



Workforce Innovation and Opportunity Act (WIOA) Policies and Procedures

ETO Participant File Documentation Policy & Procedures

POLICY NUMBER: 1011

EFFECTIVE DATE: 12-4-2020

Supersedes: N/A

PURPOSE:

This policy communicates WorkForce Central's requirements for uploading WIOA program participant documentation into Washington State's Management Information System (MIS), known as "Efforts to Outcomes" and commonly referred to as "ETO".

BACKGROUND:

Beginning in Program Year 2020 (PY20), WorkForce Central's WIOA Young Adult, Adult, and Dislocated Worker program service providers will be transitioning from paper participant records (hard files) to electronic participant records (ETO).

POLICY:

Service providers must transition from paper (hard) participant files to a virtual case management system by following the procedures outlined in this policy.

PROCEDURES:

1. Scanning and Shredding Requirements

Reference: [WA State Archives "Requirements for Destruction of Non-archival Paper Records after Imaging"](#)

A. Scanning Requirements:

- Documents must be uploaded into ETO within seven (7) calendar days of receipt.
- **All documents uploaded into ETO must be complete and accurate copies of the original records and be legible.**
- Black and white documents containing fonts no smaller than 6-point, grayscale, and color records must be scanned with a resolution of at least 300 dpi.

B. Shredding documents after scanning:

- Documents meeting the scanning requirements listed above may be shredded after scanning.

C. Provider Quality Control Responsibilities:

- Providers must have written quality control procedures and work instructions to ensure a consistent capture of complete and accurate copies of original records; ensure uploads are accurate and legible.
- Providers must train all staff with scanning responsibilities to ensure they adhere to these requirements and procedures.

2. Eligibility & Enrollment Documentation

A. **All WIOA Participants:** The following documents must be uploaded into ETO for all WIOA enrolled participants in the following sequence:

- **WIOA Registration:**

- ✓ **Upload to ETO:**

- 1) Upload the document to the “Uploaded Files” touchpoint and title it “*WIOA Registration Form*”, and
- 2) Cite location of the WIOA Registration Form in case notes.

- **Program Eligibility:** Supporting source documentation for program-specific data elements must be in compliance with WFC’s WIOA Adult, Dislocated Worker and Youth: Eligibility & Documentation Policy Handbook located on WFC’s website.

- ✓ **Upload to ETO:**

- 1) Open the “Demographics” tab in the WIOA Eligibility Application touchpoint and upload each document in the appropriate field.
- 2) Title the documents what they are and what eligibility criteria the document is being used for. For example:
 - When uploading an ID to verify age, title the document, “*ID-Age Verification*”.
 - If uploading an ID and SS card for verification to work in the U.S., title the document, “*I-9 Verification*”.

- **Pierce County and/or City of Tacoma residency:**

- ✓ **Upload to ETO:**

- 1) Cite the documentation used to verify residency in case notes and direct the reader to the specific WIOA Eligibility Touch Point to locate the documentation.
- 2) If documentation for eligibility purposes is also being used to verify residency, add “*verification of residency*” to the title of the document when uploading the document in the WIOA Eligibility Application Touch Point.
 - For example, if a picture ID was used to verify age and/or eligibility to work in the U.S. and it was also used to verify residency, the title of the document would be, “*ID, Verifying age/eligibility to work in U.S. and residency*”.
- 3) If using a utility bill or other document not utilized to verify eligibility:
 - Upload the document to an “Uploaded Files” Touch Point.
 - Title the document, “*Verification of Residency*”.

- **Equal Opportunity-Notice of Right to File a Discrimination Complaint:**

- ✓ **Upload to ETO:**

- 1) Upload the document to an “Uploaded Files” Touch Point.
- 2) Title the document, “*EO Notice*”.

- **Authorization to Release Confidential Information:**

- ✓ **Upload to ETO:**

- 1) Upload the document to the “Uploaded Files” Touch Point.
- 2) Title the document, “*Authorization to Release Confidential Information*”.

B. **WIOA Young Adult Participants:** The following documents must be uploaded into ETO for all WIOA enrolled Young Adult program participants:

- **Education status at program enrollment:**

- ✓ **Upload to ETO:**

- 1) Open the “Demographics” tab in the WIOA Eligibility Application touchpoint and upload the documentation used to verify school status at participation.

- 2) If not using self-attestation, upload applicable records from education institution (GED certificate, diploma, attendance record, transcripts, dropout letter, school documentation).
- 3) Title the document what it is. For example, if uploading a dropout letter, title the document, *“OSY verification, dropout letter”*.

- **Objective Assessment:**

- ✓ **Upload to ETO:**

- 1) Upload to the “Individual Participant Plan” tab.
- 2) Title the document, *“Objective Assessment”*.

- **Individual Service Strategy (ISS):**

- ✓ **Upload to ETO:**

- 1) Upload to the “Individual Participant Plan” tab.
- 2) Title the document, *“ISS”*.

