|  |  |  |  |
| --- | --- | --- | --- |
| **COVID-19 Enrollment Exception**  *WIN 0109: Verbal Self-Attestation and Remote Eligibility Documentation*  *\* Effective Date: April 29, 2020*  *\*Expiration Date: November 8, 2020*  **Minimum Requirements for Documenting Eligibility for WIOA Title I-B Programs**  Verbal self-attestation is allowed to document eligibility for criteria for which self-attestation is not otherwise allowed per DOL guidance but should not be used as a first resort. LWDBs and their service providers should attempt to collect eligibility source documentation when possible. However, while one-stop offices remain closed due to COVID-19 impacts**,** full verbal self-attestation is allowed if clearly documented in case files as follows:  **(a.)** The case manager and applicant conduct the eligibility determination and registration verbally by phone with the case manager case-noting the following in the ETO management information system:  **i.** That verbal self-attestation was necessary due to a one-stop office closure caused by COVID-19.  **ii.** Each eligibility and priority of service criterion to which the applicant is self-attesting with a statement that reads, “I attest that [applicant name] verbally self-attested to the eligibility and priority of service criteria cited above.”  **iii.** That the case manager has provided to the applicant the *Equal Employment Opportunity and Complaint and Grievance Procedures* and *WIOA Title I-B Program Data Collection Certification* information verbally or in hard copy and that the applicant verbally acknowledged understanding the information by a statement that reads, “I attest that I provided the Equal Employment Opportunity and Complaint and Grievance Procedures and WIOA Title I-B Program Data Collection Certification statements to [applicant name] on [date] and [applicant name] attested to understanding the information.”  **(b.)** If determined eligible per the process described in paragraph 1, the case manager verbally obtains from the applicant all information required for federal reporting and records the information in the appropriate sections and fields in the ETO management information system.  For up to date state and federal COVID guidance, please visit: <https://wpc.wa.gov/policy/state/and/federal/COVID-19/guidance> | N/A, verbal self-attestation was not used to determine eligibility and priority of service   * **Verbal self-attestation was used to determine eligibility:***(WIN 0109)*   YES, one or more of the following eligibility criteria were verbally self-attested (if documentation was provided for any of the eligibility criteria, refer to those respective sections found in 1.A, 1.B or 1.C below):  Age / Date of Birth  Legally Entitled to Work  Selective Service Registration (if applicable)   * **Verbal self-attestation was used to determine priority of service criterion:***(WIN 0109)*   YES, the following priority of service criterion were verbally self-attested: (Case notes must include *how* they meet each criterion)  Priority 1: Veteran/eligible spouse *and* low income or BSD  Priority 2: Low income or public assistance recipient or BSD  Priority 3: Veteran/eligible spouse not low income or BSD  Other Priority: Local policy criterion   * **Verbal self-attestation was clearly documented by case-noting all of the following in ETO:** *(WIN 0109)*   YES, all of the following were located in case notes:  That verbal self-attestation was necessary due to a one-stop office closure caused by COVID-19.  Each eligibility and priority of service criterion to which the applicant is self-attesting.  A statement that reads, “I attest that [applicant name] verbally self-attested to the eligibility and priority of service criteria cited above.”  A statement that reads, “I attest that I provided the Equal Employment Opportunity and Complaint and Grievance Procedures and WIOA Title I-B Program Data Collection Certification statements to [applicant name] on [date] and [applicant name] attested to understanding the information.”  NO, One or More Issues Identified  **REPORTING:**   * **All demographics and required federal reporting information was collected and entered in ETO** *(WIN 0109)*   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. **WIOA ADULT ELIGIBILITY CRITERIA**  N/A, verbal self-attestation used during COVID-19 closure | | | |
| **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: *(TEGL 23-19)*  Driver’s License or ID  Federal, State, Local ID Card  Birth certificate  Passport  Baptismal record  DD-214  Work permit  Hospital record of birth  Public assistance  Social service records  School records / ID’s  Family bible  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 |
