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| 1. **EcSA-WIOA ADULT ELIGIBILITY CRITERIA**     * **To be eligible for enrollment** in EcSA, an individual **must be determined eligible for the WIOA Adult**, Youth, or Dislocated Worker programs, ***and***    * **must be SNAP enrolled at the time of eligibility determination** | | | |
| **1-a. Age/ Date of Birth**  **Age 18 or older**  **SELF-ATTESTATION:**   * **ESD Policy 1019, Rev. 4:**   + Self-attestation of age is acceptable for ISD co-enrollment, Basic Career Services only   + Full eligibility documentation is required for participants pursuing Individualized Career Services or Training Services | * Participant was age 18 or older at program enrollment: *[WIOA Section 129(a)]*   **YES, Validated by one of the following**: *(ESD Policy 1019, Rev. 4)*  Driver’s License or ID  Birth Certificate  Passport  Other:  **NO, Unable to Validate**  **Reporting:**   * Date of Birth is accurately recorded in MIS: *(20 CFR 677.235)*   **YES, No Issue Identified**  **NO, one or more issue identified** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **1-b. Selective Service Registration**  All males (U.S. citizens and aliens living in the U.S.) born after January 1, 1960 must be registered with Selective Service.  **SELF-ATTESTATION:**   * **ESD Policy 1019, Rev. 4:**   + Self-attestation of Selective Service Registration is acceptable for ISD co-enrollment, Basic Career Services only   + Full eligibility documentation is required for participants pursuing Individualized Career Services or Training Services | **N/A-**  Female  Born before Jan. 1, 1960  Entered US after age 26   * Participant was registered with Selective Service Registration or received a waiver: *[WIOA Section 189(h)]*   **YES, Validated by one of the following:** *(ESD Policy 1019, Rev. 4)*  DD-214  Online SS Verification  SS Acknowledgement letter  Other:  **NO, Unable to Validate**  **Reporting:**   * Selective Service Registration is recorded in MIS:   *(20 CFR 677.235)*  **YES, No Issue Identified**  **NO, one or more issue identified** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **1-c. Legally Entitled to Work in**  **the U.S.**   * Citizens; * Nationals; * Lawfully admitted permanent resident aliens; * Refugees; * Asylees; * Parolees; and * Other immigrants authorized by the Attorney General to work in the United States. | * Participant was eligible to work in the U.S.:   *(WIOA Section 3(2); ESD Policy 1019, Rev. 4)*  **YES, Validated by one of the following:** *(ESD Policy 1019, Rev. 4)*  ID & SS card  Self-attestation:   * Self-attestation was a signed and dated **paper version from ESD Policy 1019, Rev. 4** or a substantially similar version:   **YES, No Issues Identified**  **NO, one or more issues identified**   * Self-attestation was a signed and dated **paper WIOA eligibility** application:   **YES, No Issues Identified**  **NO, one or more issues identified**   * Self-attestation was a signed and dated **MIS WIOA Application**:   **YES, No Issues Identified**  **NO, one or more issues identified**   * The reason for using self-attestation was documented in case notes as recommended by DOL and ESD Policy 1019, Rev. 4:   **YES, No Issues Identified**  **NO, Could not Locate**  Other:  **NO, Unable to Validate**  **Reporting:**   * Eligibility to work in the U.S. is recorded in MIS:   *(20 CFR 677.235)*  **YES, No Issue Identified**  **NO, one or more issue identified** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **1-D. SNAP enrollment**   * **EcSA Guidance included in Training 12 meeting minutes 8-21-19:**   + **To be eligible for enrollment** in EcSA, an individual **must be determined eligible for the WIOA Adult**, Youth, or Dislocated Worker programs, ***and***   + **Must be SNAP enrolled at the time of eligibility determination**   **Note:** During the EcSA tool review on 12-19 and 12/20/19, John Traugott clarified **that applicants can be enrolled in SNAP but not necessarily receiving SNAP benefits at the time of program enrollment.** | * Participant was enrolled in SNAP at the time of eligibility determination:   **YES, Validated by:**  **Copy of SNAP enrollment**  **Other:**  **NO, Unable to Validate** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **1-e. participant residential**  **requirement/contractual**  **geographical area**   * **Exhibit A-2 of Benton-Franklin’s EcSA contract:**   + Franklin County, zip code 99326, Connell, WA | * Participant resided in Connell, WA/zip code 99326 as required in Benton-Franklin’s EcSA contract, Exhibit A-2:   **YES, validated by:**  Case notes, or  Signed MIS WIOA Application, or  Other:  **NO, Unable to Validate if participant resided in Connell, WA/zip code 99326** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **2. PRIORITY OF SERVICE**  **-Only required if co-enrolled into WIOA Adult Program**  **Priority 1**-Coverd Persons (veterans and eligible spouses) who are low-income, recipients of public assistance, or basic skills deficient  **Priority 2-** Individuals (non-covered persons) who are low-income, recipients of public assistance, or basic skills deficient.  **Priority 3-** Covered persons (veterans and eligible spouses) who are not low income and not basic skills deficient.  **Priority 4-** Optional, LWDB Defined | **N/A: Participant is not co-enrolled in the WIOA Adult**  **Program**   * WIOA Priority of Service category of enrollment is documented: *[wIoa Sec. 134(c)(3)(E)]*   **YES, Validated by one of the following:** *(ESD Policy 1019, Rev. 4)*    Signed and dated WIOA Registration paper form  Signed MIS online Eligibility/Enrollment form  Case Notes  Other:  **NO, Unable to Validate** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **2-a. Veterans & Eligible Spouses**  *Priority of Service Categories 1 & 3* | **N/A:** No evidence of this status and/or not the category  selected for enrollment   * Verification of participant’s veteran/eligible spouse status was located in the file: *(TEGL 22-15)*   **YES, Validated by one of the following:** *(ESD Policy 1019, Rev. 4)*    DD-214  Letter from the Veteran’s Admin.  Letter from any branch of the military  Other:  **NO, Unable to Validate**  **Reporting:**   * Veteran status is recorded in MIS: *(20 CFR 677.235)*   **YES, No Issue Identified**  **NO, one or more issue identified** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **2-b. Low Income**  *Priority of Service Categories 1 & 2*  **Low income is not an eligibility criteria for the Adult program**   * **WIOA Final Rule, Department’s response, pages 56113 and 56147:**   + Rather, it is a statutory emphasis on providing individualized career services and training services to public assistance recipients, low income individuals or individuals who are BSD. | **N/A:** No evidence of this status and/or not the category  selected for enrollment   * Verification of participant’s low-income status was located in the file: *(ESD Policy 1019, Rev. 4)*   **YES, Validated by one of the following:** *(ESD Policy 1019, Rev. 4)*  TANF  Other Public Assistance  Food Stamps  Pay Stubs  Signed & DatedApplicant Statement  Other:  **NO, Unable to Validate**  **Reporting:**   * Low income status is recorded in MIS: *(20 CFR 677.235)*     **YES, No Issue Identified**  **NO, one or more issue identified** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **2-c. Basic Skills Deficient (BSD)**  *Priority of Service Categories 1 & 2*  **BSD SCORE:**   * **ESD WS Policy 1011, Rev. 6:**    + Basic Skills Deficiency is denoted by a CASAS score of **238 or below in** **reading** or **235 or below in math.**   **DEFINITIONS**   * **WIOA Sec. 3(5):**   **b.** A youth or adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.   * **ESD WS Policy 1011, Rev. 6:**   + Individuals who are English Language Learners meet the criteria for BSD and must be included in the priority populations for the Title I Adult program.   **DOCUMENTATION REQUIREMENTS**   * **TEGL 22-15:**    + **Self-attestation is not acceptable for validating BSD.** * **ESD WIOA Policy 1011, Rev. 6:**   + **BSD must be documented in the ETO WIOA Eligibility Application:**   **1.** On the “Barriers” tab of the WIOA  Eligibility Application, click the “yes” radio  button for Basic Literacy Skills Deficiency.  **2.** On the dropdown list for BSD Verification,  choose “Standardized Assessment Test”  **3.** Go to the “Notes” tab of the WIOA  Eligibility Application and document the  date of the test, score(s), name of the  person or entity administering the test and  any other supporting details.   * + **Staff must not upload into the case management system or retain in hard files any CASAS document(s) that contain test questions or other sensitive testing information.** | **N/A, no evidence of this status and/or not the category**  **selected for enrollment**  **N/A, evidence in the file indicates the participant is**  **not BSD, *or***    **N/A, unable to locate evidence the participant was**  **tested for BSD**   * Adult met BSD status at program enrollment:   **YES, Validated BSD Status by one of the following:**  *(ESD WS Policy 1011, Rev. 6; ESD Policy 1019. Rev. 4)*  Standardized assessment test (CASAS Pre-Test)  School Records  Case notes with BSD status and test scores  Other:  **NO, Unable to Validate**  **Reporting:**   * BSD status is recorded in MIS as required in ESD Policy 1011, Rev. 6: *(20 CFR 677.235; ESD Policy 1011, Rev. 6)*   **N/A, participant not tested so cannot answer “Yes”**  **or “No” in ETO**  **YES, No Issues Identified**  **NO, One or Two Issues Identified**  **NO, Two or More Issues Identified** | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **2-D. oTHER PRIORITY- optional**  *Priority of Service Category 4 or more* | **N/A:** Not enrolled under this priority of service   * Eligibility for LWDB “Other Priority of Service” is documented in the file:   **YES, No Issues Identified**  **NO, Could Not Locate** | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **3. EcSA program enrollment** | | | |
