ETO Data Validation & Documentation Policy Handbook

Policy Number: P-1011, Rev. 3

Effective
September 27, 2022

Contents

PURPOSE

This ETO Data Validation & Documentation Policy Handbook 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 handbook supersedes WorkForce Central's previous ETO Data Validation and Documentation Policy dated December 21, 2021.

This policy was revised to:

- Convert the policy to a handbook with table of contents for easier navigation.
- Rescind the use of the Confidential touchpoint in ETO.
- Add Transitional Jobs documentation requirements for individuals enrolled in the Adult and Dislocated Worker programs.
- Update WIOA Title I Adult Priority of Service categories.
- Update list of supportive service documentation requirements.
- Add the requirement of young adult providers to record all youth services, including services provided by other organizations, into ETO.
- Update OJT reimbursement documentation requirements.
- Update program completion documentation requirements.
- Other formatting and editing changes for clarity purposes.

BACKGROUND

As a recipient of WIOA Title I funding, WorkForce Central and its 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 handbook. 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 procedures described in this policy handbook 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.

REFERENCES

- WIOA Section 116
- 20 CFR 667.300
- 2 CFR 200.328
- TEGLs:
  - 10-16, Change 2
  - 05-18
  - 07-18
  - 14-18
  - 23-19
  - 26-26
- ESD Policy 1003 (current and future revisions) -Data Element Validation
- ESD Policy 1020 (current and future revisions) -Data Integrity and Performance Policy and Handbook
- ESD Policy 5414 (current and future revisions) – WIOA Title I Monitoring
- ESD WIN 0081 (current and future revisions)-Procedures for Creating ETO Accounts without SS Number
- ESD WIN 0100 (current and future revisions) -School Status at Exit for WIOA Title I Youth Participants
- ESD WIN 0023 (current and future revisions)-Management of Medical and Disability Related Information

Approved:

Katie Condit (Sep 28, 2022 08:56 CDT) Sep 28, 2022

Katie Condit, WFC CEO Date

Timely and Accurate ETO Data Entry

Real time and accurate ETO data entry is 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 (current and future revisions) and WIN 0082 (current and future 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 recorded in ETO. 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. Services recorded in ETO must align with the definition of that service in ESD's WorkSource Service Catalog. Not all interactions with individuals will qualify as a service as defined in the Service Catalog and while these interactions should be documented in case notes, a service should not be recorded in ETO.

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, or errors identified after the 7-day restriction, the reason for the late entry or correction to a service must be recorded in case notes. As required in ESD's WIN 0082 (current and future revisions) the Department Head assigned to each service provider must document in case notes the specific service that was recorded late or corrected, the reason for the late entry or correction, and that the Department Head reviewed and approved the late entry or correction. 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.

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 is 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 (current and future revisions).

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, Washington State Auditor's Office; WorkForce Central, and other 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 individual receiving WIOA Title I services, 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 and new service provider(s).

Confidential Information

For the WIOA Title I programs, collecting a participant's medical diagnosis or other medically confidential information is not required, nor is it authorized to upload or record medically confidential information in ETO. In the event a provider determines the collection of medically confidential information is necessary, the documentation must be saved in a paper file and stored in a locked and secure location separate from all other confidential information (e.g., court documents). See ESD WIN 0023 (current and future revisions) and WorkForce Central's Protecting Personal & Confidential Information Policy located on [WorkForce Central's policy library] for more information.

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.

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.

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, Attachment B (current and future revisions).

Self-attestation: When authorized by DOL and ESD, WorkForce Central accepts self-attestation via a signed and dated paper WIOA Application (uploaded into ETO) or a signed and dated ETO WIOA Eligibility Application.