| **Selective Service Registration**  **TEGL 11-11, Change 2**  All males (U.S. citizens and aliens living in the U.S.) born after January 1, 1960 must be registered with Selective Service within 30 days of their 18th birthday.  **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   **Immigrants and Dual Nationals**  [**https://www.sss.gov/register/immigrants/**](https://www.sss.gov/register/immigrants/)  *Immigrant Men Are Required to Register*  With very few exceptions, all immigrant males between ages 18 and 25 are required by law to register with the Selective Service System (SSS) within 30 days of arriving in the United States. This includes naturalized citizens, parolees, undocumented immigrants, legal permanent residents, asylum seekers, refugees, and all males with visas more than 30 days expired.  *Non-Immigrant Foreigners*  Non-immigrant men living in the United States on a valid visa are not required to register for as long as they remain on a valid visa up until they turn 26 | N/A, participant was one of the following: (TEGL 11-11, change 2)  Female  Born before Jan. 1, 1960  Non-US male, who entered the US for the first time after his 26th birthday, validated by one of the following:  Date of entry stamp in passport  I-94 with date of entry stamp  USCIS letter with date of entry presented in conjunction with documentation of age  Non-US male who entered the US illegally after his 26th birthday, validated by:  Proof he was not living in the US from age 18-25  Non-US male on a valid non-immigrant visa   * **Participant was registered with Selective Service**   **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  Selective Service Registration Card  Selective Service Verification Form (Form 3A)  Stamped Post Office Receipt of Registration  Local area approved waiver documentation  NO, Unable to Validate    **Reporting:**   * **Selective Service Registration is recorded in MIS:**   *(20 CFR 677.235)*  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 |
| **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.   For a list of accepted I-9 Documentation, visit: <https://www.uscis.gov/i-9-central/form-i-9-acceptable-documents> | * **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)*  Accepted I-9 Documentation  Self-attestation, which was *one* of the following:   * 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   * Signed and dated paper WIOA eligibility application:   YES, No Issues Identified  NO, one or more issues identified   * Signed and dated MIS WIOAApplication:   YES, No Issues Identified  NO, one or more issues identified  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. **PRIORITY OF SERVICE**  N/A, verbal self-attestation used during COVID-19 closure | | | |
| **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 | * **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 |
| **Other Priority (4 or more) - Optional**  *Priority of Service Category 4 or more*  \*Refer to local policy for eligibility criteria and acceptable documentation requirements. | N/A, not enrolled under this priority of service   * **Eligibility for LWDB defined “Other Priority of Service” category is documented in the file:**   YES, No Issues Identified  NO, Could Not Locate | No Issues Identified  Items to Address  Observation | No Action Required  Action Required  Recommendation |
| **Veterans & Eligible Spouses**  *Priority of Service Categories 1 & 3*  The documentation must include:   * Dates of service, **and** * Indicate the veteran was discharged or released from such duty with other than a   dishonorable discharge. | N/A, not identified as a veteran or eligible spouse   * **Verification of participant’s veteran/eligible spouse status was located in the file:** *(TEGL 23-19)*   YES, Validated by one of the following:    DD-214  Letter from the Veteran’s Admin.  Cross-match with Dept of Defense Records  Cross-match with Veterans Service Database  NO, Unable to Validate  **Reporting:**   * **Veteran status is recorded in MIS:***(20 CFR 677.235)*   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 |
| **Low Income**  *Priority of Service Categories 1 & 2*  *\*Low income is not an eligibility criterion 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.   **TEGL 23-19 – Types of Source Documentation**  **Cross-Match:** A cross-match requires validators to find detailed supporting evidence for the data element in a database. An indicator or presence of a Social Security Number (SSN) in an administrative non-WIOA database, i.e., a database not maintained by a WIOA core program such as data from the State’s Department of Motor Vehicles, is not sufficient evidence for a cross-match. State validators must also confirm supporting information such as dates of participation and services rendered. States must have *data sharing agreements in place* as appropriate.  ***Note:*** *In order to use a cross-match, a data sharing agreement would need to be in place with the agency that owns the database in which you would be accessing for validation.* | 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; TEGL 23-19)*   YES, Validated by *one* of the following: **(***TEGL 23-19)*  Award Letter from Veteran’s Administration  Bank Statements  Pay Stubs  Compensation Award Letter  Court Award Letter  Pension Statement  Employer Statement / Contact  Family or Business Financial Records  Housing Authority Verification  Quarterly Estimated Tax for Self-Employed Persons  Social Security Benefits  UI Claim Documents  Copy of Authorization to Receive Cash Public Assistance  Copy of Public Assistance Check  Public Assistance Records  Cross-match with UI Wage Records  Cross-match with Public Assistance Records  Cross-match with Refugee Assistance Records    Self-attestation, which was one of the following:   * 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   * Signed and dated paper WIOA eligibility application:   YES, No Issues Identified  NO, one or more issues identified   * Signed and dated MIS WIOAApplication:   YES, No Issues Identified  NO, one or more issues identified  **Reporting:**   * **Low income status is recorded in MIS:***(20 CFR 677.235)*     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 |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Basic Skills Deficient (BSD)**  *Priority of Service Categories 1 & 2*  **BSD Scores**  **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.   **Required Assessment Tool- CASAS**  **ESD WIOA Policy 1011, Rev. 6:**   * + ESD has approved CASAS tests as the only standard tools to determine BSD used for program enrollment.   + The Appraisal test must be given first (prior to the pre-test) to determine the appropriate level and form of the pre-test to be used.   + The CASAS appraisal test cannot be used in lieu of the CASAS pre-test to determine BSD.   + When using the e-test format (called Locator), administration of CASAS to determine BSD is one step.   + Pre-tests determine BSD and EFL   **Documentation Requirements**  **TEGL 23-19:**   * + **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.   **WIN 0107:** Temporary suspension of WorkSource System Policy 1101 (CASAS for Basic Skills Assessment) to allow alternative documentation of basic skills deficiency in WIOA Title I-B programs. *Effective April 17, 2020, Expiration Date October 17, 2020.* | N/A, 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  NO, Unable to Validate  ***OR***  **Enrolled during COVID Pandemic, under WIN0107- *Effective 4/17/2020 – 10/17/2020.***  YES, validated by *one* of the following: *(WIN 0107)*  CASAS assessment (paper or e-test)  Verification of enrollment in a Title II adult education program (documented in case notes)  Staff observation of deficient functioning, such as observing the applicant is not able to read or complete an application form, or observing that applicant does not have basic computer literacy (documented in case notes)  Self-certification that the individual lacks a HS diploma or equivalency  NO, One or More Issues Identified  **Reporting:**   * **BSD status is recorded in MIS as required in ESD Policy 1011, Rev. 6:***(20 CFR 677.235; ESD Policy 1011, Rev. 6)*   YES, all of the following were completed in the *ETO WIOA Eligibility Application: (ESD Policy 1011, Rev. 6)*  Barriers Tab – Basic Literacy Skills Deficiency  “yes” radio button selected  “Standardized Assessment Test” dropdown selected for BSD Verification  Notes Tab- the following were documented:  Date of test  Score(s)  Name of person or entity administering test  NO, One or More Issues Identified  ***OR***  **Enrolled during COVID Pandemic, under WIN0107- *Effective 4/17/2020 – 10/17/2020.***   * **BSD status is recorded in MIS:***(20 CFR 677.235)*   N/A, participant not tested or assessed  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 |
| **3. program enrollment** | | | | |
| **Date of 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*.*  **WS System Policy 1020 Handbook**:   * + Date of participation is initiated by the first program-funded qualifying service. | **FILE REVIEW:**   * **Participant met all programmatic eligibility requirements:** *[20 CFR 680.110 and TEGL 19-16)*   YES, No Issues Identified  NO, Unable to Validate   * **There is documented evidence indicating a service other than self-service or information only activities were provided to the participant initiating program participation:***[20 CFR 680.110) and TEGL 19-16; TEGL 23-19]*   YES, documented on one of following: *(TEGL 23-19)*  Individual Plan for Employment  Electronic Records  Program intake documents such as eligibility  determination documentation or program  enrollment forms  NO, Unable to Validate  **Reporting:**   * **A service other than self-service or information-only activities is recorded in MIS on date of program enrollment:** *(20 CFR 680.110) and TEGL 19-16; TEGL 23-19)*   YES, No Issues Identified  NO, One or More Issues Identified   * **Program enrollment is documented in case notes:**   *(WIN 0089)*  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 |
| **Concurrent Program Enrollment**  **Tracking of Funds**  **TEGL 19-16**   * + Local program operators mustidentify and track the funding streamswhich pay the costs of services provided to individuals who are concurrently enrolled, and   + Ensure no duplication of services. | N/A, Not co-enrolled at time of monitoring  **Reporting:**   * **Program enrollments are correctly recorded in MIS:** (20 CFR 677.160)   YES, No Issues Identified  NO, One or More Issues Identified   * **Services are correctly recorded in MIS and assigned to the appropriate program**: (20 CFR 677.160)   YES, No Issues Identified  NO, One or More Issues Identified   * **No duplication of services between co-enrolled programs were observed at the time of review:**   (TEGL 19-16)  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 |
| **4. services** | | | | |
