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| **COVID-19 Enrollment Exception**  *WIN 0109, Change 10: Verbal Self-Attestation and Remote Eligibility Documentation*  *\* Effective Date: March 23, 2020*  *\*Expiration Date: June 30, 2024*  **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 the inability to meet in person and/or  provide eligibility source documentation for COVID-19 reasons, including the specific  circumstances preventing in-person engagement and/or eligibility source documentation transaction.  **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.  **(c.)** Effective with the issuance of Change 5 of this WIN, case managers must obtain appropriate  eligibility source documentation within 30 calendar days after the circumstances that prevented  applicants from providing source documents cease to exist. | N/A, verbal self-attestation was not used to determine eligibility and priority of service  **Verbal self-attestation was used to determine eligibility:** YES, the following eligibility criteria were verbally self-attested:  Age / Date of Birth  Legally Entitled to Work  Selective Service Registration (if applicable)  Low Income  ISY Status at Program Entry  **Verbal self-attestation was used to meet a minimum of one of the following criteria for eligibility:**  YES, the following priority of service category and its criterion were verbally self-attested: (Case notes must include *how* they meet each criterion)  Basic Skills Deficient  English Language Learner  Offender, Ex-Offender  Homeless or Runaway  Foster Care Youth  Pregnant or Parenting Youth  Individual with a Disability  Youth who Needs Additional Assistance  Exception to Low Income Eligibility Requirement  **Verbal self-attestation was clearly documented by case-noting the following in ETO:**  YES, the following were in case notes:  (*December 3, 2021 and beyond*) That verbal self-attestation was necessary due to the inability to meet in person and/or provide eligibility source documentation for COVID-19 reasons, including the specific circumstances preventing in-person engagement and/or eligibility source documentation transaction.  **AND**  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.”  **AND**  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 (see Attachment A) 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.”  NO, one or more issues identified    **REPORTING:**   * **All demographics and required federal reporting information was collected and entered in ETO**   YES, no issues identified  NO, one or more issues identified   * **Case managers obtained appropriate eligibility source documentation within 30 calendar days after the circumstances that prevented applicants from providing source documents cease to exist.** (Enrollments *December 3, 2021 and beyond*)   N/A, circumstances still exist  N/A, 30 days has not passed at time of monitoring  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 |
| **1.WIOA ISY ELIGIBILITY CRITERIA**  N/A, verbal self-attestation used during COVID-19 | | | |
| **Age/Date of Birth**  **In-School-Youth Ages (ISY) -** Between the ages 14-21  **TEGL 09-22**  Self-attestation is an acceptable source of documenting almost all program elements related to WIOA Youth eligibility. As stated in TEGL 23-19, Change 1, the following youth eligibility data elements allow self-attestation as an acceptable source of documentation: school status at program entry, date of birth, individual with a disability, pregnant or parenting, youth who needs additional assistance, foster youth, homeless youth, offender, low income, and English Language Learner. The only data element related to WIOA Youth eligibility that does not permit the use of self-attestation for documentation is “basic skills deficient.”  As stated in TEGL 23-19, Change 1, ETA encourages grant recipients to consider the impacts on equity and accessibility when developing their source documentation policies and procedures. For example, grantees considering restrictions on the use of self-attestation should consider that while other documentation sources are preferred when practical, self-attestation is an important option for populations with barriers to obtaining eligibility and reporting documents (such as disconnected youth, American Indian and Alaska Native populations, individuals experiencing homelessness, justice involved individuals, refugees, disaster impacted individuals, and others) and help ensure such populations are able to equitably access services. As a best practice, once enrolled, programs should assist the participant in obtaining the required documents through the use of supportive service funds as these documents are likely needed for employment and training related activities. | **Participant was between the ages of 14-21 on the date of program enrollment:** *[WIOA Section 129(a)]*  YES, Validated by one of the following:  Driver’s License or ID  Federal, State, Local ID Card  Birth certificate  Passport  Baptismal record  DD-214  Work permit  Hospital record of birth  Public assistance  Social service records  School records / ID’s  Family bible  Crossmatch  Justice system records  Medical records  Selective Service Registration  Signed letter from parents or guardian  Report of Transfer or Discharge Paper  Self-attestation which:  was a declaration of information for this element ***and***  was signed and dated by participant ***and***  was participant generated and traceable to the participant  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.  **ESD Policy 1019, Rev. 8**  If a youth fails to provide verification of Selective Service registration within 30 days of his 18th birthday, services must be suspended (i.e., on the 31st day after his 18th birthday). LWDBs must stop providing services to participants who have not met Selective Service registration requirements until the requirements are met. These requirements apply to transgender females. Selective Service registration requirements are based on the gender assigned at birth and not on gender identity or gender reassignment. Individuals who are born male and change their gender identity or assignment to female are required to register. Individuals who are born female and change their gender identity or assignment to male are not required to register.  **Individuals exempt from Selective Service registration:** Transgender males (born females, but identify as or transitioned to males | N/A, participant was one of the following: *(TEGL 11-11, Chg. 2*)  Female/Assigned Female at birth  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:  DD-214  Online Verification  SS Acknowledgement letter  Selective Service Registration Card  Selective Service Verification Form (Form 3A)  Stamped Post Office Receipt of Registration  Local area approved waiver documentation  NO, unable to validate  **Reporting:**  **Selective Service Registration is recorded in MIS:**  *(20 CFR 677.235)*  YES, no issues identified  NO, one or more issues identified | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **Legally Entitled to Work in 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. 8)*  YES, validated by one of the following:  Accepted I-9 documentation  Self-attestation which:  was a declaration of information for this element ***and***  was signed and dated by participant ***and***  was participant generated and traceable to the participant  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 |
