ETO Data Validation and Documentation Policy

Policy Number: P-1011, Rev. 2

Revision Date: December 21, 2021

Supersedes: ETO Participant File Documentation Policy & Procedures, effective 9-15-21 and previous WorkForce Central Case Note policies and/or procedures

PURPOSE

This policy communicates WorkForce Central's WIOA Title I program data validation requirements and provides instruction for the uploading of source documentation pertinent to the eligibility determination, program enrollment, delivery of services, and performance outcomes of WIOA Title I enrolled individuals into Washington State's Management Information System (MIS), known as "Efforts to Outcomes" and commonly referred to as "ETO".

This policy was revised to:

- Include potential consequences for repeated and/or ongoing failure to record accurate and timely data to the Department of Labor through ETO.
- Include a new section describing minimum case note requirements.
- Update data validation source documentation for the following WIOA Title I Youth (Young Adult) program services:
  - Tutoring, Study Skills Training Instruction and Drop-out Prevention
  - Job Shadow
  - Pre-Apprenticeship
- Include reporting and source data validation requirements for date enrolled in training and start date of training.
- Include a new section for reporting and collecting source documentation for employment and credential performance measures earned after exit

BACKGROUND

As a recipient of WIOA Title I funding, WorkForce Central and it's WIOA Title I funded service providers are required to maintain and report accurate and reliable program and financial information to the Department of Labor (DOL). Data validation requires the Washington State Employment Security Department (ESD), WorkForce Central, and WIOA Title I service providers to ascertain the validity, accuracy, and reliability of participant data submitted to DOL, as set forth in Section 166 of the Workforce Innovation and Opportunity Act (WIOA). DOL, ESD, and WorkForce Central will monitor for compliance with the data validation requirements set forth in TEGL 23-19, ESD Policy 1003, Rev. 2, and this policy.

In addition, modern time saving and cost cutting business practices, and virtual work environments embrace the elimination of paper "hard files" for storing participant source documentation used in the data validation process. Case management and compliance oversight is most efficient when source documentation is stored in a common and secure virtual database. Common virtual case file documentation practices across WIOA Title I programs ensures consistency, increases accuracy, and contributes to lean practices.

POLICY

It is WorkForce Central's policy to ensure, to the maximum extent feasible, the accuracy of the data entered by WIOA Title I providers into ETO. WorkForce Central's WIOA Title I funded service providers must upload and record all source documentation and case notes related to the demographics, eligibility determination, program enrollment, provision of services, and outcomes of WIOA Title I enrolled individuals into ETO as outlined in this policy. Source documentation for required data elements are located in TEGL 23-19, Attachment II, and ESD's Policy 1003, Rev. 2, Attachment B.

WorkForce Central will conduct ongoing reviews of ETO records to ensure compliance with this policy and to validate the accuracy of information recorded in ETO. ETO reviews may include but are not limited to desktop review of ETO records and the review of ETO reports. WorkForce Central's WIOA Title I funded service providers are required to conduct similar ongoing review of ETO records and ETO reports to ensure compliance with this policy and to validate the accuracy of information recorded in ETO. Errors identified by service providers and WorkForce Central must be resolved immediately. WorkForce Central will assist providers in correcting errors identified in ETO as needed and will provide ongoing training and technical assistance as appropriate, but not less frequently than on an annual basis. Repeated and/or ongoing failure to record accurate and timely data to the Department of Labor through ETO may result in WorkForce Central placing the service provider in a corrective action plan, reallocating funds, or suspension or termination of the provider's WIOA Title I contract.

To ensure consistency and accuracy of the uploading of data validation source documentation into ETO across all WIOA Title I programs in Pierce County, WorkForce Central's WIOA Title I service providers are required to comply with the following procedures when recording services and other data, uploading documents, and recording case notes into ETO records.

Providers are authorized to upload documents in addition to those referenced in this policy. Providers must ensure a consistent naming convention and consistent ETO filing system for these additional documents.

A. TIMELINE FOR ETO DATA ENTRY, UPLOADING DOCUMENTS, AND RECORDING CASE NOTES

Real time and accurate ETO data entries are imperative. DOL requires the collection and reporting of *"accurate and timely information about individuals who receive services through programs authorized under the law"* (20 CFR WIOA Joint Rule, Department's response on page 55793) and further describes the states' responsibilities for ensuring valid and reliable data collection in 20 CFR 677.240. ESD's policy 1003, Rev. 2 (and subsequent revisions) and WIN 0082, Rev. 1 (and subsequent revisions) describe the state's requirement for data validation and timely ETO data entry requirements.

ESD's WorkSource Service Catalog, located at ESD's Workforce Professionals Center website, Technology tab is the source of all qualifying services. Service providers are required to review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained. Services must be attached to the correct program of enrollment, align with the objectives, outcomes and deliverables associated with the program of enrollment and that of the individual's employment and training goals, and be documented in case notes. Case notes must support the data recorded in ETO including the demographics, eligibility, services provided, and outcomes of services for individuals enrolled in WIOA Title I programs.

WIOA Title I service providers must record services, upload supporting data validation source documentation, and record case notes corroborating participant eligibility determination, program enrollment, services provided, and outcomes of services in real time. If real time data entry is not possible, service providers have seven (7) calendar days to record services, upload applicable documentation, and record case notes. Dates of services recorded in ETO must reflect the date of the actual service.

If services are entered beyond the 7-day allotted timeframe, the reason for the late entry must be recorded in case notes. The Department Head assigned to each Service Provider must document in case notes the service that was recorded late, the reason for the late entry, and that the Department Head reviewed and approved the late entry. Department Head case note requirements are not applicable for all other late ETO entries or corrections to an ETO record. The reason for all other late entries or corrections to an ETO record must be documented in case notes and can be recorded by the case manager.

WorkForce Central and ESD will monitor ETO and case notes to ensure compliance with these requirements.

B. CASE NOTES

Case notes are a required method of documenting WIOA Title I funded services and represent the essential elements of WIOA Title I program service delivery. Case notes create a historical record of service delivery and are a compliance record for risk management and cost allowances. As such, case notes must be recorded in each of the service touchpoints recorded in ETO, and as standalone case notes when applicable, as described in this policy.

Recording case notes are also critical because they weave each service element provided to an individual enrolled in WIOA Title I programs into a comprehensive service plan. Case notes provide a complete, accurate, and concise explanation of frequency and type of contact with individuals enrolled in WIOA Title I program, including the type of services provided and the outcomes associated with those services. Case notes are a tool to help service providers organize and analyze the information and plan appropriate case management strategies.