C. **WIOA Adult & Dislocated Worker Participants:** The following documents must be uploaded into ETO for all WIOA enrolled Adult and Dislocated Worker program participants:

- **Employment status at program enrollment:**

- 1) Record employment status at enrollment in case notes.

- **Comprehensive Assessment, to include self-sufficiency calculator:**

- ✓ **Upload to ETO:**

- 1) Upload to the “Individual Participant Plan” tab.
- 2) Title the document, *“Comprehensive Assessment”*.

- **Individual Employment Plan (IEP):**

- ✓ **Upload to ETO:**

- 1) Upload to the “Individual Participant Plan” tab.
- 2) Title the document, *“IEP”*.

- **Veteran status at program enrollment, if applicable:**

- ✓ **Upload to ETO:**

- 1) Upload to Veteran demographics tab in the WIOA Eligibility Application touchpoint in ETO.
- 2) Title the document, *“Veteran Status”*.

3. Services

Supporting documentation for the following services must be uploaded in the applicable service touchpoint recorded in ETO and **in the sequence listed**:

A. Supportive Services Touchpoint:

- ✓ **Upload to ETO:**

- 1) **Approved supportive service request form or voucher:**

- Title the document, *“SS Request”*.

- 2) **Participant’s current budget for the first supportive service request and as needed for future services:**

- Title the document, *“Current Budget”*.
- If additional supportive services are requested and the participant’s budget has not changed, uploading a new budget in the subsequent supportive service touchpoints will not be necessary. However, the reason for not uploading a new budget must be documented in case notes.

- 3) **Up-to-date supportive service tracking log:**

- Title the document, *“SS Tracking Log”*.

- 4) **Copies of supporting documentation**, including itemized receipts, as described in WFC “WIOA Adult, Dislocated Worker & Youth Supportive Service Policy & Procedures”:
- Title the document what it is. Examples:
 - For a receipt, title it, “*Receipt*”.
 - For a bus pass, title it, “*Bus Pass*”.
 - For utility bill, title it, “*Utility Bill*”.

B. WEX Touchpoint:

- 1) **Record Case notes** that:
 - Outline how the WEX aligns with the participant’s employment and training goals as documented on their ISS/IEP.
 - Updates on participant’s progress and outcomes of the WEX activity.
 - Educational and occupational skills portion of the WEX (Young Adults only).
- ✓ **Upload to ETO:**
 - 2) **WEX Contracts**, including modifications, signed by all parties:
 - Title the documents, “*WEX Host Site Contract*” and “*WEX Intern Contract*”.
 - 3) **Mid-Evaluation Forms:**
 - Title the documents, “*Mid-WEX Evaluation*”.
 - 4) **Timecards/time sheets:**
 - Title each timecard with the pay period. For example, “*Timecard 7/1/20-7/15/20*”.
 - 5) **Paystubs/record of payment** (e.g., ADP):
 - Title each paystub/record of payment, “*Pay Record 7-16-20*” (pay date).
 - 6) **Final Evaluation:**
 - Title the final evaluation, “*Final WEX Evaluation*”.

C. OJT Touchpoint:

- ✓ **Upload to ETO:**
 - 1) **OJT Contract**, including how the reimbursement rate was determined and modifications, signed by all parties:
 - Title original agreement, “*OJT Contract*”.
 - Title modifications, “*OJT Mod 1, or 2, etc.*”.
 - 2) **Learning plan**, completed prior to the start of the OJT:
 - Title the document, “*Learning Plan*”.
 - 3) **Job description and related DOL/O*NET reports** to support training duration and skills to be learned:
 - Title the document, “*Job Description*”.
 - 4) **OJT evaluations/Trainee progress reports:**
 - Title the document, “*Trainee Progress Report*”.
 - 5) **Results of onsite employer monitoring reviews** (could be documented in case notes):
 - Title the document or case note, “*OJT Onsite Monitoring*”.
 - 6) **OJT reimbursement invoice and supporting documentation** to include timecards:
 - Title document, “*OJT Invoice Packet*”.

D. Occupational Skills Training Touchpoint:

- ✓ **Upload to ETO:**
 - 1) **Evidence** the selected program of study will result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment.
 - Title the document and/or case notes: “*Training will lead to Self-sufficiency*”.
 - 2) **Evidence** the selected training program is directly linked to an in-demand industry sector or occupation or sectors that have a high potential of sustained demand or growth in the local area or in the planning region or in another area in which the participant is willing to travel or relocate.
 - Title the document: “*Occupation In-Demand*”.

