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| **COVID-19**  *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 Department of Labor (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, the following eligibility criteria were verbally self-attested:  Age / Date of Birth  Legally Entitled to Work  Selective Service Registration (if applicable)   * **Verbal self-attestation was used to meet a minimum of one of the following criteria for eligibility:***(WIN 0109)*   YES, the following priority of service category and its criterion were verbally self-attested: (Case notes must include *how* they meet each criterion)  School Dropout  Basic Skills Deficient & Low Income  English Language Learner & Low Income  Offender, Ex-Offender  Homeless or Runaway  Foster Care Youth  Pregnant or Parenting Youth  Individual with a Disability  Youth who Needs Additional Assistance & Low Income  Exception to Low Income Eligibility Requirement   * **Verbal self-attestation was clearly documented by case-noting the following in ETO:** *(WIN 0109)*   YES, the following were in case notes:  That verbal self-attestation was necessary due to a one-stop office closure caused by COVID-19.  Each eligibility and *criteria* for eligibility to which the applicant is self-attesting.  A statement that reads, “I attest that [applicant name] verbally self-attested to the eligibility and *criteria* for eligibility 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 Issue 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 OSY ELIGIBILITY CRITERIA** | N/A, verbal self-attestation used during COVID-19 | |  |
| **Age/Date of Birth**  **Out-School-Youth ages**   * Between the ages 16-24   **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 between the ages of 16-24 on the date of 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  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 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 |
| **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.  **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, participant was one of the following: (TEGL 11-11, change 2)  Female  Male younger than age 18   * **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 Verification  SS Acknowledgement letter  Selective Service Registration Card  Stamped Post Office Receipt of Registration  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 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 Documents  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 WIOA application**:   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 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 |
| **OSY School Status at Program**  **Entry**   * **Out-School-Youth 20 CFR 681.230**   + WIOA youth programs may consider a youth to be **OSY** for purposes of WIOA youth program eligibility if he or she attend adult education provided under title II of WIOA, YouthBuild, Job Corps, high school equivalency programs, or dropout re-engagement programs regardless of the funding sources of those programs. * **WIN 0084, Change 1**   + If schools or school districts, despite having enrolled the youth into school, largely cede service provision to other entities (e.g., WIOA youth providers, CBOs, other non-profits), have minimal financial investment, and require little district-based accountability of participants, youth in these programs can be **designated OSY.** * **TEGL 21-16**    + If a youth graduates high school and registers for postsecondary education, but does not ultimately follow through with attending postsecondary education, then such a youth would be considered an **OSY** *if the eligibility determination is made after the point that the youth decided not to attend postsecondary education.*   + If the youth participant is only enrolled in non-credit-bearing postsecondary classes, they would not be considered attending postsecondary school and, therefore, an **OSY**. * **WIN 0084**   + Homeschooled youth who do not meet the WA State requirements at [RCW 28A.200](http://app.leg.wa.gov/RCW/default.aspx?cite=28A.200) and [28A.225.010(4)](http://app.leg.wa.gov/RCW/default.aspx?cite=28A.225.010) are not considered **ISY** and need to meet the **OSY** eligibility criteria.   **Open Doors/Other Dropout Re-engagement Programs**   * **WIN 0084, Change 1**    + If schools or school districts, despite having enrolled the youth into school, largely cede service provision to other entities (e.g., WIOA youth providers, CBOs, other non-profits), have minimal financial investment, and require little district-based accountability of participants, youth in these programs can be **designated OSY.**   + Conversely, if schools or school districts are substantially directive, invested, and accountable (e.g., WIOA program only provides supportive services to participants), those youth should **be** **designated ISY**.   + This test also applies to dropout re-engagement programs not connected to Open Doors. | * **Youth met WIOA Out-of-school criteria at program entry: *[WIOA Sec. 129(c)]***   YES, OSY validated by one of the following:  *(ESD Policy 1019, Rev. 4)*  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 WIOA application**:   YES, No Issues Identified  NO, one or more issues identified  Applicable records from education institution  (GED certificate, diploma, attendance record,  transcripts, dropout letter, school documentation)  No, Unable to Validate OSY status at program  entry  **Reporting:**   * **School status at enrollment is accurately recorded in MIS*: [WIOA Section 129(a)(B)]***   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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| **eligibility continued: OSY must meet a minimum of one of the following criteria:** | | | | | | | | | |
| **School Dropout**  **Definition**   * **WIOA Sec. 3(54)**   + The term “school dropout” means an individual who is *no longer attending any school* and *who has not received a secondary diploma or its recognized equivalent*. * **TEGL 21-16**    + An individual who has dropped out of postsecondary education is not a “school dropout” for purposes of youth program eligibility.   + *A dropout only includes an individual who is currently a secondary school dropout and does not include a youth who previously dropped out of secondary school but subsequently returned.* | N/A: No evidence of this status and/or not the category  selected for enrollment   * **Verification of participant’s drop out status was in the file: *(ESD Policy 1019, Rev. 4)***   YES, Dropout status validated by one of the following:  *(ESD Policy 1019, Rev 4)*  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 WIOA application**:   YES, No Issues Identified  NO, one or more issues identified  Applicable records from education institution  (GED certificate, diploma, attendance record,  transcripts, dropout letter, school documentation)  No, Unable to validate OSY status at program  Entry | | | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | | | No Action Required  Action Required  Recommendation | | |
| **Basic Skills Deficient & is Low Income**  **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**.**   **Applies To:**   * OSY who have a diploma or equivalent * Low income is only required if BSD is the only element selected for eligibility * Individuals who are English Language Learners (ELL)   **Definition**   * **WIOA Sec. 3(5)**   **a.** A youth who has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or  **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.  **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.*  **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.   + If using the Locator (e-test), the appraisal and pre-test are combined.   + When using the e-test format (called Locator), administration of CASAS to determine BSD is completed in one-step.   + **Pre-tests determine BSD and EFL**   **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.   **TEGL 23-19 – Types of Source Documentation**  **Crossmatch:** 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 crossmatch. 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 crossmatch, 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 category not selected for enrollment  No evidence indicating participant was tested for BSD  Participant is not BSD   * **Youth met BSD status at program enrollment:**   YES: BSD status Validated 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 WIN 0107 *Effective 4/17/2020 – 10/17/2020.***  YES, validated by the following: *(WIN 0107)*  CASAS assessment (paper or e-test)  Transcript with a failing grade in math or reading during the most recent academic year (or a detailed case note if verified verbally with appropriate entity)  School records showing test scores from a generally accepted standardized test within the last year showing grade level below 9th grade (grade 8.9 or lower) (or a detailed case note if verified verbally with appropriate entity)  NO, One or More Issues Identified  **low Income:**  N/A, BSD not the category of enrollment   * Youth met the low-income requirement: *[*WIOA Sec. 129(c)]   YES, Low Income validated by one of the following:  *(ESD Policy 1019, Rev. 4)*  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  Crossmatch with UI Wage Records  Crossmatch with Public Assistance Records  Crossmatch 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  NO, Unable to Validate  **Reporting:**   * **BSD status is recorded in MIS as required in ESD Policy 1011, Rev. 6: *(20 CFR 677.235)***   YES, 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 WIN 0107- *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   * **Low income status is recorded in MIS: *(20 CFR 677.235)***   N/A  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 | | |
