

Department of Community Colleges and Workforce Development	Number: 589-30.11
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SUBJECT: Workforce Investment Act Title IB Policy Document Collection and Storage	Approved: 

Purpose: To outline documentation necessary for Non-formula WIA grants and for WIA intensive and training services. Documentation specific to the special grant should be obtained and kept for examination.

References: 29 CFR Part 37.37
 WSO Joint Policy 03-10 *Workforce Investment Act Title IB Adult and Dislocated Worker Program Eligibility and Wagner-Peyser Program Eligibility*
 CCWD WIA Policy 589-40.4 *Workforce Investment Act Title IB Records Retention and Public Access*

Policy: WSO Joint Policy 03-10 sets a standard for a paperless WIA Title IB Adult, Dislocated Worker and Wagner-Peyser Program registration, eligibility determination and program enrollment system based on definition of self-attestation and implemented through the WorkSource Oregon Management Information System (WOMIS) registration program.

Grants administered by CCWD and funded through the Department of Labor (DOL) have specific eligibility and documentation requirements and may require additional documentation beyond the requirements outlined in WSO Joint Policy 03-10 *Workforce Investment Act Title IB Adult and Dislocated Worker Program Eligibility and Wagner-Peyser Program Eligibility*.

Formula and non-formula grants will need to meet the standards of WSO Joint Policy 03-10, along with any special documentation requirements set out in the grant's narrative. The purpose of this policy is to set documentation guidelines for grants and services that go beyond the scope of WSO Joint Policy 03-10.

- Priority of Service
Documentation requirements are dependent on service/ activity level received (see below).
- Selective Service
Documentation requirements are dependent on service/ activity level received (see below).
- WIA Core Services
Customer records in WOMIS comprise a combination of customer- and staff-attested information sufficient for the receipt of WIA core services without additional documentation.
- WIA Intensive and Training services
Receipt of WIA intensive and training services requires further documentation of elements that verify the participant's eligibility. Refer to Attachment A of this policy for a current list of eligibility documentation requirements.

- Other Grants
Some non-formula grants may require:
 - Additional documentation of *existing* eligibility requirements, and/ or
 - Documentation of *additional* eligibility requirements
- Local Area Policies
LWIAs may establish additional documentation requirements for intensive or training services, and/ or priority of service.
- Data Element Validation (DEV)
Although Data Element Validation is not directly linked to eligibility determination or criteria, each has documentation requirements that vary based on services received. Local areas are encouraged to reference current DOL and state guidance for Data Element Validation for specific data element requirements and allowable source documentation requirements for the receipt of intensive and/ or training services. Refer to WSO Joint Policy 01-12 *Data Element Validation and Source Documentation Requirements for Department of Labor for Workforce Investment Act and Wagner-Peyser Programs* for additional information.

Procedure: In the case of WIA intensive and training services or when any non WIA-formula grant narrative calls for further documentation, documentation should be obtained and kept in accordance with state and LWIB record retention policy(ies).

Documentation can be copied and kept in paper files, or scanned and kept in a secure electronic file, in accordance with state and LWIB record retention policy(ies), and must be made available for examination upon request of monitors.

Storage

- Service providers must maintain documents and forms in an appropriate storage space that ensures security and confidentiality.
- Access to customer information should be restricted to authorized entities associated with the operation and performance of workforce programs.
- Any customer medical information should be recorded on separate forms and stored separately.
- Participant/applicant information that is stored electronically must be password protected to ensure confidentiality.

Local workforce areas are required to follow the provisions in this document at the grant recipient, fiscal agent and WIB levels; and provide this information to all local WIA Title I funded service providers, along with any applicable locally developed policies that might supplement these state-level requirements.

Responsibility Action

WIA Fund

Recipients: Establish, implement and maintain document collection and storage processes that ensure compliance with the prescribed rules and regulations.

CCWD

Monitor for compliance with this policy.

CORE SERVICES

Self-Service, Informational
 Services or activities available to all customers with little or no staff involvement; may be delivered to all customers through self-service or staff-facilitated methods or processes

Staff Assisted
 Services or activities in which the staff involvement is customer-specific, or personalized

- *Customers who receive ONLY this level of service are counted as part of the general WIA and Wagner-Peyser participant count, but excluded from WIA performance calculations*

- *Requires additional eligibility verification before receipt*
- *Participant is included in WIA performance calculations*

Services or activities that:

Are readily available and accessible to the general public in a WSO Center or a LWIA or OED stand-alone site, or on-line;

Are designed to inform and educate eligible registrants about the labor market, their employment strengths and weaknesses, and the range of services appropriate to their situation;

and,

Do not require significant staff involvement with the individual in terms of resources or time.

