ETO Data Validation & Documentation Policy Handbook

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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 & Documentation Policy Handbook, Rev. 3 dated September 27, 2022.

This policy was revised to:
- Update references, citations, and applicable hyperlinks.
- Clarify documentation requirements when editing an ETO record.
- Include "pregnant/pregnancy" in the "medically confidential" category and update procedures for recording this eligibility criteria for applicable WIOA Title I youth.
- Update eligibility and enrollment processes including:
  - Allowances for the use of self-attestation and remote or virtual documentation for eligibility and data validation purposes, in alignment with current DOL and ESD authorizations.
  - Include the option to upload a complete enrollment packet in the Uploaded Files touchpoint in ETO.
  - Clarify Pierce County residency requirements by removing referenced to "City of Tacoma".
  - Clarify Selective Service documentation requirements for participants who turn age 18 after program enrollment.
  - Update procedures for enrolling non-Pierce County residents into Pierce County WIOA Title I programs.
  - Add a requirement to record notification of EMAP services in the eligibility/program enrollment case note.
  - Add procedures when co-enrolling participants into more than one program.
- Update documentation requirements when validating delivery of WEX and pre-apprenticeship services.
- Emphasize subrecipient monitoring requirements for WEXs and OJTs.
- Algin occupational skills documentation requirements with WorkForce Central's ITA policy.
- Add new section for Incumbent Worker Training (i.e., WorkForce Central's Employer Reskill/Upskill Fund (ERUF) program).
- Update Supportive Service documentation and ETO requirements including:

- o Add the ESD requirement to record a qualifying service in ETO when providing a supportive service in the WIOA Title I Adult and Dislocated Worker programs.
  - o Clarify supportive service authorization requirements.
  - o Documentation requirements for food and gift card supportive services.
  - o Require an itemized receipt for utility supportive services.
  - o Remove the requirement to develop and upload a participant budget when requesting supportive services.
  - o Update documentation requirements for medical and accommodation supportive services.
  - o Add ESD requirement to document in case notes instances when training services (other than tuition) are paid with WIOA Title I supportive services rather than an ITA.
- Update documentation requirements for program completion including a list of "other reasons for program exit".
- Update documentation requirements for follow-up services including:
  - o Remove the requirement to upload documentation (other than case notes) to validate employment at program exit, or for youth only, enrollment in postsecondary education.
  - o Clarify documentation requirements for provision of support services during follow-up.
- Add new "Recording Measurable Skills Gains and Credentials" section.

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 serviced 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 Change 2, ESD Policy 1003-Data Validation (current and future editions), 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 employment and training outcomes of WIOA Title I recipients into ETO as outlined in this policy handbook. Source documentation for required data elements are located in TEGL 23-19 Change 2, Attachment II, and ESD's Policy 1003 Attachment B (current and future editions).

WorkForce Central will conduct ongoing reviews of ETO records and ETO reports to ensure compliance with this policy and to validate the accuracy of information recorded in ETO. WorkForce Central's WIOA Title I 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 their team is recording in ETO. Errors identified by service providers and WorkForce Central must be resolved immediately. As needed, WorkForce Central will assist providers in correcting errors identified in ETO 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 Titel I contract.

To ensure consistency and accuracy of the uploading of data validation source documentation into ETO across all Pierce County WIOA Title I programs, 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 consistent naming conventions 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, Change 2
    - 26-26
- TEN 19-22, Change 1
- 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

Attachments

- [WorkForce Central's ETO Instruction Guide](#)

Approved

Katie Condit (Mar 20, 2024 08:04 PDT)

_____   Mar 20, 2024

Katie Condit, WorkForce Central 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 WIOA Title I 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 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 serv ice 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 corrections to an ETO record must be documented in case notes recorded by the career advisor rather than the Department Head. The case note must include the specific edits made to the ETO record and the date the edits occurred. Depending on the circumstances, the case note will be recorded in a standalone case note or in the applicable service touchpoint.

Case Notes

Case notes are a required method of documenting WIOA Title I enrollments and 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 WIOA Title I recipients 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 programs, 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, WIOA Title I service providers, one-stop partners, federal, state, and local monitors and auditors are able to recognized and discern each service and expenditure provided to and made on behalf of a WIOA Title I recipient.

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), and Confidential Information, below.

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 file is transferred to a new career advisor. The new career advisor should be able to follow the story of why an individual was enrolled, services that were planned and provided, and the current status of the participant.
- In the event management needs access to information pertaining to the services provided to the participant.
- 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 (SAO), WorkForce Central, and other authorized personnel who must have access to information pertaining to the services provided to WIOA Title I enrolled individuals 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 questioned and disallowed costs.
- The participant ETO 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 and 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 separately recorded in ETO.

Case notes must be factual and not contain opinions, derogatory statements, or diagnosis for which the career advisor is not qualified to make.

Case notes must not contain information identifying other individuals enrolled in WIOA Title I programs.

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 WIOA Title I program.

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

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

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 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 Personally Identifiable Information (PII) Policy located on WorkForce Central's Policy Library for more information.

In February 2024, the State's Equal Opportunity Department notified WorkForce Central that references to a participant's pregnancy is considered medically confidential information and

cannot be documented in case notes recorded in ETO. For the WIOA Title I Youth (Young Adult) program, pregnancy is an eligibility criterion for in-school and out-of-school youth. Moving forward, service providers must not record "pregnant" in case notes when a young adult meets this eligibility criteria. Instead, providers must document the young adult met *"eligibility criteria for category #6 for In-School-Youth (ISY)"* and *"eligibility category #7 for Out-of-School Youth (OSY)"*.

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. Record the purpose and the 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 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 first confirmed the scanned item is legible in the ETO record.

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 staff who have scanning responsibilities to ensure adherence to these requirements and procedures.