It is imperative that WorkForce Central, it’s WIOA Title I service providers, one-stop partners, federal, state, and local monitors, and auditors be able to recognize and discern each service and expenditure provided to and made on behalf of a WIOA Title I enrolled individual.

Case notes create a paper trail should questions arise about how WIOA Title I services were provided and are considered legal documents that may be subpoenaed by the courts or disclosed through public records requests. Case notes are also used to represent WorkForce Central’s WIOA Title I activities and compliance with federal, state, and local policies. Case notes are subject to DOL, ESD, and WorkForce Central monitoring and data validation reviews.

Case notes recorded in ETO must not contain confidential medical information, see ESD WIN 0023.

Detailed, accurate, and up-to-date case notes are important for the following reasons (this list is not intended to be an exhaustive or exclusive list):

- If a change in WIOA Title I service provider occurs, and/or the original case manager leaves their position and a new case manager is assigned. The new case manager should be able to follow the story of why an individual was enrolled, services that were planned, services that have been provided, and current status of the enrolled individual.
- In the event management needs access to information pertaining to the services provided to the individual.
- WIOA Title I funded activities are subject to program monitoring, fiscal auditing, data validation reviews, and other compliance oversight by DOL, ESD, State Auditor; WorkForce Central, and other contract and fiscal monitors who must have access to information pertaining to the services provided to WIOA Title I enrolled individuals in order to evaluate the effectiveness of the services provided, appropriateness of funds spent, and assure conformance to governing laws, regulations and policies.
- Case notes are heavily relied on for data validation purposes. Detailed examination of case notes will provide justification and documentation for actions taken and may provide evidence for which physical documentation is not available.
- ETO records with limited, incomplete, or missing case notes may contribute to disallowed costs.
- The participant record may be requested by the participant, subpoenaed by the legal system or through public records disclosure.

Case notes must be entered into ETO and should provide substantial detail about the individual's eligibility, services planned, services provided, and service outcomes. For data validation purposes, case notes documenting the dates of services and activities such as program enrollment, service delivery, service outcomes, and program completion must match the dates recorded into ETO.

Case notes must be factual and not contain opinions, derogatory statements, or diagnoses for which the case manager is not qualified to make.

Case notes must not contain information identifying other program participants

The frequency of case note documentation is determined by the intensity of the service delivery plan. However, the minimum expectation for case note documentation is once per calendar month while the individual is actively engaged in the program.

When an individual's WIOA Title I enrollment record is transferred from one case manager to another case manager, or to a new service provider, the case notes should reflect the date the file was transferred and to whom.

When an individual's WIOA Title I enrollment record is transferred from one Workforce Development Area (WDA) to another, case notes should provide details about why and when the file is transferred and include the name(s) and contact information of the previous service provider(s).

C. UPLOADING & RECORDING PROGRAM ELIGIBILITY AND ENROLLMENT SOURCE DOCUMENTATION

Supporting source documentation for program-specific eligibility data elements and program enrollment must be in compliance with WorkForce Central's WIOA Program Eligibility, Enrollment & Documentation Policy Handbook, located at [WorkForce Central's Policy Library]() and with [ESD Policy 1003, Rev. 3, Attachment B]().

a. **All WIOA Title I Programs:** The following must be uploaded and/or recorded into ETO for all WIOA Title I enrolled individuals **in the sequence listed below**:

   I. <u>A completed and signed paper or ETO WIOA Application/Registration Form:</u> If using a paper WIOA Application/Registration form:
      i. Upload the document to the "Uploaded Files' touchpoint in ETO.
      ii. Title the document, "*WIOA Registration Form".*
      iii. Cite the location of the WIOA Application/Registration form in the program enrollment case notes located in the ETO WIOA Eligibility touchpoint.

   II. <u>Pierce County or City of Tacoma Residency:</u> Pierce County and City of Tacoma residents receive priority for enrollment into WorkForce Central's the WIOA Title I programs. Non-Pierce County residents may be enrolled on a case-by-case only if approved by WorkForce Central Contract Manager or designee. Enrollment of non-Pierce County residents will require coordination with the Workforce Development Council (WDC) of residency. Management approval and coordination with the WDC of residency must be documented in case notes recorded in ETO.
      i. Cite the documentation used to verify residency in case notes and direct the reader to the specific ETO touchpoint to locate the documents (e.g., WIOA Eligibility or Uploaded Files touchpoints).
      ii. If documentation for eligibility purposes is also used to verify residency, add, "*verification of residency"* to the title of the document when uploading the document in the WIOA Eligibility Application touchpoint. For example, if a picture ID was used to verify age and/or eligibility to work in the U.S. and the ID was also used to verify residency, titled the document, *"ID, verifying age/eligibility to work in U.S., and residency".*
      iii. If using a utility bill or other document not utilized to verify eligibility, upload the

document to the "Uploaded Files" touchpoint and title the document, *"Verification of Residency".*

III. <u>Program Eligibility</u>:

   i. Open the "Demographics" tab in the ETO WIOA Eligibility Application touchpoint. Every demographic radial button on the ETO WIOA Eligibility Application touchpoint must be answered. Upload the applicable source documentation used to validate the participant's demographics and eligibility criteria into the appropriate field.

   ii. There are a variety of source documents authorized to validate eligibility. The key is titling the document what it is and what the specific eligibility criteria the document is validating. For example:

      a. When uploading an ID to verify age (Youth and Adult only), title the document, *"ID, Age Verification".*

      b. If uploading an ID and Social Security card to verify the participant is eligible to work in the U.S., title the document, *"I-9 Verification".*

      c. When uploading Selective Service verification, title the document, *"SS Verification".*

      d. For Basic Skills Deficiency (Youth and Adult Priority of Services 1 and 2 only) source documentation:

         i. CASAS pre-test scores: Title the document, *"BSD-CASAS Scores"*

         ii. School records: Title the document, *"BSD-School Records"*

      e. For English Language Learner (ELL-Youth only) source documentation:

         i. Assessment Test Results: Title the document, *"ELL-Assessment"*

         ii. Applicable Records from Education Institution (i.e., transcripts or other school documentation): Title the document, *"ELL-School Records"*

      f. For low-income verification (Youth and Adult Priority of Service categories 1 and 2):

         i. SNAP: Title the document, *"SNAP"*

         ii. TANF: Title the document, *"TANF"*

         iii. All other low-income verification: Title the document *"Low Income Verification"*

      g. School status at enrollment (Youth Only): When uploading source documentation other than a self-attestation (e.g., paper or ETO WIOA Applications) to verify school status at enrollment such as a GED certificate, High School diploma, attendance record, transcripts, etc., open the "Demographics" tab in the WIOA Eligibility Application touchpoint and upload the source documentation used to verify school status at participation. Title the document what it is such as, *"ISY verification-transcript"* or *"OSY verification-dropout letter".*

      h. When uploading Dislocated Worker program eligibility source documentation, title the document what it is such as, "*Notice of Layoff", "Verification from Employer", "DD-214", "Spouses PCS Orders"*, etc.

      i. Follow the above naming convention protocols for all other eligibility and demographic criteria not specified in this policy.

