dislocated worker at the time of application.

B. **Right to Work.** All participants must be citizens or nationals of the United States, lawfully admitted permanent residents, lawfully admitted refugees and parolees, or other individuals authorized by the Attorney General to work in the United States.

C. **Military Selective Service Act Compliance.** All participants must be in compliance with Section 3 of the Military Selective Service Act (United States Code, Title 50, Appendix section 453).

D. **Age.** All participants must be at least 18 years of age.

- E. **State Residency (state only).** All participants must be residents of Minnesota at the time employment ends, or have been working in Minnesota at the time employment ended.

III. Specific Requirements

To be eligible for the DW program, an individual must fall into **at least one** of the following categories:

- A. **Trade Adjustment Assistance Co-enrollment.** All other requirements in this section notwithstanding, any individual receiving a *notice of termination* from a worksite certified for Trade Adjustment Assistance is automatically eligible for DW services. The service provider must co-enroll that individual in either the state or federal DW program.
- B. **Traditional Layoff.** The individual has a long attachment to the labor force, **and** has received a notice of termination or has been terminated from employment, **and** is eligible for unemployment insurance, **and** is unlikely to return to a previous industry or occupation.

An exception may be made to allow DW eligibility even if the individual is not eligible for unemployment insurance, if the worker meets all other criteria in this definition **and** is not eligible for unemployment insurance due to either (a) insufficient earnings in the relevant time period **or** (b) having worked for an employer not covered by unemployment compensation law.

- C. **Mass Layoff or Plant Closing (federal only).** The individual has received a *notice of termination* or has been *terminated from employment* as a result of any permanent closure of or substantial layoff at a plant, facility, or enterprise; **or** works at a facility at which the employer has made a *public announcement* that the facility will close within 180 days.

An individual may be eligible for DW services **with the exception of** training services described in section 134(d)(3) of the Workforce Investment Act, if the employer makes a *public announcement* but does not provide a specific closing date, or provides a closing date more than 180 days in the future.

- D. **Long-term Unemployed (state only).** The individual is *long-term unemployed*. This may include older individuals who may have substantial barriers to employment by reason of age.
- E. **Regular Armed Forces Veteran.** The individual has been discharged from the regular armed forces, for reasons other than dishonorable discharge.
- F. **National Guard or Armed Forces Reserves Veteran.** The individual is leaving active duty status of the National Guard or Armed Forces Reserves, for reasons other than dishonorable discharge, and meets one of the following conditions: (a) the individual no longer has a civilian job upon his or her return; **or** (b) the civilian job still exists but is no longer appropriate because of the individual's increased skills obtained in the military, leaving the individual essentially underemployed; **or** (c) the civilian job still exists but pays less than

eighty percent than the military paid the individual during the time of active service.

Service providers should note the impact the *military service exception* can have on determining primary occupation and/or other rules of eligibility.

- G. **Self-Employed.** The individual is *self-employed*.
- H. **Displaced Homemaker.** The individual is a *displaced homemaker*, by either the state or federal definition. To be eligible for the state program, the support must have ended while the individual resided in Minnesota.
- I. **Smoking Ban Impact (state only).** The individual has been permanently separated from employment in a restaurant, bar, or lawful gambling organization from October 1, 2007, to October 1, 2009, due to the implementation the Minnesota Freedom to Breathe Act of 2007 prohibiting smoking in restaurants and bars. Restaurant/bar/gambling establishment workers who lose their jobs as a result of an equally or more aggressive city or county smoking ban during that time period are also eligible.
- J. **Flexibility.** Service providers have some discretion in interpreting this portion of policy, given unpredictable and unusual circumstances surrounding many layoff situations. (For example, a communication from an employer announcing a plant closing may be highly ambiguous regarding intent to re-open.) In such situations, service providers must still (a) refer to at least one of the specific requirements in this section as the basis for an eligibility determination; (b) document the unusual circumstances behind the provider's interpretation (see *Documentation* section below); and (c) remain consistent with other individuals in similar circumstances.

There is no flexibility in the general requirements.

IV. Documentation

- A. **Requirement to document.** Service providers must document in the individual's file the basis for determination of eligibility.
- B. **Acceptable documentation.** Official government documentation must exist in the individual's file for all general requirements (right to work, military special service act compliance, and age). The reader can find specific documentation requirements here in the Attachments to this policy. Attachment A describes General Program Documentation Requirements. Attachment B describes Right to Work Documentation Requirements.

Self-certification of citizenship or right to work is **not** an acceptable basis for determining eligibility.