Program Eligibility & Enrollment

Supporting source documentation for program-specific eligibility data elements and program enrollment must be in compliance with WorkForce Central's Title I Program Eligibility, Enrollment & Documentation Policy Handbook, located at WorkForce Central's Policy Library and with ESD Policy 1003, Attachment B (current and future revisions), ESD Policy 1019 (current and future revisions) and Department of Labor's TEGL 23-19 (current and future revisions).

Self-Attestation

When authorized by DOL and ESD, WorkForce Central accepts self-attestation via the following

formats:
- Signed and dated paper WIOA application, or
- Electronically signed ETO WIOA Eligibility Application, or
- Texts, emails, online surveys that are dated and traceable to the participant.

Required source documentation should be collected first. However self-attestation is acceptable in the following circumstances:
- When required source documentation is unavailable,
- If collecting source documentation poses a hardship on the individual, or
- If collecting source documentation delays program enrollment.

Self-attestations other than an electronically signed ETO WIOA Eligibility Application must be uploaded in the "Uploaded Files" touchpoint in ETO.
- Title the document, *"Self-attestation, [and the eligibility or demographic element it is used for}*. For example, "*Self-attestation, unstable housing*".

Remote or Virtual Eligibility Documentation

Remote or virtual source documentation is allowed. It can be obtained and verified:
- By electronic means (emailed or texted attachments, scans, digital photographs sent in encrypted form, electronic signature platforms such as DocuSign or Verisign).
- Through copies of documents sent via postal pick-up or mail drop-off at local one-stop sites.
- Through a combination of the above in order to safeguard Personally Identifiable Information (PII).

Required signatures for eligibility documentation (including applications, Equal Opportunity (EO) and complaint procedures, data collection certification, and self-attestation) can be obtained via:
- Electronic document signing platforms (e.g., DocuSign, Verisign).
- Electronically transmitted digital photos of signed documents.
- Postal mail pick-up or drop-off paper forms.
- Email (in lieu of signatures)
  - For applications and Equal Opportunity (EO) and complaint procedures, applicants must reply in the affirmative that they have read and understand the information. The responses and date stamps on the emailed replies indicate completion of the form.
  - For the data collection certification and self-attestation forms, applicants must reply in the affirmative that they certify the information is true and accurate. The responses and date stamps on the emailed replies indicate completion of the form.
- A combination of the above.

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. <u>ETO WIOA Eligibility Application Touchpoint:</u>
   a. Take a new touchpoint and select "WIOA Eligibility Application".
      i. Every demographic radial button and drop down option must be answered.
      ii. Upload the applicable source documentation used to validate the participant's demographics and eligibility criteria into the appropriate field.
         1. Alternatively, uploading all enrollment and eligibility source documentation, including the paper WIOA Title I program application in one packet to an Uploaded Files TP is acceptable. If choosing this option, record a case note directing the reader to the Uploaded Files TP where the eligibility source documentation is uploaded and ensure the touchpoint is clearly identified as containing the eligibility source documentation.
   b. There are a variety of source documents authorized to validate eligibility and participant demographics when completing the ETO WIOA Eligibility Application touchpoint (See [ESD Policy 1003, Rev. 5 Attachment B](#)). When uploading source documentation other than a self-attestation, title the document what it is and what the specific eligibility criteria the document is validating. For all naming conventions, it is ok to add the participant's initials in front of the document title. For example:
      i. If uploading an ID to verify age, title the document, *"ID, Age Verification"*. Or if adding the participant's initials, "*KD, ID, Age Verification*".
      ii. When uploading Selective Service verification, title the document, *"SS verification".*
         1. If a participant who meets the criteria for registering for Selective Service turns age 18 *after* program enrollment, upload the Selective Service registration verification in the Uploaded Files touchpoint.
         2. Enter a case note indicating registration has occurred and the Selective Service registration verification is in the Uploaded Files touchpoint.
      iii. Basic Skills Deficiency (BSD) source documentation:
         1. 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 (ELL) source documentation:
         1. Assessment test results: Title the document, *"ELL-Assessment"*.
         2. Applicable records from education institution (i.e., transcripts or other school documentation): Title the document, *"ELL-School*

Records”.

     v. Income verification:
1. WIOA income eligible: Signed and dated WIOA application.
2. SNAP benefit documentation in the participant's name: Title the document, *“SNAP”*.
3. TANF benefit documentation in the participant's name: Title the document, *“TANF”*.

    vi. Dislocated Worker Eligibility Only:
1. When uploading Dislocated Worker program eligibility source documentation, title the document what it is such as, *“Notice of Layoff”, “Verification from Employer”, “DD-214”, Spouse PCS Orders”*, etc.

   vii. All other eligibility and demographic criteria:
1. 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: If using a paper WIOA program application:
     i. Upload the complete, signed, and dated application to the Uploaded Files touchpoint in ETO.
     ii. Title the application, *“WIOA Application”.*
   b. ETO WIOA Title I program application: If you are not using a paper WIOA application, ensure the ETO WIOA Title I program application is completed in its entirety and the participant electronically signs the application.

III. Pierce County Residency: Pierce County residents receive priority for enrollment into WorkForce Central's WIOA Title I programs. Non-Pierce County residents may be enrolled on a case-by-case basis only if approved by the WorkForce Central contract manager or designee. Enrollment of non-Pierce County residents will require WorkForce Central's coordination with the Workforce Development Board (WDB) of residency. WorkForce Central approval must be documented in the eligibility/program enrollment case note recorded in the ETO WIOA Eligibility Application Touchpoint.
   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. Title the document, *“PC Residency”*.

IV. Authorization to Share Confidential Information and Records Form: Individuals seeking WIOA Title I program services must be provided the <u>Authorization to Share Confidential Information and Records Form.</u> By signing this form, individuals are attesting they have read and understand how their information will be shared and protected among the WorkSource Pierce partnership.
   a. Upload the signed Authorization to Share Confidential Information and Records Form into the Uploaded Files touchpoint.

b. Title the document, *"Auth. To Share Form".*

V. <u>Participant Information Form:</u> Individuals must also be provided the opportunity to sign a statement acknowledging they understand their Equal Opportunity (EO) and non-discrimination rights and that they 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 form, *"Part. Info. Form and EO Notice"*.