| **English Language Learner & is Low Income**      **Applies To:**   * OSY who have a diploma or equivalent * Low income is only required if ELL is the only element selected for eligibility   **Definition**   * WIOA Sec. 3(21) and WIOA Title II Sec. 203(7): An eligible individual who has limited ability in reading, writing, speaking, or comprehending the English language, ***and***   + Whose native language is a language other than English, ***or***   + Who lives in a family or community environment where a language other than English is the dominant language   **TEGL 23-19 – Types of Source Documentation**  **Crossmatch:** A crossmatch 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 crossmatch. 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 crossmatch, 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   * **Youth met ELL status at program enrollment:**   YES, validated by one of the following: *(ESD Policy 1019, Rev 4)*  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 WIOA application**:   YES, No Issues Identified  NO, one or more issues identified  NO, Unable to Validate  **LOW INCOME:**  N/A, ELL not the category of enrollment  YES, Low income validated by one of the following:  *(ESD Policy 1019, Rev 4)*  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  Crossmatch with UI Wage Records  Crossmatch with Public Assistance Records  Crossmatch 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  NO, Unable to Validate  **Reporting:**   * **ELL status is recorded in MIS: *(20 CFR 677.235)***   YES  NO, Could Not Locate   * **Low income status is recorded in MIS, if applicable:**   *(20 CFR 677.235)*  N/A  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 | |
| **Offender, Ex-Offender**  **Definition**   * **ETA 9170 (PIRL):** If the participant, at program entry who either:   **(a)** Has been subject to any stage of the criminal justice process for committing a status offense or delinquent act, or  **(b)** Requires assistance in overcoming barriers to employment resulting from a record of arrest or conviction.   * **WIN 0084 & ESD WS System Policy 1019, Rev. 4**   + An individual who has been charged with an offense, but subsequently directed to a community-based diversion program rather than the formal court system meets the definition of having been “subject to any stage of the criminal justice process” due to having been *charged* with an offense, even though that individual has not been remanded to the court system.   **Reporting/MIS Requirement**   * **WIN 0084**   + When “offender” is solely relied on for eligibility purposes (ISY Category 3 or OSY Category 4), DOL has stated that the offender status **must** be captured and reported (in MIS) so DOL and Congress can know whether or not states and local areas are adequately serving individuals with, as in this case, employment barriers related to ex-offender status. | | N/A: No evidence of this status and/or not the category  selected for enrollment   * **Youth met Offender status at program enrollment:**   YES, validated by one of the following: *(ESD Policy 1019, Rev 4)*  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 WIOA application**:   YES, No Issues Identified  NO, one or more issues identified  Documentation from juvenile or adult criminal  justice system  Documentation of a phone call with court or  probation representatives  NO, Unable to Validate  **Reporting:**   * **Offender status is recorded in MIS: *(20 CFR 677.235 & WIN 0084)***   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 | |
| **Homeless, Runaway**  **Definition**   * [**Violence Against Women Act of 1994**](https://www.law.cornell.edu/uscode/text/42/14043e-2)   + Is sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;   + Is living in a motel, hotel, trailer park, or campground due to the lack of alternative adequate accommodations;   + Is living in an emergency or transitional shelter;   + Is abandoned in a hospital; or   + Is awaiting foster care placement.   + An individual who has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings; or * [**McKinney-Vento Homeless Assistance Act**](https://www.law.cornell.edu/uscode/text/42/11434a)   + Children and youth who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement;   + Children and youth who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings * **TEGL 21-16**   + (OSY) Homeless youth do not need to meet any additional low-income criteria | | N/A: No evidence of this status and/or not the category  selected for enrollment   * **Youth met Homeless or Runaway criteria at program enrollment:**   YES, validated by one of the following:*(ESD Policy 1019, Rev 4)*  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 WIOA application**:   YES, No Issues Identified  NO, one or more issues identified  Written statements from individual providing  residence, shelter or social service agency  NO, Unable to Validate  **Reporting:**   * **Homeless 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 | |
| **Foster Care Youth**  **Definition**   * **20 CFR 681.210(6) and .220(5):** An individual in foster care or who:   + has aged out of the foster care system, or   + who has attained 16 years of age and left foster care for kinship guardianship or adoption,   + a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or   + in an out-of-home placement. * **ETA 9170:** At program entry, is a person *aged 24*   *or under* who is currently in foster care or has aged out of the foster care system. | | | N/A: No evidence of this status and/or not the category  selected for enrollment   * **Youth met Foster Care status at program enrollment:**   YES, validated by one of the following: *(ESD Policy 1019, Rev 4)*  Written confirmation from shelter or social  service agency  Case notes  NO, Unable to Validate  **Reporting:**   * **Foster care 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 |
| **Pregnant or Parenting Youth**  **DEFINITIONS**   * **TEGL 21-16:**   + An individual who is parenting can be a mother or father, custodial or non-custodial.   + **A pregnant individual can only be the expectant mother.**   **SINGLE PARENT:**   * **ETA 9170 (PIRL):**    + If the participant, at program entry, is single, separated, divorced or a widowed individual who has primary responsibility for one or more dependent children under age 18 (including single pregnant women). | | | N/A: no evidence of this status and/or not the category  selected for enrollment   * **Youth met the Pregnant or Parenting Youth criteria at program enrollment**:   YES, validated by one of the following:*(ESD Policy 1019, Rev 4)*  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 WIOA application**:   YES, No Issues Identified  NO, one or more issues identified  **NO, Unable to Validate**  **Reporting:**   * **Pregnant or parenting 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 |
| **Individual with a Disability**  **Note:** OSY with disabilities are *not required* to  be low income  **Definition**   * **WIOA Sec. 3(25):** An individual with a disability as defined in [section 3 of the Americans with Disabilities Act of 1990](https://www.law.cornell.edu/uscode/text/42/12102) (42. U.S.C. 12102) means, with respect to an individual –   + A physical or mental impairment that substantially limits one or more major life activities of such individual;   + A record of such an impairment | | | N/A: no evidence of this status and/or not the category selected for enrollment   * **Youth met the Disability criteria at program enrollment:**   YES, validated by one of the following: *(ESD Policy 1019, Rev. 4)*  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 WIOA application**:   YES, No Issues Identified  NO, one or more issues identified  School 504 Records Provided by Student  Assessment Test Results  NO, Unable to Validate  **Reporting:**   * **Disability 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 |