Examples of Center services that fall within this category may include:

- Customer Registration
- iMatchSkills (iMS) Profile completion
- WorkSource Oregon Online Resources
- General Information workshops (Orientations, Claimant Reemployment, etc.)

Services or activities that:

Assist participants in deciding on appropriate next steps in the search for employment, training, and related services, including job referral; **or**

Assist participants in assessing their personal barriers to employment; or

Assist participants in accessing other related services necessary to enhance their employability and individual employment related needs.

Examples of Center services that may fall within this category include:

- Basic Skills Assessment/Certification – NCRC
- Training preparation workshops and assistance
- Career planning or skill building workshops and assistance
 - (Workplace basic skills, basic math, workplace ESL, GED preparation, etc.)

- DEV & Eligibility Documentation Requirements:**
- WOMIS Registration Required for self-attestation
 - Veteran Status is self-attested

- DEV & Eligibility Documentation Requirements:**
- Staff verification of an acceptable document corroborating customer’s DOB and entering required document information in WOMIS
 - Veteran Status is self-attested

Note: The critical distinction between these categories is whether the service is designed to be delivered by staff or as a self-service. It is understood that some customers may require considerable assistance from staff in utilizing or accessing a particular self-service or informational service, activity, or resource – this does not mean that the activity or service meets the “staff assisted” definition.

INTENSIVE SERVICES

Intensive

Services or activities that are designed to determine appropriate/ additional -training or skill development needs, or require that a payment is made on behalf of the customer

- *Requires a participant receive a staff assisted core service before receipt*
- *Requires additional eligibility documentation before receipt*

Comprehensive services which may include:

Development of an individual training plan

Support services and needs related payments

Structured formal coursework, including:

- GED coursework
- ESL coursework

Short-term prevocational services/ classes/ coursework that is less than 40 hours in length and provides an industry recognized certificate/ certification.

Examples of Center services that may fall within this category include:

- Software certifications (i.e. Microsoft)
- Fork Lift Driver certification
- Flagging certification

DEV & Eligibility Documentation Requirements:

- Physical or electronic copy of an acceptable document corroborating customer's DOB
- Physical or electronic copy of an acceptable document corroborating customer's Veteran Status
- Documentation demonstrating that staff has verified the customer's compliance with the requirements of the Military Selective Service Act. A staff-generated case note that includes the Selective Service Number and Date of Registration meets State standard. For more information and acceptable source documents refer to TEGL 11-11
- Other data element-specific acceptable source documentation (see appropriate DOL/ ETA guidance)
- LWIAs may apply additional eligibility documentation standards

TRAINING SERVICES

Training

Services where the participant receives WIA- or partner-funded occupational skills training from an eligible training provider or employer

- *Requires a participant receive an intensive service before receipt*
- *Requires a participant to have completed eligibility documentation before receipt*

Training services are more than 40 hours in length and may provide the participant with a credential or industry-recognized certification (see Short-term prevocational services, under “Intensive” above, for programs less than 40 hours). Examples include:

- Occupational skills training, including training for nontraditional employment
- On-the-job training
- Programs that combine workplace training with related instruction, which may include cooperative education programs
- Training programs operated by the private sector
- Skill upgrading and retraining
- Entrepreneurial training
- Apprenticeship programs
- Adult education and literacy activities in combination with other training
- Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training

DEV & Eligibility Documentation Requirements:

- Physical or electronic copy of an acceptable document corroborating customer’s DOB
- Physical or electronic copy of an acceptable document corroborating customer’s Veteran Status
- Documentation demonstrating that staff has verified compliance with the requirements of the Military Selective Service Act. A staff-generated case note that includes the Selective Service Number and Date of Registration meets State standard. For more information and acceptable source documents refer to TEGL 11-11
- Other data element-specific acceptable source documentation (see appropriate DOL/ ETA guidance)
- LWIAs may apply additional eligibility documentation standards