



WIOA File Management Policy Effective September 1, 2023

I. PURPOSE:

The purpose of this policy is to provide guidelines for the file management of participant data enrolled in Workforce Innovation and Opportunity Act (WIOA), Title I services, TANF Youth Development Program services and Employment and Advancement Retention Network (EARN) program services.

II. REFERENCES:

- Workforce Innovation and Opportunity Act (WIOA or Opportunity Act), Public Law 113-128, enacted July 22, 2014
- Temporary Assistance for Needy Families (TANF) Youth Development Program (YDP) Desk Guide for Providers to the TANF YDP PY 2023-2024
- WSP 01-2015 (Change 1)
- Employment and Advancement Retention Network (EARN) Program Policy and Procedures Manual, Department of Human Services, Office of Income Maintenance, Bureau of Employment Programs

III. BACKGROUND:

Federal regulations require the effective control and management of WIOA records through accurate and timely record keeping. Additionally, as the recipient of WIOA and other Federal and State funds, Workforce Solutions is required to take appropriate measures to mitigate the risks associated with the collection, storage, and dissemination of sensitive data including personal identifying information (PII).

IV. DEFINITIONS:

EARN. EARN stands for Employment and Advancement Retention Network. It is a program through the Department of Human Services (DHS) that is dedicated to assisting clients in transition from welfare to the workforce by decreasing dependency on public assistance and moving them toward self-sufficiency.

TANF. TANF stands for Temporary Assistance for Needy Families. It is a program through the Department of Human Services (DHS) dedicated to help low income families become independent while they receive Temporary Assistance for Needy Families (TANF) benefits, cash assistance.

Self-sufficiency. Self Sufficiency is employment that pays at least the lower living standard income level, as defined in WIOA Section 134(c)(3)(A).

Personal Identifying Information (PII). PII is defined in the Employment and Training Administration's

(ETA) Training and Guidance Letter 39-11 as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

V. POLICY:

It is the policy of the Workforce Solutions for North Central PA (North Central Workforce Development Board) that all WIOA, TANF Youth Development and EARN subrecipients maintain both electronic and hard copy files for all participants who receive services and have not yet been called for archiving. In addition, the maintenance of both the electronic and hard copy files must adhere to the NCWDB's "Policy on the Handling and Protection of Personally Identifiable Information (PII)."

Prior to archiving, case notes will be printed and added to each file. Paper files must be prepared for all Youth participants following eligibility determination and enrollment. Paper files must be prepared for Adult/Dislocated Worker participants prior to the receipt of their first individualized service. Participant files and electronic records must not contain any medical information. Subrecipients will update files with appropriate documentation in accordance with Workforce Solutions for North Central PA / North Central Workforce Development Board policies to ensure that both paper files and electronic records are up-to-date.

Benefits of a standardized file structure include:

- Assistance in providing Priority of Service
- Established procedures for obtaining relevant documentation
- Differentiation between eligibility and data validation

VI. PARTICIPANT FILE CONTENTS BY PROGRAM:

A. Contents of the WIOA Participant File:

Certain information is required by federal regulations, state policy as well as local WDB policy for all WIOA program participants. The following information is required and must be maintained in a hard copy format in the permanent case file for each WIOA adult, dislocated worker, National emergency Grant (NEG), National Dislocated Worker Grant and youth participant.

- Participant contact information
- A signed and dated copy of the WIOA Registration Form
- Copies of documentation uploaded to CWDS for determination of eligibility. If self-certification is utilized, documentation including case notes must be in the file.
- Assessments (objective and basic skills) including a copy of the Educational Functioning Level test scoring sheets that show the date, total score, and grade level equivalent for each test
- Written notice of exit for an ineligible participant
- "Equal Opportunity is the Law" statement signed by the participant or a signed acknowledgement that the participant received a copy of this statement.
- ISS/IEP, or Educational Development Plan (including any object assessment utilized during the development of the ISS/IEP.)
- Signed Authorization for the Release of Information. All documentation with the participant's signature must be kept in paper format.
- Credentials/Certifications
- Supporting Documentation for all Expenditures including Supportive Services and Incentives, if applicable.