IV. <u>Required Notifications</u>:

   i. Individuals seeking WIOA Title I program services must be provided the <u>Authorization to Share Confidential Information and Records Form.</u> By signing the form, individuals are attesting they have read and understand how their information will be shared and protected amongst the WorkSource Pierce partnership.

      a. Upload the signed Authorization to Share Confidential Information and Records Form into the "Uploaded Files" touchpoint.

b. Title the Authorization to Share Confidential Information and Records Form, *"Authorization to Share Form".*

ii. Individuals must also be provided the opportunity to sign a statement acknowledging they understand their Equal Opportunity (EO) and Non-Discrimination rights and have received the EO Notice. The EO notice is incorporated in WorkForce Central's Participant Information Form.

a. Upload the signed Participant Information Form into the "Uploaded Files" touchpoint.

b. Title the Program Participant Information Form, *"Participant Info Form and EO Notice".*

b. WIOA Title I Youth (Young Adults) Only:

V. Exception to Low Income Requirement (5% Window): Service providers must receive permission from WorkForce Central to enroll young adults into the ISY program or the OSY program (categories 3 or 9) who otherwise would have to meet the low-income eligibility criteria. The request submitted to WorkForce Central and subsequent approval to enroll must be uploaded into the participant's ETO file and documented in case notes recorded in ETO.

i. Upload the request and approval into the Uploaded Files touchpoint.

ii. Title the documents uploaded into ETO, and the case notes recorded in ETO, *"Low Income Exception-5% Window".*

VI. Objective Assessment (OA): To become a participant in the WIOA Title I Youth (Young Adult) Program, the young adult must first receive an Objective Assessment (OA) followed by the development of an Individual Service Strategy (ISS). Per TEGL 21-16, an OA must include a review of the following for the purpose of identifying appropriate services and career pathways for the WIOA Title I Youth (Young Adult) participants:

- Basic Skills
- Occupational Skills
- Prior work history
- Employability
- Interests
- Aptitudes
- Supportive service needs
- Developmental needs
- Strengths

The OA may be documented in standalone case notes recorded in ETO or on a paper form uploaded into ETO. Ensure the date and type of assessment is documented. Examples of "type of assessment" may be information learned about the individual through interviewing, or outcomes of formal or informal skill/personality/interest assessments, or through other means.

i. If using a paper OA, upload the document into the "Individual Participant Plan" touchpoint in ETO. Title the document, *"Objective Assessment"* or "*OA".* If the document is a combined OA and ISS, title the document, *"OA-ISS".* Ensure the location of the OA is documented in the enrollment case note recorded in the WIOA Eligibility Application touchpoint, Notes tab in ETO.

ii. If recording the OA in standalone case notes only (select Review Seeker/Participant Touchpoints on the participant's dashboard, then select Case Notes, Take New), list each of the OA elements identified above with the result of that specific assessment detailed in the body of the case note, followed by a brief description of the service plan (ISS) created as a result of the assessment. Title the case notes, *"OA-ISS Case Notes".* For example:

Example OA-ISS Case Note 6-1-21:

- ***Basic Skills**: John's most recent report card reflected a failing grade in Literature. He stated he doesn't enjoy writing. Services Planned (ISS): We will schedule a future meeting and develop a plan to address his writing challenges.*
- ***Occupational Skills:** John reported not having any knowledge or skills for a specific occupation. He did however express an interest in learning skills necessary for employment in the construction trades. Services Planned: We will work with John in identifying a WEX opportunity where he will be introduced to some basic construction techniques as well as online research in this industry using these resources: (include list of resources)*
- ***Prior Work Experience**: John does not have any paid work experience but did work alongside his Dad on a few occasions. Services Planned (ISS): We will help John identify a WEX and/or employment opportunities where he can build on his current construction skill sets.*
- ***Employability:** Services Planned (ISS): Based on ABC assessment and not having any prior exposure to work, John may benefit from XYZ activities/services to improve his understanding of the necessary attributes and soft skills that are necessary for obtaining and maintaining employment.*
- For the complete list of example OA-ISS case notes: *Link to Example OA-ISS case notes*

OAs are an ongoing process, continually reviewing the young adult's interests, abilities, needs, etc. throughout the duration of their participation in the WIOA Title I Youth (Young Adult) program. Record a standalone case note every time an assessment is conducted and titled the case note, *"OA Case Note."*

VII. Individual Service Strategy (ISS): The results of the OA are documented on the ISS on a paper document uploaded into ETO or recorded in standalone case notes along with the OA, as noted in the example above.

i. If using a paper ISS, upload the document into the "Individual Participant Plan" tab in ETO. Title the document, *"ISS*". If the document is a combined OA and ISS, title the document, *"OA-ISS".*

ii. If recording the ISS in standalone case notes only, follow the example case notes above when recording the first ISS at enrollment following the first OA. Title the case notes, *"OA-ISS Case Notes".*

iii. As services occur, or as service strategies change, record the activity, the outcome of the activity, reason for changes to the service strategy, new planned services, etc. in case notes. Title the case notes *"ISS Update Case Notes".*

iv. In addition to updating the ISS on an ongoing basis to reflect real-time services and/or changes to the service strategy, the service provider must formally review the ISS with the participant on a quarterly basis and update the ISS accordingly at that time. As with all changes to the ISS, the outcome of this quarterly ISS review must also be recorded in standalone case notes. Title the updated paper ISS or case note *"ISS Quarterly Review".*

c. WIOA Title I Adult Only:

VIII. Priority of Service, including Fourth Priority Enrollment Authorization Request:

i. Document the Priority of Service category on both the WIOA paper application and in the program enrollment case note recorded in the WIOA Eligibility Application touchpoint, Notes tab in ETO.

ii. If the participant is a veteran or eligible spouse, follow the upload requirements below at "Veteran status at program enrollment"

iii. If the participant is low income, follow the uploading directions for low income above under Program Eligibility.

iv. If the participant is basic skills deficient, follow the uploading directions for basic skills deficiency above under Program Eligibility.

v. If enrolling the adult into WorkForce Central's Fourth Priority category, the request for fourth priority of service must be submitted in writing using the "["WorkForce Central WIOA Adult Fourth Priority Enrollment Authorization Request"] form. The authorization request form must be completed and include an estimated total amount of WIOA Title I Adult grant funds that will be used. The authorization request form must be signed by the authorized service provider representative and a copy of the authorization must be uploaded into the Uploaded Files touchpoint in ETO. Title the document, "4th Priority".

d. WIOA Title I <u>Adult & Dislocated Only</u>:

IX. <u>Employment status at program enrollment:</u> Employment status at program enrollment can be documented via a paper WIOA Application/Registration Form uploaded into ETO, via the ETO WIOA Eligibility Application touchpoint, or in case notes. At a minimum, the individual's employment status must be documented in the program enrollment case note recorded in the WIOA Eligibility Application touchpoint, Notes tab in ETO.