| **Youth who Needs Additional Assistance & is Low Income**  **Notes:**   * Low income is required if this is the ***only***   element selected for eligibility; ***and***   * Youth **must** meet eligibility criteria defined by LWDB policy.   **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 crossmatch. 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 crossmatch, 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   * **Youth met the LWDBs definition of a Youth Who Needs Additional Assistance:**   YES, validated by one of the following: *(ESD Policy 1019, Rev. 4)*  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 WIOA application**:   YES, No Issues Identified  NO, one or more issues identified  ISS  Case notes  NO, Unable to Validate  **LOW INCOME:**  N/A, Needs Additional Assistance not the category of enrollment  YES, Low income validated by one of the following:  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  Crossmatch with UI Wage Records  Crossmatch with Public Assistance Records  Crossmatch 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  NO, Unable to Validate  **Reporting:**   * **Youth who needs Additional Assistance status is recorded in MIS:**   YES, No Issues Identified  NO, one or more issue identified   * **Low income status is recorded in MIS, if applicable:** (*20 CFR 677.235)*   N/A 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 |
| **Exception to Low Income Eligibility Requirement**  **Applies To:**   * Out-of-school youth who meet the following eligibility criteria: * A recipient of a secondary school diploma or its recognized equivalent who is either basic skills deficient or an English language learner; ***or*** * Requires additional assistance to enter or complete an educational program or to secure or hold employment.   **Reporting/MIS Requirements**   * **Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on Workforce GPS October 24, 2017:**    + MIS will only capture those youth in which this is the only eligibility criteria recorded in the system.   + If the participant has other barriers, ensure the other eligibility barriers are recorded in MIS and case notes to ensure the participant is not captured in the 5% limit. | | | N/A: no evidence of this status and/or not the category  selected for enrollment   * **Verification of the participant’s eligibility for this category is in the file*: (LWDB policy)***   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 |
| **2. Objective Assessment**  **Requirement**   * **WIOA Sec. 129(c)(1)(A):** *The objective assessment shall include a review of the following* for the purpose of identifying appropriate services and career pathways for participants:   + - * Basic skills;       * Occupational skills;       * Prior work experience;       * Employability;       * Interests, aptitudes (including interests and aptitudes for nontraditional jobs);       * Supportive service needs; ***and***       * Developmental needs * **681.420 (a)** The design framework services of local youth programs must:   **(1)** Provide for an **objective assessment** of each youth participant that meets the requirements of WIOA sec. 129(c)(1)(A), and **includes a review** of the academic and occupational skill levels, as well as the service needs and ***strengths***, of each youth for the purpose of identifying appropriate services and career pathways for participants and informing the individual service strategy   * **TEGL 21-16:**   + Assessments ***must also consider a youth’s strengths* r**ather than just focusing on areas that need improvement. * **TEGL 33-12**:   + Assessment **should be an ongoing process**, continually reviewing participant interests, abilities, etc., that allows the case manager an opportunity to evaluate how effective services are in meeting needs and ensuring flexibility in adapting service delivery strategies to youth’s needs and employment goals. | | | * **It was evident an Objective Assessment occurred prior to program enrollment:**   YES, No Issues Identified  NO, Unable to Validate   * **Objective Assessment(s) included the following criteria listed in WIOA Sec. 129(c)(1)(A) and 20 CFR 681.420(a)(1):**   Basic Skills  Occupational Skills  Prior Work Experience  Employability  Interests  Aptitudes  Supportive Service Needs  Developmental Needs  Strengths  YES, No Issues Identified  NO, Unable to Validate the youth was assessed in  one or more criteria listed above  **Reporting:** Not applicable for this activity | | | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | | | No Action Required  Action Required  Recommendation |
| **3. ISS**  **Requirements**   * **WIOA Sec. 129(c)(1)(B):** ISS’s must be *directly linked to 1 or more of the performance indicators* described in WIOA section 116(b)(2)(A)(ii) *and identify career pathways* *that include*:   + education and employment goals (including, in appropriate circumstances, nontraditional employment),   + appropriate achievement objectives, and   + appropriate services for the participant considering the results of the objective assessment. * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does *require the program elements provided to a youth to align with the goals the youth set forth in the ISS.*   + Case managers must **update the ISS on an on-going basis and document,** among other items:     - Services provided;     - Participant’s progress,     - Activities completed;     - Benchmarks reached; and     - Any other accomplishments**.**   + **Case managers must document this information** regardless of who provides the element. | | | * **Results of the Objective Assessment(s) were addressed on an ISS and planned services were documented:**   ***[WIOA Sec. 129(c)(1)(B)]***  YES, No Issues Identified  NO, Unable to Validate   * **ISS is directly linked to one (1) or more of the performance indicators: *[WIOA Sec. 129(c)(1)(B)]***   YES, No Issues Identified  NO, Unable to Validate   * **ISS identifies career pathways that include education and employment goals: *[WIOA Sec. 129(c)(1)(B)]***   YES, No Issues Identified  NO, Unable to Validate   * **ISS was updated on an on-going basis, including the participant’s progress and activities completed:**   ***(WIOA Final Rule)***  YES, No Issues Identified  NO, Unable to Validate  **Reporting:** Not applicable for this activity | | | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | | | No Action Required  Action Required  Recommendation |
| **4. 14 Program Elements**  **Program Enrollment**   * **20 CFR 677.150(a)(2):** For the WIOA youth program, **a participant** is a reportable individual **who has satisfied all applicable program requirements for the provision of services, including:**   + Eligibility determination,   + An objective assessment,   + Development of an individual service strategy, *and*   + **Received 1 of the 14 WIOA youth program elements** identified in sec. 129(c)(2) of WIOA * **WIN 0092:**   + The State directs Title I youth case managers to ensure the Title I youth receive at least one WIOA youth program element and that the service(s) are recorded in the system to ensure those youth become participants. | | | * **There is documented evidence one (1) of the following 14 Elements was provided to the participant initiating program enrollment: *[20 CFR 677.150(a)(2); TEGL 10-16, Change1; TEGL 23-19]***   Tutoring, Study Skills Training, Instruction, and  Dropout Prevention Services *“Educational*  *Achievement Service” prior to WIN 0077, Change 9)*  Alternative Secondary School Services or Dropout Recovery Services *“EAS” prior to WIN 0077, Change 9)*  Paid and Unpaid Work Experience (WEX)  Occupational Skills Training  Education offered concurrently with and in the  same context as workforce prep  Leadership Development  Supportive Service  Adult Mentoring  Comprehensive Guidance & Counseling  Financial Literacy  Entrepreneurial Training  Labor Market Information Services  Post-secondary Prep Activities  YES, Documented on one of the 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 | | | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | | | No Action Required  Action Required  Recommendation |
| **5. PROGRAM ENROLLMENT** | | | | | | | | | |
| **Date of Program Entry, Participation**  **Participant**   * **20 CFR 677.150(a)(2):** For the WIOA youth program, **a participant** is a reportable individual **who has satisfied all applicable program requirements for the provision of services, including:**   + **Eligibility determination,**   + **An objective assessment,**   + **Development of an individual service strategy, *and***   + **Received 1 of the 14 WIOA youth program elements** identified in sec. 129(c)(2) of WIOA. * **WIN 0092:**   + DOL has implemented a new edit check for the PIRL that rejects any Title I youth record that shows an enrollment into the program but no affiliated record of at least one recognized WIOA youth program element.   + The State directs Title I youth case managers to ensure the Title I youth receive at least one WIOA youth service at program element and that the service(s) are recorded in the system to ensure those youth become participants.   **Reporting/MIS DATA Entry Requirements**   * **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 677.150(a)(2); TEGL 21-16; TEGL 23-19]***   YES, No Issues Identified  NO, Unable to Validate, SEE SECTION 1. ABOVE   * **An objective assessment was conducted prior to, or on the date of program enrollment and included all of the criteria in WIOA Sec. 129(c)(1)(A) and 20 CFR 681.420(a)(1): *[20 CFR 677.150(a)(2; 20 CFR 681.320(b); TEGL 10-16, Change 1]***   YES, No Issues Identified  NO, Unable to Validate, SEE SECTION 2. ABOVE   * **An ISS was developed prior to, or on the date of program enrollment:**   ***[20 CFR 677.150(a)(2; 20 CFR 681.320(b); TEGL 10-16, Change 1]***  YES, No Issues Identified  NO, Unable to Validate, SEE SECTION 3. ABOVE   * **There is documented evidence one (1) of the 14 Elements was provided to the participant:**   ***[20 CFR 677.150(a)(2); TEGL 10-16, Change1; TEGL 23-19]***  YES, No Issues Identified  NO, Unable to Locate, SEE section 4. above  **Reporting:**   * **A minimum of one (1) of the 14 Elements is correctly recorded in MIS on the date of program enrollment:**   ***[20 CFR 677.150(a)(2); TEGL 10-16, Change1; WIN 0082, Change 1; TEGL 23-19]***  YES, No Issues Identified  NO, SEE section 4. above | | | 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 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, 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 |