| **Low Income**  **Applies To**  **All in School Youth**  **Types of Source Documentation**  **ESD Policy 1003, Rev. 5**  **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.*  **Note:** Data element validation requires collection of source documentation for element 802 (Low Income Status at Program Entry) to document eligibility criteria, per ESD Policy 1003, Rev. 5 Attachment B | N/A, no evidence of this status  **Youth met the low-income requirement:** *[*WIOA Sec. 129(c)]  YES, low income validated by one of the following:  *(ESD Policy 1003, Rev. 5)*  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 a declaration of information for this element ***and***  was signed and dated by participant ***and***  was participant generated and traceable to the participant  NO, unable to validate  **Reporting:**  **Low income status is recorded in ETO:***(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 |
| **Exception to Low Income Eligibility Requirement**  **Reporting/MIS Requirement**  **Evan Rosenberg, Division of Youth Services, DOL ETA, “WIOA Youth Eligibility Live Q&A Session” on WorkforceGPS 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 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 |
| **ISY School Status at Program**  **Entry**    **In-School Youth**  **20 CFR 681.230**:  Youth attending high school equivalency programs funded by the public K-12 school system who are classified by the school system as still enrolled in school are considered **ISY.**  **ESD Policy 1020, Rev. 1**  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**.  **TEGL 21-16 Chg.1**  If a youth is enrolled in the WIOA youth program during the summer and is in between school years, the youth is considered an **ISY** if they are enrolled to continue school in the fall.  If a youth is enrolled in the WIOA youth program between high school graduation and postsecondary education, the youth is considered an **ISY** if they are registered for postsecondary education, even if they have not yet begun postsecondary classes at the time of WIOA youth program enrollment.  If the youth participant is enrolled in any credit-bearing postsecondary education classes, including credit-bearing community college classes and credit-bearing continuing education classes, then they are considered attending postsecondary education, and, therefore, in **ISY**.  **ESD Policy 1020, Rev. 1**Homeschooled youth who 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 considered **ISY**.  **ESD Policy 1020, Rev. 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 In-school criteria at program entry:**  *[WIOA Sec. 129(c)]*  YES, ISY validated by one of the following:  (*ESD Policy 1003, Rev. 5)*  Self-attestation which:  was a declaration of information for this element ***and***  was signed and dated by participant ***and***  was participant generated and traceable to the participant  Applicable records from education institution  (GED certificate, diploma, attendance record,  transcripts, dropout letter, school documentation)  No, unable to validate ISY 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 |
| **eligibility continued: iSY must meet a minimum of one of the following criteria:** | | | |
| **Basic Skills Deficient**  **BSD Scores**  **ESD 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.**  **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.  **CASAS Required Tool Assessment**  **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 Required**  **ESD Policy 1003, Rev. 5** *Self-attestation is not acceptable for validating BSD.*  **ESD WIOA Policy 1011, Rev. 6**  **BSD must be documented in the ETO WIOA Eligibility Application:**  **1.** On the “Barriers” tab of the WIOA Eligibility Application, click the “yes” radio button for Basic Literacy Skills Deficiency.  **2.** On the dropdown list for BSD Verification, choose “Standardized Assessment Test”  **3.** Go to the “Notes” tab of the WIOA Eligibility Application and document the date of the test, score(s), name of the person or entity administering the test and any other supporting details.  Staff **must not** upload into the case management system or retain in hard files any CASAS document(s) that contain test questions or other sensitive testing information.  **WIN 0107, Change 10** 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 December 31, 2024* | 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 Policy 1011, Rev. 6; ESD Policy 1003. Rev.5)*  CASAS Pre-test scores(s)  NO, unable to validate  ***OR***  **Enrolled during COVID Pandemic, under WIN 0107, Chg. 10 *Effective 4/17/2020 – 12/31/2024.***  YES, validated by the following:  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  **Reporting:**  **BSD status is recorded in MIS as required in ESD Policy 1011, Rev. 6:***(20 CFR 677.235; ESD Policy 1011, Rev. 6)*  YES, 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, Chg. 10 *Effective 4/17/2020 – 12/31/2024.***  **BSD status is recorded in MIS:***(20 CFR 677.235)*  N/A, participant not tested or assessed  YES, no issues identified  NO, one or more issues identified | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **English Language Learner**  **Definitions**  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. | 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 1003, Rev.5)*  Assessment Test Results  Applicable Records from Education Institution (Transcripts, or other school documentation)  Intake Application or Enrollment form  Case Notes  Self-attestation which:  was a declaration of information for this element ***and***  was signed and dated by participant ***and***  was participant generated and traceable to the participant  NO, unable to validate  **Reporting:**  **ELL 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 |