- 3) If applicable, documentation of the **participant's willingness and ability to travel** or relocate to locations outside of Pierce County if the selected training program and/or demand occupation is outside of Pierce County must be documented in case notes and on the IEP/ISS.
 - Title the case note: *"Willing to travel/relocate outside PC"*.
- 4) **Evidence** the participant is unable to obtain financial assistance from other sources to pay the costs of training or require assistance beyond available grant resources from other sources, such as Pell Grants in order to complete their training goals.
 - Title the document or case note: *"No other financial assistance available"*.
- 5) **Verification** of FAFSA or other financial award status, if applicable.
 - Title of document: *"Financial Award Documentation"*.
- 6) **Evidence** the selected training program is on the Eligible Training Provider List (ETPL).
 - Title of document: *"ETPL"*.
- 7) **Authorization of the ITA** and any approved increase or modification.
 - Title of document: *"ITA Voucher"*.
- 8) **Copies of transcripts**, grades, progress reports or other documentation providing evidence of the participant's satisfactory progress in training.
 - Title of document: *"Progress Report"*.
- 9) **Training outcome**. This includes:
 - If applicable, reason for the participant's discontinuation of training and the change in service delivery as a result of this decision.
 - Copy of degree, certificate or other evidence of satisfactory completion of training
 - Title of document and case notes: *"Training Outcome"*.

4. Date & Reason for Program Completion

The following procedures must be followed for recording and documenting a participant's program completion in ETO:

A. For Young Adults who are completing the program as a result of enrollment into post-secondary education:

✓ **Upload to ETO:**

- 1) Create Outcomes and Completion TouchPoint
- 2) Upload enrollment paperwork/school records/other formal communication (e.g. email) from school.
 - Title of document and title of case notes: *"Post-secondary enrollment"*.

B. For any participant completing the program due to obtaining unsubsidized employment:

✓ **Upload to ETO:**

- 1) Create Outcomes and Completion TouchPoint and upload:
- 2) **Self-sufficiency calculator** printout showing evidence the employment will provide the participant a self-sufficient wage, or
- 3) **Evidence the new job** provides comparable income to previous employment, if applicable, and
- 4) **Record a case note** documenting the following:
 - Name of employer,
 - Job title,
 - Wage,
 - Full-time or part-time status,
 - Start date, and
 - Whether the new job meets the participant's self-sufficiency needs or is comparable to previous employment, if applicable.
 - Title the uploaded document and case note *"UE"*.

C. Other reason for exit:

- 1) **Record a case note** describing reason for exit.

5. Performance Measures

The following procedures must be followed for uploading Measurable Skill Gains and Credentials earned:

A. Open the Test and Results Touchpoint:

✓ Upload to ETO:

- 1) Transcript, or other applicable documentation.
 - Title the document and the correlating case note “MSG” or “Credential”.

6. Follow-up – Young Adults Only

The only documentation that must be uploaded during follow-up is for Young Adults who receive a supportive service. There are no other documentation uploading requirements for services provided during follow-up.

A. Create Supportive Services Touchpoint in Follow-up

B. In the Uploaded Files Touchpoint:

✓ Upload to ETO:

- 1) **Approved supportive service request form**
 - Title the document, “*Follow-up SS Request*”.
- 2) **Participant’s current budget for the first supportive service request and as needed for future services:**
 - Title the document, “*Current budget*”.
 - If additional supportive services are requested and the participant’s budget has not changed, uploading a new budget in the subsequent supportive service touchpoints will not be necessary. However, the reason for not uploading a new budget must be documented in case notes.
- 3) **Up-to-date supportive service tracking log:**
 - Title the document, “*SS Tracking Log*”.
- 4) **Copies of supporting documentation**, including itemized receipts, as described in WFC “WIOA Adult, Dislocated Worker & Youth Supportive Service Policy & Procedures”.
 - Title the document what it is. Examples:
 - For a receipt, title it, “*Receipt*”.
 - For a bus pass, title it, “*Bus pass*”.
 - For utility bill, title it, “*Utility bill*”.

7. Confidential Information

Case notes and other documentation containing confidential information, such as medical information, must be kept in a secure location apart from the participant’s regular program file. To ensure compliance with this requirement in ETO:

A. Create a new Confidential Case Note Touch Point:

✓ Upload to ETO:

- 1) Upload confidential document or record a confidential case note.
 - It is recommended confidential information that is not relevant to the participant’s eligibility or service delivery be protected by crossing out the information using a black pen.
- 2) Document in case notes where the confidential information is uploaded or recorded in ETO.

8. Miscellaneous Documents

All other documentation relevant to the participant's enrollment and/or service delivery strategy but not applicable to any of the situations noted above in this policy:

A. In the Uploaded Files Touch Point:

✓ **Upload to ETO:**

- 1) Upload applicable documentation.
- 2) Record in a case note the purpose of the document and where to locate it in the participant's ETO record.

Approved:

Katie Condit

12/4/2020

[Katie Condit \(Dec 4, 2020 08:59 PST\)](#)

WorkForce Central CEO

Date

EQUAL OPPORTUNITY – EQUAL ACCESS

WorkForce Central is an equal opportunity employer/program. Auxiliary aids and services are available upon request for individuals with disabilities.
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