- C. **Specific documentation for extended plant closings (federal only).** In cases where an employer that has made a *public announcement* decides to extend the projected date of plant closure, after participant program enrollment and beyond an original 180-day window, the dislocated worker

customer must provide documentation from the employer. With such documentation, otherwise eligible participants may participate in training services described in section 134(d)(3) of the Workforce Investment Act, in addition to the other DW services for which they have already been found eligible, irrespective of the 180-day limit stated elsewhere in this policy.

V. Eligibility Disqualifications

- A. **General presumption of continuing eligibility.** Unless a customer takes a specific action listed in this section, he or she remains eligible for the program until he or she completes the program, exits voluntarily (e.g., moves out of state), or exits due to circumstances beyond the customer's control (e.g., death). Providers may pre-emptively exit a customer only for the reasons stated in this policy, or after consultation with state or federal authorities.
- B. **Compulsory reasons for disqualifying an eligible DW customer.** A service provider **must** immediately exit a customer if it discovers any of the following: (1) the customer no longer meets one or more of the general requirements (right to work, military special service act compliance, age); **or** (2) the customer has undertaken full-time work that does not fall under a reasonable interpretation of *interim employment* or *temporary recall*; **or** (3) the customer, prior to layoff, accepts a buyout package that essentially qualifies the individual as a voluntary quit **or** (4) the customer has provided false or intentionally misleading information that served as the basis for an eligibility determination; **or** (5) the customer is not in training yet has verifiably stopped a serious search for permanent, full-time work.
- C. **Discretionary reasons for disqualifying an eligible DW customer.** A service provider **may** exit a customer, at its own discretion, if it determines any of the following: (1) the customer presents a direct threat to the health or safety of any employees of the service provider, or any other customers present at the service provider's location; **or** (2) the customer is uncooperative with all reasonable attempts to work with him or her on a successful transition to permanent, full-time work.
- D. **Documenting disqualifications.** The service provider must carefully document any and all cases of disqualification.

VI. Training Eligibility

- A. **Importance of Plan.** Just as not every laid off worker is automatically eligible for the DW program, **not** every DW program customer is automatically eligible for training. All training that the service provider pays for using DW funds must have a basis in the employment and training plan (or similar career planning document) that the customer and counselor have agreed upon.
- B. **Training with a Credential.** Any training for a new occupation or industry must take place in a state licensed or registered program (or in a program that is exempt) and should lead to a meaningful credential. Such training is only for dislocated workers whose skills are obsolete and who have no transferable skills likely to result in employment at a comparable wage. Such training is **only**

provided toward occupations or industries with reasonable expectations of job availability (i.e. occupations which are in demand) based on the service provider's thorough assessment of local labor market information, supplied by valid sources of information, where the individual currently lives or is willing to relocate.

- C. **WIA certification (federal only).** Customers in federally funded programs may only receive reimbursement for a WIA certified training program. A list exists from the [ISEEK website](#).

VII. Frequently Asked Questions

The following questions highlight common situations you may see when determining an individual's eligibility for the Dislocated Worker program.

This section may change, to add, delete, or clarify questions, **without** a public comment period. This agency **will** provide public comment period for any Q&As that represent substantial changes to existing policy or practice.

Q: Can an individual be declared ineligible for DW because a service provider does not have sufficient funds to serve that worker?

A: No. Fund availability has nothing to do with an individual's eligibility. A service provider should determine eligibility based **solely** on the parameters laid out in this policy. If a provider does not have sufficient funds to enroll every worker found eligible, they should consult with state authorities to determine what avenues are available to request more funds.

Q: What can the DW program do for someone who is "under-employed"?

A: Someone who is employed, even if the employment appears less than appropriate, can only receive services if they would otherwise be eligible for the program **and** if their employment meets the definition of *interim employment*.

Q: A DW program applicant has worked full-time, five and a half of the last thirty-six months (she was a student before that). Can we sneak her in?

A: No. She does not meet the requirement for long attachment to the labor force.

Q: A veteran is applying for the DW program. He's a regular armed forces veteran, discharged honorably. He has not yet accessed his benefits available through the GI bill. Also, he wants to go to school for four years. Is he eligible?

A: Yes. It is important to separate out the **DW program eligibility** of the customer, from the determination of **which DW services** may be most appropriate for that customer. First, determine if the veteran is eligible: in this case, he is eligible. Mark him eligible and enroll him. Then, work through what training may be appropriate.

This agency requires service providers to use all available federal resources before accessing state resources. This applies to the DW program. The customer should, in their counselor-approved employment and training plan, come up with a course of study and apply GI bill benefits to that course of study. If those resources are not sufficient to complete the plan, the service provider may use DW resources to help the customer finish those studies.

There is nothing in state policy that specifically prohibits paying for a four-year degree. However, the state recommends caution in committing program resources for a training/education period greater than two years, given the corresponding commitment of staff time and lags in outcome reporting. Ultimately, this is a matter for the service provider to decide, on a case-by-case basis, with the best interests of the customer in mind.