A. All WIOA Title I Programs

The following eligibility and enrollment documentation must be uploaded and/or recorded into ETO for all WIOA Title I enrolled individuals:

I. ETO WIOA Eligibility Application:

a. Take a new touchpoint and select "WIOA Eligibility Application". Every demographic radial button and drop down option must be answered. Upload the applicable source documentation used to validate the participant's demographics and eligibility criteria into the appropriate field.

b. There are a variety of source documents authorized to validate eligibility and participant demographics (See ESD policy 1003, Attachment B, current and future revisions). However, WorkForce Central encourages the use of a self-attestation via a signed and date paper or ETO WIOA Application when authorized to do so (see WorkForce Central's WIOA Title I Eligibility, Enrollment and Documentation Handbook). When uploading source documentation other than the paper WIOA application, title the document what it is and what the specific eligibility criteria the document is validating. For example:

i. When uploading an ID to verify age, title the document, ***"ID, Age Verification".***

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

iii. Basic Skills Deficiency source documentation:
- CASAS pre-test scores: Title the document, ***"BSD-CASAS Scores"*** or record CASAS pre-test scores in the program enrollment case note.

iv. English Language Learner source documentation:
- Assessment Test Results: Title the document, ***"ELL-Assessment"***
- Applicable Records from Education Institution (i.e., transcripts or other school documentation): Title the document, ***"ELL-School Records"***

v. Income verification:
- WIOA income eligible (low income): Signed and dated WIOA Application
- SNAP benefit documentation in the participant's name: Title the document, ***"SNAP"***
- TANF benefit documentation in the participant's name: Title the document, ***"TANF"***

vi. Dislocated Worker eligibility only: 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.

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

II. A completed and signed paper ***or*** ETO WIOA Title I program application:

a. Paper WIOA Application Form: If using a paper WIOA Application form:

i. Upload the document to the “Uploaded Files’ touchpoint in ETO
ii. Title the document, ***“WIOA Application Form”.***
iii. Cite the location of the WIOA Application form in the program enrollment case notes located in the ETO WIOA Eligibility touchpoint.

III. Pierce County or City of Tacoma Residency:

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 Board (WDB) of residency. Management approval and coordination with the WDB of residency must be documented in case notes recorded in ETO.

a. 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).

b. 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”.***

c. 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”.***

IV. Authorization to Share Confidential Information and Records Form:

Individuals seeking WIOA Title I program services must be provided the Authorization to Share Confidential Information and Records Form. 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”.***

V. Participant Information Form:

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

I. School status at enrollment: 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"***.

a. Exception to Income Requirement (5% Window): Service providers must receive authorization 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 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, ***"Income Exception-5% Window"***.

b. 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:

   i. Basic Skills
   ii. Occupational Skills
   iii. Prior work history
   iv. Employability
   v. Interests
   vi. Aptitudes
   vii. Supportive service needs
   viii. Developmental needs
   ix. 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.

Paper OA: 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.

OA in standalone case notes: 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:

i. ***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.*

ii. ***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 training opportunity where he will earn a credential in* *construction and conduct online research in this industry using these resources: (include list of resources)*

iii. ***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.*

iv. ***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.*

v. 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."***

c. 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.

Paper ISS: 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"***.

ISS in standalone case notes: 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".***

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"***.

Quarterly ISS Review: 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

I. Priority of Service: Document the Priority of Service category on both the WIOA paper registration form (if using a paper registration form) and in the program enrollment case note recorded in the WIOA Eligibility Application touchpoint, Notes tab in ETO.

a. Priority of Service Categories 1 and 2:

i. If the participant is a veteran or eligible spouse:

1. 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"***
2. 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.

ii. If the participant meets WIOA's income guidelines, upload any one of the following:

- Signed and dated WIOA Application

- SNAP benefit documentation in the participant's name: Title the document, ***"SNAP"***
- TANF benefit documentation in the participant's name: Title the document, ***"TANF"***
- All other income verification: Title the document ***"Income Verification***.

iii. If the participant is basic skills deficient, upload CASAS pre-test scores and title the document, ***"BSD-CASAS Scores"*** or record BSD scores in program enrollment case notes.

b. Priority of Service Category 3:

i. If the participant is a veteran or eligible spouse:

1. 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"***
2. 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.

c. Priority of Service Category 4:

i. Describe in the program enrollment case note the circumstances that contribute to the participant not earning sufficient income to meet their basic needs and results of the Self-Sufficiency Calculator. Upload results of the Self-Sufficiency Calculator to the Uploaded Files touchpoint and title it, "*Self-Sufficiency Calculator*"

D. WIOA Title I Adult & Dislocated Only:

I. Employment status at program enrollment: Employment status at program enrollment can be documented via a paper WIOA 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.