| **Support Services**  **MIS**  **WIN 0077, Change 9; WorkSource Services Catalog:**   * + **Program Support Services-Other (3.0)**     - 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, assistance with books, fees, and school supplies, and payments for employment and training-related applications, tests, and certifications.     - 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.  **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 in follow-up**  **ESD WIN 0078, Rev. 1:**   * + Supportive services are not allowed for adults and dislocated workers during follow-up and after exit.   **Reporting / MIS Requirements**  **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 service(s) 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 as a last dollar resource, only when the participant was unable to obtain supportive services through other resources / programs providing such services:**   *[20 CFR 680.910(a)(2)]*  YES, No Issues Identified  NO, One or More Issues Identified   * **Documentation of supportive services is on file and meets local policy requirements:** *(ESD WIOA Policy 5602, rev. 2)*   YES, No Issues Identified  NO, One or More Issues 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 |
| **Incentives**  **MIS**  **WIN 0077, Change 9; WorkSource Services Catalog:** 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.**  **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. | | N/A, no documented evidence incentives were  provided   * **Justification of the incentive payment is documented:** *(ESD Policy 5621, Rev. 2)*   YES, No Issues Identified  NO, Unable to Validate   * **How the incentive payment was calculated is documented, either in local policy or the case file:**   *(ESD Policy 5621, Rev. 2)*  YES, No Issues Identified  NO, Unable to Validate   * **Incentive expenditure records were available for monitoring purposes:** *(ESD Policy 5621, Rev. 2)*   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 |
| **Needs-Related Payments**  **MIS**  **WIN 0077, Change 9; WorkSource Services Catalog:**   * + **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 Requirements**  **ESD WIOA Policy 5602, Rev.2:**   1. Adults and OSY ages 18-24 must:    * Be unemployed;    * Not qualify for (or have ceased to qualify for) UI; and    * Be enrolled in a program of training services | | N/A, no documented evidence this service was needed or provided   * **Participant was unemployed, did not qualify for UI (or ceased to qualify) and was enrolled in training:** *(20 CFR 680.930)*   YES, No Issues Identified  NO, Unable to Validate   * **For participants who have ceased to qualify for UI, the participant was enrolled in training by the end of the 13th week after the most recent layoff, or enrolled by the end of the 8th week after the worker was informed that a short-term layoff would exceed 8 weeks, whichever is applicable?** *[WIOA Sec. 134(d)(3)(B)]*   N/A  YES, No Issues Identified  NO, Unable to Validate   * **Is the level of NRP equal to or less than the applicable level of UI or the poverty line as described in WIOA Sec. 134(d)(3)(C)?**   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 |

|  |  |  |  |
| --- | --- | --- | --- |
| **training services** | | | |
| **Occupational Skills Training**  **MIS**  **WIN 0077, Change 9; 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.   **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.  **Occupational Skills Training***, continued…*  **Individual Training Accounts (ITA)**  **TEGL 19-16:**  Training services, when determined appropriate, *must be provided either through an Individual Training Account (ITA) or through a training contract discussed in Section 8 of this TEGL. Except in certain instances listed in WIOA sec. 122(h) and 20 CFR sec. 680.320*, training services *must* be provided by an Eligible Training Provider (ETP) in accordance with WIOA sec. 122(d).  **Use of ITA Funds**  **ESD** **Policy 5601, Rev 2:**  If an ITA has been established and the training is managed between the WIOA Title I case manager and the participant, those funds may be used to pay for allowable training-related expenses as well as tuition expenses.  If the training provider was selected by the WIOA Title I participant and the case manager, but the source of *payment* for training is Pell, other financial aid, or private scholarships, a WIOA-funded ITA **may be used** to pay allowable training costs not covered by those fund sources.  A WIOA-funded ITA is **not** appropriate **if** the WIOA Title I case manager and program played no role in training provider selection and the participant’s training is selected, funded, and directed by a program other than Title I, such as Vocational Rehabilitation (VR), Trade Adjustment Assistance (TAA), or community and technical colleges (Worker Retraining (WRT). However, if such funding ends after training has started, a WIOA Title I-funded ITA may be initiated if that program is on the Eligible Training Provider (ETP) list.  **In-demand Occupations**  **ESD** **Policy 5601, Rev 2:**  ITA funds must be directly linked to an in-demand industry sector or occupation in the local area, or in another area to which the individual is willing to relocate. Local boards may also approve training services for occupations determined by the local board to be in economic sectors that have high potential for sustained demand or growth in the local area.  