WIOA Title I Youth (Young Adults) Program Only

I. <u>School status at enrollment:</u>
    a. When uploading source documentation other than self-attestation (i.e., paper or ETO WIOA applications) to verify school status at program enrollment, such as 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 program enrollment.
    b. Title the document what it is, such as, *"ISY verification, transcript"*, or *"OSY verification, dropout letter"*.

II. <u>Exception to Income Requirement (5% Window):</u> Service providers must receive WorkForce Central authorization to enroll young adults into the ISY program or into categories 3 or 9 of the OSY program who otherwise would have to meet the income eligibility criteria. The request and subsequent WorkForce Central approval to waive the required income eligibility must be uploaded into the participant's ETO file and documented in case notes recorded in ETO.
    a. Upload the request and WorkForce Central approval into the Uploaded Files touchpoint.
    b. Title the document and the case notes *"Income Exception-5% Window".*

III. <u>Objective Assessment (OA):</u>
    a. 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:
        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

b. Ensure the date and type of assessment is documented. Examples of "type of assessment" may be information learned about the individual through an interview, or outcomes of formal or informal skill, personality, or interest assessments, or through other means.

c. The OA may be documented in standalone case notes recorded in ETO or on a paper form uploaded into ETO:

    i. <u>Paper OA</u>:

        1. If using a paper OA, upload the document into the Individual Participant Plan touchpoint in ETO.

        2. Title the OA *"Objective Assessment"* or *"OA"*.

        3. If the document is a combined OA and ISS, title the document, *"OA-ISS"*.

        4. Ensure the location of the OA is documented in the enrollment case note recorded in the ETO WIOA Eligibility Application touchpoint, Notes tab.

    ii. <u>OA in standalone case notes</u>:

        1. If recording an OA in standalone case notes only, select "Review Seeker/Participant Touchpoints" on the participant's dashboard then select "Case Notes, Take New", and 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 individual service plan (ISS) created as a result of the assessment.

        2. Title the case notes, "OA-*ISS Case Notes"*. For example:

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

          a. **Basic Skills**: *John's most recent report card reflected A's and B's in most courses, but 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.*

          b. **Occupational Skills:** *John reported not having much knowledge or skills for a specific occupation. He did, however, express an interest in learning skills necessary for employment in the construction trades since he worked alongside his Dad on construction sites on a few occasions. Services Planned (ISS): 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 a list of resources).*

          c. **Prior Work Experience:** *John does not have any paid work experience but as mentioned before, he did work alongside his Dad on a few occasions on construction sites performing labor work such as carrying building materials or cleaning*

worksites. Services Planned (ISS): We will help John identify a WEX and/or employment opportunities where he can build on his current entry level labor experience in construction.

        d. **Employability:** *Services Planned (ISS): Based on ABC assessment and not having much prior exposure to work, John may benefit from XYZ activities/services to improve his understanding of the necessary attributes and soft skills necessary for obtaining and maintaining employment.*

        e. **Complete list of example OA-ISS case notes:** *Link to Example OA-ISS case notes*

    d. 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 title the case note *"OA Case Note"*.

IV. Individual Service Strategy (ISS):

    a. The results of the OA are documented on the ISS on a paper document uploaded int ETO or recorded in standalone case notes along with the OA, as noted in the examples above.

        i. Paper ISS:

            1. If using a paper ISS, upload the document into the "Individual Participant Plan" tab in ETO.

            2. Title the document *"ISS"*.

            3. If the document is a combined OA and ISS, as in the examples above, title the document *"OA-ISS"*.

        ii. ISS in standalone case notes:

            1. 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.

            2. Title the case notes, *"OA-ISS Case Notes"*.

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

    b. Quarterly ISS Review:

        i. 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 young adult on a quarterly basis and update the ISS accordingly at that time.

        ii. As with all changes to the ISS, the outcome of the quarterly ISS review must also be recorded in standalone case notes.

        iii. Title the updated paper ISS or case note *"ISS Quarterly Review"*.

WIOA Title I Adult Program Only

I. Priority of Service:

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

        i. Priority of Service categories 1 and 2:

            1. Priority 1 only: If the participant is a veteran or eligible spouse:

                a. Upload a DD-214, letter from the Veteran's Administration, or other applicable documentation to the Uploaded Files touchpoint.

                b. Title the document, *"Veteran (or Eligible Spouse) Verification"*.

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

            2. Priority 1 and 2:

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

                    i. Signed and dated WIOA Title I Adult application

                    ii. SNAP benefit documentation in the participant's name. Title the document, *"SNAP"*.

                    iii. TANF benefit documentation in the participant's. Title the document, *"TANF"*.

                    iv. All other income verification: Title the document *"Income Verification"*.

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

        ii. Priority of Service Category 3:

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

                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 program enrollment case note recorded in the ETO WIOA Eligibility Application touchpoint, Notes tab.

        iii. Priority of Service Category 4:

            1. Describe in the program enrollment case note the circumstances that contribute to the participant earning insufficient income to meet their basic needs and results of the U.W. Self-Sufficiency Calculator.

            2. Upload the results of the U.W. Self-Sufficiency Calculator to the

WIOA Title I Adult & Dislocated Worker Programs Only

I. Employment status at program enrollment:
   a. Employment status at program enrollment can be documented via a paper WIOA Application uploaded into ETO, via the ETO WIOA Eligibility Application touchpoint, or in case notes.
   b. At a minimum, the individual's employment status must be documented in the program enrollment case notes recorded in the ETO WIOA Eligibility Application touchpoint, Notes tab.

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.
   b. Title the document, *"Veteran (or Eligible Spouse) Verification"*.
   c. Document the participant's veteran or eligible spouse status in the enrollment case note recorded in the ETO WIOA Eligibility Application touchpoint, Notes tab.