II. Veteran (or eligible spouse) status at program enrollment, if applicable:

a. 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"***

b. 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.

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

a. Paper Assessment: 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.

b. Assessment in standalone case notes: 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".***

IV. Individual Employment Plan (IEP): 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.

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

b. IEP in standalone case notes: 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".***

c. Quarterly IEP Review: 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. All WIOA Title I Programs:

I. Date and type of first qualifying service that triggers participation:

a. 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.

b. 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.

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

I. 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:

a. Date of program enrollment.

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

c. Adult Only: Priority of Service Category.

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

e. The individual's education and employment goals.

f. Summary of planned services.

i. Adult and Dislocated Worker programs: Staff may record further detailed planned services in the Development of IEP touchpoint.

g. Young Adults only: Notification of follow-up services available to young adults following completion of their program.

h. 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.

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 (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. Dates of services recorded in ETO must reflect the actual date of service. 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.

For the Young Adult (Youth) program only, DOL requires WIOA Title I Young Adult service providers to report a youth program element regardless of the organization providing or funding the service to the young adult. If a young adult receives program elements from another WIOA Title I service provider, or non-WIOA community-based agency, or another entity, the WIOA Title I Young Adult service provider must record these services in ETO in the same way as they would if the service provider directly delivered the service.

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.

Tutoring, Study Skills Training, Instruction, and Dropout Prevention Services (Youth Only)

Alternative Secondary School Services or Dropout Prevention Services (Youth Only)

Education Offered Concurrently with Workforce Preparation & Training (Youth Only)

A. Service Verification

Upload and record any of the following source documents into the applicable service touchpoint recorded in ETO to validate the delivery 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

B. 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 Start"***:
   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.

C. Measurable Skill Gain (MSG)

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

D. Credential Earned

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 a "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 in the "Outcomes, Program Completion" touchpoint, "Credentials" tab.

Paid Work Experiences

Job Shadows (Youth Only)

Transitional Jobs (Adult, Dislocated Worker Only)

A. Service Verification

Upload or record 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, ***"WEX, or Job Shadow, or Transitional Job Verification"***:

- Case notes
- Activity sheets
- Sign-in sheets
- Attendance record
- Vendor contract
- Logs or status forms/case notes noting receipt of service and combination of services received.

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

I. Youth Only: For minors ages 17 or younger, a completed parent/school or summer authorization form. 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 Agreement" and "WEX Intern (or Job Shadow or Transitional Job) Contract, Learning Plan.*"**

III. Mid-evaluation forms. Title the documents, **"*Mid-WEX (Transitional Job) Mid-Eval*"**.

- 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.
- Ensure the timecard is accurate, signed, and legible.

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

- Not applicable for Job Shadows, Youth Only.
- If paystub/paychecks aren't available, a payroll/ADP report that lists WEX participants by name and included in the invoice packet, is acceptable. Upload into ETO is not applicable.

VI. Final evaluation. Title the document, ***"Final WEX or Transitional Job Evaluation"***.

- Not applicable for Job Shadows, Youth Only.

C. 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. Record a case note in the WEX touchpoint for the following:

VII. At the start of WEX placement, document the following and title the case note ***"WEX Start"***:

a. How the WEX, Job shadow, or Transitional Job placement aligns with the individual's employment and training goals.

b. Name and location of the WEX, Job Shadow, or Transitional Job Host Site.

c. Anticipated duration and outcome of the WEX, Job Shadow, or Transitional Job.

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

e. If applicable, anticipated supportive service needs of the Intern for successful participation of the WEX or Job Shadow.

f. Transitional Jobs only (Adult and Dislocated Worker):

- Description of how the individual meets the "systemic barriers to employment" eligibility criteria, including those who are chronically unemployed or have inconsistent work history.
- Description of the required comprehensive career services and supportive services to be provided.

g. Actual start date of the WEX, Job Shadow, or Transitional Job.