X. <u>Veteran (or eligible spouse) status at program enrollment</u>, if applicable:

   i. Upload a DD-214, letter from the Veteran's Administration, or other applicable documentation to the Uploaded Files touchpoint. Title the document, *"Veteran (or Eligible Spouse) Verification"*

   ii. Document the participant's veteran or eligible spouse status in the enrollment case note recorded in the WIOA Eligibility Application touchpoint, Notes tab in ETO.

XI. <u>Comprehensive Assessment</u>, including self-sufficiency determination may be documented in a paper format uploaded into ETO or recorded in standalone case notes.

   i. If using a paper assessment, upload the document into the Development of Individual Employment Plan (IEP) touchpoint. Title the document, *"Assessment, Self-sufficiency"*. Ensure the location of the assessment is documented in the enrollment case note recorded in the WIOA Eligibility Application touchpoint, Notes tab in ETO.

   ii. If recording the assessment in standalone case notes only, provide a brief summary of the outcome of the assessment, the individual's self-sufficiency needs, followed by a brief description of the service plan (IEP) created as a result of the assessment. Title the case notes, *"Assessment-IEP Case Notes"*

XII. <u>Individual Employment Plan (IEP)</u>: The IEP may be documented in a paper format uploaded into ETO or recorded in standalone case notes along with the assessment results as noted above.

   i. If using a paper format, upload the document in the IEP touchpoint. Title the document, *"IEP".*

   ii. If recording the IEP in standalone case notes only, provide a brief summary of the service strategy resulting from the first assessment. Title the case notes, *"OA-IEP Case Notes".* As services occur, or as service strategies change, record the activity, the outcome of the activity, reason for changes to the service strategy, new planned services, etc. in case notes. Title the case notes *"IEP Case Notes".*

   iii. In addition to updating the IEP on an ongoing basis to reflect real-time services and/or changes to the service strategy, the Service Provider must formally review the IEP with the participant on a quarterly basis and update the IEP accordingly at that time. As with all changes to the IEP, the outcome of this quarterly IEP review must also be recorded in case notes. Title the updated paper IEP or case note "IEP Quarterly Review".

e. <u>All WIOA Title I Programs</u>:

XIII. <u>Date and type of first qualifying service that triggers participation</u>:

   i. Record the applicable qualifying service into ETO that triggers the individual's participation for DOL performance purposes. Qualifying services are found in ESD's WorkSource Service Catalog located at ESD's Workforce Professionals Center website, Technology tab.

   ii. Record the individual's program enrollment date into ETO. The program enrollment date must be the same date as the first qualifying service that triggers participation.

iii. Record a case note in the applicable service touchpoint describing the service provided, expected outcomes, and next steps in the service delivery plan.

XIV. Program Enrollment Case Note: At a minimum, the following must be recorded in a case note in the WIOA Eligibility Application touchpoint, Notes tab, at the time of the individual's enrollment into the WIOA Title I program:

i. Date of program enrollment.

ii. Reason for the individual's enrollment into the WIOA Title I program, including how the individual meets the WIOA Title I program eligibility.

iii. The individual's current education and employment status.

iv. The individual's education and employment goals.

v. Summary of planned services. (For Adult and Dislocated Worker programs, staff may record further detailed planned services in the Development of IEP touchpoint.)

vi. Notification of follow-up services (Youth-Young Adults Only).

vii. If a participant is co-enrolled in two or more programs (e.g.: an older WIOA Title I Youth co-enrolled in the WIOA Title I Adult program), case notes must document the justification for the concurrent enrollment, document the coordination between programs for services provided, and document WorkForce Central approval.

D. VALIDATING SERVICES AND SERVICE OUTCOMES

Services provided to WIOA Title I enrolled participants must align with their unique individual employment and training goals as documented on their ISS (Youth-Young Adults) and IEP (Adult and Dislocated Workers). ISSs and IEPs, either in paper format uploaded into ETO or recorded in case notes only, must be updated as services are provided, as outcomes are attained, or as service delivery strategies change.

Every qualifying service provided to participant, and the outcome of the services must be recorded in ETO and in case notes. Qualifying services are listed in ESD's WorkSource Service Catalog located at ESD's Workforce Professionals Center website, Technology tab. When applicable, source documentation used to validate the provision of a service received by a participant and the outcome of that service must be uploaded into the applicable service touchpoint in ETO. Source documentation for WIOA Title I services are located in TEGL 23-19, Attachment II. Case notes must corroborate the services and service outcomes recorded in ETO. WorkForce Central and ESD will monitor ETO records to ensure compliance with TEGL 23-19 and this policy to ensure case notes support the data recorded in ETO.

Not all services will require source documentation to be uploaded into ETO. In many instances, an appropriately documented case note will sufficiently validate the delivery and outcome of the service. However, **source documentation for the following services must be uploaded in the applicable service touchpoint recorded in ETO and in the sequence listed below.** WorkForce Central and ESD will monitor ETO records to ensure compliance with this policy.

a. **Tutoring, Study Skills Training, Instruction, and Drop-out Prevention Services** (Youth Only), and

b. **Alternative Secondary School Services or Dropout Recovery Services** (Youth Only):

I. Upload and record any of the following source documents into the applicable service touchpoint recorded in ETO to validate the delivery of either of these services. Title the uploaded document and/or case notes, *"Service Verification"*:

- Activity sheets
- Sign-in sheets
- Attendance record
- Vendor contract
- WIOA status forms or case notes noting receipt of service and type of service received

II. Case Notes: For durational services, case notes must be recorded in the applicable service touchpoint at the beginning of the service, during the service, and at the conclusion of the service and include the following details.

i. At the start of service, document the following and title the case note *"Service Initiation"*:

a. How the service aligns with the individual's employment and training goals.

b. Where the service is being provided.

c. Anticipated duration and outcome of the service.

d. Actual start date of the service.

ii. During the service, document the following and title the case note, *"Service Update":*

a. Participant's progress during the service including challenges and accomplishments to date, including MSGs if applicable.

b. If challenges have occurred, document steps taken/services provided to help the participant overcome those challenges to ensure successful completion of the service.

iii. At the conclusion of the service, record the following and title the case notes, *"Service Conclusion":*

a. Outcome of the service, including credentials earned, if applicable.

b. Next steps in the service delivery strategy as a result of the outcome of the service.