III. Comprehensive Assessment:
   a. The comprehensive assessment, including the self-sufficiency determination may be documented in a paper format uploaded into ETO or recorded in standalone case notes.
      i. Paper assessment:
         1. If using a paper assessment, upload the document into the "Development of Individual Employment Plan (IEP)" touchpoint.
         2. Title the document, *"Assessment, Self-Sufficiency"*.
         3. Ensure the location of the assessment is documented in the enrollment case note recorded in the ETO WIOA Eligibility Application touchpoint, Notes tab.
      ii. Assessment in standalone case notes:
         1. If recording the assessment in standalone case notes only, provide a brief summary of the:
            a. Outcome of the assessment,
            b. The individual's self-sufficiency needs,
            c. Followed by a brief description of the service plan (IEP) created as a result of the assessment.
         2. Title the case notes, *"Assessment, IEP Case Notes"*.

IV. Individual Employment Plan (IEP):
   a. 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. Paper IEP:
         1. If using a paper format, upload the document into the IEP touchpoint in ETO.
         2. Title the document, *"IEP"*.
      ii. IEP in standalone case notes:

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

 b. <u>Quarterly IEP Review</u>:
  i. 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.
  ii. As with all changes to the IEP, the outcome of this quarterly IEP review must also be recorded in case notes.
  iii. Title the updated paper IEP or case notes, "*IEP Quarterly Review*".

All WIOA Title I Programs

I. <u>Date and type of first qualifying service that triggers participation</u>:
 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 participant'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 of the service, and next steps in the service delivery plan.

II. <u>Eligibility/Program enrollment case note</u>:
 a. At a minimum, the following must be recorded in a case note in the ETO WIOA Eligibility Application touchpoint, Notes tab:
  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. <u>Adult Only</u>: Priority of Service category.
  iv. The individual's current education and employment status.
  v. The individual's education and employment goals.
  vi. Notification of EMAP services
  vii. Summary of planned services.
   1. <u>Adult and Dislocated Worker programs</u>: Staff may record further detailed planned services in he Development of IEP touchpoint.
  viii. <u>Young Adult program only</u>: Notification of follow-up services available to

the participant following completion of their program.

    III.   <u>Co-enrollment:</u>
   a. Ensure the participant meets the program specific eligibility criteria for each program of enrollment.
   b. Follow ETO enrollment requirements for each program of enrollment.
   c. Record the justification for the co-enrollment in case notes including how the co-enrollment will assist the participant with achieving their training and/or employment goals.

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 standalone case notes, must be updated as services are provided, as outcomes are attained, or as service delivery strategies change.

Every qualifying service provided to the participant, and the outcome of the service must be recorded in ETO and documented in case notes. Dates of services recorded in ETO must reflect the actual date the participant received the service. Case notes must corroborate the services and service outcomes recorded in ETO. Qualifying services are listed in ESD's WorkSource Service Catalog located t ESD's [Workforce Professionals Center website, Technology Tab](#).

When appliable, 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, Change 2, Attachment II](#) and [ESD Policy 1003, Rev. 5](#).

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

Not all services provided to participants 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 services and performance outcomes described in this policy handbook must be uploaded in the applicable service touchpoint recorded in ETO and in the sequence provided.

The Department of Labor, WA State ESD, and WorkForce Central will monitor ETO records to ensure compliance with TEGL 23-19 (current and future changes), ESD Policy 1003 (current and future revisions), and this policy to ensure the appropriate source documents are uploaded into

ETO, the accuracy and timeliness of services and service outcomes recorded in ETO, and case notes support the data recorded in ETO.

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

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

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

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 the service and type of service received.

Case notes

For durational services, case notes must be recorded in the applicable service touchpoint at the beginning, during, and conclusion of the service and include the following details:
I.   At the start of the service, document the following and title the case note, *"Service Start"*:
    a. How the service aligns with the young adult'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 notes, *"Service Update"*:
    a. The young adult's progress during the service including challenges and accomplishments to-date, including MSGs if applicable.
    b. If challenges occur, document steps taken or services provided to help the young adult overcome the 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.

Measurable Skill Gain (MSG) and Credentials Earned

See Recording Measurable Skill Gain (MSG) and Credentials in ETO

Paid Work Experience (WEX)

Job Shadow (Youth Only)

Transitional Jobs (Adult, Dislocated Worker Only)

Service Verification

Upload and record both of the following source documents into the applicable WEX service touchpoint recorded in ETO to validate the delivery of the service. Title the document and case notes, "*WEX (or "Job Shadow" or "Transitional Job) Verification"*.

- Case notes
- Signed WEX/Job Shadow/Transitional Job agreement

Case Notes

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

I. At the start of the WEX/Job Shadow/Transitional Job, document the following and title the case note, *"WEX (or Job Shadow/Transitional Job) Start"*.
   a. How the WEX, Job Shadow, or Transitional Job placement aligns with the participant's employment and training goals.
   b. Employer name and location of the WEX, Job Shadow, or Transitional Job.
   c. Anticipated duration and outcome of the activity.
   d. Summary of the job duties (not applicable for Job Shadows).
   e. The supportive service needs of the intern for successful participation and completion of the activity (required for Transitional Jobs, as needed for WEX and Job Shadow).
   f. Transitional Jobs only (Adult and Dislocated Workers):
      i. Description of how the participant meets the "systemic barriers to employment" eligibility criteria, including those who are chronically unemployed or have inconsistent work history.
      ii. Description of the required comprehensive career and supportive services to be provided as part of the Transitional Job placement.
   g. Actual start date of the WEX, Job Shadow, or Transitional Job placement.
II. During the service, document the following and title the case note, *"WEX (or Job Shadow or Transitional Job) Update"*:
   a. Not applicable for Job Shadows.
   b. Progress of the learning plan during the WEX or Transitional Job placement.
   c. If challenges have occurred, document the steps taken or services provided to help the participant overcome the challenges to ensure successful completion of the activity.
   d. **Monitoring**:

        i.   Not applicable for Job Shadows.

        ii.   The service provider is required to conduct monitoring of the WEX or Transitional Job to ensure the participant is receiving the planned training and to address issues as they arise. Monitoring may include onsite visits and phone or email communications with the Host Site and intern.

        iii. Outcomes of the ongoing monitoring must be recorded in case notes.

    e. Pay dates:

        i.   Not applicable for Job Shadows.

        ii.   Record pay dates in case notes.