| **Offender, Ex-Offender**  **Definitions**  **ETO 9172 (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.  **ESD Policy 1020, Rev. 1****& ESD Policy 1019, Rev. 8**   * + 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**  **ESD Policy 1020, Rev. 1**  To address a broader concern, when individuals rely solely on ISY Category 3 or OSY Category 4 criteria as the additional determinants of eligibility for the Title I-B youth program and express concerns about documentation and disclosure of their offender status, DOL has stated that the offender status must be captured and reported so DOL and Congress can know whether or not states and local areas are adequately serving individuals with, in this case, employment barriers related to ex-offender status. Accordingly, offender status is a required reporting element in the PIRL.  **Note:** Data element validation requires collection of source documentation for this element, per ESD Policy 1003, Rev. 5 Attachment B | 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 1003, Rev.5)*  Self-attestation which:  was a declaration of information for this element ***and***  was signed and dated by participant ***and***  was participant generated and traceable to the participant  Documentation from Juvenile or Adult Criminal  Justice System  Written Statement or Referral Document from a  Court or Probation Officer  Referral Transmittal from a Reintegration Agency  Signed Intake Application or Enrollment Form  Case Notes  Needs Assessment  Signed Individual Service Strategy  Federal Bonding Program Application  NO, unable to validate  **Reporting:**  **Offender status is recorded in MIS:** *(20 CFR 677.235 &**ESD Policy 1020, Rev. 1)****)***  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 Youth or Foster Care Youth**  **Definition**  [**Violence Against Women Act of 1994**](https://www.law.cornell.edu/uscode/text/42/14043e-2) : An individual who lacks a fixed, regular, and adequate nighttime residence; and includes an individual who-  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  Migratory children (as defined in section 6399 of title 20) who qualify as homeless under this section because the children are living in circumstances described in this paragraph.  [**McKinney-Vento Homeless Assistance Act**](https://www.law.cornell.edu/uscode/text/42/11434a)The term homeless children and youth means individuals who lack a fixed, regular, and adequate nighttime residence and includes –  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;  Children and youth who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and  Migratory children who qualify as homeless for the purposes of this subtitle.  **TEGL 21-16 Chg.1** Homeless youth do not need to meet any additional low-income criteria  **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.  **Note:** Data element validation requires collection of source documentation for this element, per ESD Policy 1003, Rev. 5 Attachment B | N/A, no evidence of this status and/or not the category  selected for enrollment  **Youth met Homeless or Runaway criteria at program enrollment:**  N/A  Yes  No  **Youth met Foster Care status at program enrollment:**  N/A  Yes  No  YES, validated by one of the following:*(ESD Policy 1003, Rev. 5)*  A letter from caseworker or support provider  Case Notes  Foster Care Agency Referral Transmittal  Needs Assessment  Self-attestation which:  was a declaration of information for this element and  was signed and dated by participant and  was participant generated and traceable to the participant  Signed Individual Service Strategy  Signed Intake Application or Enrollment Form  Written Statement or Referral Transmittal from a Shelter or Social Service Agency  Written confirmation from Social Service Agency  NO, unable to validate  **Reporting:**  **Homeless/Runaway status is recorded in MIS:***(20 CFR 677.235)*  N/A  YES, no issues identified  NO, one or more issues identified  **Foster Care 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 |
| **Pregnant or Parenting Youth**  **Definitions**  **TEGL 21-16 Chg.1**   * + 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 9172 (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).   **Note:** Data element validation requires collection of source documentation for this element, per ESD Policy 1003, Rev. 5 Attachment B | 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 1003, Rev. 5)*  Self-attestation which:  was a declaration of information for this element ***and***  was signed and dated by participant ***and***  was participant generated and traceable to the participant  Case notes  Needs Assessment  TANF Single Parent Eligibility Verification  Signed Intake Application or Enrollment Form  Signed Individual Service Strategy or Employment Plan  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 |
| **Youth who Needs Additional Assistance**  **Note:** Youth must meet eligibility criteria defined  by LWDB policy.  **Note:** Data element validation requires collection of source documentation for this element, per ESD Policy 1003, Rev. 5 Attachment B  **TEGL 09-22**  There is one exception to the reporting of all youth eligibility barriers -- in-school youth who require additional assistance to complete an education program or secure or hold employment. For this particular barrier, it is important that local programs report it only when it is a participant’s sole eligibility barrier. WIOA includes a limitation where in each local area only five percent of in-school youth in a given program year can be determined eligible using the “youth who require additional assistance to complete an education program or secure or hold employment” barrier. Based on the most recent data, 24.3 percent of in-school youth nationally are reported as having the “youth who require additional assistance” barrier. In order to more accurately track this five percent limitation, WIOA Youth programs should only report youth as having this barrier if it is their only barrier, and therefore, the barrier used for eligibility determination. | 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 1003, Rev. 5)*  Self-attestation which:  was a declaration of information for this element ***and***  was signed and dated by participant ***and***  was participant generated and traceable to the participant  Signed Intake Application or Enrollment Form  Case notes  Needs Assessment  Signed Individual Service Strategy  NO, unable to validate  **Reporting:**  **Youth who needs Additional Assistance 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**  **Definitions**  **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   **Note:** Data element validation requires collection of source documentation for this element, per ESD Policy 1003, Rev. 5 Attachment B | 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 1003, Rev. 5)*  Self-attestation which:  was a declaration of information for this element ***and***  was signed and dated by participant ***and***  was participant generated and traceable to the participant  School 504 Records Provided by Student  Assessment Test Results  School Individualized Education Program (IEP) record  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 |
| **2. OBJECTIVE ASSESSMENT** | | | |