III. <u>Measurable Skill Gain (MSG):</u>

i. Upload either of the following source documents into the ETO "Tests and Results" touchpoint to validate MSG when applicable. Title the document, *"MSG Verification"*:

- Transcript
- Report card

IV. <u>Credential Earned:</u>

i. Upload one of the following source documents into the applicable service touchpoint verifying date and type of credential earned. Title the document, *"Credential Verification"*:

- Copy of credential
- Copy of school record
- Follow up survey from program participants (defined in TEGL 14-18 as "signed self-attestation from program participants")

ii. Ensure the appropriate "Credential Earned" outcome is recorded in ETO for the applicable service.

iii. At the time the credential is earned record the type of credential earned in the "Outcomes, Program Completion" touchpoint, "Credentials" tab.

a. **Work Experience (WEX), including Job Shadows (Youth Only)**

I. Upload any of the following source documents into the applicable WEX service touchpoint recorded in ETO to validate the delivery of the service. Title the uploaded document and/or case notes, *"Service Verification"*:

- Activity sheets
- Sign-in sheets
- Attendance record
- Vendor contract (i.e., WEX Intern contracts)
- Logs or status forms/case notes noting receipt of service and combination of services received.

II. Upload the following WEX placement documents into the WEX service touchpoint recorded in ETO:

i. For minors, ages 17 and younger only: Completed parent/school or summer authorization forms. Title the document, *"Minor Authorization Form"*

ii. WEX contracts, including modifications and learning plans (includes pre-assessment) signed by all parties. Title the documents, *"WEX Host Site Contract"* and *"WEX Intern Contract, Learning Plan".*

iii. Mid-evaluation forms. Title the documents, "*Mid-WEX (or Pre-Apprenticeship) Evaluation".*

- Not applicable for Job Shadows, Youth Only.

iv. Timecards/time sheets for each pay period. Title the document, *"Timecard (insert pay period)"*, for example, *"Timecard 7/1/20-7/15/20".*

- Not applicable for Job Shadows, Youth Only.

v. Paystub/paycheck: Uploaded copy of paystub or paycheck and title the document, "*Paycheck (insert pay date)"*, for example, "*Paycheck 7-16-20".*

- Not applicable for Job Shadows, Youth Only.

vi. Final evaluation. Title the document, *"Final WEX Evaluation".*

III. <u>Case Notes:</u> Record a case note in the WEX service touchpoint describing:

i. How the WEX or Job Shadow placement aligns with the Intern's employment and training goals.

ii. Name and location of the WEX or Job Shadow Host Site.

iii. Anticipated duration of the WEX or Job Shadow.

iv. Job description/duties (not applicable to Job Shadow).

v. Anticipated supportive services needs of the Intern for successful participation in the WEX or Job Shadow.

vi. Actual start date of the WEX or Job Shadow.

vii. Progress of the learning plan during the WEX (not applicable to Job Shadow). If challenges have occurred, document steps taken/services provided to help the participant overcome those challenges to ensure successful completion of the service.

viii. Outcomes of ongoing monitoring of the WEX by the WEX Sponsor which may include onsite visits and phone/email communications with the WEX Host Site (not applicable to Job Shadow).

ix. Pay dates, including last paid workday (not applicable to Job Shadow).

x. Outcome of the WEX or Job Shadow.

xi. Next steps in the service delivery strategy as a result of the outcome of the WEX.

b. **Pre-Apprenticeships (Youth Only):**

I. Upload any of the following source documents into the Paid and Unpaid Work Experience with Academic/Education Component Pre-Apprenticeship Program (Youth Only) service touchpoint recorded in ETO to validate the delivery of this service. Title the uploaded document and/or case notes, *"Pre-Apprenticeship Verification"*:

- Copy of enrollment record
- File documentation with notes from program staff
- School records
- Transcript or report card
- Case notes
- Signed training contract

II. <u>Case Notes</u>: For durational services, case notes must be recorded in the applicable service touchpoint at the beginning of the service, during the service, and at the conclusion of the service and include the following details.

i. At the start of service, document the following and title the case note *"Service Initiation"*:

a. How the service aligns with the individual's employment and training goals.

b. Where the service is being provided.
c. Anticipated duration and outcome of the service.
d. Actual start date of the service.

ii. During the service, document the following and title the case note, *"Service Update":*

a. Participant's progress during the service including challenges and accomplishments to date, including MSGs if applicable.
b. If challenges have occurred, document steps taken/services provided to help the participant overcome those challenges to ensure successful completion of the service.

iii. At the conclusion of the service, record the following and title the case notes, *"Service Conclusion":*

a. Outcome of the service, including credentials earned, if applicable.
b. Next steps in the service delivery strategy as a result of the service outcome.

e. **On-the-Job Training (OJT):**

I. Upload the following documents into the OJT touchpoint recorded in ETO:

i. <u>OJT Employer Pre-Screening Checklist</u> verifying the employer's eligibility.

ii. <u>OJT Contract</u>, including how the reimbursement rate was determined and modifications, signed by all parties.

a. Title original agreement, *"OJT Contract".*
b. Title modifications, *"OJT Mod 1, or 2, etc.".*

iii. <u>Learning plan</u>, completed prior to the start of the OJT. Title the document, *"OJT Learning Plan".*

iv. <u>Job description and related DOL/O*NET reports</u> to support training duration and skills to be learned. Title the document, *"Job Description".*

v. <u>OJT evaluations/Trainee progress reports</u>. Title the document, *"OJT Progress Report".* See Measurable Skill Gain (MSG), below.

vi. <u>Measurable Skill Gain (MSG):</u> Upload either of the following source documents into the ETO "Tests and Results" touchpoint to validate MSG when applicable. Title the document, *"OJT Progress Report; MSG Verification"*:

- Contract and/or evaluation from employer or training provider
- Progress report from employer documenting skill gain

vii. <u>Results of onsite employer monitoring reviews</u>**.** Title the document or case note, "*OJT Onsite Monitoring".*

viii. <u>OJT reimbursement invoice and supporting documentation</u> to include timecards. Title document, *"OJT Invoice Packet".*