- School Records, if applicable
- Work Experience and OJT Documentation, if applicable
- Worksite Supervisor clearances (copies), if applicable.
- Exit/Performance Measure documentation
- If enrolled in any other programs (i.e. ARC Prosper from Recovery to Career) all relevant documents must be in file including referral forms, supportive service payments and training awards.

WIOA Participant file documents must be retained for at least six years after the end of a fiscal year from when the document (or file) was created.

B. Contents of a TANF YDP Participant file:

All data files must contain the participant’s application and verifications for the following items (Refer to the TANF Youth Development Policy for additional information)

- Social Security Number Verification
- Verification of identity
- Verification of Preliminary Screening Result from CWDS.
- Verification of activity. Examples include, where the youth was placed for work experience, activity flyer, assignment completion, self-attestation, telephone verification, attendance sheet, copies of pay stubs, time sheets, etc.
- TANF YDP application.
- Signed Authorization for the Release of Information.

The results of the Preliminary Screening Tool in CWDS will determine what other verifications are needed. Participants that have received a “Yes- TANF Recipient” or “Yes- Other Benefit” require no additional information or verifications for the file beyond those listed above. Participants that have received a “Yes-Pending Income Verification” must have verification in the file of the personal monthly gross earned income for all mandatory household members or verification of an additional barrier (only for those determined income-eligible through residency in a high poverty area). For TANF YDP purposes, local staff should refer to WIOA’s definitions for these barrier groups; and follow the existing state and/or federal acceptable documentation guidelines for the WIOA Youth Program. Participants that have received a “Yes-Pending Full Verification” must have all eligibility verifications in the file, including:

1. PA residency
2. Citizenship status
3. Personal monthly gross earned income.
4. Additional barrier (only for those determined income-eligible through residency in a high poverty area)

All documentation with the participant’s signature must be kept in paper format.

TANF Youth Development documents must be retained for six years from when the document (or file) was created.

C. Contents of EARN Case Records:

The EARN service provider will create a confidential EARN Case Record. The EARN Case Record must be kept in a secure location with limited accessibility. Staff not associated with the EARN case may not have access to the EARN Case Record or narrative.

The EARN service provider will document the following in the EARN Case Record narrative:

- date, time, and location of all EARN related contacts
- purpose and outcome of all EARN related contacts
- any changes in the client's conditions or circumstances
- solutions offered and the client's responses
- services and supports requested or provided
- pertinent information received from the CAO
- any other relevant information

NOTE: The EARN service providers are required to document their narratives using the CWDS Create Case Progress Notes screen. Additionally, it is suggested to identify case notes with specific topics, for example "Incentives."

The following documents should be maintained in the client's file and must be available for upload on DocuShare for validation purposes:

- AMR
- Service Plan/IEP
- Attendance Sheets, including make-up plans*
- Job Search Logs
- Excused Absence Logs
- Release of Information Form *
- Employment Verification Form (EVF)*
- Verification of Retention
- Other Relevant Information

*Please refer to the EARN Manual for the appropriate forms.

Documents must be retained for a period of six years.

VII. EXPIRATION:

Ongoing

VIII. INQUIRIES:

Questions shall be directed to:

Pamela Streich, Executive Director at pstreich@ncwdb.org; or
Donna Hottel, Strategic Planning and Project Manager at dhottel@ncwdb.org

Workforce Solutions for North Central PA

425 Old Kersey Road

Kersey, PA 15846

(814) 245-1835

Pam Streich pstreich@ncwdb.org

IX. HISTORY:

Name	Date	Description of Change	Effective Date
Donna Hottel	09/01/2023	Format, References, Background, Definitions	09/01/2023
Pam Streich	05/20/2020	Added TANF and EARN	5/20/2020
Pam Streich	07/01/2016	New Policy	7/1/2016

Auxiliary aids and services are available upon request to individuals with disabilities.

Equal Opportunity Employer/Program