| **Requirements**  **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 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 Chg.1**  Assessments ***must also consider a youth’s strengths*** rather than just focusing on areas that need improvement. | **It was evident an Objective Assessment *occurred prior to, or on the date* of 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   **ESD Policy 1020, Rev. 1**  Title I-B youth case managers must ensure that Title I-B youth receive at least one WIOA youth program element available in the WorkSource Services Catalog 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, Change 1; ESD Policy 1003, Rev. 5]*  Tutoring, Study Skills Training, Instruction, and  Dropout Prevention Services  Alternative Secondary School Services or Dropout Recovery Services  Work Experience (WEX)  Paid/Unpaid-Internships or Employment  Unpaid-Job Shadowing  Paid/Unpaid-On the Job training  Paid/Unpaid-Pre-Apprenticeship program  Occupational Skills Training  Education offered with Workforce Preparation Activities & Occupational Training  Youth Leadership Development  Supportive Service  Mentoring  Youth Guidance & Counseling  Financial Literacy  Entrepreneurial Training  Labor Market Information Services  Post-secondary Preparation & Transition  YES, Documented on one of the following: *(ESD Policy 1003, Rev. 5)*  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.   **ESD Policy 1020, Rev. 1**  Title I-B youth case managers must ensure that Title I-B youth receive at least one WIOA youth program element available in the WorkSource Services Catalog 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, Rev.1 Handbook**:  For youth, the date of participation is when all applicable program requirements for the provision of services, including eligibility determination, objective assessment, development of an individual service strategy, and receipt of one or more of the 14 WIOA Youth program elements occur. | **FILE REVIEW:**  **Participant met all programmatic eligibility requirements:** *[20 CFR 677.150(a)(2); TEGL 21-16 Chg.1; ESD Policy 1003, Rev. 5]*  YES, no issues identified  NO, unable to validate  **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  **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  **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; ESD Policy 1003, Rev. 5]*  YES, no issues identified  NO, unable to locate  **Reporting:**  **A minimum of one (1) of the 14 Elements was correctly recorded in MIS on the date of program enrollment:**  *[20 CFR 677.150(a)(2); TEGL 10-16, Chg. 1; WIN 0082 Chg. 1; ESD Policy 1003, Rev. 5]*  YES, no issues identified  NO, unable to locate | 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  **Pogram enrollments are correctly recorded in MIS:**  *(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 |

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| **6. SERVICES** | | | |
| **Tutoring, Study Skills Training,**  **Instruction, and Dropout**  **Prevention Services** *-Program Element 1*  **MIS:**  **WIN 0077, Change 15; 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.   **Definitions**  **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:** *(ESD Policy 1003, Rev. 5)*  N/A-school not yet started/progress not yet provided  YES, progress in school validated by one of the following: *(ESD Policy 1003, Rev.5)*  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: *(****ESD Policy 1020, Rev. 1)*  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: *(ESD Policy 1003, Rev. 5)*  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:** (*ESD Policy 1020, Rev. 1****)***  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 15; 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.   **Definitions**  **TEGL 21-16 Chg. 1:**   * + 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:**  YES, Validated by one of the following: *(ESD Policy 1003, Rev. 5)*  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:** *(ESD Policy 1003, Rev. 5)*  YES, Validated by one of the following: *(ESD Policy 1003, Rev. 5)*  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:** *(ESD Policy 1003, Rev. 5)*  N/A-training not started/progress not yet provided  YES, Validated by one of the following: *(ESD Policy 1003, Rev. 5)*  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: *(****ESD Policy 1020, Rev. 1****)***  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: *(ESD Policy 1003, Rev. 5)*  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: *(****ESD Policy 1003, Rev. 5; ESD Policy 1020, Rev. 1****)***  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 15**; 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.   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.     - If the pre-apprenticeship program includes an occupational skills training component, separate from the work experience, WIOA Youth programs may report pre-apprenticeship under both the work experience program element and the occupational skills training program element.   **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 Chg.1:**  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  **On-the-Job Training**  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  **Fiscal review of Direct participant costs:**  **Expenditures were reasonable, allowable, and allocable:**  YES, no issues identified  NO, on one or more issues  **Expenditures were the correct amounts across the timesheets, paystubs, vouchers, and general ledger:**  YES, no issues identified  NO, on one or more issues  **Expenditures did not exceed approved amounts and were within local policy:**  YES, no issues identified  NO, on one or more issues  **Expenditures were charged to the correct programs:**  YES, no issues identified  NO, on one or more issues | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **Occupational Skills Training**  *-Program Element 4*  **MIS:**  **WIN 0077, Change 15; 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 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.***  **Reporting/MIS DATA Entry Requirements**  **WIN 0082 Chg. 1:**   * + Services must be entered at the point in time they are delivered;   + If services cannot be entered at the time they are delivered, services must be entered within **14** calendar days of service delivery and the service date entered must always reflect the date the service was delivered.   **ESD Policy 1023, Rev 1:**   * + All services must be linked to an Active Program Enrollment.   **ESD Policy 1020, Rev. 1 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.**   **ESD Policy 1020, Rev. 1**   * + **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.