Q: A veteran is applying for the DW program. She appears eligible for the program. However, she says she only wants the program so she can qualify for Unemployment Insurance while she goes to school. She says she has no other unmet needs that the DW program can help with. Should I enroll her?

A: It depends. A service provider should look carefully at any individual who is using Unemployment Insurance, yet claims to need nothing from the Dislocated Worker program. What will the customer do after unemployment compensation runs out? What is their career plan? Are there books or equipment that they wouldn't get from other programs?

A service provider should engage a customer in this situation, and do their best to determine any unmet needs. If there are possible needs the program can fulfill, the service provider **should** enroll the customer. That customer, of course, has an obligation to abide by the rules of the program. He or she needs to meet with a counselor, generate an employment and training plan, and so on. For as long as the customer is in an approved DW activity, his or her file stays open and active, and counselors must stay in touch for as long as that activity continues.

If there are no needs the program can fulfill, and the customer is clear on that point, the service provider **should not** enroll that individual. He or she would not be conducting a serious search for full-time, permanent work. (See Eligibility Disqualifications, above.)

Q: A veteran came in with his non-veteran spouse. The veteran is eligible for DW. Is the non-veteran spouse eligible?

A: Possibly. As of this writing, the eligibility of a spouse is receiving increased attention by the U.S. Department of Labor. A service provider should make any and all reasonable efforts to define veterans' spouses as eligible for DW, **if and when** that spouse loses a job and seeks services. The spouse still must demonstrate a *long attachment to the labor force*, still must be *unlikely to return* to their prior occupation or industry, and still must meet the general requirements in this policy (right to work, etc.). However, no other specific conditions need apply.

This special case of eligibility applies **only** to the federal program. At the time of this writing, we do not have specific enough guidance from Minnesota's elected officials to allow state funds to be used for this purpose. Of course, if the spouse meets

other state eligibility criteria, they are eligible in any case.

See federal Training and Employment Guidance Letter (TEGL) 22-04, Change 1, dated September 28, 2007 for more information.

Q: A veteran has come in; she's a reservist but doesn't have much of a work history prior to her active duty. Since she's a recent high school graduate, her only "real" civilian job was working at the local Dairy Queen a few summers ago. So there's no real long term attachment to the labor force. Is she eligible?

A: Yes. A veteran need not demonstrate a *long attachment to the labor force*. The absence of a suitable civilian job upon the reservist's return is sufficient to trigger eligibility.

Q: A worker in the trades (e.g., carpenter) is requesting program eligibility, since she hasn't had much work lately. She's thinking of a different career. Is she eligible?

A: Members of trade unions who generally find work through their association with that union, may be eligible for DW if their situation is reasonably analogous to a layoff. The agency recommends the following three filters:

1. Is the person *long-term unemployed*?
2. Is the person **not** in a high-demand occupation?
3. Is the person committed to shifting into a high-demand occupation?

If the individual can answer "yes" to all three questions, then the service provider may find the individual eligible.

VII. Links to Guidance in Specific Situations

Some specific layoffs have resulted in policy guidance specific to that situation. The links below may be helpful for those situations. Guidance for such specific situations does not necessarily translate into general guidance for all eligibility determinations. Consult with state or federal authorities for clarification.

Reference Section:

Cites/References:

Acceptable Documentation - Attachment A
List of Acceptable Documentation – Attachment B
Minnesota Statutes 144.414
Minnesota Statutes 116L.17
Workforce Investment Act Section 134
Workforce Investment Act Regulations 20 CFR Part 663

Contact:

Anthony Alongi Voice: (651) 259-7528 or 1-866-213-1422 TTY/TDD: (651) 296-3900
Fax: (651) 215-3842 E-mail: Anthony.Alongi@state.mn.us

Website: www.positivelyminnesota.com/dw

Acceptable Documentation

Below is an excerpt of a DRAFT table that expresses acceptable documentation for the Dislocated Worker eligibility requirements in this policy. It will likely become a separate policy, but is included in this document for ease of reference.