| **3-a. Date of EcSA Program Entry,**  **Participation**  **participant**   * **20 CFR 680.110:**   **(a)** Individuals are considered participants **when they have received a WIOA service other than self-service or information-only activities and have satisfied all applicable programmatic requirements** for the provision of services, such as eligibility determination.  **(b)** **Adults who receive services funded under Title I other than self-service or information-only activities must be registered and must be a participant**.  **EcSA ELIGIBILITY**   * **EcSA Guidance included in Training 12 meeting minutes 8-21-19:**   + To be eligible for enrollment in EcSA, an individual **must be determined eligible for the WIOA Adult,** Youth or DW **programs *and***   + **Must be SNAP enrolled at the time of eligibility determination.**   + **Document EcSA eligibility determination in case notes**, based on local guidance for case note requirements   **REPORTING/MIS DATA ENTRY REQUIREMENTS**   * **EcSA contract Statement of Work:**   + All EcSA participants **must be enrolled as participants in the Economic Security for All program or enrollment in ETO.** * **EcSA Guidance included in Training 12 meeting minutes 8-21-19:**   + **Provide at least one of the services below (depending on your local process)** as the initial service recorded in ETO to trigger active participation in EcSA:     - **Development of IEP** (recorded in ETO as “Development of Individual Employment Plans (2.0)”); or     - Completion of the Self-Sufficiency Matrix (recorded in ETO as “**Comprehensive and Specialized Assessment**”); or     - Completion of another basic assessment service, recorded in ETO as “**Basic Assessment** (2.0)”. * **WIN 0082:**    + If services cannot be entered at the time they are delivered, services must be entered within **14** calendar days of service delivery and the service date entered must always reflect the date the service was delivered. | * Participant met EcSA and WIOA Adult program eligibility requirements: *[20 CFR 680.110 and TEGL 19-16; EcSA Contract)*   **YES, No Issues Identified**  **NO, Unable to Validate**   * There is documented evidence indicating a service other than self-service or information only activities was provided to the participant initiating program participation: *[20 CFR 680.110) and TEGL 19-16; TEGL 7-18]*   **YES, Documented on one of following:** *(TEGL 7-18)*  Individual Plan for Employment  Electronic Records  Program intake documents such as eligibility  determination documentation or program  enrollment forms  **NO, Unable to Validate**  **Reporting:**   * A minimum of one of the following services is recorded in MIS initiating EcSA program participation: *(EcSA Guidance included in Training 12 meeting minutes 8-21-19)*   **YES, No Issues Identified:**  Development of IEP  Comprehensive and Specialized Assessment  (Self-Sufficiency Matrix)  Basic Assessment   * Service was attached to the EcSA program:   (*Economic Security for All Initiative – ETO Guidance)*  **YES, No Issues Identified**  **NO, one or more service was not attached to the**  **EcSA program**   * Participant eligibility and program enrollment is documented in case notes:   *(WIN 0089; Economic Security for All Initiative – ETO Guidance)*  **YES, very detailed**  **YES, some detail**  **NO, could not locate case notes documenting:**  **Date of program enrollment as recorded in MIS**  **Participant’s eligibility**  **Services planned** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **3-b. Concurrent Program**  **Enrollment**   * **EcSA Statement of Work:**   + EcSA participants may be co-enrolled into WIOA formula grants if they are eligible, but it is not required. * **EcSA Guidance included in Training 12 meeting minutes 8-21-19:**   + EcSA participants may be co-enrolled into WIOA formula grants if they are eligible, but it is not required.   **TRACKING OF FUNDS**   * **TEGL 19-16**   + Local program operators must **identify and track the funding streams** which pay the costs of services provided to individuals who are concurrently enrolled, and   + Ensure no duplication of services. | **N/A**  **Reporting:**   * Program enrollments are correctly recorded in MIS:   *(20 CFR 677.160)*  **YES, No Issue Identified**  **NO, one or more issue identified**   * Services are correctly recorded in MIS and assigned to the appropriate program: *(20 CFR 677.160)*   **YES, No Issue Identified**  **NO, one or more issue identified** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **3-C. Employment Status at**  **Participation**   * **Federal Register Vol. 80, No. 140; ETA 9170-WIOA PIRL**:   + **Employed**   + **Employed, but Received Notice of Termination of Employment or Military Separation**:   + **Not in the Labor Force**   + **Actively Seeking Employment** * **TEGL 19-16:**   + **Underemployed:**     - Employed less than full-time and seeking full-time employment;     - Employed in a position that is inadequate with respect to skills and training;     - Employed and meet the definition of a low-income individual in WIOA Sec. 3(36); and     - Employed, but whose current job’s earnings are not sufficient compared to their previous job’s earnings from their previous employment. | * Employed status at program enrollment is documented in the file:   **Not Employed**  **YES, Employment status at participation validated by one of the following:** *(TEGL 22-15)*  Pay stub  Case notes  **NO, Unable to Validate**    **Reporting:**   * Employment Status at Program Entry is recorded in MIS: *(20 CFR 677.235)*   **Yes, No Issues Identified**  **No, one or more issues identified** | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **4. EcSA-SPECIFIC services-Benton franklin** | | | |
| **4(1). COMPREHENSIVE & SPECIALIZED**  **ASSESSMENT/SELF-SUFFICIENCY**  **ASSESSMENT**  **MIS**   * **EcSA Guidance included in Training 12 meeting minutes 8-21-19:**   + **Comprehensive and Specialized Assessment**   **REQUIREMENTS**   * **Benton-Franklin EcSA Statement of Work-Task 2:**   **B.** Utilize Customized-Case-Management, Eco-mapping and the **United Way Self-Sufficiency Matrix** as outlined in EcSA Application section 4.a. to prioritize participants’ services and support needs.  **REPORTING/MIS DATA ENTRY REQUIREMENTS**   * **EcSA Contract Statement of Work:**   + All participant services received must be documented in ETO or its successor. * **EcSA Guidance included in Training 12 meeting minutes 8-21-19:**   + Each EcSA program is utilizing the:     - **United Way Self-Sufficiency Matrix,**     - **Arizona Self-Sufficiency Matrices, or**     - **Self-Sufficiency Calculator**, to:       * Assess the needs of each EcSA enrolled participant and their family, ***and***       * Prioritize services.   + **The Self-Sufficiency resource utilized in your area must be recorded in ETO:**     - **at the time of assessment** as a service to participant **as a “Comprehensive and Specialized Assessment” *and***     - **attached to the EcSA program of enrollment**:       * Take a new Individualized Training and Supportive Services (ITSS) TP.       * Select the service **COMPREHENSIVE AND SPECIALIZED ASSESSMENT** and       * **Attach to the EcSA program of enrollment.** * **WIN 0082:** * Services must be entered at the point in time they are delivered; * If services cannot be entered at the time they are delivered, services must be entered **within 14 calendar days** of service delivery and the **service date entered must always reflect** **the date the service was delivered**. | * As defined in Benton-Franklin’s EcSA Application, section 4.a., a combination of the United Way Self-Sufficiency Matrix, Customized-Case-Management approach, orientations, desk-side interviews, group assessments, WorkKeys, CASAS, Prove It and eco-mapping were utilized to capture the participant’s:   Eligibility,  Basic and literacy skills,  Career interests,  Barrier identification,  Occupational skill readiness, and  Supports and resources.  **YES, No Issues Identified**  **NO, Unable to Validate one or more of the above**  **Reporting:**   * A “Comprehensive and Specialized Assessment” is recorded in MIS: *(Economic Security for All Initiative – ETO Guidance)*   **YES, No Issues Identified**  **NO, this service was not recorded in MIS**  **NO, incorrect service recorded in MIS**   * Service is attached to the EcSA program:   *(Economic Security for All Initiative – ETO Guidance)*  **YES, No Issues Identified**  **YES, however an incorrect service is recorded in MIS**  **NO, this service is not recorded in MIS** | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **4(2). CAREER PLANS**  **MIS**   * **EcSA Guidance included in Training 12 meeting minutes 8-21-19:**    + **Development of Individual Employment Plan (2.0)**   **requirements**   * **Benton-Franklin EcSA Statement of Work-Task 3:**   **A. Develop career plans** for each EcSA participant as outlined in EcSA Application section 4.b.  **B.** Based on career plans, **connect EcSA participants to workforce training, career opportunities and related supportive services** as outlined in EcSA Application sections 3a., 4.a and 4.b.  **REPORTING/MIS DATA ENTRY REQUIREMENTS**   * **EcSA Contract Statement of Work:** * All participant services received must be documented in ETO or its successor. * **EcSA Guidance included in Training 12 meeting minutes 8-21-19:** * Career plans that lead to earnings above 200% of FPL should be developed with each EcSA participant and should be used as the basis to connect them to workforce training, career opportunities and related supportive services. * The **Career Plan must be recorded in ETO at the time of development** as a service to the participant as follows:   + Take a new Individualized Training and Supportive Services (ITSS) TP.   + Select the service **DEVELOPMENT OF INDIVIDUAL EMPLOYMENT PLANS (2.0)** and   + **Attach to the EcSA program of enrollment.