IV. <u>Case Notes:</u> Record a case note in the OJT service touchpoint describing:

i. How the OJT aligns with the individual's employment and training goals.
ii. Name and location of the OJT employer.
iii. Anticipated duration of the OJT.
iv. Description of training/skills to be learned.
v. Actual start date of the OJT.
xii. Progress of the OJT learning plan. If challenges have occurred, document steps taken/services provided to help the participant overcome those challenges to ensure successful completion of the OJT.
vi. Outcomes of ongoing monitoring of the OJT which may include onsite visits and phone/email communications with the employer.
vii. Pay dates, including last day of OJT wage reimbursement.

viii. Outcome of the OJT.

ix. Next steps in the service delivery strategy as a result of the outcome of the OJT.

f. **Occupational Skills Training (OST) and Customized Training (Adult, DW Only):**

I. Upload any of the following source documents into the OST or Customized Training (Adult, DW Only) service touchpoint recorded in ETO to validate the delivery of this service. Title the uploaded document and/or case notes, *"Training Verification"*: Ensure supporting documentation clearly identifies the individual's name and training provider's information.

- Copy of enrollment record
- File documentation with notes from program staff
- School records
- Transcript or report card
- Case notes
- Signed training contract
- ITA

II. Upload the following (or record in case notes when specific documentation isn't required) into the OST or Customized Training touchpoint. Documents may be uploaded as a single item or combined in one package. If uploaded in a single package, title the package, "*OST Requirements"* and ensure each required element listed below is clearly identifiable in the package.

i. Self-Sufficiency: Upload documents and/or record in case notes evidence collected to verify the selected program of study will result in employment that will lead the participant 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".*

ii. In-demand Occupation: Upload 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 an area which the participant is willing to travel or relocate (i.e., Demand-Decline list). Title the document *"In Demand".*

If applicable, document in case notes 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. Title the case note *"Willing to travel/relocate outside PC".*

iii. Non-WIOA Financial Resources: Upload evidence or document in case notes the participant is unable to obtain non-WIOA financial assistance from other sources to pay the costs of training or requires assistance beyond available grant resources, such as Pell Grants to complete their training. Title the document and/or case notes, *"No other financial available".*

When applicable upload copies of FAFSA award letters, title the document *"FAFSA Documentation".*

iv. Eligible Training Provider: Upload a copy of the Eligible Training Provider List (ETPL) showing the training program is on the ETPL. Title the document, *"ETPL".*

v. Authorization of Training:

a. Upload the ITA authorization (when applicable) and any approved increase or modification. Title the document, *"ITA", "ITA mod".*

b. For trainings paid with supportive services (ISY Only), upload the supportive service form authorizing training into the OST touchpoint. Title the document, "Training Approval".

c. For training paid through a contract funded directly by WorkForce Central (e.g., customized training and cohorts), document in case notes the training is paid via a contract paid directly by WorkForce Central and the service provider is not paying the costs of tuition and any other expenses the WorkForce Central contract is covering. Specify in case notes what the service provider is paying for, when applicable. Title the case note, “*Contracted Training”.*

vi. Date of enrollment into training

a. Record the date the individual became enrolled in an education or training program that leads to a recognized post-secondary credential, including a secondary education program, or training program that leads to employment.

b. Record this date if the individual was already enrolled in education or training at the time of program entry or became enrolled in education or training at any point while participating in the program.

(i) If the participant was already enrolled at program entry, the date in this field should be the date of program entry.

(ii) This includes but is not limited to participation in Job Corps or YouthBuild or Adult Education or secondary education programs.

c. Upload one of the following documents and title the document, “*Training Enrollment Date”*

- Copy of training enrollment record
- File documentation with notes from program staff
- School records
- Transcript or report card
- Data match with post-secondary data system

vii. Actual start date of training

a. Record the date on which the individual’s first training service began.

b. Upload one of the following documents, or record the start date in case notes, and title the document or case notes, *“Training Start Date”.*

- Attendance sheets or other school records
- Vendor training records
- Case notes (the training start date recorded in case notes must align with the training service start date recorded in ETO)
- Signed training contract
- ITA

viii. Measurable Skill Gain (MSG):

a. Record a case note when an MSG has been earned.

b. Upload either of the following source documents into the ETO “Tests and Results” touchpoint to validate MSG when applicable. Title the document, *“MSG Verification”*:

- Transcript
- Report card

ix. Credential Earned (Not applicable for Customized Training):

a. Record a case note when a credential has been eared.

b. Ensure the appropriate “Credential Earned” outcome is recorded in ETO for the applicable service.

c. Upload one of the following source documents into the applicable service touchpoint verifying date and type of credential earned. Title the document, *“Credential Verification”*:

- Copy of credential
- Copy of school record
- Follow up survey from program participants (defined in TEGL 14-18 as

"signed self-attestation from program participants")

ix. At program completion, record the type of credential earned in the "Outcomes, Program Completion" touchpoint, "Credentials" tab.

x. Case Notes: For durational services, case notes must be recorded in the applicable service touchpoint at the beginning of the service, during the service, and at the conclusion of the service and include the following details.

   a. At the start of service, document the following and title the case note *"Training Start"*:
      1. How the service aligns with the individual's employment and training goals.
      2. Where the service is being provided.
      3. Anticipated duration and outcome of the service.
      4. Actual start date of the service.

   b. During the service, document the following and title the case note, *"Training Update":*
      1. Participant's progress during the service including challenges and accomplishments to date, including MSGs if applicable.
      2. If challenges have occurred, document steps taken/services provided to help the participant overcome those challenges to ensure successful completion of the service.

   c. At the conclusion of the service, record the following and title the case notes, *"Training Conclusion":*
      1. Outcome of the service, including credentials earned, if applicable.
      2. Next steps in the service delivery strategy as a result of the outcome of the service.

a. **Supportive Services:**

I. Assessment of Need: Document the assessment of the individual's need for supportive services in case notes in the applicable Supportive Service touchpoint in ETO. Title the case note *"Assessment of Need for SS".*

II. Current Budget: Upload the individual's current budget reflecting a financial need for supportive services in the Supportive Service touchpoint. Title the document, *"Current Budget".*

   - If additional supportive services are requested and the participant's budget has not changed since the last provision of a supportive service, uploading a new budget form in the subsequent Supportive Service touchpoints is not necessary. However, the reason for not uploading an updated budget must be documented in case notes.

III. Referral to Community Resources: When applicable, document in case notes in the Supportive Service touchpoint in ETO the attempts to acquire requested supportive service from organizations in the community that are known to provide the service, outcomes of referrals to 2-1-1, or exemption from the referral requirement.