DOL guidance is that registered apprenticeship programs are in-demand even if the labor market information may not list as “in-demand” the occupation for which the individual is apprenticed because registered apprenticeship programs, being tied to specific employers, only enroll individuals when there is employer demand, which makes it possible to carry out the on-the-job aspect of the instruction**.** | N/A, no evidence this service was provided  **FILE REVIEW:**   * **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 23-19)*   N/A  YES, Validated by one of the following: *(TEGL 23-19)*  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   * **Established Individual Training Account (ITA)** *(TEGL 23-19)*   N/A, training provided through contract or under an exception listed in 20 CFR 680.320  YES, validated by one of the following: *(TEGL 23-19)*  Case notes  ITA approval, Allocation or Activation 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 needed *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   * **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   * **Training is linked to *in-demand employment* opportunities in local area or area in which they are willing to commute or relocate:** *[20 CFR 680.210(b)]*   YES, No Issues Identified  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. 2)*   N/A-training not started/progress not yet provided  YES, No Issues Identified  NO, Could Not Locate   * **Date participant enrolled in training is documented in the file:** *(TEGL 23-19)*   YES, Validated by one of the following: *(TEGL 23-19)*  Copy of enrollment record  File documentation with notes from program staff  School Records  Transcript or report cards  No, Unable to Validate   * **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 23-19)*  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  **Reporting:**   * **Date withdrew/completed training is recorded in MIS:**   *(TEGL 23-19; WIN 0088)*  N/A-still active in service  YES, validated by one of the following: *(TEGL 23-19)*  Crossmatch between state MIS *and* attendance sheets or records  Vendor training records *with* follow-up crossmatch to state MIS database  Case notes *with* follow-up crossmatch to state MIS database  NO, Unable to Validate if the participant is still in training  NO, date withdrew/completed training is not recorded in MIS   * **Date participant actually began training is accurately recorded in MIS** *(ETA PIRL 9170, TEGL 23-19)*   YES, validated by one of the following: *(TEGL 23-19)*  Crossmatch between state MIS *and* attendance sheets or records  Vendor training records *with* follow-up crossmatch to state MIS database  Case notes *with* follow-up crossmatch to state MIS database  ITA  NO, date participant began training is not recorded in MIS | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **Consumer Choice *(Occupational Skills Training Continued)***  **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 |
| **Financial Aid; Other Program / Grant Assistance *(Occupational Skills Training Continued)***  **Coordination of WIOA Training Funds and other Federal Assistance**  **ESD Policy 5601, Rev 2:**   * + 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.**   **20 CFR 680.310**  (d) An individual may select training that costs more than the maximum amount available for ITAs under a State or local policy when other sources of funds are available to supplement the ITA. These other sources may include Pell Grants; scholarships; severance pay; and other sources. | 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 such as TAA, TANF, BFET, Worker Retraining, Title IV programs, and State-funded grants, etc. *were explored first*, and not available, utilizing WIOA funds as a last dollar resource:   YES, No Issues Identified  NO, Could Not Validate   * Outcome of FAFSA/other resources explored was documented:   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 |

|  |  |  |  |
| --- | --- | --- | --- |
| **Adult Education & Literacy Activities**  **MIS**  **WIN 0077, Change 9; 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. | N/A, no documented evidence service was 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, provided concurrently with *one or more* of the following training services:  Occupational Skills Training, including training for nontraditional employment  On-the-job Training (OJT)  Incumbent Worker Training (IWT)  Programs that combine workplace training and related instruction, which may include cooperative education programs  Training programs operated by the private sector  Skill upgrading and retraining  Entrepreneurial training  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 23-19)*   N/A  YES, Validated by one of the following: *(TEGL 23-19)*  Copy of enrollment record  File documentation with notes from program staff  School Records  Transcript or report card  Data match to State K-12 data system  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** | | | |
| **On-the-Job Training (OJT)**  **MIS**  **WIN 0077, Change 9; 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.  *Continued on next page…*  **On-the-Job Training (OJT),** *continued…*  **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 service was 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  Contract(s)  Time sheets  Performance evaluations   * **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 |

|  |  |  |  |
| --- | --- | --- | --- |