VIII. During the service, document the following in and title the case note, ***"WEX Update":***

a. Progress of the learning plan during the WEX or Transitional Job
   - Not applicable to Job Shadow

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

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

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

IX. At the conclusion of the service, record the following and title the case notes, *"**WEX (or Job Shadow/Transitional Job) Conclusion":***

a. Outcome of the WEX, Job Shadow, or Transitional Job.

b. Actual end date of the WEX, Job Shadow, or Transitional Job.

c. Next steps in the service delivery strategy as a result of the outcome of the WEX, Job Shadow, or Transitional Job.

Pre-Apprenticeships (Youth Only)

A. Service Verification

Upload or record 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"*:

- Case notes
- Activity sheets
- Sign-in sheets
- Attendance records
- Logs or status forms noting receipt of service and combination of services received
- Copy of enrollment record
- File documentation with notes from program staff
- School records
- Transcript or report card
- Signed training contract

B. Upload the following documents into the Pre-Apprenticeship WEX service touchpoint recorded in ETO:

I. Training schedules, if provided.
II. Certificates or credentials earned. Title the documents, "Certificate (or Credential) Earned".

C. 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. Record a case note in the WEX/Pre-apprenticeship touchpoint for the following:

I. At the start of service, document the following and title the case note ***"Pre-apprenticeship Start":***

a. How the pre-apprenticeship aligns with the individual's employment and training goals.
b. Where the pre-apprenticeship is being provided.
c. Learning plan/Instruction overview
d. Anticipated duration and outcome of the pre-apprenticeship.
e. Actual start date of the pre-apprenticeship.

II. During the pre-apprenticeship, document the following and title the case note, ***"Pre-Apprenticeship 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.

I. At the conclusion of the pre-apprenticeship, record the following and title the case notes, ***"Pre-apprenticeship Conclusion":***

a. Outcome of the service, including credentials earned, if applicable.
b. Actual end date of the pre-apprenticeship.
c. Next steps in the service delivery strategy as a result of the service outcome.

On-the-Job Training (OJT)

A. Service Verification

Upload or record the following documents into the OJT touchpoint recorded in ETO to validate the delivery of this service. Title the uploaded document and/or case notes, ***"OJT Start":***

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

B. Upload, or record in case notes the following documents into the OJT service touchpoint recorded in ETO

I. Assessment results identifying an OJT as an appropriate service may be documented in case notes.

II. Completed ISS/IEP (paper copy or recorded in case notes) documenting the OJT service including, potential supportive service needs during the OJT, and outcomes of the OJT.

III. Employer OJT Agreement verifying the employer's eligibility (Completed by WFC Business Solutions).

IV. OJT Contract, including how the reimbursement rate was determined and modifications, signed by all parties.

- Title original contract, ***"OJT Contract".***
- Title modifications, ***"OJT Mod 1, or 2, etc.".***

V. Learning plan, completed prior to the start of the OJT. Title the document, ***"OJT Learning Plan".***

VI. Job description and related DOL/O*NET reports (if not included in the OJT contract) to support training duration andskills to be learned. Title the document, ***"Job Description".***

VII. OJT evaluations/Trainee progress reports. Title the document, ***"OJT Progress Report".***

VIII. Measurable Skill Gain (MSG): 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

IX. Results of onsite employer monitoring reviews**.** Title the document or case note, ***"OJT Onsite Monitoring".***

X. OJT reimbursement invoice and supporting documentation to include timecards. Title document, ***"OJT Invoice Packet".***

a. **Invoice:**

i. Must clearly document the number of hours worked each day by the trainee and the rate of pay for the time period.

ii. Copy of the completed training plan showing evaluation of skill attainment, copies of signed payroll documentation for the trainee's wages, fringe benefits, and copies of supplemental training, if applicable.

iii. The total OJT reimbursement should not exceed the amount obligated as shown on the OJT contract or modifications, if applicable.