IV. Supportive Service Authorization: Upload the supportive service request/authorization form into the applicable Supportive Service touchpoint in ETO. Title the uploaded document, *"SS Request" or "SS. Authorization".*

V. Supportive Service Log: An up-to-date supportive service tracking log must be uploaded into the most recent Supportive Service touchpoint in ETO. Title the document, *"SS Tracking Log"*. The log must include the date a supportive service was provided to the participant, what was purchased, the total cost of the service and a running total of supportive services spent to-date.

   - When applicable, disallowed costs must also be tracked on the supportive service log.

VI. Receipt, Supporting Documentation: Copies of supporting documentation, including legible itemized receipts must be uploaded in the applicable Support Service touchpoint in ETO. Title the document what it is. For example:

i. Title a receipt of the purchase, *"Receipt".*

ii. For a bus pass, title it, *"Bus Pass"*

iii. For payment of a utility bill, title the bill, *"Utility Bill Payment".*

VII. **Incentives** (Youth-Young Adults Only):

i. The following must be documented in case notes recorded in the Case Notes History in ETO. In the case note identifier field, title the case note *"Incentive Justification"* followed by the date of the incentive:

a. How the incentive was determined appropriate for the young adult,

b. How the incentive will contribute to the young adult's success, and

c. How the amount of the incentive was determined appropriate for the young adult.

d. The specific training, education, work experience, or other accomplishment the incentive was provided for as documented on the young adult's ISS.

e. Attempts to access incentives via non-WIOA resources in the community, if known and available, prior to issuing WIOA Title I funded incentives.

ii. In the *"Incentive Justification"* case note, upload the following documents:

a. Approved incentive request form or voucher. Title the document, *"Incentive Request"*.

b. Participant's current budget for the first incentive request and as needed for future requests (same process for supportive service described above).

c. Up-to-date supportive service/incentive tracking log. Title the document, "*SS-Incentive Tracking Log".* The log must include the date an incentive was provided to the participant, the total cost of the incentive, and a running total of incentives provided to-date.

- When applicable, disallowed incentive costs must also be tracked on the supportive service-incentive tracking log.

d. Copies of service provider's receipts showing the incentive that was purchased. This may include but is not limited to receipts for gift cards or receipts for items (incentives) purchased for young adults. Copies of gift cards must include the amount of the gift card. The front and back of the gift card must be uploaded into ETO. Title the document, "*Incentive Docs".*

b. **Date and Reason for Program Completion:**

I. The following case notes must be recorded in the Program Completion touchpoint in ETO documenting an individual's completion of the WIOA Title I program. Title the case note, *"Program Completion".*

i. Brief summary of the individual's service needs at time of program enrollment, services provided to address those needs while enrolled in the program, and outcomes of those services.

ii. School status at program completion (Youth-Young Adults Only)

iii. Date and reason from program completion.

iv. Type and duration of planned follow-up services.

c. **School Status at Program Completion (Young Adults Only):**

I. (WIN 0100): In the Outcomes and Completion touchpoint record the following:

i. School status at exit if known.

ii. Last known documented school status, after participation has begun and if unknown at time of exit.

iii. School status at 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.

II. TEGL 23-19: Upload evidence the young adult obtained their high school diploma or GED. Label the document, *"HS Diploma"* or *"GED":*
   i. Copy of HS diploma, GED
   ii. Signed follow-up survey response from the participant
   iii. Signed file documentation with information obtained from education or training provider

III. Case Notes: Record the young adult's school status at exit in case notes recorded in the Outcomes and Completion touchpoint. If the youth is in school, whether in secondary or post-secondary education, record the following:
   i. Date enrolled in school
   ii. Name of school
   iii. Training program
   iv. Anticipated completion date
   v. Anticipated credential to be earned.

d. **Exit due to post-secondary enrollment (Young Adults Only):**

I. For young adults who are completing the program and are exited due to enrollment in post-secondary education, upload any one of the following into the Outcomes and Completion touchpoint. Title the document, *"Post-secondary Enrollment".*
   - Copy of enrollment record
   - File documentation with notes from program staff
   - School records
   - Transcript or report card
   - Documentation from the school must include:
      a. The participant's name,
      b. Name of school
      c. Date young adult enrolled in the training program
      d. Date young adult started training, if applicable at time of program completion
      e. Title of training program participant is enrolled in
      f. Anticipated training completion date

II. Record a case note in the Outcomes and Completion touchpoint where the above documents were uploaded, that includes the date of enrollment, actual start date/anticipated start date of training, training program, name of school, anticipated completion date, and anticipated credential to be earned. Title the case notes, *"Post-secondary Enrollment*".

e. **Exit due to unsubsidized employment**:

I. For any participant completing their program as a result of obtaining unsubsidized employment, create an Outcomes, Program Completion touchpoint and record the following in case notes. Title the case note *"UE".*
   i. Confirmation the employment will provide the participant a self-sufficient wage, or the new job will provide comparable income to previous employment, if applicable. Title the document, *"Self-sufficiency Evidence".*
   ii. Record case notes in the Outcomes and Completion touchpoint documenting the following:
      a. Name of employer

b. Job title
c. Wage
d. Full-time or part-time status
e. Start date.
f. Whether the new job meets the participant's self-sufficiency needs or is comparable to previous employment, if applicable.

f. **For any other reason for exit:**

I. For any individual exiting the program for reasons other than enrollment in post-secondary education (Youth Only) or unsubsidized employment leading to self-sufficient wages, record the reason for exit in case notes in the Program Completion touchpoint in ETO.

g. **Follow-up Services:**

I. Case notes: Document the individual's progress or status update in case notes recorded in ETO on a minimum quarterly basis.
II. Consent forms: Prior to contacting an employer to verify an individual's employment, the Service Provider must first obtain a consent form signed by the participant authorizing the provider to contact the participant's employer. The consent form must be uploaded into the Uploaded Files touchpoint in the participant's ETO record.
III. Opt Out: If an individual opts out of receiving follow up services, the date and reason the individual opted out must be documented in case notes recorded in the Outcomes and Completion touchpoint.
IV. Services: In the Follow-up Services touchpoint, record follow-up services at the time the service is provided. Follow the same documentation upload and case note documentation procedures noted above.

E. REPORTING PERFORMANCE OUTCOMES 2ND AND 4TH QUARTERS AFTER EXIT

WIOA Title I service providers must ensure accurate and timely reporting of the following performance measures in ETO during the four (4) quarters after an individual is system exited from ETO.

a. Unsubsidized employment (or training for WIOA Title I young adults only) 2nd and 4th quarters after exit

I. **Definition**

Employment Rate - 2nd Quarter After Exit: The percentage of individuals who are in unsubsidized employment during the 2nd quarter after exit.