| **6. SERVICES** | | | | | | | | | |
| **Tutoring, Study Skills Training, Instruction, and Dropout Prevention Services**  *-Program Element 1*  **MIS:**   * **WIN 0077, Change 9; WorkSource Service Catalog:**    + **Tutoring, Study Skills Training, Instruction, and Dropout Prevention (Youth Only):**     - Tutoring, study skills training, and instruction provided *in addition* to regular in-school instruction that lead to a high school diploma are services that focus on providing academic support, helping a youth identify areas of academic concern, assisting with overcoming learning obstacles, and providing tools and resources to develop learning strategies.     - These services can be provided one-on-one, in a group setting, through resources and workshops.     - Secondary school dropout prevention strategies intended to lead to a high school diploma are also included in this youth element and include services and activities that keep a young person in-school and engaged in a formal learning and/or training setting.     - Strategies include but are not limited to tutoring, literacy development, active learning experiences, after-school opportunities, and individualized instruction.   **Definition**   * **TEGL 21-16:**    + **Tutoring, study skills training, and instruction that lead to a high school diploma**:Such services focus on:     - * providing academic support,       * helping a youth identify areas of academic concern,       * assisting with overcoming learning obstacles and providing tools and resources to develop learning strategies.       * Tutoring, study skills training, and instruction can be provided one-on-one, in a group setting, through resources and workshops.   + **Secondary school dropout prevention strategies intended to lead to a high school diploma:** Secondary school dropout prevention strategies include services and activities that **keep a young person in-school** and engaged in a formal learning and/or training setting. Strategies include, but are not limited to:     - * tutoring,       * literacy development,       * active learning experiences,       * after-school opportunities, and       * individualized instruction.   **Align with ISS**   * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does **require the** **program elements** provided to a youth to*align with the goals the youth set forth in the ISS.* | | | N/A, no documented evidence this service was planned or provided   * **Service was provided as a result of the Objective Assessment and aligned with the participant’s ISS: *[DOL Final Rules; 20 CFR 681.460(b)]***   YES, No Issues Identified  NO, Unable to Validate   * **Progress and outcomes of this service are documented on the ISS: *(WIOA Final Rule, narrative page 56177)***   YES, No Issues Identified  NO, Unable to Locate   * **Evidence of youth’s progress in school is located in the file: *(TEGL 23-19)***   N/A-school not yet started/progress not yet provided  YES, progress in school validated by one of the following: *(TEGL 23-19)*  Transcript  Report card  NO, Could Not Locate   * **If the participant withdrew from school, the reason for withdrawing and the revision to the participant’s ISS is documented: *(WIN 0088)***   N/A, participant did not withdraw from school  YES, reason for withdrawal is documented and revision to youth’s ISS is documented.  NO, could not locate documentation for reason for  withdrawing from school and/or revision to ISS   * **Evidence of High School completion is documented 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   * **Date withdrew/completed secondary education is recorded in MIS: *(TEGL 22-15; WIN 0088)***   N/A-still active in service  YES, No Issues Identified  NO, Unable to Validate if the participant is still in secondary education  NO, date withdrew/completed secondary education is not recorded in MIS | | | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | | | No Action Required  Action Required  Recommendation |
| **Alternative Secondary School Services or Dropout Recovery Services**  *-Program Element 2*  **MIS:**   * **WIN 0077, Change 9; WorkSource Service Catalog:**    + **Alternative Secondary School Services or Dropout Recovery Services (Youth Only):**     - Alternative secondary school services, such as basic education skills training, individualized academic instruction, and English as a Second Language training, are those that assist youth who have struggled in traditional secondary education.     - Dropout recovery services, such as credit recovery, counseling, and educational plan development, are those that assist youth who have dropped out of school.     - While such activities may overlap, each are provided with the goal of helping youth to re-engage and persist in education that leads to the completion of a recognized high school equivalent.   **Definition**   * **TEGL 21-16:**    + Under 20 CFR 681.460(a)(2), **alternative secondary school services**, such as **basic education skills training, individualized academic instruction, and English as a Second Language training**, are those that assist **youth who have struggled in traditional secondary education**.   + **Dropout recovery services**, such as **credit recovery, counseling, and educational plan development**, are those that assist **youth who have dropped out of school**.   **Align with ISS**   * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.*** | | | N/A, no documented evidence this service was planned or  provided   * **Participant attended a program of study designed to lead to a HS equivalent credential (GED) at program enrollment or at any point while participating in the program: *(TEGL 23-19)***   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   * **Service was provided as a result of the Objective Assessment and aligned with the participant’s ISS: *[DOL Final Rules; 20 CFR 681.460(b)]***   YES, No Issues Identified  NO, Unable to Validate   * **Date participant enrolled in secondary education leading to GED/ HS Equivalency 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, Could Not Locate   * **Progress and outcomes of this service are documented on the ISS: *(WIOA Final Rule, narrative page 56177)***   YES, No Issues Identified  NO, Unable to Validate   * **Evidence of participant’s satisfactory progress in secondary education was located in the file: *(TEGL 23-19)***   N/A-training not started/progress not yet provided  YES, Validated by one of the following: *(TEGL 23-19)*  Transcript  Report card  NO, Could Not Locate   * **If the participant withdrew from secondary education, the reason for withdrawing and the revision to the youth’s ISS is documented: *(WIN 0088)***   N/A, participant did not withdraw from secondary education  YES, reason for withdrawal is documented and  revision to participant’s ISS is documented  NO, could not locate documentation for reason for  withdrawing from secondary education and/or revision to plan   * **Evidence of secondary education outcome is documented 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 secondary education is recorded in MIS: *(TEGL 22-15; WIN 0088)***   N/A-still active in service  YES, No Issues Identified  NO, Unable to Validate if the participant is still in  secondary education  NO, date completed secondary education is not recorded in MIS | | | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | | | No Action Required  Action Required  Recommendation |