** | 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:** *(ESD Policy 1003, Rev. 5)*  YES, Validated by one of the following: *(ESD Policy 1003, Rev. 5)*  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:** *(ESD Policy 1003, Rev. 5)*  YES, Validated by one of the following: *(ESD Policy 1003, Rev. 5)*  Copy of enrollment record  File documentation with notes from program staff  School Records  Transcript or report cards  No, Could Not Locate  **Evidence of participant’s satisfactory progress in training was in the file:** *(ESD Policy 1003, Rev. 5)*  N/A-training not started/progress not yet provided  YES, Validated by one of the following: *(ESD Policy 1003, Rev. 5)*  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:***(ESD Policy 1020, Rev. 1)*  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: *(ESD Policy 1003, Rev. 5)*  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 participant began training is accurately recorded in MIS:**  *(ETA PIRL 9172)*  YES, no issues identified  NO, unable to validate  **Date withdrew/completed training is recorded in MIS:** *(ESD Policy 1003, Rev. 5; DOL ETA PIRL 9172)*  N/A-still active in service  YES, no issues identified  NO, unable to validate if the participant is still in training  NO, date withdrew/completed training is not recorded in MIS  **Fiscal review of Direct participant costs:**  **Expenditures were reasonable, allowable, and allocable:**  YES, no issues identified  NO, on one or more issues  **Expenditures were the correct amounts across the timesheets, paystubs, vouchers, and general ledger:**  YES, no issues identified  NO, on one or more issues  **Expenditures did not exceed approved amounts and were within local policy:**  YES, no issues identified  NO, on one or more issues  **Expenditures were charged to the correct programs:**  YES, no issues identified  NO, on one or more issues | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation | |
| **Education Offered with Workforce Preparation Activities & Occupational Training**  *-Program Element 5*  **MIS:**  **WIN 0077, Change 15; 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.   **Definitions**  **TEGL 21-16 Chg.1:** 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 |
| **Youth Leadership Development**  *-Program Element 6*  **MIS:**  **WIN 0077, Change 15; 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 opportunities; **(b)** community and service learning projects; **(c)** peer-centered activities including peer mentoring and tutoring; **(d)** organizational and team work 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.  **Definitions**  **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 15; 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.***  **ESD WIOA Policy 5602, Revision 5**  **Effective May 17, 2023**  In 2020, DOL clarified that food may be purchased with Title I-B fund for eligible youth on a limited and reasonable basis if necessary to assist or enable them to participate in allowable youth program activities and reach their employment and training goals. However, Local Workforce Development Boards (LWDBs) must first coordinate the purchase of food for Title I-B youth with other community, state, or federal services that provide food to low-income individuals and document the coordination efforts undertaken. This includes pursuing food assistance available through the Supplemental Nutrition Assistance Program (SNAP), which is a required WIOA onestop partner, as well as through local food banks and at-risk youth organizations whether or not they are partners in local one-stop systems.  If Title I-B funds are ultimately used to purchase food, DOL expects case files to amply document: (1) unsuccessful efforts to first secure food for the youth through federal, state, and community food assistance programs and services; and (2) the immediate need for Title I-B funds to be used to purchase food for the youth to enable effective participation in youth program activities. Before using Title I-B funds to provide food as a supportive service for Title I-B youth participants, LWDBs are encouraged to review local policies regarding internal controls and documentation requirements and assess or establish partnerships with entities that can provide food to Title I-B youth participants. | 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. 3)*  YES, no issues identified  NO, One or More issues Identified  **Fiscal review of Direct participant costs:**  **Expenditures were reasonable, allowable, and allocable:**  YES, no issues identified  NO, on one or more issues  **Expenditures were the correct amounts across the invoice/receipt, voucher and/or supporting documentation and general ledger:**  YES, no issues identified  NO, on one or more issues  **Expenditures did not exceed approved amounts and were within local policy:**  YES, no issues identified  NO, on one or more issues  **Expenditures were charged to the correct programs:**  YES, no issues identified  NO, on one or more issues | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **Incentives**  **MIS**  ESD Policy 5621, Rev. 5  Incentive payments are *not services* but, rather, financial transactions. Youth service providers must document incentive payments to youth by recording in case notes and participant files the youth program element and milestone, including attainment and retention of unsubsidized employment, achieved along with the incentive amount paid for the achievement. *(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 5 (3)(a):**  **Per Section 5 of TEGL 21-16**, incentive payments to WIOA Title I youth participants paid for with WIOA funds are permitted for recognition and achievement of milestones tied to work experience, education, or training. To that end, the allowable WIOA Title I youth program elements to which incentives may be tied can be found in *Attachment* *A*. This includes youth engaged in youth program elements through activities funded by Title I statewide activities (Governor’s reserve) funds.  **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  **(June 30, 2022, and beyond)**  **Was the milestone for the incentive payment documented in case notes:** *(ESD Policy 5621, Rev.5)*  YES, no issues identified  NO, unable to validate  **Was the incentive payment attached to one of the following allowable youth program elements:** *(ESD Policy 5621, Rev. 5)*  YES, no issues identified  Tutoring, study skills training, instruction, and dropout recovery  Alternative secondary school services or dropout recovery services  Paid or unpaid work experience  Occupational Skills training  Education offered concurrently with Workforce Preparation and training for a specific occupation  Financial Literacy education  Financial Literacy education (in follow-up)  Entrepreneurial skills training  Post-Secondary preparation and transition activities  Post-Secondary preparation and transition activities (in follow-up)  NO, could not locate  **Was an incentive payment provided for unsubsidized employment and/or employment retention as a result of participation in one or more program elements for which incentive payments qualify:** *(ESD Policy 5621 Rev.5)*  N/A, no documented evidence incentives were provided  YES, no issues identified  NO, one or