III.   At the conclusion of the WEX, Job Shadow, or Transitional Job, record the following and title the case note, *"WEX (or Job Shadow or Transitional Job) Conclusion"*:

    a. Outcome of the service.

    b. Actual end date of the service, including the last paid workday.

    c. Next steps in the service delivery strategy.

Required WEX/Job Shadow/Transitional Job Documentation

Upload the following documents into the applicable WEX/Job Shadow/Transitional Job service touchpoint recorded in ETO:

I.   <u>Youth Only</u>:

    a. For minors ages 17 and younger, a completed parent/school or summer authorization form.

    b. Title the document, *"Minor Authorization Form"*.

II.   <u>WEX/Job Shadow/Transitional Job Host Site and Intern contracts,</u> including modifications and learning plans (including a pre-assessment):

    a. The WEX Host Site (completed by WFC's Business Solutions) and Intern contracts must be signed by all parties.

    b. Title the contracts:

        i.   *"WEX Host Site Agreement"*

        ii.   *"WEX Intern (or Job Shadow or Transitional Job) Contract, Learning Plan"*

III.   <u>Mid-evaluation forms</u>:

    a. Not applicable for Job Shadows (Youth Only)

    b. Title the mid-evaluation, *"Mid-WEX (or Transitional Job) Eval"*

IV.   <u>Timecards/time sheets</u>:

    a. Not applicable for Job Shadows (Youth Only)

    b. Timecards/time sheets for each pay period must accurately reflect the hours the intern worked, must be legible, and must be signed by both the intern and the site supervisor.

    c. Title the documents, *"Timecard (insert pay period)"*, for example, *"Timecard 7/1/23 – 7/15/23"*.

V.   <u>Paystub/paycheck</u>:

    a. Not applicable for Job Shadows (Youth Only)

    b. Upload a copy of the paystub, or paycheck, or other evidence of WEX earnings.

    c. Title the document *"Paycheck (or Payment) and insert pay date"*. For example,

"Paycheck 7-16-23".

     d. If paystub/paychecks aren't available, a payroll/ADP report that includes the WEX participant by name and is included in the monthly invoice packet submitted to WorkForce Central is acceptable. Upload into ETO is not applicable.

VI. <u>Final evaluation</u>:

     a. Not applicable for Job Shadows (Youth Only)

     b. Title the document, *"Final WEX (or Transitional Job) Eval"*.

Measurable Skill Gain (MSG) and Credentials:

MSGs and credentials are not applicable for Paid WEXs, Job Shadows, or Transitional Jobs.

Pre-apprenticeship (Youth Only)

Service Verification

I.   Pre-apprenticeship program with recognized credentials:
   a. If the youth pre-apprenticeship program includes the attainment of one or more industry recognized credentials, the following two services must be recorded in ETO:
      i. Paid and Unpaid Work Experience with Academic/Education Component Pre-Apprenticeship Program (Youth Only)
      ii. Occupational Skills Training (Youth Only)
   b. Both service touchpoints must have the same activity start date and completion date recorded in ETO.
   c. See instructions for documenting the Occupational Skills Training (Youth Only) service touchpoint in the Occupational Skills Training section of the policy handbook.
II. 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 the service. Title the document, *"Pre-Apprenticeship Verification"*.
   a. Case notes
   b. Activity sheets
   c. Sign-in sheets
   d. Attendance records
   e. Logs or status forms noting receipt of service and combination of services received.
   f. Copy of enrollment record
   g. File documentation with notes from program staff
   h. School records, such as training schedules
   i. Transcript or report card
   j. Signed training contract

Case notes

For durational services, case notes must be recorded in the applicable service touchpoint at the beginning, during, and conclusion of the service and include the following details:
I.   At the start of the service, document the following and title the case notes, *"Pre-apprenticeship Start"*:
   a. How the pre-apprenticeship aligns with the young adult'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. The young adult's progress in the pre-apprenticeship including challenges and accomplishments to-date, including MSGs, if applicable.

    b. If challenges have occurred, document the steps taken or services provided to help the young adult overcome the challenges to ensure successful completion of the service.

III. 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.

Measurable Skill Gain (MSG) and Credentials

MSGs and credentials are not applicable for the Paid and Unpaid Work Experience with Academic/Education Component Pre-Apprenticeship Program (Youth Only).

However, MSG and credentials are applicable when an occupational skills training is included in the pre-apprenticeship program, and the applicable Occupational Skills Training (Youth Only) service is recorded in ETO, as noted above. Instructions for recording and uploading the MSG and credentials earned are located in the Recording Measurable Skills Gains and Credentials in ETO section of this policy handbook.

On-the-Job Training (OJT)

Service Verification

Upload or record the following documents in the OJT touchpoint recorded in ETO to validate the delivery of this service. Title the uploaded documents or case notes, *"OJT Start"*.
- Case notes
- Activity sheets
- Sign-in sheets
- Attendance record
- Vendor contract/OJT contract
- Logs or status forms/case notes noting receipt of the service and combination of services received.