| **Internship or Work Experience (WEX)**  **MIS**  **WIN 0077, Change 9; 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. | N/A, no documented evidence service was provided  **FILE REVIEW:**   * **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  Contract(s)  Time sheets  Performance evaluations | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **Transitional Jobs**  **mis**  **WIN 0077, Change 9; WorkSource Services Catalog:**   * + **Individualized, transitional Job:**     - A transitional job is a training service that is a subsidized, time-limited work experience with a public, private, or nonprofit employer for individuals with barriers to employment who are chronically unemployed or have an inconsistent work history to establish a work history that will lead to retention in unsubsidized employment. This service must be provided in combination with career services and support services. If it is not, it must be recorded as a work experience and/or internship.   **Program Design and Eligible Participants**  **20 CFR 680.190**:   * + A transitional job is one that provides a time-limited work experience that is wage-paid and subsidized, and is in the public, private, or not-for-profit sectors for those *\*individuals with barriers to employment who are chronically unemployed or have inconsistent work history,* as determined by the Local WDB.   + Transitional jobs*must be combined with comprehensive career services and supportive services.*   **TEGL 19-16:**   * + This service *must be combined with career and supportive services.*   **\*Individuals with a barrier to employment**  **WIOA sec. 3(24):**  **(1)** Displaced homemakers;  **(2)** Low-income individuals;  **(3)** Indians, Alaska Natives, and Native Hawaiians;  **(4)** Individuals with disabilities;  **(5)** Older individuals, i.e., those aged 55 or over  **(6)** Ex-offenders;  **(7)** Homeless individuals;  **(8)** Youth who are in or have aged out of the foster care system;  **(9)** Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers;  **(10)** Eligible migrant and seasonal farmworkers, defined in WIOA sec. 167(i);  **(11)** Individuals within 2 years of exhausting lifetime eligibility under TANF;  **(12)** Single parents (including single pregnant women);  **(13)** Long-term unemployed individuals;  **(14)** Other groups determined by the Governor to have barriers to employment. | N/A, no documented evidence service was provided   * **Participant met the definition of “individual with barrier to employment” as described in WIOA Sec. 3(24) and was chronically unemployed or had inconsistent work history as determined by the LWDB:** *(20 CFR 680.190)*   YES, No Issues Identified  NO, Unable to Validate   * **The transitional job was combined with comprehensive career services *and* supportive services:**   *(20 CFR 680.190 and TEGL 19-16)*  YES, No Issues Identified  NO, Unable to Validate   * **The service provider confirmed the employer had not relocated less than 120 days prior to the training and did not lay off employees at the prior location:**   *[WIOA Sec. 181(d)]*  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 |

|  |  |  |  |
| --- | --- | --- | --- |
| **5.** **OUTCOMES** | | | |
| **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   *Continued on next page…*  **Date of Most Recent Measurable Skill Gains** *Continued…* | N/A, not participating in applicable services or no measurable skill gain documented at the time of monitoring  **Educational Functioning Level (EFL):**  N/A  YES, **the most recent date** the achieved at least one EFL is **recorded in MIS** and **validated by one of the following**:  *(TEGL 23-19; DOL ETA PIRL 9170)*  Pre- and post-test results measuring EFL gain  Adult High School transcript showing EFL gain through the awarding of credits or Carnegie units  Post-secondary education or training enrollment determined through survey documentation or *program notes.*  NO, Could Not Validate  **Secondary Progress:**  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 **validated by one of the following:** *(TEGL 23-19; DOL ETA PIRL 9170)*  Transcript  Report Card  NO, Could Not Validate  **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 23-19, DOL ETA PIRL 9170)*  Transcript  Report card  NO, Could Not Validate  **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 **validated**  **by:** (TEGL 23-19)  Documentation of a skill gained through OJT or Registered Apprenticeship  Contract and/or evaluation from employer or training provider  Progress report from employer documenting skill gain  NO, Could Not Validate  **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 a knowledge-based exam **is recorded in MIS** and **validated by one of the** following: *(TEGL 23-19; DOL ETA PIRL 9170)*  Results of knowledge-based exam or certification of completion  Documentation demonstrating progress in attaining technical or occupational skills through an exam or benchmark attainment  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, Could Not Validate  **REPORTING:**   * **Measurable Skill Gains recorded in ETO:**   YES, No Issues Identified  NO, one or more issues identified   * **Case notes document the date achieved and type of the Measurable Skill Gain*:*** *(20 CFR 677.155(c)(5); WIN 0088)*   YES, very detailed  YES, some detail  Could not locate case notes for:  Date Measurable Skill Gain achieved  Type of Measurable Skill Gain | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