Attachment A		
Data Element	Requirement Notes	Source Documentation Requirements
Date of Birth/Proof of Age	Required (see General Requirements)	A copy of a driver's license or state ID; report of Transfer or Discharge paper; a copy of a birth certificate; a copy of an age certificate issued by local school officials; public assistance or social service records; federal, state or local government identification card; passport; hospital record of birth; Social Security Administration printout; work permit; official school record; or baptismal record; DD-214, cross-matched with Department of Vital Statistics and Tribal Records.
Proof of Name	Required	The documentation may be in the form of a driver's license or state ID; a copy of a utility bill; passport; Veteran's DD214; health insurance card; Social Security card; or school records.
Social Security	Required of the provider if the customer is willing, but we cannot use refusal to provide a number as a basis for denying eligibility.	The documentation may be in the form of a Social Security Card; W-2 form; IRS form letter 1722; pay stubs; Social Security benefits; DD-214; health insurance card; bank records; or official school record.
Residency	Required	Documentation may be in the form of self-attestation; driver's license; food stamp award letter; housing authority verification; insurance policy (residence or auto); landlord statement and/or lease(s); letter from social service agency or school; library card; Medicare or Medicaid card; telephone directory; postmarked mail addressed to applicant; property tax record; public assistance record; rent receipt; school ID; utility bill; or voter's registration card. Homeless status may be documented in the form of self-attestation; written statement from individual providing temporary residence; written statement from shelter; or written statement from social service agency.
Selective Service	Required (see General Requirements)	Documentation can be in the form of an acknowledgement letter; a selective service registration card; a stamped post office receipt of registration, DD214, Report of Transfer or Discharge; Selective Service Advisory Opinion Letter, Selective registration record (form 3A, selective service verification form).
Disability Status	Only required where related to priority of service.	Documentation can be in the form of a letter from drug or alcohol rehabilitation agency; medical records; case notes; observable condition; self-attestation; health practitioner's statement; rehabilitation evaluation; school records; psychologist diagnosis; sheltered workshop certification; social service records/referral; Social Security Administration letter/records; Veterans Administration Letter/Records; Vocational Rehabilitation letter; workers' Compensation records; or disability records. Self-attestation allowed if necessary.

Data Element	Requirement Notes	Source Documentation Requirements
Displaced Homemaker Status	Only required if it is related to priority of service and/or is used as the basis for program eligibility.	The documentation can be in the form of public assistance record; spouse's layoff notice; spouse's death certificate; public assistance records; divorce records; court records; or bank records. Self-attestation allowed if necessary.
Dislocated Worker Status/Date of Actual Qualifying Dislocation	Required.	Documentation can be in the form of a WARN notice; letter of termination; newspaper article describing dislocation; union letter indicating dislocation; or a layoff notice. Self-attestation allowed if necessary.
Unemployment Insurance Status	Required if used as the basis for program eligibility.	Documentation can be in the form of a Unemployment Insurance cross match or a Unemployment Notice of Entitlement.
Veteran Status	Required if used as the basis for program eligibility.	DD-214, cross match with Veterans data.
Temporary Assistance to Needy Families (TANF)/ Minnesota Family Investment Program (MFIP)	Required.	Cross match with MFIP public assistance records.

LISTS OF ACCEPTABLE DOCUMENTS

LIST A	LIST B	LIST C
Documents that Establish Both Identity and Employment Eligibility	Documents that Establish Identity	Documents that Establish Employment Eligibility
	OR	AND
1. U.S. Passport (unexpired or expired)	1. Driver's license or ID card issued by a state or outlying possession of the United States provided it contains a photograph or information such as name, date of birth, gender, height, eye color and address	1. U.S. Social Security card issued by the Social Security Administration (<i>other than a card stating it is not valid for employment</i>)
2. Permanent Resident Card or Alien Registration Receipt Card (Form I-551)	2. ID card issued by federal, state or local government agencies or entities, provided it contains a photograph or information such as name, date of birth, gender, height, eye color and address	2. Certification of Birth Abroad issued by the Department of State (<i>Form FS-545 or Form DS-1350</i>)
3. An unexpired foreign passport with a temporary I-551 stamp	3. School ID card with a photograph	3. Original or certified copy of a birth certificate issued by a state, county, municipal authority or outlying possession of the United States bearing an official seal
4. An unexpired Employment Authorization Document that contains a photograph (Form I-766, I-688, I-688A, I-688B)	4. Voter's registration card	4. Native American tribal document
	5. U.S. Military card or draft record	5. U.S. Citizen ID Card (<i>Form I-197</i>)
5. An unexpired foreign passport with an unexpired Arrival-Departure Record, Form I-94, bearing the same name as the passport and containing an endorsement of the alien's nonimmigrant status, if that status authorizes the alien to work for the employer	6. Military dependent's ID card	6. ID Card for use of Resident Citizen in the United States (<i>Form I-179</i>)
	7. U.S. Coast Guard Merchant Mariner Card	
	8. Native American tribal document	7. Unexpired employment authorization document issued by DHS (<i>other than those listed under List A</i>)
	9. Driver's license issued by a Canadian government authority	
	For persons under age 18 who are unable to present a document listed above:	
	10. School record or report card	
	11. Clinic, doctor or hospital record	
	12. Day-care or nursery school record	

Illustrations of many of these documents appear in Part 8 of the Handbook for Employers (M-274)