C. 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. Record a case note in the OJT service touchpoint describing:

I. At the start of OJT placement, document the following and title the case note ***"OJT Start"***:

a. How the OJT aligns with the individual's employment and training goals.
b. Name and location of the OJT employer.
c. Anticipated duration of the OJT.
d. Description of training/skills to be learned.
e. If applicable, anticipated supportive services that may be necessary to ensure successful completion of the OJT
f. Actual start date of the OJT.

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

a. Progress of the OJT learning plan.
b. If challenges have occurred, document steps taken/services provided to help the participant overcome those challenges to ensure successful completion of the OJT.
c. Pay dates
d. **Monitoring:** Outcomes of ongoing monitoring of the OJT which may include onsite visits and phone/email communications with the employer.

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

a. Outcome of the OJT.
b. Last paid workday
c. Next steps in the service delivery strategy as a result of the outcome of the OJT.

Occupational Skills Training (OST)

Customized Training (Adult, DW Only)

A. Service Verification

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 Start**"*: 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

B. 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. Completed ISS/IEP (paper copy or recorded in case notes) documenting the selected program of study with start date of training.

II. <u>Self-Sufficiency</u>: 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".***

III. <u>In-demand Occupation</u>: 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".***

a. 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".***

I. <u>Non-WIOA Financial Resources:</u>

a. No other resources available: 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".***

b. Other financial resources available: If the participant is awarded a Pell grant or other financial assistance or has access to other non-WIOA Title I funding to pay for training, upload copies of FAFSA award letters, or other documentation, or record the information in a case note and title the document ***"FAFSA/Other Financial Assistance".***

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

III. Training Authorization:

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

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

c. Customized or Cohort Trainings: 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, "***Cohort Training***".

IV. 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.
   i. If the individual was already enrolled in education or training at the time of 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.

b. 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

V. 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

VI. 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

VII. 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")

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

C. 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 ***"Training Start"*:**
   a. How the training aligns with the individual's employment and training goals.
   b. A description of the individual's skills and qualifications that will contribute to their successful completion of the training program and how this information was obtained.
   c. Where the training is being provided.
   d. Anticipated duration and outcome of the training.
   e. Actual start date of the training.

II. During the service, document the following and title the case note, ***"Training Update"***:
   a. Participant's progress in training 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 training.

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

Supportive Services

A. Service Verification

Record the applicable supportive service touchpoint in ETO.

B. Qualifying Service (Adult and Dislocated Worker programs Only):

I. A separate qualifying career and/or training service must be provided to individuals and recorded in ETO to accompany the supportive service, except for supportive services provided during follow-up. The qualifying service must be recorded in ETO on or close to the same date as the supportive service.

II. It is recommended a case note be recorded explaining how the accompanying career and/or training service connects to the supportive service recorded in ETO.

C. Upload the following (or record in case notes when specific documentation isn't required) into the Supportive Service touchpoint:

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.
- Not applicable for incentives (YA only).

II. Current Budget: A personal budget verifying the participant does not have adequate financial resources to obtain necessary supportive services is required. 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.
- Not applicable for incentives (YA only).

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.
- Not applicable for incentives (YA only).

IV. Supportive Service Request/Authorization:

a. Service providers will submit a written supportive service request/authorization to the service provider's authorized representative for approval. The request must be legible and include, at a minimum:
   i. The participant's name,
   ii. ETO ID,
   iii. Date of supportive service or incentive (YA only),
   iv. Vendor's name, and
   v. Signature of the applicable service provider representatives.

b. 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 Tracking Log: An up-to-date and legible 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:

a. The date a supportive service was provided to the participant,
b. What was purchased,
c. Total cost of the purchase,
d. Vendor name, and,
e. An up-to-date running total of supportive services spent to-date.
f. When applicable, disallowed costs must also be tracked on the supportive service log.