|  |  |  |  |
| --- | --- | --- | --- |
| **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 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 23-19)*   YES, Documented on one of the following: *(TEGL 23-19)*  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)*  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 |

|  |  |  |  |
| --- | --- | --- | --- |
| **6. PROGRAM Exit** | | | |
| **Date and Reason for Program Exit**    **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 Requirements**  **TEGL 23-19** – Date of Program Exit (WIOA)   * + 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 23-19**:   * + 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.   **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. | N/A, there is evidence the participant has not  completed the program  **file review:**   * **Date of program exit is documented in the file:**   YES, Validated by one of the following: *(TEGL 23-19)*  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 exit was due to “Other Reasons for Exit”, evidence is documented in the file:**   N/A  YES**,** Validated by one of the following:*(TEGL 23-19)*  File documentation with notes from program  staff  Information from partner services  WIOA status/exit forms  Electronic 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 |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Follow-up Services**  **MIS**  **WIN 0077, Change 9; 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. | 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 |
| **7. Data Validation, Data Integrity** | | | | |
| **MIS**  **Reporting / MIS Requirements**  **WIN 0082, Change 1:** The minimal ETO data entry requirements are as follows:   * + *Services must be entered at the point in time they are delivered;*   + If services cannot be entered at the time they are delivered, Basic Services and ITSS 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.*   + For any Activity Start Date of Basic and ITSS services errors identified after the 14-day calendar restriction, *staff must correct the errors and request Department Head review and approve the correction*. Department Head approval must be documented with a case note. **The case note must identify** *the service name, the reason for the correction, and the Department Head’s review and approval of the correction.*   + 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.   **ESD Policy 1023:**   * + All services must be linked to an Active Program Enrollment. | **summary of MIS observations:**   * **Participant’s demographic information is accurately recorded in MIS*:*** *(20 CFR 677.235)*   YES, No Issues Identified  NO, One or More Issues Identified   * **Employment Status at Program Entry is recorded in MIS:** *(20 CFR 677.235)*   YES, No Issues Identified  NO, One or More Issues Identified   * **All basic and/or individualized 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)*   YES, No Issues Identified  NO, One or More Issues Identified   * **For services recorded in MIS, services are attached to the appropriate programs:** *(ESD Policy 1023)*   YES, No Issues Identified  NO, One 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 More Issues Identified   * **For services recorded in MIS, services are recorded within the allotted timeframes:** *(WIN 0082)*   YES, No Issues Identified  NO, One 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 More Issues Identified | No Issues Identified  Items to Address  Data Validation Issues  Observation | | No Action Required  Action Required  Recommendation |
| **Case Notes**  **DOL Definition**  **TEGL 23-19**: 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**  **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.   **Late Service Entry**  **WIN 0082, Change 1 (Sept 30, 2020)**   * + For any Activity Start Date of Basic and ITSS services errors identified after the 14-day calendar restriction, *staff must correct the errors and request Department Head review and approve the correction*. Department Head approval must be documented with a case note. **The case note must identify** *the service name, the reason for the correction, and the Department Head’s review and approval of the correction.* | **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   * **Actual delivery of services:** *(WIN 0082; WIN 0088; WIN 0089)*   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 more occasions   * **Documentation of case notes followed local policy, if applicable:**   N/A, No local policy or procedure  YES, No Issues Identified  NO, one or more issues identified   * **For service errors identified after the 14-day calendar restriction a Department Head review and approval was documented in case notes:**   N/A, no service errors identified  YES, the case note included *all* of the following:  Name of service  Reason for the correction / late entry  Department head review and approval  NO, could not locate | No Issues Identified  Items to Address  Data Validation Issues  Observation | | No Action Required  Action Required  Recommendation |
| **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 | |