more issues identified  **Fiscal review of Direct participant costs:**  **Expenditures were reasonable, allowable, and allocable:**  YES, no issues identified  NO, on one or more issues  **Expenditures were the correct amounts across the incentive payment, voucher and/or supporting documentation and general ledger:**  YES, no issues identified  NO, on one or more issues  **Expenditures did not exceed approved amounts and were within local policy:**  YES, no issues identified  NO, on one or more issues  **Expenditures were charged to the correct programs:**  YES, no issues identified  NO, on one or more issues | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **Youth Stipends**  **MIS:**  **WIOA Title I Policy** [5622](https://lnks.gd/l/eyJhbGciOiJIUzI1NiJ9.eyJidWxsZXRpbl9saW5rX2lkIjoxMDAsInVyaSI6ImJwMjpjbGljayIsInVybCI6Imh0dHBzOi8vc3RvcmVtdWx0aXNpdGVzLmJsb2IuY29yZS53aW5kb3dzLm5ldC9tZWRpYS9XUEMvYWRtL3BvbGljeS81NjIyLnBkZj91dG1fbWVkaXVtPWVtYWlsJnV0bV9zb3VyY2U9Z292ZGVsaXZlcnkiLCJidWxsZXRpbl9pZCI6IjIwMjMxMjI4Ljg3NzM0MTkxIn0.VOP78JwsCtOrlft1RGg-cTnLsZwfH7o51vDGFSTvS6c/s/1807768599/br/233897386664-l) **– Youth Stipends:** Stipends may be used as an allowable payment for **participation in WIOA Title I-B youth program element activities** such as occupational skills training or classroom activities, including high school equivalency preparation, work readiness, or employability skills training.  Stipends cannot be used when an employer-employee relationship exists because that relationship warrants wages rather than stipends.  **Allowable Activities:**  The allowable activities for which stipends may be provided to eligible and enrolled WIOA Title I-B youth program participants are identified in **WIOA Title I Policy** [5622](https://lnks.gd/l/eyJhbGciOiJIUzI1NiJ9.eyJidWxsZXRpbl9saW5rX2lkIjoxMDAsInVyaSI6ImJwMjpjbGljayIsInVybCI6Imh0dHBzOi8vc3RvcmVtdWx0aXNpdGVzLmJsb2IuY29yZS53aW5kb3dzLm5ldC9tZWRpYS9XUEMvYWRtL3BvbGljeS81NjIyLnBkZj91dG1fbWVkaXVtPWVtYWlsJnV0bV9zb3VyY2U9Z292ZGVsaXZlcnkiLCJidWxsZXRpbl9pZCI6IjIwMjMxMjI4Ljg3NzM0MTkxIn0.VOP78JwsCtOrlft1RGg-cTnLsZwfH7o51vDGFSTvS6c/s/1807768599/br/233897386664-l), Attachment A, which denotes the Youth Program Elements to which stipends can and cannot be applied.  Stipends must be tracked and documented separately from incentive payments that WIOA Title I-B youth participants might receive for achievement of milestones in Youth Program Elements like work experience, education, and training – activities for which stipends can concurrently be provided.  **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 participating in one or more of the following WIOA Title I-B youth program element activities**  YES, no issues identified  Tutoring, study skills training, instruction, and dropout recovery  Alternative secondary school services or dropout recovery services  **Unpaid** work experience  Occupational Skills training  Education offered concurrently with Workforce Preparation and training for a specific occupation  Leadership development opportunities  Adult mentoring  Adult mentoring (in follow-up)  Comprehensive guidance and counseling  Financial Literacy education  Financial Literacy education (in follow-up)  Entrepreneurial skills training  Services that provide labor market information  Services that provide labor market information (in follow-up)  Post-Secondary preparation and transition activities  Post-Secondary preparation and transition activities (in follow-up)  ☐ NO, could not locate  **Stipend payments were tracked and documented separately from incentive payments:**  YES, no issues identified  NO, unable to validate  **Fiscal review of Direct participant costs:**  **Expenditures were reasonable, allowable, and allocable:**  YES, no issues identified  NO, on one or more issue  **Expenditures were the correct amounts across the stipend payments, voucher and/or supporting documentation and general ledger:**  YES, no issues identified  NO, on one or more issue    **Expenditures did not exceed approved amounts and were within local policy:**  YES, no issues identified  NO, on one or more issue  **Expenditures were charged to the correct programs:**  YES, no issues identified  NO, on one or more issue | No Issues Identified  Items to Address  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **Mentoring**  *-Program Element 8*  **MIS:**  **WIN 0077, Change 15; 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 Chg.1 and WIN 0077, Change 15:**  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 |
| **Youth Guidance & Counseling**  *-Program Element 9*  **MIS:**  **WIN 0077, Change 15; 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.  **Definitions**  **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.**  **TEGL 09-22**  In reviewing reporting data, ETA observed that many states may not be accurately reporting the comprehensive guidance and counseling program element. For example, in the most recent data reported, five states report 100 percent of participants receive this program element, two additional states report over 90 percent of participants receive this program element, and three more report over 70 percent as receiving comprehensive guidance and counseling. It appears some states report certain program services as comprehensive guidance and counseling that should be categorized in other program elements, or they are reporting general case management as comprehensive guidance and counseling. As stated in TEGL 21-16, case management is the act of connecting youth to appropriate services and is not considered a program element.  Another program element that often is misreported as comprehensive guidance and counseling is the program element entitled “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.” As discussed in TEGL 21-16, 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. This type of career counseling, often provided by a case manager, should be reported as the “services that provide labor market information” program element and should not be reported as the comprehensive guidance and counseling program element. | 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 |

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| **Financial Literacy Education**  *-Program Element 10*  **MIS:**  **WIN 0077, Change 15; 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.  **Definitions**  **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 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 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:** [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 |