| **Paid and Unpaid Work Experience (WEX)**  *-Program Element 3*  **MIS:**   * WIN 0077, change 9; WorkSource Service Catalog:   + Paid and Unpaid Work Experience with Academic/Education Component-Internships or Employment Opportunities (Youth Only):     - Paid and unpaid work experiences or internships that have as a component academic and occupational education, consisting of employment opportunities available throughout the year.   + Paid and Unpaid Work Experience with Academic/Education Component-Job Shadowing (Youth Only):     - Paid and unpaid work experiences that have as a component academic and occupational education, consisting of job shadowing.   + Paid and Unpaid Work Experience with Academic/Education Component-On-the-Job Training Opportunities (Youth Only)     - Paid and unpaid work experiences that have as a component academic and occupational education, consisting of on-the-job training opportunities.   + Paid and Unpaid Work Experience with Academic/Education Component-Pre-Apprenticeship Programs (Youth Only):     - Paid and unpaid work experiences that have as a component academic and occupational education, consisting of pre-apprenticeship programs.   **Academic & Occupational Education**   * **20 CFR 681.600(b):**    + **Work experiences must include academic and occupational education**.   + The educational component may occur concurrently or sequentially with the work experience.   + Further academic and occupational education may occur inside or outside the work site. * **TEGL 21-16:**    + The academic and occupational education component refers to contextual learning that accompanies a work experience.   + It includes the information necessary to understand and work in specific industries and/or occupations.   **Align with ISS**   * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.*** | | | N/A, no documented evidence this service was planned or provided   * **WEX/OJT/Pre-apprenticeship**: **Services were provided as a result of the Objective Assessment and aligned with the participant’s ISS: [*DOL Final Rules; 20 CFR 681.460(b)]***   YES, No Issues Identified  NO, Unable to Validate   * **Progress and outcomes of the services are documented on the ISS: *(WIOA Final Rule, narrative page 56177)***   YES, No Issues Identified  NO, Unable to Validate   * **Academic and occupational education was provided concurrently or sequentially to the WEX: *[20 CFR 681.600(b)]***   YES, No Issues Identified  NO, Unable to Validate   * **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 Validate  **OJT:**  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   * **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  **PRE-APPRENTICESHIP**  **N/A, no documented evidence this service was planned**  **or provided**   * **The pre-apprenticeship program is recognized by and feeds into a Registered Apprenticeship program:**   ***(20 CFR 681.480)***  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 |
| **Occupational Skills Training**  *-Program Element 4*  **MIS:**   * **WIN 0077, Change 9; WorkSource Service Catalog:**   + **Occupational Skills Training (Youth Only):**     - An organized program of study for youth (ages 16-24) 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.   **Definition & Requirements**   * **20 cfr 681.540(a):**    + The Department **defines occupational skills training** as an organized program of study 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.   + Local areas must give priority consideration to training programs that **lead to recognized post-secondary credentials** that **align with in-demand industry sectors** or occupations in the local area**.** * **ESD WS Policy 5601, Rev. 2**    + LWDBs must require that participants demonstrate satisfactory progress in training, except for good cause.   **Documentation Requirements**   * **20 CFR 680.220(b)**:   + **The case file must contain a determination of need for training 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.  **Align with ISS**   * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.*** | | | N/A, no documented evidence this service was planned or provided   * **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)***   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   * **Service was provided as a result of the Objective Assessment and aligned with the participant’s ISS:**   **[*DOL Final Rules; 20 CFR 681.460(b)]***  YES, No Issues Identified  NO, Unable to Validate   * **Training aligned with an in-demand industry: *[20 CFR 681.540(a)]***   YES, No Issues Identified  NO, Unable to Validate   * **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   * **Evidence of participant’s satisfactory progress in training was in the file: *(TEGL 23-19)***   N/A-training not started/progress not yet provided  YES, Validated by one of the following: *(TEGL 23-19)*  Transcript  Report card  NO, Could Not Locate   * **If the youth withdrew from training, the reason for withdrawing and the revision to the youth’s ISS is documented: *(WIN 0088)***   N/A, youth did not withdraw from training  YES, reason for withdrawal is documented and revision  to youth’s ISS is documented.  NO, could not locate documentation for reason for  withdrawing from training and/or revision to ISS   * **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 | | | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | | | No Action Required  Action Required  Recommendation |
| **Consumer Choice**  **Applies to:** OSY enrolled in WIOA ITA-funded post-  secondary training   * **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, Could Not Validate | | | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | | | No Action Required  Action Required  Recommendation |
| **Financial Aid; Other Grant Assistance**  **Applies to:** OSY enrolled in WIOA ITA-funded post-  secondary training   * **ESD WS 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  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 |
| **Education Offered Concurrently with Workforce Preparation & Training for a Specific Occupation**  *-Program Element 5*  **MIS:**   * **WIN 0077, Change 9; WorkSource Service Catalog:**   + **Education Offered with Workforce Preparation Activities and Occupational Training-Youth Only:**     - Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.   **Definition**   * **TEGL 21-16:**    + 20 CFR 681.630 states that this program element reflects an integrated education and training model and describes how workforce preparation activities, basic academic skills, and hands-on occupational skills training are to be taught within the same timeframe and connected to training in a specific occupation, occupational cluster, or career pathway.   **Align with ISS**   * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.*** | | | N/A, no documented evidence this service was planned  or provided   * **Service was provided as a result of the Objective Assessment and aligned with the participant’s ISS:**   **[*DOL Final Rules; 20 CFR 681.460(b)]***  YES, No Issues Identified  NO, Unable to Validate   * **Progress and outcomes of this service are documented on the ISS: *(WIOA Final Rule, narrative page 56177)***   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 |
| **Leadership Development Opportunities**  *-Program Element 6*  **MIS:**   * **WIN 0077, change 9; WorkSource Service Catalog:**   + **Youth Leadership Development Opportunities 2.0 (Youth Only):** Leadership Development Opportunities include but are not limited to activities that encourage responsibility, employability, and other positive social behaviors such as:   **(a)** exposure to post-secondary educational opportunity;  **(b)** community and service-learning projects;  **(c)** peer-centered activities including peer mentoring and tutoring;  **(d)** organizational and teamwork training, including team leadership training;  **(e)** training in decision making, including determining priorities; and  **(f)** citizenship training, including life skills training such as parenting, work behavior training, and budgeting of resources.    **Definition**   * **20 CFR 681.520:**   **(a)** Exposure to postsecondary educational possibilities;  **(b)** Community and service-learning projects;  **(c)** Peer-centered activities, including peer mentoring and tutoring;  **(d)** Organizational and teamwork training, including team leadership training;  **(e)** Training in decision-making, including determining priorities and problem solving;  **(f)** Citizenship training, including life skills training such as parenting and work behavior training;  **(g)** Civic engagement activities which promote the quality of life in a community; and  **(h)** Other leadership activities that place youth in a leadership role such as serving on youth leadership committees, such as a Standing Youth Committee.  **Align with ISS**   * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.*** | | | N/A, no documented evidence this service was planned  or provided   * **Services were provided as a result of the Objective Assessment and aligned with the participant’s ISS:**   **[*DOL Final Rules; 20 CFR 681.460(b)]***  YES, No Issues Identified  NO, Unable to Validate   * **Progress and outcomes of this service are documented on the ISS: *(WIOA Final Rule, narrative page 56177)***   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 |