** | * A Career Plan was developed and included the following components as outlined in Benton-Franklin’s EcSA Application section 4.b:   *(Benton-Franklin EcSA Statement of Work, Task 3)*  **YES, No Issues Identified-the Career Plan included:**  **Assessment**  **Career planning**  **Support services**  **Preparation/training**  **Job matching**  **Placement, if applicable**  **Follow-up, if applicable**  **NO, Unable to validate one or more of the above**  **components in the Career Plan**   * As a result of the Career Plan, the participant was connected to workforce training, career opportunities and related supportive services described in Task 3 of Benton-Franklin’s EcSA contact:   **N/A, participant has not yet been connected to**  **any of the above at the time of monitoring.**  **YES, No Issues Identified, participant was connected**  **to:**  **Workforce training, and/or**  **Career opportunities, and/or**  **Supportive services.**  **NO, Unable to Validate if participant was connected**  **to:**  **Workforce training, or**  **Career opportunities, or**  **Supportive services.**  **Reporting:**   * A “Development of IEP” is recorded in ETO:   *(Economic Security for All Initiative – ETO Guidance)*  **YES, No Issues Identified**  **NO, this service is not recorded in MIS**  **NO, an incorrect service is recorded in MIS**   * Service is attached to the EcSA program:   *(Economic Security for All Initiative – ETO Guidance)*  **YES, No Issues Identified**  **YES, however an incorrect service is recorded in MIS**  **NO, this service is not recorded in MIS** | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **4(3). MentorsHIPS**  **MIS**   * **WIN 0077, Rev. 5 & EcSA Contract Statement of Work:**   + **EcSA One-to-One Mentoring** * **One-to-one mentorship or coaching of at least 10 hours per year.**   + Can be provided by an employer, coworker, community member, or case management staff.   + Mentorship is intended to provide guidance, support, and encouragement to ensure the participant experiences inclusion and feels strong support from their community.   + May include opportunities to support workplace preparedness and increase awareness of or exposure to additional resources or employment opportunities.   + **Documentation must be maintained to demonstrate that the participant has met the 10 hour requirement.** * This service triggers and extends participation and **is a durational service**. * **EcSA Mentorship Opportunity:**   + A single point in time event or workshop intended to provide guidance, support, and encouragement to participants and build community and peer support.   + May include opportunities to support workplace preparedness, increase awareness of or exposure to additional resources or employment opportunities.   + Examples may include (EcSA Guidance):     - * **Informational and life skills workshops**       * **Networking events**       * **Job shadows**       * **Informational interviews, or**       * **Employer led workshops**   + This service triggers and extends participation but is **not a durational service**.   **REQUIREMENTS:**   * **Benton-Franklin EcSA Contract Statement of Work-Task 4 Mentors:**   **B.** Connect participants to community mentors through  job shadows, information interviews, business led  workshops, through partnership with United Way, and  other means, as outlined in EcSA Application sections  4.a., 4.c., and 4.d.  **C.** Provide targeted one-to-one mentoring, by employers, coworkers, community members or partner staff, based on assessed support needs. **Will be documented in participant case notes.**  **REPORTING/MIS DATA ENTRY REQUIREMENTS**   * **EcSA Contract Statement of Work:** * All participant services received must be documented in ETO or its successor. * **EcSA Guidance included in Training 12 meeting minutes 8-21-19:**   + **One-to-One Mentoring:**     - Take a new Individualized Training and Supportive Services (ITSS) TP.     - Select the service **EcSA ONE-TO-ONE MENTORING**     - **Attach to the EcSA program of enrollment**.     - Enter an end date and outcome into this TP after the participant completes the service. * This service triggers and extends participation and **is a durational service**. * **Mentorship Opportunity:**   + Take a new Individualized Training and Supportive Services (ITSS) TP.   + Select the service **EcSA MENTORSHIP OPPORTUNITY** and   + **Attach to the EcSA program of enrollment.**   + This service triggers and extends participation but is **not a durational service**. | * Participant was connected to mentorships through job shadows, informational interviews, business led workshops, through partnership with United Way, and other means, as outlined in EcSA Application sections 4.a., 4.c., and 4.d.   **N/A,** Mentorship not provided at the time of  monitoring  **YES, No Issues Identified, mentorship included:**  Job shadows, and/or  Informational interviews, and/or  Business led workshops, and/or  One-to-one mentorship by employer, coworker,  community member or partner staff, based on  assessed support need:  If 10-hours of mentorship has been provided,  documentation has been maintained  demonstrating the 10 hours of mentorship  was provided *(EcSA Contract Statement of Work)*  **NO, Unable to Validate if the participant was**  **connected to mentorships**  **Reporting:**   * An “EcSA One-to-One Mentoring” or “EcSA Mentorship Opportunity” is recorded in ETO:   *(Economic Security for All Initiative – ETO Guidance)*  **YES, No Issues Identified**  **NO, one or more service is not recorded in MIS**  **NO, one or more service is incorrectly recorded in**  **MIS**   * Service is attached to the EcSA program:   *(Economic Security for All Initiative – ETO Guidance)*  **YES, No Issues Identified**  **YES, however an incorrect service is recorded in MIS**  **NO, this service is not recorded in MIS**   * One-to-one mentoring and/or EcSA Mentorship Opportunity was documented in case notes as required in Task 4 of Benton-Franklin’s EcSA contract statement of work:   **YES, No Issues Identified**  **NO, Unable to locate case notes documenting**  **mentorship activities on one or more occasion** | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **4(4). Personal Stability**  **MIS:**  **SEE WIN 0077, Change 5:**   * **Strategies for Success**   **REQUIREMENTS:**   * **Benton-Franklin EcSA Contract Statement of Work-Task 5:**   **A.** Address participants’ personal stability as outlined in EcSA Application sections 3.a., 4.a. and 4.d.  **B.** Deliver six (6) module Strategies for Success pre-employment workshops, connecting participants based on their plan.  **REPORTING/MIS DATA ENTRY REQUIREMENTS**   * **EcSA Contract Statement of Work:** * All participant services received must be documented in ETO or its successor. * **EcSA Guidance included in Training 12 meeting minutes 8-21-19:**   + Each EcSA program has included a workshop series as one of the services to help participants establish personal stability as a foundation for success. Follow the guidance below, based on the workshop series being utilized in your area:     - **Strategies for Success (SFS):** (open to all 4 EcSA programs, but specifically included for Spokane Area WDA and Benton-Franklin WDA):       * Prior to starting SFS, **ensure the participant is enrolled in the EcSA program of enrollment i**n ETO, ***and***       * Has **received an initial service to trigger active participation**, as outlined in the **Program Enrollment** section above.       * Completion of individual SFS modules will be recorded by the program instructor for all module participants.       * This service should be recorded in the same way SFS would be recorded for any local participant.       * **It should not be tied directly to the EcSA program of enrollment.** | * Participant’s personal stability was assessed using the Self-Sufficiency Matrix as outlined in Benton-Franklin’s EcSA Application sections 3.a., 4.a and 4.d.:   *(Benton-Franklin EcSA Statement of Work-Task 5)*  **YES, No Issues Identified:**  Participant was provided a Self-Sufficiency Matrix  pre-assessment of their personal stability needs  Participant attended Strategies for Success Workshops  Participant received a post-assessment using the Self-  Sufficiency Matrix, if applicable at the time of monitoring  **NO, Unable to Validate an assessment of the**  **participant’s personal stability occurred as**  **descried above.**  **Reporting:**  **\*Strategies for Success (sfs) MIS requirements**  **ONLY:**  **N/A, participant has not attended a SFS workshop**   * Participant was enrolled in EcSA prior to starting the Strategies for Success workshop:   *(Economic Security for All Initiative – ETO Guidance)*  **YES, No Issues Identified**  **NO, one or more issue identified**   * Participant received an initial qualifying service triggering participation prior to starting the Strategies for Success workshop:   *(Economic Security for All Initiative – ETO Guidance)*  **YES, No Issues Identified**  **NO, one or more issue identified** | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **4(5). Financial Stability**  **MIS:**  **SEE WIN 0077, Change 5 & WS Service Catalog**  **REQUIREMENTS:**   * **Benton-Franklin EcSA Contract Statement of Work-Task 6:**   1. Address participant’s financial stability as outlined in EcSA Application sections 3.a. and 4.e., focusing on financial education and housing support.   **C.** Utilize Washington Connection and other resources, to ensure that every participant makes informed choices about the full range of benefits for which they may be eligible.  **REPORTING/MIS DATA ENTRY REQUIREMENTS**   * **EcSA Contract Statement of Work:** * All participant services received must be documented in ETO or its successor. | * Participant’s financial stability was addressed as outlined in Benton-Franklin’s EcSA Application sections 3.a. and 4.e:   **YES, No Issues Identified:**  Participant attended financial capacity  building workshops  Participant received housing and financial  assistance through UWBF, TCUGM and DSHS  **N/A, participant has not yet attended one of the**  **above workshops or received housing and**  **financial assistance at the time of monitoring**  **NO, Unable to Validate if the participant’s financial stability was addressed**   * Washington Connection and other resources were utilized to ensure the participant was informed of the full range of benefits for which they may be eligible.   **YES, No Issues Identified:**  **NO, Unable to Validate**  **Reporting:**   * The appropriate financial stability service as defined in the WS Service Catalog is recorded in MIS:   **N/A, participant has not received an applicable**  **service at the time of monitoring**  **Unable to validate if participant received an**  **applicable financial stability service**  **YES, No Issues Identified**  **NO, one or more service is not recorded in MIS**  **NO, one or more service is incorrectly recorded in**  **MIS** | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **WIOA Adult SERVICES** | | | |