| **Entrepreneurial Skills Training**  *-Program Element 11*  **MIS:**  **WIN 0077, Change 15; 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.  **Definitions**  **20 CFR 681.560:** Entrepreneurial skills training provides the basics of starting and operating a small business. 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 12*  **MIS:**  **WIN 0077, Change 15; 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**.  **Definitions**  **TEGL 21-16 Chg.1:** 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 13*  **MIS:**  **WIN 0077, Change 15; 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:  **(a)** assisting youth to prepare for SAT/ACT testing; **(b)** assisting with college admission applications,  **(c)** searching and applying for scholarships and grants,  **(d)** filling out the proper Financial Aid applications and adhering to changing guidelines; and  **(e)** 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 provided via email from Carri Callaghan on 8-11-23:  *Create a new Tests and Results Touchpoint (TP), if the job seeker has a pre-test Tests and Results (TP).*  **On the Record Type Tab:**   * + - Select “Tests and Results” from the Record Type drop down.   **On the Tests and Results Tab:**   * + - Select the appropriate program from the Associated Program Enrollment drop down.     - Select the “Post Test” radio button.     - Select the appropriate category from the Assessment Category drop down.     - Select a date from the Test Date field.   \*For the post-test to count as an MSG it must take place on or after the pre-test, in the same participation episode.  It also must take place during the reporting period.   * + - Select an appropriate functional area from the Functional Area drop down.   \*For the post-test to count as an MSG, it must have the same functional area as the pre-test.   * + - Select an appropriate level from the Educational Functioning Level drop down.   \*For the post-test to count as an MSG, it must have a higher level than the pre-test.  **-OR-**  For Credential Attainments for Secondary School Diploma/or equivalency to be counted for Measurable Skill Gains it does not need to be entered into the system outside of the normal process, see DOL Credential Attainment Performance Measure (PM) Statewide Data Analysis document for more information.  **-OR-**  *Create a Transcript/Report Card on the Test and Results Touchpoint (TP)*  **On Record Type Tab:**   * + - Select “Report Card or Transcript” from the Record Type drop down.   **On Report or Transcript Tab:**   * + - Select the appropriate program enrollment from the Associated Program Enrollment drop down.     - Enter an appropriate date in the Date of Report Card or Transcript field.     - Select the appropriate school type from Secondary or Postsecondary drop down.     - If the school type is “Postsecondary School” enter the appropriate response in the How many credits/units did the participant complete? field.     - Select the appropriate Radio Button on the Does the transcript or report card meet the state unit’s academic standards?   **-OR-**  *Create a Training Milestone on the Test and Results Touchpoint (TP)*  **On Record Type Tab:**   * + - Select “Progress Report” from the Record Type drop down.     - Select the appropriate program enrollment from the Associated Program Enrollment drop down.     - Select the appropriate progress report type, either “Apprenticeship” or “OJT” from the Progress Report Type drop down.     - Enter an appropriate date in the Date of Progress Report field.     - Select the appropriate response for the Is the progress satisfactory? radio button.   **-OR-**  *Create a Skills Progression on the Test and Results Touchpoint (TP)*  **On Record Type Tab:**   * + - Select “Progress Report” from the Record Type drop down.   **On Progress Report Tab:**   * + - Select the appropriate program enrollment from the Associated Program Enrollment drop down.     - Select “Skills Progression” from Progress Report Type drop down.     - Enter an appropriate date in the Date of Progress Report field.     - Select the appropriate response for the Did the participant successfully pass an exam that is required for a particular occupation, or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams? radio button.     - Select the appropriate response for the “Is the progress satisfactory?” radio button.   Skill gains should be counted using the *date on which they occur*, not the date on which they are recorded, or documentation is received.  **ESD Policy 1020, Rev. 1**   * + The State has established the academic standards as a grade of “C” or better. | 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**:  *(ESD Policy 1003, Rev. 5; DOL ETA PIRL 9172))*  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 ESD Policy 1020, Rev. 1)* **is recorded in MIS** and **validated by one of the following:** *(ESD Policy 1003, Rev.5; DOL ETA PIRL 9172)*  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 ESD Policy 1020, Rev. 1)***is recorded in MIS** and **validated by one of the following:** *(ESD Policy 1003, Rev.5, DOL ETA PIRL 9172)*  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:** *(ESD Policy 1003, Rev. 5)*  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: *((ESD Policy 1003, Rev. 5); DOL ETA PIRL 9172)*  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 correctly 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); ESD Policy 1020, Rev. 1)*  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  Questioned Cost  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’s degree   + Bachelor’s degree   + Graduate degree for purposes of the VR program   + Occupational licensure   + Occupational certificate, including Registered Apprenticeship and Career and Technical Education educational certificates   + Occupational certification   + Other recognized certificates of industry/ occupational skills completion sufficient to qualify for entry-level or advancement in employment.   **Certificates/Credentials NOT Included**  **ESD Policy 1020, Rev. 1 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   + Proof of employment held subsequent to training   + Certificates of completion for short-term prevocational services   + Completion of programs provided by institutions and training organizations not licensed by WTECB or an equivalent state regulatory agency or trade association in cases where the institution or training provider is not eligible to provide recognized postsecondary credentials as described above.   **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:**  YES, Documented on one of the following *(ESD Policy 1003, Rev. 5)*  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 9172)*  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:** *(ESD Policy 1020, Rev. 1)*  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  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |

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| **8. PROGRAM COMPLETION** | | | |