VI. Receipt, Supporting Documentation:

a. 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:
   - Title a receipt of the purchase, ***"Receipt".***
   - For a bus pass, title it, *"**Bus Pass**"*
   - For payment of a utility bill, title the bill, *"**Utility Bill Payment**".*
   - Follow the same naming convention for all other supportive services.

b. Example Supporting Documentation Requirements:

   Below are examples of required documents for various supportive services. Please reach out to WorkForce Central for documentation required for supportive services not listed here.

   i. **Incentives** (Young Adults Only):

      WIOA Title I funded incentives are permitted for recognition and achievement of milestones tied to any of the WIOA Title I Youth 14 elements and attainment of unsubsidized employment and/or employment retention resulting from participation in one or more youth program elements. Incentives may also be provided to young adults engaged in youth program elements funded by Title I statewide activities (Governor's reserve) funds.

      a. Do not record a service in ETO when providing an incentive. ESD does not consider incentives a service. Instead, create an Uploaded Files touchpoint in ETO and upload applicable incentive documentation to this touchpoint. In the identifier field, title the touchpoint "Incentive" followed by the date of the incentive.

      b. Case note: The following must be recorded in case notes recorded in the Case Notes History in ETO. Title the case note, ***"YA Incentive"*:**

         1) The WIOA Title I Youth program element/service and milestone achieved, or
         2) Attainment and retention of unsubsidized employment resulting from participating in one of the youth program elements, and
         3) Incentive amount paid for the achievement.

      c. Incentive Authorization: Young Adult service providers will submit a written supportive service/incentive request to the service provider's authorized representative for approval which is then uploaded into ETO into the Uploaded Files touchpoint. Title the document, ***"Incentive Request"*** or "***Incentive Authorization"***. The request must be legible and include, at a minimum:

         1) The participant's name,
         2) ETO ID,
         3) Date of incentive,
         4) Vendor's name, and

5) Signature of the applicable service provider representatives.

d. Up-to-date incentive tracking log. Title the document, "***Incentive Tracking Log***". The log must include:

1) The date an incentive was provided to the young adult,
2) The total cost of the incentive, and
3) A running total of incentives provided to-date.
4) When applicable, disallowed incentive costs must also be tracked on the supportive service/incentive tracking log.

e. Copies of service provider's receipts or gift cards 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".*

f. Service providers must also internally maintain appropriate and identifiable expenditure records of incentive payments for the purpose of local, state, and federal WIOA Title I monitoring and auditing activities.

ii. **Transportation assistance:**

The need for transportation assistance must be based on a lack of other available and reliable transportation necessary for the individual to successfully participate in employment and training activities and documented in case notes recorded in ETO.

a) Bus tickets/bus passes:
   1) Copy of the front and back of the bus ticket/pass.
   2) Itemized receipt
   3) Proof of payment including screen shot from transit provider showing fare price

b) Gas:
   1) Copy of the participant's valid driver's license
   2) Copy of the vehicle registration in the participant's name.
   3) Copy of participant's valid and current auto insurance with the individual listed as covered.
      - WorkForce Central authorization for exception to the above list must be documented in case notes recorded in ETO.
   4) Gas cards must be "gas only", itemized receipt not applicable
   5) Itemized receipt/Proof of payment from provider

c) Driver license expenses such as driver's education, or acquiring or renewing a driver's license:
   1) Copy of invoice paid to the vendor.
   2) Copy of certificate of completion of driver's education.
   3) Copy of new or renewed driver's license.

d) Vehicle insurance:
   1) Copy of the participant's valid driver's license.
   2) Copy of the vehicle registration in the participant's name.

e) Vehicle repair:
   1) Copy of the participant's valid driver's license.

2) Copy of the participant's valid and current auto insurance with the individual listed as covered.
3) Copy of the vehicle registration in the participant's name.
4) Copy of printed estimate for repairs from the vendor.
5) Copy of invoice paid to the vendor.

iii. **Childcare:**

Must be a licensed provider. WIOA Title I funded childcare is provided only for days/hours when the participant is engaged in employment and training activities.

a) W-9
b) Copy of itemized invoice which includes dates of care provided.
c) Proof of payment to the vendor.

iv. **Rental or other housing assistance**:

Referrals to housing resources must be facilitated and clearly documented in ETO case notes. Providers, in collaboration with the participant, must develop a financial plan for future rental/housing assistance payments.