| **4-B. Internship or Work Experience**  **(WEX)**  **MIS**   * **WIN 0077, Change 6; WorkSource Services Catalog:**   + **Individualized, Work/Internship Experience:**     - For adults and dislocated workers, work experience is a planned, structured learning experience that takes place in a workplace for a limited period of time and is linked to a career. Work experience may be paid or unpaid, as appropriate. A work experience workplace may be in the private for profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists.   **definition**   * **20 CFR 680.180**:   + An **internship or work experience** is a planned, structured learning experience that takes place in a workplace for a limited period of time.   + Internships and other work experience may be paid or unpaid, as appropriate and consistent with other laws, such as the Fair Labor Standards Act.   + An internship or other work experience may be arranged within the private for profit sector, the non-profit sector, or the public sector.   + **Labor standards apply** in any work experience setting where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists.   **REPORTING/MIS DATA ENTRY REQUIREMENTS**   * **EcSA Contract Statement of Work:** * All participant services received must be documented in ETO or its successor. * **WIN 0082:**   + Services must be entered at the point in time they are delivered;   + If services cannot be entered at the time they are delivered, services must be entered **within 14 calendar days** of service delivery and the **service date entered must always reflect** ***the date the service was delivered***. * **ESD Policy 1023 :**   + All services must be linked to an Active Program Enrollment. * **ESD Policy 1020 Data Integrity and Performance Policy and Handbook:**   + Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system.   + **Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.** | **N/A, no documented evidence this service was**  **planned or provided**   * Contracts, time sheets, performance evaluations, and similar documentation supporting the WEX was on file for the participant: *(DOL, State guidance)*   **YES, No Issues Identified**  **NO, Unable to Locate:**  **Contracts**  **Time sheets / Pay stubs**  **Performance evaluations** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **4-C. Supportive Services, iNCENTIVES &**  **Needs-Related Payments**  **MIS**   * **WIN 0077, Change 6; WorkSource Services Catalog:**   + **Program Support Services-Other (2.0)**     - This service is used when the support services being provided   does not fall into the transportation category.   * + - This may include assistance with clothing, counseling, family/health care, housing, tools, union dues, driver’s licenses, or car repairs.     - The purpose of support services is to offer a resource for participants who are actively engaged in job search, work activities or training. Support services should be provided based on the real and immediate needs of the participant.   + **Program Support Services-Transportation**     - Support services to be provided to participants prior to job placement and exiting the program. Transportation support are goods in the form of transportation assistance. The purpose of support services is to offer a resource for participants who are actively engaged in job search, work activities or training. Support services should be provided based on the real and immediate needs of the participant.   + **Incentives:**     - While ESD Policy 5621, Rev. 2 allows for incentives for WIOA Adults and DW, ESD policy confirmed **there is no service to record an incentive in ETO.**   + **Needs-Related Payments:** Needs-Related Payments 3.0     - Financial assistance (income support) to eligible adults and dislocated workers in training to enable them to participate in that training.   **Eligibility to Receive Supportive Services**   * **20 CFR 680.910:**   **(a)** Supportive services may only be provided to individuals who are:  **(1)** Participating in career or training services as defined in WIOA secs 134(c)(2) and (3); **and**  **(2)** Unable to obtain supportive services through other programs providing such services.  **(b)** Supportive services may only be provided when they are necessary to enable individuals to participate in career services or training services*.*  **SERVICES NOT ALLOWED DURING FOLLOW-UP**   * **ESD WIN 0078, Rev. 1:**    + Supportive services are not allowed for adults and dislocated workers during follow-up and after exit.   **INCENTIVES**   * **ESD WIOA Policy 5621, Rev. 2:**   + Incentive payments must be justified and documented by service providers.   + Service providers must document (case note) the following in the case management system for each participant that receives an incentive payment:     - The business case for the incentive payment’s contribution to the participant’s success and     - How the incentive payment was calculated.   **REPORTING/MIS DATA ENTRY REQUIREMENTS**   * **EcSA Contract Statement of Work:**   + All participant services received must be documented in ETO or its successor. * **ESD Policy 1019, Rev. 4:**   + Supportive services can be provided to Adults and DW (except during follow-up or after exit) **subject to also receiving a career and training services** (supportive services cannot be the only service in a participant record).   + The supportive service **can be record on or after the date of the career or training service**, and   should also **include a case note** explaining how  the supportive service connects to a career or  training service. | **N/A, no documented evidence Supportive**  **Services were planned or provided**  **SUPPORTIVE SERVICE:**  **N/A, Supportive Services not provided**   * Supportive services were necessary to enable the individual to participate in career and training services: *(20 CFR 680.910; TEGL 19-16)*   **YES, No Issues Identified**  **NO, Unable to Validate**   * Supportive services were provided with WIOA funds only when the participant was unable to obtain supportive services through other resources:   *[20 CFR 680.910(a)(2)]*  **YES, No Issues Identified**  **NO, one or more issue identified**   * Documentation of supportive services is on file and meets local policy requirements: *(ESD WIOA Policy 5602)*   **YES, No Issues Identified**  **NO, one or more issue identified**  **Reporting:**   * For Supportive Services, a qualifying career or training service was provided to the participant and is recorded in MIS in conjunction to the supportive services recorded in MIS:   *(WIN 0078, Rev. 1; ESD Policy 1019, Rev. 4)*  **YES, No Issues Identified**  **NO, on one or more occasion, no supportive service is recorded in MIS**  **NO, on one or more occasion, no**  **qualifying service is recorded in MIS** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **training services** | | | |
| **4-D. Occupational Skills Training**  **MIS**   * **WIN 0077, Change 6; WorkSource Services Catalog:**   + **Training, Occupational Skills Training (2.0):**      - An organized program of study for adults and dislocated workers that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels.   **REQUIREMENTS:**   * **Benton-Franklin EcSA Statement of Work-Task 3:**   **B. Based on career plans, connect EcSA participants to workforce training, career opportunities, and related supportive services as outlined in EcSA Application sections 3.a., 4.a., and 4.b.**  **Eligibility**   * **20 CFR 680.210**: Training services may be made available to employed and unemployed adults who:   **(a)** A one-stop center or one-stop partner determines,  *after an interview, evaluation or assessment, and*  *career planning*, are:   1. Unlikely or unable to obtain or retain employment that leads to economic **self-sufficiency** or wages comparable to or higher than wages from previous employment through career services; 2. In need of training services to obtain or retain employment leading to economic **self-sufficiency** or wages comparable to or higher than wages from previous employment through career services; 3. Have the skills and qualifications to participate successfully in training services;   **(b)** Select a program of training services that is **directly**  **linked to the employment opportunities** in the local  area or the planning region, or in another area to  which the individuals are willing to commute or  relocate;  **(c)** Are **unable to obtain grant assistance from other**  **sources** to pay the costs of such training, including  such sources as State-funded training funds, TAA, and  Federal Pell Grants, or require WIOA assistance in  addition to other sources of grant assistance,  including Pell Grants.  **Documentation requirements**   * **20 CFR 680.220:**   **(b) The case file must contain a determination of need**  **for training services** **as determined through the**  **interview, evaluation, or assessment**, **and career**  **planning** **informed by local labor market information**  **and training provider performance information, or**  **through any other career service received.**  There is no requirement that career services be provided as a condition to receive training services; however, **if career services are not provided before training, the Local WDB must document the circumstances that justified its determination to provide training without first providing the services described in paragraph (a) of this section.