| **Supportive Services**  *-Program Element 7*  **MIS:**   * **WIN 0077, Change 9; WorkSource Service Catalog:**   + **Support Services-fees, supplies, tests, transportation, etc. (Youth Only):**     - Support services to be provided to youth to enable them to participate in youth program activities.     - These services may include: linkages to community services; assistance with transportation, child and dependent care, housing, educational testing, uniforms or other appropriate work attire and work-related tools, such as eyeglasses, protective eye gear, books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; payments and fees for employment and training-related applications, tests, and certifications; reasonable accommodations for youth with disabilities; legal aid services, and referrals to health care.   **Align with ISS**   * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.***   **WIN 0111**  **Effective 6/3/2020-12/3/2020**  **Due to the COVID-19 crisis**, food may be provided as a supportive service to WIOA Title I Youth program participants on a limited basis and in certain situations.  Food may be provided to eligible youth **when it will assist or enable them to participate in allowable youth program activities and reach their employment and training goals.** The focus of the program is to train youth and the use of WIOA Title I-B grant funds for food should be limited to **reasonable and necessary purchases.**  Local Workforce Development Boards (LWDBs) must coordinate the purchase of food for WIOA Title I-B youth with other community, state, or federal services that provide food to low-income individuals and document the coordination efforts undertaken. | | | N/A, no documented evidence supportive services were  provided   * **Supportive services were necessary to enable the individual to participate in allowable youth program activities:** *(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 | | | 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**   * **20 CFR 681.640:**    + Incentive payments to youth participants are permitted for recognition and achievement ***directly tied to training activities and work experiences.*** * **ESD Policy 5621, Rev 2:**   + Service providers must document (case note) the following in the case management system for each participant that receives an incentive payment(s):     - The business case for the incentive payment’s contribution to the participant’s success ***and***     - How the incentive payment was calculated.   **Align with ISS**   * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.*** | | | N/A, no documented evidence incentives were provided   * **Supportive services were provided to the youth to enable them to participate in youth program activities:**   ***(20 CFR 681.570; WIN 0077 Change 9)***  YES, No Issues Identified  NO, Unable to Validate   * **Justification for the incentive payment was documented: *(ESD Policy 5621, Rev. 2)***   YES, No Issues Identified  NO, Could Not Locate   * **How the incentive payment was calculated was documented, either in local policy or in the case file: *(ESD Policy 5621, Rev. 2)***   YES, No Issues Identified  NO, Could Not Locate   * **Incentive expenditure records were available for monitoring purposes: *(ESD Policy 5621 Rev.2)***   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 |
| **Needs-Related Payments**  *-Program Element 7*  **MIS:**   * **WIN 0077, Change 9; WorkSource Service Catalog:**   + **Needs-Related Payments (Youth Only):**     - Financial assistance (income support) to eligible youth (ages 18-24) in training to enable them to participate in that training.   **Needs Related Payments:**   * **20 CFR 680.930:**    + Needs-related payments provide financial assistance to participants for them to participate in training and are a supportive service. * **WIOA Final Rule, Department’s Response, page 56182:**    + Needs-related payments are allowed for **youth ages 18-24** enrolled in WIOA youth services. * **20 CFR 680.940:** Adults must be:   + *Unemployed;*   + *Not qualify for or have ceased qualifying for UI; and*   + *Be enrolled in a program of training services* under WIOA sec. 134(c)(3).   **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   **Align with ISS**   * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.*** | | | N/A, no documented evidence this service was needed or provided   * **Youth was between the ages of 18-24, unemployed, did not qualify (or ceased) for UI and enrolled in training:*(WIOA Final Rule, page 56182 and 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 (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 |
| **Adult Mentoring**  *-Program Element 8*  **MIS:**   * **WIN 0077, Change 9; WorkSource Service Catalog:**   + **Mentoring (Youth):**     - A formal relationship between youth and an adult mentor that includes structured activities, guidance, support, and encouragement to develop competence and character of the mentee.     - May include workplace mentoring where a youth is matched with an employer or employee of a company.     - WIOA case managers are discouraged from serving as mentors unless adult mentors are sparse in the local area, in which case, WIOA case managers can serve in that role.     - Mentoring must be provided for at least 12 months.   **Requirements**   * **20 CFR 681.490:**   **(a)** Adult mentoring for youth must:  **(1)** *Last at least 12 months* and may take place both during the program and following exit from the program;  **(2)** Be a *formal relationship between a youth participant and an adult mentor* that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee; and  **(3)** While group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the local youth program *must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis.*  **(b)** Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company.  **Case managers as mentors**   * **TEGL 21-16 and WIN 0077, Change 9:**    + While DOL strongly prefers that case managers not serve as mentors, the final rule allows case managers to serve as mentors in areas where adult mentors are sparse.   **Align with ISS**   * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.*** | | | N/A, no documented evidence this service was planned  or provided   * **Service was provided as a result of the Objective Assessment and aligned with the participant’s ISS:**   **[*DOL Final Rules; 20 CFR 681.460(b)]***  YES, No Issues Identified  NO, Unable to Validate   * **The mentorship was a formal relationship between the participant and adult mentor and included face-to-face interactions: *[20 CFR 681.490(a)(2)]***   YES, No Issues Identified  NO, Unable to Validate   * **Progress and outcomes of this service are documented on the ISS: *(WIOA Final Rule, narrative page 56177)***   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 |
| **Comprehensive Guidance & Counseling**  *-Program Element 10*  **MIS:**   * **WIN 0077, change 9; WorkSource Service Catalog:**   + **Youth Guidance and Counseling:**     - Additional support for youth includes activities such as comprehensive guidance and counseling as aids to barrier removal, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth.   **Definition**   * **20 CFR 681.510:**   + Comprehensive guidance and counseling provide individualized counseling to participants.   + This includes drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate.   + When referring participants to necessary counseling that cannot be provided by the local youth program or its service providers, the local **youth program must coordinate with the organization it refers to in order to ensure continuity of service.**   **Align with ISS**   * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.*** | | | N/A, no documented evidence this service was planned  or provided   * **Service was provided as a result of the Objective Assessment and aligned with the participant’s ISS:**   **[*DOL Final Rules; 20 CFR 681.460(b)]***  YES, No Issues Identified  NO, Unable to Validate   * **If referred to counseling, the local youth program coordinated with the organization it referred the participant to ensure continuity of service: *(20 CFR 681.510)***   N/A, youth was not referred to counseling  YES, No Issues Identified  NO, Unable to validate if youth was referred to  counseling and/or if continuity of services was  coordinated   * **Progress and outcomes of this service are documented on the ISS: *(WIOA Final Rule, narrative page 56177)***   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 Literacy Education**  *-Program Element 11*  **MIS:**   * **WIN 0077, Change 9; WorkSource Service Catalog:**   + **Financial Literacy (Youth Only):**     - Supporting the ability of youth participants to create household budgets; initiate savings plans; understand financial services and products; make informed financial decisions; understand rights and protections related to identity theft and financial data and pursue financially-related activities and education that are age-appropriate and timely.   **Definition**   * **20 CFR 681.500:** The financial literacy education program element may include activities which:   **(a)** Support the ability of participants to create budgets, initiate checking and savings accounts at banks, and make informed financial decisions;  **(b)** **Support participants in learning how to effectively manage spending,** credit, and debt, including student loans, consumer credit, and credit cards;  **(c)** Teach participants about the significance of credit reports and credit scores; what their rights are regarding their credit and financial information; how to determine the accuracy of a credit report and how to correct inaccuracies; and how to improve or maintain good credit;  **(d)** Support a participant’s ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions;  **(e)** Educate participants about identity theft, ways to protect themselves from identify theft, and how to resolve cases of identity theft and in other ways understand their rights and protections related to personal identity and financial data;  **(f)** Support activities that address the particular financial literacy needs of non-English speakers, including providing the support through the development and distribution of multilingual financial literacy and education materials;  **(g)** Support activities that address the particular financial literacy needs of youth with disabilities, including connecting them to benefits planning and work incentives counseling;  **(h)** Provide financial education that is age appropriate, timely, and provides opportunities to put lessons into practice, such as by access to safe and affordable financial products that enable money management and savings.  **Align with ISS**   * **WIOA Final Rule, narrative page 56177:** The Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.*** | | | N/A, no documented evidence this service was planned  or provided   * **Services were provided as a result of the Objective Assessment and aligned with the participant’s ISS:**   **[*DOL Final Rules; 20 CFR 681.460(b)]***  YES, No Issues Identified  NO, Unable to Validate   * **Progress and outcomes of this service are documented on the ISS: *(WIOA Final Rule, narrative page 56177)***   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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| **Entrepreneurial Skills Training**  *-Program Element 12*  **MIS:**   * **WIN 0077, change 9; WorkSource Service Catalog:**   + **Entrepreneurial Skills Training (Youth Only):**     - Training to provide youth with the basics of starting and operating a small business.     - Training may include, but not be limited to:       * + taking initiative,         + identifying business opportunities;         + developing budgets and forecasting   resource needs;   * + - * + understanding options for acquiring   capital; and   * + - * + effectively communicating and marketing   ideas.  **Definition**   * **20 CFR 681.560:** Entrepreneurial skills training provides the basics of starting and operating a small business.   **(a)** Such training *must develop the skills associated*  *with entrepreneurship.*  **Align with ISS**   * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.*** | N/A, no documented evidence this service was planned  or provided   * **Service was provided as a result of the Objective Assessment and aligned with the participant’s ISS:**   **[*DOL Final Rules; 20 CFR 681.460(b)]***  YES, No Issues Identified  NO, Unable to Validate   * **Progress and outcomes of this service are documented on the ISS: *(WIOA Final Rule, narrative page 56177)***   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 |
| **Labor Market Information Services (2.0)**  -*Program Element 13*  **MIS:**   * **WIN 0077, Change 9; WorkSource Service Catalog:**   + **Labor Market Information Services (Youth Only):**     - Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as **career awareness, career counseling, and career exploration services**. * **WIN 0092:**   + It is the State’s expectation that Title I Youth case manager take only **Labor Market Information Services (Youth Only)** to represent either **job search or labor market-related activities**.   **Definition**   * **TEGL 21-16:**   + Under 20 CFR 681.460(a)(13),this element includes services such as **career awareness, career counseling** and **career exploration** that **provide labor market and employment information about in-demand industry sectors or occupations available in the local area.**     - **Career awareness** begins the process of developing knowledge of the variety of careers and occupations available, their skill requirements, working conditions and training prerequisites, and job opportunities across a wide range of industry sectors.     - **Career counseling** or guidance provides advice and support in making decisions about what career paths to take. Career counseling services may include providing information about resume preparation, interview skills, potential opportunities for job shadowing, and the long-term benefits of postsecondary education and training (e.g., increased earning power and career mobility).   **Align with ISS**   * **WIOA Final Rule, narrative page 56177:**   + [t]he Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.*** | N/A, no documented evidence this service was planned  or provided   * **Services were provided as a result of the Objective Assessment and aligned with the participant’s ISS:**   **[*DOL Final Rules; 20 CFR 681.460(b)]***  YES, No Issues Identified  NO, Unable to Validate   * **Progress and outcomes of this service are documented on the ISS: *(WIOA Final Rule, narrative page 56177)***   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 |
| **Post-secondary Preparation & Transition Activities**  *-Program Element 14*  **MIS:**  **WIN 0077, Change 9; WorkSource Service Catalog:**  **Post-Secondary Preparation and Transition Activities (Youth Only):**   * + - Such activities prepare ISY and OSY for advancement to postsecondary education after attaining a high school diploma or its recognized equivalent.     - These services include exploring postsecondary education options including technical training schools, community colleges, four-year colleges and universities, and registered apprenticeship.     - Additional services include, but are not limited to:       * + assisting youth to prepare for SAT/ACT testing;         + assisting with college admission applications;         + searching and applying for scholarships and grants;         + filling out the proper Financial Aid applications and adhering to changing guidelines; and         + connecting youth to postsecondary education programs.   **Align with ISS**  **WIOA Final Rule, narrative page 56177:**   * + [t]he Department does **require the** **program elements** provided to a youth to ***align with the goals the youth set forth in the ISS.*** | N/A, no documented evidence this service was planned  or provided   * **Services were provided as a result of the Objective Assessment and aligned with the participant’s ISS:**   **[*DOL Final Rules; 20 CFR 681.460(b)]***  YES, No Issues Identified  NO, Unable to Validate   * **Progress and outcomes of this service are documented on the ISS: *(WIOA Final Rule, narrative page 56177)***   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 |
| **7. 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 | N/A, youth not participating in applicable services or no  measurable skill gain documented at the time of  monitoring  **FILE REVIEW:**   * **Type of skill gain was based on the youth’s ISS: *(TEGL 10-16, Change 1)***   YES, No Issues Identified  NO, Unable to Validate  **REPORTING:**  **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 was 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; DOL ETO 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  NO, 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 Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **8. PROGRAM COMPLETION** | | | |