Case Notes

For durational services, case notes must be recorded in the applicable service touchpoint at the beginning, during, and conclusion of the service and include the following details:
I. At the start of the OJT placement, document the following and title the case notes, *"OJT Start"*:
   a. How the OJT aligns with the participant's employment and training goals.
   b. Name and location of the OJT employer.
   c. Anticipated duration of the OJT.
   d. Description of the training/skills to be learned.
   e. If applicable, anticipated supportive services that may be necessary to ensure successful participation and completion of the OJT.
   f. Actual start date of the OJT.
II. During the OJT placement, document the following and title the case note, *"OJT Update"*:
   a. Progress the trainee is making on their OJT learning plan.
   b. If challenges have occurred, steps taken or services provided to help the participant overcome the challenges to ensure successful completion of the OJT.
   c. Monitoring:
      i. The service provider is required to conduct regular monitoring of the OJT to ensure the participant is receiving the contracted training and to address issues as they arise. Monitoring may include onsite visits and phone or email communications with the employer and trainee.
      ii. Outcomes of the ongoing monitoring must be recorded in case notes.
   d. Pay dates.
III. At the conclusion of the OJT, record the following and title the case notes, *"OJT Conclusion"*:
   a. Outcome of the OJT, including if the employer retained the trainee on a permanent full-time basis.
   b. Last paid workday.

c. Next steps in the service delivery strategy.

Required OJT Documentation

The following must be uploaded or documented in case notes in the OJT service touchpoint recorded in ETO:

I. <u>Assessment results</u> identifying an OJT as an appropriate service.
II. <u>Updated ISS/IEP</u> (paper or recorded in case notes) documenting the OJT service.
III. <u>Employer OJT Agreement</u> (completed by WFC Business Solutions). Title the document, *"OJT Employer Agreement"*.
IV. <u>OJT Contract,</u> including how the reimbursement rate was determined and modifications, signed by all parties.
    a. Title the original contract *"OJT Contract"* and modifications, *"OJT Mod 1 (or 2, etc.)"*
V. <u>Learning pla</u>n, completed prior to the start of the OJT. Title the learning plan, "*OJT Learning Plan"*.
VI. <u>Job description and related DOL/O*NET</u> reports (if not already included in the OJT contract) to support the training duration and skills to be learned. Title the document, *"Job Description"*.
VII. <u>OJT evaluations/trainee progress report</u>s. Title the document, *"OJT Progress Report"*.
VIII. <u>OJT reimbursement invoice</u> and supporting documentation, including timecards/timesheets or other documentation showing evidence of hours worked, lunch breaks, and pay. Title the document, "*OJT Invoice Packet"*.
    a. Invoice packet must include:
        i. Must clearly document the number of hours the trainee worked each day and the rate of pay for the time period.
        ii. Copy of the completed training plan showing the evaluation of skill attainment, copies of signed payroll documentation for the trainee's wages fringe benefits, and copies of supplemental training, if applicable.
        iii. Total OJT reimbursement should not exceed the amount obligated as shown on the OJT contract or modification, if applicable.

Measurable Skill Gain (MSG) and Credentials

I. <u>Recording MSG:</u>
    a. Upload one of the following source documents into the ETO "Tests and Results" touchpoint in ETO to validate the MSG.
        i. Evaluation from the employer or training provider
        ii. Progress report from the employer documenting the skill gain.
    b. The document must include the month, date, and year of the MSG.
    c. Title the document, *"OJT MSG"*.
    d. See also <u>Training Milestone/Progress Report</u> for further ETO MSG instructions.
II. <u>Recording Credentials</u>:
    a. Not applicable for OJTs

Occupational Skills Training (OST)

Customized Training (Adult and Dislocated Worker Only)

Service Verification

Upload or record any of the following source documents into the OST or Customized Training (Adult and Dislocated Worker only) service touchpoint recorded in ETO to validate the delivery of the service. Title the document or case notes, *"Training Start"*.

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

Case Notes

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

I.   At the start of training, document the following and title the case note, *"Training Start"*:
   a. How the training aligns with the participant's employment and training goals.
   b. Assessment results that demonstrate the participant is unlikely to obtain or retain employment that leads to self-sufficiency or wages comparable to or higher than wages from previous employment through career services alone.
   c. A description of the participant's skills and qualifications that will contribute to their successful completion of the training program and how this information was obtained.
   d. Training provider's refund policy, including when a refund will no longer be honored, and attempts to recover WIOA Title I training funds if the participant discontinues training. See WorkForce Central's ITA policy, located on WorkForce Central's Policy Library for additional documentation requirements for recovery of tuition funds.
   e. Name and location of training provider.
   f. Anticipated duration and outcome of the training.
   g. Actual start date of the training.
II. During the training, document the following and title the case notes *"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 or services provided to help the participant overcome the challenges to ensure successful completion of the

training.

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

    a. Training outcome, including credentials earned, if applicable.

        i. Per <u>TEN 19-22, Change 1</u>, the date on which a training program ends is the last date the participant attended any service provided as part of that training, including the dates of examinations if they were provided as part of the service.

    b. Next steps in the service delivery strategy.

Required Training Documentation

I. Upload (or record in case notes when specific documentation isn't required) the following into the Occupational Skills Training or Customized Training touchpoint. Documents may be uploaded as a single item or combined in one package.

II. If uploaded in a single package, title the package, *"OST (or Customized Training) Requirements"* and ensure each required element listed below is clearly identifiable in the package:

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

    b. <u>Self-Sufficiency:</u>

        i. Upload documents 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.

        ii. Title the document, *"Training will lead to self-sufficiency"*.

    c. <u>In-demand occupation</u>:

        i. Upload evidence collected that verifies 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 relocated (e.g., Demand-Decline list).

        ii. 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 document, *"Willing to travel/relocate outside PC"*.