** | **N/A, no documented evidence this service was planned or**  **provided**  **Post-Secondary Education:**   * Participant attended a post-secondary education program that leads to a credential or degree from an accredited post-secondary education institution at any point during program participation: *(TEGL 7-18)*   **N/A**  **YES, Validated by one of the following**: *(TEGL 7-18)*  Copy of enrollment record  File documentation with notes from program staff  Vendor training documentation  Electronic Records  Individual Training Account  Attendance Records  **No, Unable to Validate**   * Participant was unlikely or unable to obtain or retain employment that leads to economic *self-sufficiency or wages comparable to or higher than wages from previous employment* through career services: *[20 CFR 680.210(a)(1)]*   **YES, No Issues Identified**  **NO, Unable to Validate**   * The participant was *in need of training to obtain or retain*   *employment leading to economic self-sufficiency* or wages  comparable to or higher than wages from previous employment:  *[20 CFR 680.210(a)(2)]*  **YES, No Issues Identified**  **NO, Unable to Validate**   * Participant attended training in one of the following demand occupations, as specified in Benton-Franklin EcSA Application, section 4.a.:   **YES, training was connected to participant’s career pathway**  **YES, participant was connected to training in one of the**  **following targeted in demand industries:**  *(Benton-Franklin EcSA Statement of Work-Task 3)*  Correctional Officer  Maintenance Mechanics  Patient Service Representatives  Administrative Assistants  CDL  Manufacturing Sales Representatives  Upskilling participants close to filling positions as:  Registered Nurse,  Mechanics or  Managers  Other:  **NO, Unable to validate:**  If training was connected to participant’s career  pathway  If training was in one of Benton-Franklin’s target in-  demand industries | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **4-D. Occupational Skills Training***, continued…*  **REPORTING/MIS DATA ENTRY REQUIREMENTS**   * **EcSA Contract Statement of Work:**   + All participant services received must be documented in ETO or its successor. * **WIN 0082:**    + Services must be entered at the point in time they are delivered;   + If services cannot be entered at the time they are delivered, services must be entered **within 14 calendar days** of service delivery and the **service date entered must always reflect** **the date the service was delivered**. * **ESD Policy 1023 :**   + All services must be linked to an Active Program Enrollment. * **ESD Policy 1020 Data Integrity and Performance Policy and Handbook:**   + Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system.   + **Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.** | * The participant had the *skills and qualifications* to participate   successfully in training: *[20 CFR 680.210(a)(3)]*  **YES, No Issues Identified**  **NO, Unable to Validate**   * Date participant enrolled in training is documented in the file:   *(TEGL 7-18)*  **YES, Validated by one of the following:** *(TEGL 7-18)*  Copy of enrollment record  File documentation with notes from program staff  School Records  Transcript or report cards  **No, Unable to Validate**   * Evidence of participant’s satisfactory progress in training is in the file: *(WIOA Final Rule, narrative page 56177; ESD Policy 5601, Rev. 1)*   **N/A-training not started/progress not yet provided**  **YES***(Source Documentation Requirements TEGL 7-18):*  Transcript  Report card  **NO, Could Not Locate**   * If the participant withdrew from training, the reason for withdrawing and the revision to the participant’s employment and training plan is documented: *(WIN 0088)*   **N/A, participant did not withdraw from training**  **YES, reason for withdrawal is documented and revision to**  **participant’s employment and training program is**  **documented.**  **NO, could not locate documentation for reason for**  **withdrawing from training and/or revision to plan**   * Evidence of training outcome is in the file:(*20 CFR 677.235)*   **N/A-still active in service**  **YES,** Documented on one of the following: *(TEGL 7-18)*  Copy of credential  Copy of school record  Follow-up survey from program participants  **Case notes** documenting information obtained from  education or training provider  **NO, Could Not Locate**   * Date participant began training is accurately recorded in MIS *(ETA PIRL 9170)*   **YES, No Issues Identified**  **NO, Unable to Validate**   * Date withdrew/completed training is recorded in MIS: *(DOL ETA PIRL 9170)*   **N/A-still active in service**  **N/A-still active in service**  **YES, No Issues Identified**  **NO, Unable to Validate if the participant is still in training**  **NO, date withdrew/completed training is not recorded in MIS** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **4-D(a). Consumer Choice**   * **20 cfr 680.340:**   **(a)** Training services, whether under ITAs or under contract, **must be provided in a manner that maximizes informed consumer choice in selecting an eligible provider**.  **(b)** Each Local WDB, through the one-stop center, **must make available to customers the State list of eligible training providers** required in WIOA sec. 122(d). | **N/A, not participating in applicable training service**   * Eligible Training Provider List (ETPL) was made available to the participant*: [20 CFR 680.340(b)]*   **YES, No Issues Identified**  **NO, Unable to Validate**   * Training was outside of WA State and met the requirements of local policy and ESD WIOA Policy 5611, Rev. 1:   **N/A**  **YES, No Issues Identified**  **NO, Unable to Validate** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **4-D(b). Financial Aid; Other Grant**  **Assistance**   * **ESD Policy 5601:**    + Local areas **must consider the availability of other sources of grants**, excluding loans, to pay for training costs so that WIOA funds are used to supplement but not supplant other sources.   + WIOA funds are intended to provide training services in instances when there is **no grant assistance (or insufficient assistance) from other sources** (i.e., TANF, BFET, Title IV Programs and State-funded grants) to pay for those costs.   + The use of WIOA funds to pay down a loan of an otherwise eligible participant is prohibited; however, **the mere existence of a federal loan must not impact eligibility determinations.** | **N/A, not participating in applicable training service**   * Availability of non-WIOA funds, excluding loans, was explored and outcome of efforts was documented:   *(20 CFR 680.230)*   * FAFSA/other resources were explored:   **YES, No Issues Identified**  **YES, evidence training provider was not**  **eligible for Aid**  **NO, Could Not Validate**   * Outcome of FAFSA/other resources explored was documented:   **N/A**  **YES, No Issues Identified**  **NO, Could Not Locate**   * If applicable, Dept. of Veterans Affairs training funds were exempt from the “other sources of training grants” requirement: *(WIOA Final Rules)*   **N/A**  **YES, No Issues Identified**  **NO, Unable to Validate** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **4-E. Adult Education & Literacy**  **Activities**  **MIS**   * **WIN 0077, Change 6; WorkSource Services Catalog:**   + **Training, Adult Education and Literacy with Training (2.0):**     - Adult education and literacy instruction is intended to upgrade basic skills in order to prepare the individual for further training, future employment, or retention in present employment. Includes remedial reading, writing, mathematics, literacy training, study skills, English for non-English speakers, bilingual training, and GED preparation (including computer assisted competency training, and school to post-secondary education transition).     - This group must be offered in combination with other allowable training services (not including transitional jobs or customized training).     - If not in combination with training, this group must be recorded as a career service. * **ETA 9170 (PIRL)**: If the participant received services under WIOA Title II defined as academic instruction and education services below the post-secondary level that increases an individual’s ability to-   + Read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent;   + Transition to post-secondary education and training; and   + Obtain employment   **TRAINING REQUIREMENT**   * **20 cfr 680.350:**    + **WIOA funds may provide adult education and literacy activities if they are provided concurrently or in combination with one or more of the following training services**:   **(a)** Occupational skills training, including training for nontraditional employment;  **(b)** OJT;  **(c)** Incumbent worker training;  **(d)** Programs that combine workplace training and related instruction, which may include cooperative education programs;  **(e)** Training programs operated by the private sector;  **(f)** Skill upgrading and retraining; or  **(g)** Entrepreneurial training.  **REPORTING/MIS DATA ENTRY REQUIREMENTS**   * **EcSA Contract Statement of Work:**   + All participant services received must be documented in ETO or its successor. * **WIN 0082:**    + Services must be entered at the point in time they are delivered;   + If services cannot be entered at the time they are delivered, services must be entered **within 14 calendar days** of service delivery and the **service date entered must always reflect** ***the date the service was delivered***. * **ESD Policy 1023 :**   + All services must be linked to an Active Program Enrollment. * **ESD Policy 1020 Data Integrity and Performance Policy and Handbook:**   + **Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.** | **N/A, no documented evidence this service was**  **planned or provided**   * If WIOA funds were used for the Adult Education & Literacy Activities, they were provided in concurrence with any of the training activities in WIOA sec. 134(c)(3)(D)(i)–(vii) and 20 CFR 680.350.   **YES, No Issues Identified**  **NO, Unable to Validate**  **Secondary Education Program at or above the 9thGrade Level:**   * Participant attended a program designed to lead to a HS equivalent credential **(GED)** at program enrollment or at any   point while participating in the program:*(TEGL 7-18)*  **N/A**  **YES, Validated by one of the following:** *(TEGL 7-18)*  Copy of enrollment record  File documentation with notes from program staff  Vendor training documentation  Electronic Records  Individual Training Account  Attendance Records  **No, Unable to Validate** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation | |
| **work-based training** | | | | |
| **4-F. On-the-Job Training (OJT)**  **MIS**   * **WIN 0077, Change 6; WorkSource Services Catalog:**   + **Training, On-the-Job Training (2.0):**     - Training provided by an employer to a paid participant while engaged in productive work in a job that improves knowledge or skills essential to the full and adequate performance of the job;     - Provides reimbursement to the employer of up to 75% of the wage rate of the participant, for the extraordinary costs of providing the training and additional supervision related to the training;     - Limited in duration as is appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participants, as appropriate.   **ojt definition & design**   * **WIOA Sec. 3(44):**The term “**on-the-job training” means** training by an employer that is provided to a paid participant while engaged in productive work in a job that-  1. Provides knowledge or skills essential to the full and adequate performance of the job; 2. Is made available through a program that provides reimbursement to the employer of up to 50% of the wage rate of the participant, except as provided in section 134(c)(3)(H), for the extraordinary costs of providing the training and additional supervision related to the training; and 3. Is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant.   **OJT Wages & benefits**   * **20 CFR 683.275:**   **(a)** Individual in OJT must be compensated at the same rates, including periodic increase, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills.  **(c)** Individuals in OJT must be provided benefits and working conditions at the same level and to the same extent as other trainees or employees working a similar length of time and doing the same type of work.  **ojt contracts**   * **20 CFR 680.710: *OJT*** contracts may be written for *eligible employed workers when:*   **(a)** The employee is not earning a self-sufficient wage or wages comparable to or higher than wages from previous employment;  **(b)** The requirements of sec. 680.700 are met; and  **(c)** The OJT relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes identified by the Local WDB.   * **WIOA Final Rules, page 56149:**   + OJT contracts *must be continually monitored* so that WIOA funds provided through OJT contracts are providing participants the training to retain employment successfully. | **N/A, no documented evidence this service was planned or**  **provided**   * The participant’s work experience and existing knowledge and skills were considered when developing the OJT: *[WIOA Sec. 3(44)]*   **YES, No Issues Identified**  **NO, Unable to Validate**   * Contracts, time sheets, performance evaluations, and similar documentation supporting the OJT was on file for the participant: *(DOL, State guidance)*   **YES, No Issues Identified**  **NO, Could Not Locate:**  **Time sheets / pay stubs**  **Performance evaluations**  **Contracts**   * Knowledge and skills essential to the full and adequate performance of the job was documented: *[WIOA Sec. 3(44)]*   **YES, No Issues Identified**  **NO, Unable to Validate**   * The length of the OJT was appropriate to the occupation for which the participant was trained. *[WIOA Sec. 3(44)]*   **YES, No Issues Identified**  **NO, Unable to Validate**   * The participant was compensated at the same rate and provided benefits and working conditions as other employees in similar occupations by the same employer: *(20 CFR 683.275)*   **YES, No Issues Identified**  **NO, Unable to Validate**   * The OJT did not displace or partially displace other employees of the employer: *[WIOA Sec. 181(b)]*   **YES, No Issues Identified**  **NO, Unable to Validate**   * Written concurrence of the labor organization and employer was obtained, if applicable: *[WIOA Sec. 181(b)]*   **N/A**  **YES, No Issues Identified**  **NO, Unable to Validate**   * The OJT was developed with an employer who does not continuously fail to provide long-term employment with equal benefits and wages: *[WIOA Sec. 194(4)]*   **YES, No Issues Identified**  **NO, Unable to Validate**   * The service provider confirmed the employer had not relocated less than 120 days prior to the OJT and did not lay off employees at the prior location: *[WIOA Sec. 181(d)]*   **YES, No Issues Identified**  **NO, Unable to Validate**   * Factors were documented if employer was reimbursed above 50% and up to 75%: *[20 CFR 680.730(b); TEGL 19-16]*   **N/A**  **YES, No Issues Identified**  **NO, Unable to Validate**   * OJT contract was regularly monitored: *(WIOA Final Rules, page 56149)*   **YES, No Issues Identified**  **NO, Unable to Validate** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | | No Action Required  Action Required  Recommendation |

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| **4-G. Registered Apprenticeship**  **mis**   * **WIN 0077, Change 6; WorkSource Services Catalog:**   + Training that is provided through a Registered Apprenticeship training system that combines paid learning on-the-job and related technical and theoretical instruction in a skilled occupation.   **Reporting and Data Validation Requirements:**   * **TEGL 13-16:**    + For data validation purposes, *staff are required to flag whether or not a WIOA participant is either in a RA program at the time of program enrollment or whether they enter a RA during program participation.*   **POINT OF EXIT**   * **TEGL 13-16:**    + The point of exit should be based on when the participant is *successfully moving through the RA program and is no longer receiving services from WIOA*.   + The following two factors **should be considered when determining an appropriate exit policy**:     - **Wage Increases**: Apprentices receive progressive increases in pay as their skills and knowledge increase-this is a core element of all Registered Apprenticeships. A wage increase may be an appropriate point of exit from WIOA, as it means that apprentices have passed a milestone in their training, improved their skills, and increased their earnings-signaling that support through WIOA may no longer be needed.     - **Credential Attainment**: Many RA programs offer interim occupational credentials that can be attained by apprentices during their program. The attainment of a credential is another aspect that could be factored into the determination of an appropriate exit point from WIOA, given that this marks an important milestone in the RA program. Attainment of a credential signals that apprentices have successfully advanced along a career pathway and increased their skills in the field, and potentially moved beyond the point of needing WIOA support.   **REPORTING/MIS DATA ENTRY REQUIREMENTS**   * **WIN 0082:**    + Services must be entered at the point in time they are delivered;   + If services cannot be entered at the time they are delivered, services must be entered **within 14 calendar days** of service delivery and the **service date entered must always reflect** ***the date the service was delivered***. * **ESD Policy 1023 :**   + All services must be linked to an Active Program Enrollment. * **ESD Policy 1020 Data Integrity and Performance Policy and Handbook:**   + Services within the WorkSource Service Catalog are the source data for performance and outcome measurements across the WorkSource system.   + **Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained.** | **N/A, no documented evidence this service was**  **planned or provided**  **Reporting:**   * Service *(as documented in* ***case notes*** *or other documentation in the file*) is correctly recorded in MIS*: (20 CFR 677.235; WIN 0082)*   **YES, No Issues Identified**  **NO, the service is not recorded in MIS**  **NO, the service is incorrectly recorded in MIS** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | | No Action Required  Action Required  Recommendation | |
| **5.** **OUTCOMES** | | | | | |
| **5-A. Date of Most Recent**  **Measurable Skill Gains**  *-In-Program Performance Measure*  **REPORTING/MIS data entry requirements:**   * **Recording MSG in ETO instructions included Training 12 Meeting Minutes sent via email from Lynn Aue (ESD) on 8-7-19 and revised on 10-9-19:**   + **Test and Results Page**   + **Progress Report Page**     - Element titled “Associated Program Enrollment” with a dropdown of cross-referenced active program enrollment values     - **Required field:** Element titled **“Progress Report Type”** with a dropdown of the following values: “Apprenticeship”, “OJT” and “Skills Progression”.     - **Required field:** Element titled **“Is the progress satisfactory?”** with response values of “Yes” and “No”.     - Element titled “Documentation” with the option to upload documents.     - Element titled “Notes” with a free form text field that allows 1200 characters.   + **Report Card or Transcript page:**     - Element titled “Associated Program Enrollment” with a dropdown of cross referenced active program enrollment values.     - **Required field:** Element titled **“Credits or Units”** with a free form text field that only allows numeric characters.     - **Required field:** Element titled **“Does this meet the state unit’s academic standards?”** with response values of “Yes” and “No”.     - Element titled “Documentation” with the option to upload documents.     - Element titled “Notes” with a free form text field that allows 1200 characters   + Skill gains should be counted using the **date on which they occur**, **not the date on which they are recorded** **or documentation is received.