| **Date and Reason for Program Exit**  **Exit**  **ESD Policy 1020, Rev. 1 Handbook:**  “Exit” refers to a participant who has not received a qualifying service funded by any qualifying program in the WorkSource system for 90 consecutive calendar days and is not scheduled to receive future qualifying services.  **20 CFR 677.150(c)(1):**   * + **Exit** is the last day of service.   **ETA 9172 (PIRL):**  The last date the participant received services that are not self-service, information-only, or follow-up services.  And only if there are no future services that are not self-service, information-only or follow-up services, planned from the program.  **Other Reasons for Exit / Exclusions from Performance**  **ESD Policy 1020, Rev 1 Handbook**:  Exclusions from performance measures should only be used in rare circumstances. Only participants who have one of the following reasons are excluded from all performance measures:   * + Institutionalized;   + Health/Medical;   + Deceased (the only exclusion that can be linked to non-participants)   + Reserve Forces Called to Active Duty;   + Foster Care (Youth only);   + Criminal Offender;   The “Deceased” category is the only category that can be counted through the fourth quarter after exit.  **Program Completion**  **ESD Policy 1020, Rev 1 Handbook**:   * + The program completion date is the date of the final program-funded participation-level service. This date is entered into ETO by staff.   + Note: Individuals who have completed program participation enter a follow-up period to support their continued success (see Section 2.3.5 for youth and Section 3.1 for adults and dislocated workers). However, if at any time they return in the 90-day period, they must be provided participation-level services as needed.   + Note: “Program completion” should not be confused with system exit since completion of one program does not necessarily mean the participant has reached a true exit. | N/A, there is evidence the participant has not existed the program  **file review:**  **Date of program exit is documented in the file:**  YES, Validated by one of the following: *(ESD Policy 1003, Rev. 5*  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: *(****ESD Policy 1003, Rev. 5****)***  N/A  YES, Validated by one of the following: *(ESD Policy 1003, Rev. 5*  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: *(****ESD Policy 1020, Rev. 1)****)***  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  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **School Status at Program Completion**  **MIS Documentation Requirements**  **ESD Policy 1020, Rev. 1**  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:**  YES, and validated by one of the following: (ESD Policy 1003, Rev. 5)  Crossmatch 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 issues identified | No Issues Identified  Items to Address  Questioned Cost  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  **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; ESD Policy 1003, Rev. 5)*  YES, Validated by one of the following:  *(Federal Register Vol. 80, No. 140; ESD Policy 1003, Rev 5)*  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  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **9. FOLLOW-UP SERVICES** *-Program Element 14* | | | |
| **MIS:**  **WIN 0077, Change 15; WorkSource Service Catalog:**   * + ***Financial Literacy in Follow-up, effective budgeting and spending, etc.*** (Youth Only)   + ***Labor Market Information Services in Follow-up*** ***(2.0)*** (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 Chg.1:** 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 Chg.1**:   * + **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.*   **TEGL 09-22**  Follow-up Services and Mentoring Reporting:  While both program elements require their provision for a minimum of 12 months, it is not necessary to wait until a participant receives these services for the full 12 months prior to reporting them | **Youth was informed of Follow-up services at the time of enrollment:** *[20 CFR 681.580(c) and TEGL 21-16 Chg.1]*  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 Chg.1)*  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:**  **Services provided to the participant *(as documented in case notes or other documentation in the file*) are correctly recorded in MIS*:*** *(20 CFR 677.235; WIN 0082 Chg. 1)*  N/A, no evidence follow-up services were provided  YES, no issues identified  NO, one or more service is not recorded in MIS  NO, one or more service incorrectly recorded in MIS  **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, issues 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 INTEGRITY** | | | |
| **MIS**  **Reporting/MIS DATA Entry Requirements**  **WIN 0082 Chg. 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, Rev 1:** All services **must** be linked to an Active Program Enrollment.  **ESD Policy 1020, Rev. 1**   * + 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:**  **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 Chg. 1)*  YES, no issues identified  NO, One or More issues Identified  **Services are assigned to the appropriate program:** *(20 CFR 677.160)*  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 Chg. 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 Chg. 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 Chg. 1)*  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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| **Case Notes**  **DOL Definition**  **ESD Policy 1003, Rev. 5**: 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.   **Confidential Information**  **ESD Policy 1020 Rev. 1 Handbook:**  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.* | **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  Questioned Cost  Data Validation Issues  Observation | No Action Required  Action Required  Recommendation |
| **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”  **Confidential Information**  **WIN 0023, Change 2**  Medical and disability-related documents must be secured and maintained in a separate and confidential customer file. Medical and disability files should be stored as a medical record, and must be separate from all other confidential information (e.g. court documents). Each customer’s medical file should be separate (ie; medical information for multiple customers should not be kept in the same file). Medical and disability-related information contained in case notes, assessment forms, or other documentation in the Management Information System (MIS) must be secured in a separate and confidential medical file. This is accomplished by copying the specific sheet of the case note file, assessment form or language in the MIS that contains medical or disability related information, placing it in a separate medical and disability file, then redacting the medical and disability-related information in the case notes, assessment form or language in the MIS and inserting ‘See separate confidential file’. | N/A  Items to Address  Observation | No Action Required  Action Required  Recommendation | |