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

        i. When no other financial resources are available to pay for the participant's training, or current non-WIOA grant funding is insufficient to cover the participant's cost of training, upload evidence such as financial aid award/denial letter or other documentation, or record the reason in case notes. Title the document and case notes, *"No other financial available"*.

        ii. When other non-WIOA financial assistance is available, such as Pell grant or other, upload copies of the award letters or relevant documents, or

record the non-WIOA award in case notes. Title the document and case notes, *"FAFSA/Other Financial Assistance"*.

 e. <u>Eligible Training Provider:</u>
  i. Not required for cohort or customized training.
  ii. Upload a copy of the Eligible Training Provider List (ETPL) showing the training program is on the ETPL.
  iii. Title the document, *"ETPL"*.

 f. <u>Training Authorization:</u>
  i. Not applicable for customized training or cohorts.
   1. When training is paid through a contract funded directly by WorkForce Central (e.g., cohorts and customized training), document in case notes the training is funded via a contract paid directly by WorkForce Central to the training provider, and the service provider is not paying the costs of tuition or any other expenses the WorkForce Central contract is covering via an ITA.
   2. Specify in case notes what the service provider is paying for, when applicable.
   3. Title the case notes, *"Cohort (or Customized) Training"*.
  ii. <u>ITAs (OSY, Adult and Dislocated Workers):</u>
   1. Upload the ITA authorization and any approved increase or ITA modification.
   2. Title the document, *"ITA"* or *"ITA Mod"*.
   3. <u>ISY Only:</u>
    a. ISY are not eligible for ITAs. Therefore, any training related expenses are paid with supportive service dollars.
    b. Upload the supportive service form authorizing the training into the OST touchpoint.
    c. Title the document, *"Training Approval"*.

 g. <u>Date of enrollment into training and actual start date of training:</u> Date of enrollment and start date of training are two separate activities the State must report to DOL on the PIRL.
  i. <u>Date of enrollment:</u>
   1. Record in case notes the date the participant became enrolled in an education or training program that leads to a recognized post-secondary education credential.
    a. If the participant was already enrolled in education or training at the time of their WIOA Title I program enrollment, the start date of training recorded in ETO is the date of their WIOA Title I program enrollment. This includes but is not limited to participation in Job Corps, YouthBuild, or Adult education or secondary education programs.
   2. In additional to recoding case notes documenting the training enrollment date, upload one of the following documents in the applicable training touchpoint to validate the training enrollment

date and title the document, *"Training Enrollment Date"*:
- a. School records verifying enrollment
- b. Transcript or report card

   ii. <u>Actual start date of training</u>:
- 1. Record the training start date in the applicable training touchpoint in ETO.
  - a. Per TEN 19-22, Change 1, this is the first day a participant attends a training program.
- 2. Document the training start date in case notes recorded in the applicable training touchpoint. The training start date recorded in case notes must align with the training start date recorded in ETO.
- 3. Upload one of the following documents and title it, "Training Start Date":
  - a. Attendance sheet or other school records
  - b. ITA
  - c. Vendor training records

Measurable Skill Gain (MSG) and Credentials Earned

See Recording Measurable Skill Gain (MSG) and Credentials in ETO

Incumbent Worker Training –
WorkForce Central's Employer Reskill/Upskill Fund (ERUF)

The following procedures for recording ERUF (i.e., incumbent worker training) participant data into ETO are required pending the State's permanent resolution to this temporary work-around.

Employees receiving ERUF training who are served through WorkForce Central's WIOA Title I grant funds must be affiliate with an employer, have a training start date, and a fund source to satisfy DOL's PIRL reporting requirements. To meet this requirement, WorkForce Central staff must record the following in ETO:

I. **Establishing an ETO record:** To set up an incumbent worker in ETO and by-pass the requirement for the incumbent worker to establish a SAW Account and WorkSourceWA profile:

    a. First ensure the individual is not already in ETO. If they're already in ETO, no further actions are required. Proceed to step II, completing the WIOA Eligibility Application TouchPoint. If they are not in ETO, proceed to step b.

    b. From the side tool bar in ETO, select "Participants, Add New Participant".

    c. Check the box "Enroll in Program" and enter the start date of the training.

    d. Record:
        i. First Name
        ii. Last Name
        iii. Date of Birth
        iv. Social Security Number
        v. Email address.

    e. Save. This will take you to the Duplicate Information page.

    f. On the Duplicate Information page, verify the individual does not have a duplicated ETO account. Then select "Add as New". This will take you to the participant's dashboard.
        i. If a person appears on the duplicate information page, do not save the new ETO record that is being created and instead use the existing ETO record. If they have several ETO records, all accounts will need to be merged by ESD.

    g. On the participant's dashboard under General Info, select "+New" and proceed with the instructions below.

II. **Completing the WIOA Eligibility Application Touchpoint:**

    a. Select the WIOA Eligibility Application Touchpoint.

    b. In the drop-down box, select "Full WIOA Eligibility".
        i. Click on the "Selective Service Information" tab.
            1. Select the "Not Applicable (explain exemption below)" radial button.
            2. In the "Exemption Explanation/Reason" box enter, *"Selective Service not required for WDA 6 ERUF/IWT"*.

ii. Click on the "Employment" tab.
1. Under the "Dislocated Worker Status" statement, select the "None of the above" radial button under Dislocated Worker Status.
2. Record the training start date in the Date of Actual Dislocation field.
3. Record the employer's name in the Employer of Dislocation Address field, "Company" box.
c. Save the touchpoint.

III. Program Enrollment:
a. Select the Program Enrollment touchpoint.
b. Enroll the incumbent worker in the program that reflects the funding source. For example, if the funding source is WIOA Adult, select that program rather than WIOA Dislocated Worker.
i. **Important Note**: If multiple funding sources are used for the training:
1. A separate Program Enrollment Touchpoint, separate ITSS Incumbent Worker Training service, and separate Outcomes, Program Completion touchpoint are required for each program funding the training.
2. A new WIOA Eligibility Application is not required. Each Program Enrollment touchpoint taken will utilize the same WIOA Eligibility Application.
c. Select "WDA6 Reskill/Upskill Training" in the Local Program box.
d. In the "Status" box, select, "Enrolled".
e. Enter Enrollment Start Date (this is the training start date).
f. For "Highest level of Education at Time of Enrollment", select "No school grades completed" from the drop-down menu. In the Enrollment Comments box, enter, *"Education level not required for WDA 6 Reskill/Upskill Training"*.
g. Save the touchpoint.