** * **WIN 0098:**   + The State has established the academic standards as a grade of “C” or better.   + 14-day requirement for real-time data entry does not apply | **N/A, individual is not participating in applicable services or no**  **measurable skill gain documented at the time of monitoring**  **REPORTING:**   * **BSD/EFL:**   **N/A**  **YES, the most recent date** the participant who received  instruction below the post-secondary education level  achieved at least one EFL is recorded in MIS and  v**alidated by one of the following:** *(TEGL 7-18; DOL ETA PIRL 9170)*  Pre- and post-test results measuring EFL gain  Adult High School transcript showing EFL gain through  the awarding of credits  Post-secondary education or training enrollment  determined through survey documentation or **program**  **notes.**  **NO, one or more issue identified**   * **SECONDARY Diploma or GED:**   **N/A**  **YES, the most recent date** of the participant’s transcript or report  card for secondary education for one semester showing that  the participant is meeting the State unit’s academic standards *(grade “C” or better per WIN 0098)* **is recorded in MIS** and v**alidated by one of the following:**  *(TEGL 7-18; DOL ETA PIRL 9170)*  Certification of attainment of passing scores on all  parts of a state-recognized high school equivalency  test (GED)  Copy of HS diploma  **NO, one or more issue identified**   * **pOST-SECONDARY PROGRESS:**   **N/A**  **YES, the most recent date** of the participant’s transcript or report  card for post-secondary education that shows a participant is  meeting the State unit’s academic standards *(grade “C” or*  *better per WIN 0098)* is recorded in MIS and validated by one  of the following**:** *(TEGL 7-18, DOL ETA PIRL 9170)*  Transcript  Report card  **NO, one or more issue identified**   * **EMPLOYER TRAINING MILESTONES (e.g., OJT):**   **N/A**  **YES, the most recent date** that the participant had a satisfactory  or better progress report towards established milestones  from an employer who is providing training is recorded in  MIS and v**alidated by:**  **Contract and/or evaluation from employer or training**  **provider**  **NO, one or more issue identified**   * **Industry Exams or skills progression:**   **N/A**  **YES, the most recent date** the participant successfully passed an  exam that is required for a particular occupation, or progress  in attaining technical or occupational skills as evidenced by  trade-related benchmarks such as knowledge-based exams is  recorded in MIS and validated **by one of the following:**  *(TEGL 7-18; DOL ETA PIRL 9170)*  Results of knowledge-based exam or certification of  completion  Documentation demonstrating progress in attaining  technical or occupational skills  Documentation from training provider or employer  Copy of credential that is required for a particular  occupation and only is earned after the passage of an  exam  **NO, one or more issue identified** | | No Issues Identified  Items to Address  Data Validation Issues  Observation | | No Action Required  Action Required  Recommendation |
| **5-B. Date attained & Type of**  **Recognized Credential**  *In-Program and Exit-Based Performance Indicator*  **Types of Acceptable Credentials:**   * **TEGL 10-16, Change 1**: The following are acceptable types of credentials that count toward the credential attainment indicator:   + Secondary school diploma or recognized equivalent   + Associate’s degree   + Bachelor’s degree   + Graduate degree for purposes of the VR program   + Occupational licensure   + Occupational certificate, including Registered Apprenticeship and Career and Technical Education educational certificates   + Occupational certification   + Other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment.   **CERTIFICATES/CREDENTIALS NOT INCLUDED**   * **ESD Policy 1020 Data Integrity and Performance Policy and Handbook:** Credentials that do not count include, but are not limited to:   + First aid cards   + Food handler’s card   + Non-commercial driver’s license   + Completion of WEXs * **Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on WorkforceGPS October 24, 2017:** Even though DOL will not define what counts as a credential, Evan did state the following common trainings do not count as a credential or occupational skills training:   + CPR   + OSHA 10   + Work readiness   + Completion of assistive technology training program (screen reading software)   + Certificates related to hygiene and safety that are broadly required for entry level employment | **N/A not participating in applicable services, or no**  **credential documented at time of monitoring**   * Documentation of ***date and type*** of Credential Earned is located in the file: *(TEGL 7-18)*   **YES**, **Documented on one of the following:** *(TEGL 7-18)*  Copy of credential  Copy of school record  Follow-up survey from program participants  **Case notes** documenting information obtained  from education or training provider  **NO, Unable to Locate:**  Date credential earned  Type of credential  **Reporting:**   * Type of Credential Earned is recorded in MIS:   *(20 CFR 677.160; DOL ETA PIRL 9170)*  **YES, No Issues Identified**  **Yes, but on one or more occasion, the incorrect**  **credential is recorded**  **NO, on one or more occasion, no credential**  **recorded**  **Unable to Validate credential earned recorded in**  **MIS**   * Type of credential earned is documented in case notes: *(WIN 0088)*   **YES, No Issues Identified**  **NO, on one or more occasions, type of credential**  **earned is not documented in case notes**  **NO, on one or more occasion, type of credential**  **documented in case notes does not match credential recorded in MIS**  **NO, one or more credential was not recorded in MIS** | No Issues Identified  Items to Address  Data Validation Issues  Observation | | No Action Required  Action Required  Recommendation | |

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| **6. PROGRAM COMPLETION** | | | |
| **6-a. Date and Reason for Program**  **Completion**  **PROGRAM COMPLETION:**   * **ESD Policy 1020 Handbook:**    + **The date of program completion is the date of the final program-funded qualifying service**.   + In this sense, it is unlike the exit date, which is common across all programs rather than specific to a particular program.   + The program completion date may or may not be the same as the exit date. The program completion date will be equal to or less than the exit date.   **Program Completion vs System Exit**   * **ESD Policy 1020 Handbook:**    + **Exit dates** **are not the same as program completion dates**.   + A **system exit** date is the same as a **program completion date *only*** when participants do not receive a qualifying service from another program within 90 days.   **SYSTEM EXIT:**   * **ESD Policy 1020 Handbook:**    + **“Exit”** refers to a participant who has not received a qualifying service funded by any qualifying program in the WorkSource system **for 90 consecutive calendar days** and is not scheduled to receive future qualifying services. * **20 CFR 677.150(c)(1):**    + **Exit** is the last day of service. * **ETA 9170 (PIRL):**   + The last date the participant received services that are not self-service, information-only, or follow-up services.   + And only if there are no future services that are not self-service, information-only or follow-up services, planned from the program.   **REPORTING/MIS DATA ENTRY REQUIREMENTS**   * **TEGL 7-18**:   + Record the last date the participant received services that are not self-service, information only, or follow-up services.   + Record the last date of receipt of services only if there are no future services that are not self-service, information-only, or follow-up services planned from the program.   + For Titles I,II and III, record the last date of funded service(s).   **other reasons for exit:**   * **TEGL 7-18**:   + Incarcerated in a correctional institution or has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center during the course of receiving services as a participant.   + Medical treatment expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.   + Deceased   + Member of National Guard or other reserve military unit of the armed forces and is called to active duty for at least 90 days. | **N/A, there is evidence the participant has not**  **completed the program**  **file review:**   * Date of program completion is documented in the file:   **YES, Validated by one of the following**: *(TEGL 7-18)*  Copy of the letter sent to the individual indicating  that the case was closed.  WIOA Status/Exit Forms  Electronic records  Attendance Records  Review of service records identifying the last  qualifying service (and lack of a planned gap)  **NO, Unable to Locate**   * If program completion was due to “Other Reasons for Exit”, evidence is documented in the file:   **N/A**  **YES,** Validated by one of the following: *(TEGL 7-18)*  File documentation **with notes** from program  staff  Information from partner services  WIOA status/exit forms  Electronic Records  Attendance Records  Withdrawal form with explanation  Information from institution or facility  **NO, One or More Issues Identified**  **Reporting:**   * All durational services recorded in MIS are closed:   *(20 CFR 677.160)*  **N/A**  **YES, No Issues Identified**  **NO, One or More Issues Identified**   * Program Completion Date recorded in MIS matches the date of the last qualifying recorded in MIS:   **YES, No Issues Identified**  **NO, One or More Issues Identified**   * Case notes document the date and reason for program completion: *(WIN 0088)*   **YES, very detailed**  **YES, some detail**  **NO, could not locate case notes for:**  **Date of program completion**  **Reason for program completion** | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **6-B. Follow-up Services**  **MIS: WIN 0077, Change 6; WorkSource Service Catalog**  **When to provide follow-up Services**   * **ESD WIOA Policy 5620:**   + As instructed in TEGL 10-16, follow-up services can only be provided to WIOA Adult and DW participants who are **placed in unsubsidized employment and *have******system exited***.   + Follow-up services, if requested by the exited individual and determined by staff to be appropriate, must be provided for a period of up to 12 months. * **Benton-Franklin EcSA Application section 4.a.:**   + Upon employment, Follow-up Services will be used to help the participant retain employment and increase earnings and/or employee benefits.   **Note:** Clarification from John Traugott per EcSA tool review on 12-19-19: Follow-up services will be provided consistent with BFWDC local policy 2015-16, Adult and Dislocated Worker Follow-up Services Policy –  Follow-up services will conclude at the end of EcSA contract, March 31st, 2022, for those participants not co-enrolled in WIOA Adult, Dislocated Worker, or Youth formula. | **FILE REVIEW:**  **N/A, participant not placed in UE and/or has not yet**  **exited, or opted out of follow-up services**  **Reporting:**   * Follow up services included more than a contact attempted: *[20 CFR 681.580(c)]*   **YES, No Issues Identified**  **NO, one or more issues identified** | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **7. Data Validation, Data Integrity** | | | |