a) A legible copy of the current rental/lease agreement, or mortgage statement in the participant's name, with signatures.
b) A copy of the landlord's W-9.
c) It is not necessary to upload the entire rental/lease agreement. The minimum requirement for rental/lease agreements are the legible pages with the participant's name, rental address, rental amount, rent due dates, and signatures.
d) Copy of invoice paid to vendor.

v. **Utilities:**

a) Copy of the utility bill with current amount owed, in participant's name and for the residence the participant resides.
b) Copy of invoice paid to vendor.

vi. **Food** (i.e., meals, groceries)-Young Adults Only:

Follow guidelines outlined in WorkForce Central's COVID-19 Policy located on [WorkForce Central's Policy Library] for the purchasing of food for eligible WIOA Title I enrolled young adults. The following documentation must be uploaded into the Supportive Service touchpoint in ETO:

a) Itemized list of basic food needs.
b) Action plan (either hard copy or documented in case notes) that identifies strategies to address food inadequacies, including community resources, financial planning/budgeting, meal planning, healthy eating options, etc.

vii. **Medical and prescription services:**

- Itemized invoice from vendor with participant's name included
- Proof of payment
- For items or services that are confidential in nature, enter a confidential case note in ETO and upload supporting documents to the confidential case note.
- In the supportive service touchpoint, record a case note if documents have been uploaded to confidential case note and direct the reader where to locate backup documents for the supportive service

viii. **Reasonable accommodations for individuals with disabilities**
- Itemized invoice from vendor with participant's name included
- Proof of payment
- For items or services that are confidential in nature, enter a confidential case note in ETO and upload supporting documents to the confidential case note.
- In the supportive service touchpoint, record a case note if documents have been uploaded to confidential case note and direct the reader where to locate backup documents for the supportive service

ix. **Expenses for out-of-state job search**:
- Evidence of interview, training or activity that is not paid by the prospective employer
- Itemized receipt for travel expenses (e.g., air fare, hotel, car rental, etc.)
- Proof of payment to vendor(s)

x. **Expenses for relocation:**
- Evidence of new job
- Itemized receipt for relocation expenses not paid for by new employer
- Proof of payment to vendor(s)

xi. **Training related expenses**:

a) Legible syllabus, registration, training enrollment form, or other similar documentation must include:
   1) Name of school
   2) Participant's name
   3) Title of the training program/class
   4) Time period of instruction, and
   5) The specific items necessary for the student's participation in the specific training program

xii. **Gift cards:**

a) Legible itemized copy of the receipt. The receipt must include the date of purchase and amount paid.
b) If the receipt is lost, the participant and service provider must sign a statement saying the participant received the supportive service, with the exact cost included in the statement.

D. Case notes:

For all WIOA Title I programs, a case note must be recorded for each supportive service provided to participants. The case note must be recorded in the applicable Supportive Service touch point in ETO and include:

I. The justification for the supportive service, including an explanation for how the supportive service is necessary for the individual to complete their training and employment plan.

II. When applicable, 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.

III. A summary of what is being purchased. For example, "interview clothes", "bus pass", "hygiene items".

IV. Vendor.

V. The anticipated amount of the supportive service followed by the exact amount of the purchase.

VI. Outcome of the supportive service request, when applicable. Examples include:
- Documenting instances when a request for a supportive service was made but ultimately not purchased, or
- If the supportive service paid for a test of some kind (e.g., driving test), document the outcome of the test (e.g., “participant passed their driving test, copy of certificate/driver license is uploaded”)

E. Exceptions: Written WorkForce Central authorization is required for any permissible exceptions for the above requirements. Authorized exceptions must be uploaded into the applicable supportive service touchpoint in ETO.

Date and Reason for Program Completion

A. Program Completion Case Note

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. A synopsis of the individual's engagement in the program including:
   a. a brief description of the services planned at program enrollment,
   b. summary of services received, and
   c. outcomes of those services.

II. Date and reason for program completion. The date of program completion recorded in case notes must match the program completion date recorded in ETO.