For the WIOA Title I Youth (Young Adults) program only, this indicator includes young adults actively enrolled in education or training activities in addition to those who are in unsubsidized employment 2nd quarter after exit.

Employment Rate - 4th Quarter After Exit: The percentage of individuals who are in unsubsidized employment during the 4th quarter after exit from the WIOA Title I program.

For the WIOA Title I Youth (Young Adults) program only, this indicator includes young adults actively enrolled in education or training activities in addition to those who are in unsubsidized employment 4th quarter after exit.

Note: Individuals are not required to provide evidence of continued, uninterrupted employment or training during the entire 12 months after exit. Rather, DOL performance reporting requirements limit the verification of an individual's employment or training status to any time during the 2nd and 4th quarter after exit. (WIOA Joint Rule, Departments' responses: Page 55841)

II. Source Documentation Requirements

i. Training for WIOA Title I Youth (Young Adults) only:

a. Create a new Follow-up touchpoint. From the dropdown menu, select "Record Performance Information" and complete all of the tabs.

b. Upload any of the following source documentation for young adults enrolled in training during the 2nd and 4th quarters after exit. Title the document, *"Q2 (or Q4) Training Verification"*:

- Copy of school registration record
- File documentation with notes from program staff:
  - Defined in ESD Policy 1003, Rev. 2 as "supporting material that provides official information or evidence or that serves as a record in support of the data element, along with corresponding case notes from staff. Examples of file documentation include both standard state MIS forms such as ISS or assessment as well as information obtained from outside officials (i.e., emails, records, letters)".
- School records
- Transcript or report card
- Vendor/training provider documentation

ii. Employment:

a. Create a new Follow-up touchpoint. From the dropdown menu, select "Record Performance Information" and complete all tabs.

b. Upload any of the following source documentation for individuals in unsubsidized employment during the 2nd and 4th quarters after exit. Title the document, *"Q2 (or Q4) Employment Verification"*:

- Follow-up survey from participants during the reference quarters (defined in TEGL 14-18 as "signed self-attestation from program participants")
- Paycheck stubs (minimum of two copies) from the reference quarters
- Tax records, W2 form
- Quarterly tax payment forms such as an IRS form 941
- Signed letter or other documentation from employer on official company letterhead attesting to an individual's employment status and earnings during the referenced quarters
- Self-employment worksheet that reflects income after expenses during the reference quarters, signed and attested by the program participant
- Income earned from sales commissions or similar positions during the reference quarters
- Detailed case notes verified by the employer and entered by case managers during the reference quarters

iii. Employment related to training:

a. On the Follow-up touchpoint, on the Follow-up Type tab, ensure the dropdown is set to "Record Performance Information" or "Record Both".

b. On the Follow-up touchpoint, on the Follow-up Form tab, ensure the drop down "Follow-up Quarter after Exit" is set to "Second (or Fourth) Quarter.

c. On the Follow-up touchpoint, on the Follow-up Form tab, ensure the drop down "Entered Training-Related to Employment" is set to "Yes".

b. **Credentials earned 2nd and 4th quarters after exit**

I. Definition

The percentage of participants enrolled in an education or training program (excluding those in on-the-job training (OJT) and customized raining) who obtained a recognized post-secondary credential or secondary school diploma, or its recognized equivalent, during participation in or within one (1) year after exit from the program.

A participant who has attained a secondary school diploma or its recognized equivalent is included in the percentage of participants who have attained a secondary school diploma or its recognized equivalent only if the participant also is employed or is enrolled in an education or training program leading to a recognized post-secondary credential within one (1) year after exit from the program.

II. Reportable Credentials

This reporting indicator measures two types of credentials, a recognized post-secondary credential, or a secondary school diploma or its recognized equivalent (only when the individual is also employed or enrolled in post-secondary education). The following are reportable credentials:

- Secondary school diploma or its equivalency
- AA or AS diploma/degree
- BA or BS diploma/degree
- Occupational licensure
- Occupational certification
- Other recognized diploma, degree, or certificate

III. **Source Documentation Requirements**

i. Create a new Follow-up touchpoint. From the dropdown menu, select "Record Performance Information" and complete all of the tabs.
   a. Upload any of the following source documentation in ETO for individuals who have obtained a reportable credential at any point during the 12 months following exit. Title the document, *"Post-Exit Credential Verification"*:
      - Diplomas, degrees, licenses, or certificates
      - Data match
      - Copy of credential
      - Copy of school record
      - Follow-up survey from participants during the reference quarters:
        - Defined in TEGL 14-18 as "signed self-attestation from program participants"
      - Case notes documenting information obtained from the education or training provider

F. CONFIDENTIAL INFORMATION

Case notes and other documentation containing confidential information, such as medical information, must be kept in a secure location apart from the individual's regular program file. To ensure compliance with this requirement in ETO, create a new Confidential Case Note Touch Point and upload the confidential information to this touchpoint. Confidential case notes must also be recorded in this touchpoint and must not be recorded in the Case Notes History, included in service touchpoints recorded in ETO, or elsewhere in the ETO record.

Any confidential information that is in a paper format but is not relevant to the participant's eligibility or service delivery should be crossed out with a black marker before the document is uploaded into ETO.

G. ALL OTHER DOCUMENTATION

All other documentation relevant to the participant's enrollment and/or service delivery strategy not described in this policy must be uploaded in the Uploaded Files touchpoint in ETO. Document the purpose and location of the document in case notes.

H. SCANNING AND SHREDDING REQUIREMENTS

WorkForce Central follows the Washington State Archive's procedures for scanning and destroying documents. Full procedures for destruction of materials after scanning are located at the WA State WA State Archives *"Requirements for Destruction of Non-archival Paper Records after Imaging"*

All documents uploaded into ETO must be complete, accurate, and legible copies of the original records. 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. Documents meeting these criteria may be shredded after scanning and only after it is confirmed the scanned item is legible.

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

REFERENCES

- WIOA Section 116
- 20 CFR 667.300
- 2 CFR 200.328
- TEGLs:
    - 10-16, Change 1
    - 05-18
    - 07-18
    - 14-18
    - 23-19
    - 26-26
- ESD Policy 1003, Rev. 2 -Data Element Validation
- ESD Policy 1020, Rev. 1-Data Integrity and Performance Policy and Handbook
- ESD Policy 5414-Monitoring
- ESD WIN 0081, Change 3
- ESD WIN 0100-School Status at Exit for WIOA Title I Youth Participants

APPROVED:

Katie Condit (Dec 21, 2021 15:11 PST) Dec 21, 2021

Katie Condit, WFC CEO Date