| **7-B. MIS**  **mis: WIN 0077, Change 6; WorkSource Service**  **Catalog**  **REPORTING/MIS DATA ENTRY REQUIREMENTS**   * **EcSA Guidance included in Training 12 meeting minutes 8-21-19:** * **General Services:**   + **WIOA services may only be provided to eligible participants who are enrolled in the EcSA program of enrollment.**   + All WIOA career, training, work-based, and support services are allowable.   + **Services provided should be based on the participant’s Career Plan and assessments provided as part of the EcSA model.**   + **All WIOA services provided to participants must be recorded in ETO** and **each service must be tied to the Active Program funding source** (EcSA, Adult, Dislocated Worker, Youth, or other WIOA local program).   + **All services provided to a participant must be documented in case notes** and **any related documentation should be maintained in the participants file.**   + Please see [Services Catalog](http://media.wpc.wa.gov/media/WPC/wswa/support/WorkSource%20Services%20Catalog.xlsx) for additional service definitions. * **EcSA Contract Statement of Work:**   + All participant services received must be documented in ETO or its successor. * **EcSA Guidance included in Training 12 meeting minutes 8-21-19:**   + Review the Demographics at Enrollment tab and ensure demographics are complete and accurate:     - If demographics are incorrect, obtain permission from the participant to impersonate them in WorkSourceWA.com and update their record before saving the Program Enrollment TouchPoint * **WIN 0082:**    + *Services must be entered at the point in time they are delivered;*   + If services cannot be entered at the time they are delivered, services must be entered *within* ***14*** *calendar days* of service delivery and the *service date entered must always reflect the date the service was delivered.*   + When a service is provided, the appropriate qualifying service must be identified, even if case notes are entered.   + *Qualifying services are identified in the WorkSource Service Catalog.*   + *Services should only be entered when delivered to a participant* and only actual services should be entered   + Case notes should support, not contradict service entries.   + Case notes should not be entered to represent service delivery without also entering a qualifying service from the WorkSource Service Catalog.   + *Services should not be recorded if only a voice message was left or an email delivered* as they only represent the intent to provide service as opposed to the actual provision of services. | **summary of MIS observations:**   * Participant’s demographic information is accurately recorded in MIS*: (20 CFR 677.235; Training 12 meeting minutes 8-21-19)*   **YES, No Issues Identified**  **NO, One or Two Issues Identified**  **NO, Several or More Issues Identified**   * All services provided to the participant *(as identified in case notes or other documentation in the file)* are recorded in MIS:   *(20 CFR 677.240; WIN 0082; Training 12 meeting minutes 8-21-19)*  **YES, No Issues Identified**  **NO, One or Two Issues Identified**  **NO, Several or More Issues Identified**   * Services recorded in MIS are based on the participant’s Career Plan and assessments provided as part of the EcSA model: *(Training 12 meeting minutes 8-21-19)*   **YES, No Issues Identified**  **NO, Unable to validate one or more service recorded**  **in MIS is based on participant’s Career Plan**   * For services recorded in MIS, services are attached to the appropriate programs (EcSA, Adult, DW, Youth or other WIOA local program):   *(ESD Policy 1023; Training 12 meeting minutes 8-21-19)*  **YES, No Issues Identified**  **NO, One or Two Issues Identified**  **NO, Several or More Issues Identified**   * For services recorded in MIS, services are recorded correctly: *(20 CFR 677.240; WIN 0082)*   **YES, No Issues Identified**  **NO, One or Two Issues Identified**  **NO, Several or More Issues Identified**   * For services recorded in MIS, services are recorded within the allotted timeframes: *(WIN 0082)*   **YES, No Issues Identified**  **NO, One or Two Issues Identified**  **NO, Several or More Issues Identified**   * For services recorded in MIS, appropriate outcomes are recorded: *(20 CFR 677.240; WIN 0082)*   **N/A**  **YES, No Issues Identified**  **NO, One or Two Issues Identified**  **NO Several or More Issues Identified** | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **7-C. Case Notes**  **dol definition**   * **TEGL 7-18**: Paper or electronic statements by the case manager that identifies, at a minimum, the following:   + A participant’s status for a specific data element,   + The date on which the information was obtained and   + The case manager who obtained the information.   **reporting**   * **EcSA Guidance included in Training 12 meeting minutes 8-21-19:**   + **All services provided to a participant must be documented in case notes** and **any related documentation should be maintained in the participants file.** * **ESD Policy 1020:**    + Case notes should support and not contradict service entries.   + Case notes should not be entered to represent service delivery without also entering a qualifying service from the Services Catalog. * **WIN 0088:**   + Recording case notes is critical because it weaves each service element into a comprehensive service plan.   + Individualized case notes provide a complete, accurate, and concise explanation of frequency and type of contact with participants, including the types of services provided and the outcomes associated with those services.   + Case notes are a tool to help service providers organize and analyze the information gathered on participants and to plan case management strategies.   + It is imperative that Local Workforce Development Boards (LWDBs), their Title I sub-contractors, one-stop system partners, and federal and state monitors/auditors, be able to recognize and discern each service and expenditure provided to, and made on behalf of, a one-stop system customer.   + Case notes should not be entered to represent service delivery without also entering a qualifying service from the WorkSource Services Catalog (see WIN 0082).   **Confidential information**   * **WIN 0023; WIN 0088**:   + Any case notes containing confidential information, such as medical information, must be kept in a separate file and in a secure location apart from the participant’s regular program file. | **Summary of case note observations:**   * Eligibility and justification for enrollment:   **YES, very detailed**  **YES, some detail**  **NO, could not locate case notes describing the**  **participant’s eligibility for services and/or**  **justification for enrollment**   * Planned services: *(WIN 0088; WIN 0089)*   **YES, very detailed**  **YES, some detail**  **NO, could not locate case notes describing the**  **planning of services**   * All services provided to the participant are documented in case notes: *(Training 12 meeting minutes 8-21-19)*   **YES, very detailed**  **YES, some detail**  **NO, on one or more occasions, could not locate**  **case notes describing the delivery of services**  **as recorded in MIS**   * Progress of services: *(WIN 0088; WIN 0089)*   **YES, very detailed**  **YES, some detail**  **NO, on one or more occasions, could not locate**  **case notes describing the progress of services**   * Outcomes of services: *(WIN 0088; WIN 0089)*   **N/A, no outcomes to document**  **YES, very detailed**  **YES, some detail**  **NO, could not locate case notes describing the**  **outcome of one or more services**   * Case management services:   **YES, very detailed**  **YES, some detail**  **NO, could not locate case notes describing on-going**  **provision of case management**   * Significant gaps in case notes (more than 60 days):   **NO**  **YES, gaps occurred on one or two occasions**  **YES, gaps occurred on more than three occasions**   * Documentation of case notes was in compliance with local policy, if applicable:   **N/A, No local policy or procedure**  **YES, No Issues Identified**  **NO, one or two issues identified**  **NO, three or more issues identified** | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **8. Miscellaneous Observations** | **determination & COMMENTS** | **Action REquired/recommendations** |
| This element covers all other observations not accounted for on this tool. Examples of “miscellaneous observations” may include, but are not limited to:   * Loose, unattached documents located in a hard file * Medical references in the file * Names of other program participants located in the file * Other “miscellaneous observations” | **N/A**  Items to Address  Observation | No Action Required  Action Required  Recommendation |