III. School status at program completion (WIOA Title I Youth program only).

IV. Types and duration of planned follow-up services, if applicable

V. Date and reason the individual opted out of receiving follow-up services, if applicable.

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

I. (WIN 0100): In the Outcomes and Completion touchpoint record the following:
   a. School status at exit if known.
   b. Last known documented school status, after participation has begun and if unknown at time of exit.
   c. 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.
   d. TEGL 23-19: If applicable, 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

II. 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:
   a. Date enrolled in school
   b. Name of school
   c. Training program
   d. Anticipated completion date
   e. Anticipated credential to be earned
   f. Future dates and methods to collect training status and outcomes (including credentials earned) in the 2nd and 4th quarters after exit.

C. Exit Due to Post-Secondary Enrollment (Positive Exit for Young Adults Only):

I. For young adults who are completing the WIOA Title I program and are exited due to enrollment into post-secondary education, upload the following documents into the Outcomes and Completion touchpoint. Title the document, ***"Post-secondary Enrollment".***

   a. Any one of the following:
      i. Copy of post-secondary enrollment record
      ii. 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)".

iii. School records
iv. Transcript or report card

b. Documentation from the post-secondary school must include:
   i. The participant's name
   ii. Name of school
   iii. Date young adult enrolled in the training program
   iv. Date young adult started training, if applicable at time of program completion
   v. Title of training program participant is enrolled in
   vi. Anticipated training completion date

II. Record a case note in the Outcomes and Completion touchpoint where the above documents were uploaded, that includes the following. Title the case notes, ***"Post-secondary Enrollment*"**.
   a. Date of post-secondary enrollment
   b. Anticipated and actual start date of training
   c. Training program
   d. Name of school
   e. Anticipated completion date
   f. Anticipated credential to be earned

D. Exit due to unsubsidized employment (Positive exit for all formula programs):

I. For any participant completing their program as a result of obtaining unsubsidized employment, create an Outcomes, Program Completion touchpoint and upload any of the following source documentation to verify employment:

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

II. Case notes: Record the following in the Outcomes, Program Completion touchpoint. Title the case note ***"UE".***
   a. Whether the employment is on a pathway to meeting the individual's self-sufficiency needs or is comparable to previous employment, when applicable.
   b. Name of employer
   c. Job title
   d. Wage
   e. Full-time or part-time status
   f. Start date of employment
   g. Future dates and methods to collect employment status and wages in the 2nd and 4th quarters after exit.

E. Other reason for exit (Participant is excluded from positive performance outcomes)

For individuals 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. Individuals exiting the program for any of the following reasons are excluded from DOL performance outcomes:

- Loss of contact
- Incarceration
- Medical condition that will prevent participation in services
- Deceased
- National Guard or other called to active duty
- In foster care and has moved from the area (Youth Only)

Follow-up Services

A. Employer 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.

B. Case Notes

On a minimum quarterly basis, and more frequently if appropriate, record the individual's progress/status updates while in follow-up in standalone case notes recorded in ETO.

C. 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.

D. Follow-up Services

In the Follow-up Services touchpoint, record follow-up services at the time the service is provided, including case notes reflecting services provided. Follow the same documentation upload and case note procedures noted throughout this policy.

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 post-secondary education for WIOA Title I young adults only 2nd and 4th quarters after exit

I. Definitions

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

b. **Post-secondary education – 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.

c. **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.

d. **Post-secondary education – 4th 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 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

a. Employment

i. Create a new Follow-up touchpoint.

ii. From the dropdown menu, select "Record Performance Information" and complete all tabs.

iii. 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.

b. Employment related to training

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

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

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

c. Post-Secondary Education (Young Adults Only):

i. Create a new Follow-up touchpoint.

ii. From the dropdown menu, select "Record Performance Information" and complete all of the tabs.

iii. Upload any of the following source documentation for young adults enrolled in post-secondary education 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

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.

Note for High School Diploma or GED Credentials: 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
- Graduate degree programs are excluded from this measure

III. Source Documentation Requirements

a. Create a new Follow-up touchpoint.

b. From the dropdown menu, select “Record Performance Information” and complete all of the tabs.

c. Upload or record 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
   - 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