| **Date and Reason for Program Exit**  **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.   **Reporting/MIS DATA Entry Requirements**   * **ESD Policy 1020 Handbook**:   + (In MIS), the fields “Completion Outcome” and “Program Completion Date” should reflect when and why program services have ended. However, on 9-25-18, ESD Policy clarified to the ESD Monitoring Unit that while Policy 1020 Handbook encourages the recording of the “Completion Outcome” and “Program Completion Date” in MIS, it is not a requirement for DOL reporting purposes.   **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 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 exited  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 Validate   * If program exit was due to “Other Reasons for Exit”, evidence is documented in the file: *(TEGL 23-19)*   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  Attendance Records  Withdrawal form with explanation  Information from institution or facility  NO, Unable to Validate   * **Case notes document the date and reason for program exit: *(WIN 0088)***   YES, very detailed  YES, some detail  NO, could not locate case notes for:  Date of program completion  Reason for program completion  **Reporting:**   * **All durational services recorded in MIS are closed:**   ***(20 CFR 677.160)***  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 | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **School Status at Program Completion**  **MIS Documentation Requirements**   * **WIN 0100:**   + Staff must enter data on youth school status at exit into the case management system in the following sequential order of precedence:  1. School status at exit if known (the most   accurate outcome);   1. Last known documented school status,   after participation has begun, if school  status at exit is unknown;   1. School status at start of participation, if   school status at exit is unknown and  there is otherwise no documentation as  to school status other than that at start  of participation.  By following the aforementioned order of precedence, staff will be recording the last known school status of WIOA Title I youth participant. This will ensure the case management system has the required data, so no records are rejected or excluded from our federal performance reports for lack of this data element  **School Status**   * **ISY:** In-school, HS or less * **ISY:** In-school, Alternative School * **ISY:** In-School, Post-HS * **OSY**: Not attending school or HS Dropout * **OSY:** Not attending school; H.S. Graduate | N/A   * **School status at program completion is recorded in MIS:** (TEGL 23-19)   YES, and validated by one of the following: (TEGL 23-19)  Cross-Match with Secondary or Postsecondary Education Database  Copy of Diploma, Credential or Degree Awarded by Education Institution  Applicable Records from Education Institution (GED alternative course of study approved by the local educational agency whether full or part-time. certificate, transcripts, report card, enrollment record or other school documentation)  Signed Follow-up Survey Response from Program Participant  Signed File Documentation with Information Obtained from Education or Training Provider  No, one or more issue identified | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **Date Enrolled in Post-Exit Education or Training Program Leading to a Recognized Post- Secondary Credential**  **Applies To:**   * **WIOA Sec. 116(b)(2)(A)(iii):**    + This is **only for participants who** exited secondary education and **obtained a high school credential or its recognized equivalent.**   **Documentation Requirement**   * **Federal Register Vol. 80, No. 140- Information Collection for WIOA:**    + Documentation supporting the **date the participant is enrolled** in an education or training program that leads to a recognized postsecondary credential **after program exit**. | N/A, no evidence participant was planning on or was  enrolled in education or training after exit  YES, all the following criteria was met:   * **Youth obtained HS credential or equivalent:**   ***(Federal Register Vol. 80, No. 140)***  YES, No Issues Identified  NO, Unable to Validate   * **Youth has exited the WIOA Youth Program:**   ***(Federal Register Vol. 80, No. 140)***  YES, No Issues Identified  NO, Unable to Validate   * **Date of enrollment into post-secondary education is after date of program exit: *(Federal Register Vol. 80, No. 140; TEGL 23-19)***   **YES, Validated by one of the following**:  *(Federal Register Vol. 80, No. 140; TEGL 23-19)*  Copy of enrollment record  File documentation with notes from program  staff  School records  Transcript or report cared  NO, Unable to Validate   * **Training program leads to a recognized post-secondary credential:*(Federal Register Vol. 80, No. 140)***   YES, No Issues Identified  NO, Unable to Validate | No Issues Identified  Items to Address  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **Follow-up Services**  *-Program Element 9*  **MIS:**   * **WIN 0077, Change 9; WorkSource Service Catalog:**   + **Financial Literacy in Follow-up, effective budgeting and spending, etc.** *(Youth Only)*   + **Labor Market Information Services in Follow-up** *(Youth Only)*   + **Mentoring in Follow-up** *(Youth Only)*   + **Other Follow-up Assistance with Work-related Problems** *(Youth Only)*   + **Post-secondary Preparation and Transition Activities in Follow-up** *(Youth Only)*   + **Support Services in Follow-up** *(Youth Only)*   **When to provide Follow-up Services**   * **TEGL 10-16, Change 1; TEGL 21-16:**   + Follow-up services may begin immediately following the last date of service if it is expected that the participant will not receive any future services other than follow-up services.   **Allowable Services**   * **20 CFR 681.580(b)**   **(1)** Supportive services;  **(2)** Adult mentoring;  **(3)** Financial literacy education;  **(4)** Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and  **(5)** Activities that help youth prepare for and transition to postsecondary education and training.  **Requirements**   * **20 CFR 681.580(c):**   + All youth participants *must be offered* an opportunity to receive *follow-up services that align with their individual service strategies.*   + Follow-up services must be provided to all participants for *a minimum of 12 months* unless the participant declines to receive follow-up services, or the participant cannot be located or contacted.   + Follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome. * **TEGL 21-16**:   + **At the time of enrollment, youth must be informed that follow-up services will be provided for 12 months following exit**   + If at any point in time during the program or during the 12 months following exit the youth requests to opt out of follow-up services, they may do so. In this case, the *request to opt out or discontinue follow-up services made by the youth must be documented in the case file.* | * **Youth was informed of Follow-up services at the time of enrollment: *[20 CFR 681.580(c) and TEGL 21-16]***   YES, No Issues Identified  NO, Unable to Validate  **FILE REVIEW:**   * **Youth has exited and is in Follow-up:**   N/A, participant has not yet exited the program  YES, No Issues Identified  Youth has exited but cannot locate Follow-up  activities in case notes or in MIS   * **If youth opted out of follow-up services, this request was documented in the file: *(TEGL 21-16)***   N/A, youth did not opt out of follow-up services  YES, No Issues Identified  NO, unable to validate if youth opted out of  follow-up services  **Reporting:**   * **Follow-up services aligned with ISS: *[20 CFR 681.580(c)]***   N/A, no evidence follow-up services were provided  YES, No Issues Identified  NO, Unable to Validate   * **Follow up services included more than a contact attempted: *[20 CFR 681.580(c)]***   N/A, no evidence follow-up services were provided  YES, No Issues Identified  NO, issue identified on one or more occasion   * **Follow up services were provided for minimum 12 months (unless opted out): *[20 CFR 681.580(c)]***   N/A, no evidence follow-up services were provided  N/A-still active in service/opted out  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 |
| **10. DATA VALIDATION, DATA INTEGRITY** | | | |
| **MIS**  **Reporting/MIS DATA Entry Requirements:**   * **WIN 0082, Change 1;** The minimal WIT 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, 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. * **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.** * **WIN 0089, Effective February 9, 2018:**   + **Youth program staff must record in MIS any services provided to WIOA youth program participants even if the services were provided by non-WIOA providers and paid for with non-WIOA funds.**   + In terms of supporting documentation, **DOL expects to find references to youth program elements delivered by non-WIOA providers in ISS or case notes** | **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, including services not funded by WIOA: *(20 CFR 677.240; WIN 0082, Change 1)***   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, Change 1)***   YES, No Issues Identified  NO, One or More Issues Identified   * **For services recorded in MIS, services are recorded within the allotted timeframes: *(WIN 0082, Change 1)***   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, Change 1)***   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, Change 1).   **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, Change 1; 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   * **Activity start dates, progress and outcomes of services, when applicable, is documented in case notes: *(WIN 0088)***   YES, very detailed  YES, some detail  NO, on one or more occasion, could not locate case  notes for:  Activity start date(s)  Progress of service(s)  Outcome of service(s)   * **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   * **Documentation of case notes followed local policy, if applicable:**   N/A, No local policy or procedure  YES, No Issues Identified  NO, one or two 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* 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 |
| **11. 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 | |