IV. Recording the training service in ETO:
a. Select the Individualized, Training and Supportive Service (ITSS) touchpoint.
b. Enter:
i. Activity Start Date,
ii. Projected Activity Start Date, and
iii. Projected Activity End Date.
c. Select the "Incumbent Worker Training" service from the "Service Provided" drop down menu.
d. Search for the appropriate O*NET code that corresponds to the occupation the training is in.
e. Select the "Active Program Enrollment" to associate the service with the active program.
f. Select "WDA6 Reskill/Upskill Training" in the "Local Program" box.
g. In the "Notes" box, record the following:
i. Percentage of the training funded by WorkForce Central's ERUF program.
ii. Training provider's name.
iii. Course/training name.

iv. Description of the training activity.

v. Training start and end dates.

vi. Certificates/credentials to be earned, if applicable.

vii. Items included in the training such as tools provided, lab or test fees included in the tuition, personal protective equipment, etc.

h. Training completion: When training is completed, edit the same touchpoint and:

i. Enter the Activity End Date.

ii. Upload credentials or certificates earned, if applicable.

iii. In the "Notes" box, add a training conclusion case note describing the outcome of the training and the training end date.

iv. Select the appropriate outcome in the "Actual Outcome" box.

v. Save the touchpoint.

V. Program exiting incumbent workers:

a. Enter the Outcomes, Program Completion touchpoint.

b. Complete the Outcomes, Program Completion tab.

i. "Reason for Completion" is "Unsubsidized Employment" if the worker was retained by the Employer.

ii. Select, "Concluded" if the worker did not complete the training or was not retained by the employer.

iii. Enter the "Completion Date". This date must match the incumbent worker training end date recorded in ETO.

c. Complete the Employment tab. At a minimum, enter the following:

i. Employment start date

ii. Select "Yes" for Unsubsidized Employment.

iii. Wage Amount

iv. Select "per hour" for the Wage Frequency

v. Annualized Wage will be automatically calculated based on the wage amount and frequency entered above.

Measurable Skill Gain (MSG) and Credentials Earned

I. Recording MSG:

a. Record the type of MSG in the "Test and Results" touchpoint.

i. In the "Record Type" dropdown, select "Progress Report" and click on the "Progress Report" tab.

ii. Select the appropriate "Associated Program of Enrollment" from the dropdown menu.

iii. In the "Progress Report Type" dropdown, select "Skills Progression".

iv. Enter the "Dae of the Progress Report".

v. Answer the questions regarding the MSG by selecting the appropriate "Yes" or "No" radial button.

vi. When applicable, upload one of the following source documents into the ETO "Tests and Results" touchpoint to validate the MSG. The month, date, and year must be on the document:

             1. Transcript
             2. Report card
       vii. Record a case note describing the MSG earned.
       viii. Save the touchpoint.

II. <u>Recording a Credential:</u>

    a. In the applicable Incumbent Worker Training service touchpoint:
       i. Enter the Activity End Date.
       ii. Ensure the appropriate "Credential Earned" outcome is recorded.
       iii. Upload one of the following source documents into the touchpoint verifying the date and type of credential earned. The month, day, and year must be on the document:
           1. Copy of credential
           2. Copy of school record
           3. Follow up survey from the incumbent worker (defined in TEG 14-18 as "signed self-attestation from program participants").
       iv. Save the touchpoint.

    b. Record the type of credential earned in the "Outcomes, Program Completion" touchpoint:
       i. Select the Enrolled Program.
       ii. Enter the Completion Date. This is he last date of training.
       iii. Complete the Employment tab.
       iv. Complete the Credentials tab.
       v. Upload one of the following source documents into the touchpoint verifying the date and type of credential earned. The month, day, and year must be on the document:
           1. Copy of credential
           2. Copy of school record
           3. Follow up survey from the incumbent worker (defined in TEG 14-18 as "signed self-attestation from program participants").
       vi. Save the touchpoint.

Service Verification

I. Record the applicable supportive service touchpoint in ETO.
II. For the <u>WIOA Title I Adult and Dislocated Worker programs only</u>: Supportive services do not extend participation for individuals enrolled in the Adult and Dislocated Worker program.
   a. To prevent auto exiting from ETO, a qualifying service that extends participation must be recorded in addition to the supportive service. Therefore, when providing supportive services to participants enrolled in the WIOA Title I Adult or Dislocated Worker programs, service providers must also provide the participant with a career and/or training service and record this service in ETO to accompany the supportive service.
   b. 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.

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 appropriate supportive service in ETO. The case note must include:

I. The justification for the supportive service, including an explanation for how the supportive service is necessary for the participant to complete their training and employment plan.
II. When applicable, attempts to first acquire the requested supportive service from community organizations who 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 paid for the purchase.
VI. When applicable, the outcome of the supportive service. Examples include but are not limited to:
   a. Documenting instances when a request for a supportive service was made but ultimately not purchased.
   b. If the supportive service was for a test of some kind, such as a driving test, document the outcome of the test. For example, "participant passed their driving test, copy of certificate/driver license is uploaded").

Required Supportive Service Documentation

Upload (or record in case notes when specific documentation isn't required) the following into

the applicable supportive service touchpoint:

I. <u>Assessment of need:</u> Record a brief summary of the participant's need for the supportive service in case notes.
   a. Not applicable for incentives.

II. <u>Referral to Community Resources</u>:
   a. Not applicable for incentives.
   b. When applicable, document in case notes attempts made to access requested supportive services from community organizations that are known to provide the service, outcomes of referrals to 2-1-1, or exemption from the 2-1-1 referral requirement.

III. <u>Supportive Service Authorization</u>:
   a. Legible documentation of the WIOA Title I service provider's authorization for supportive services must be uploaded into the applicable supportive service touchpoint. The supportive service authorization must include the following:
      i. Participant's name
      ii. ETO ID
      iii. Date of supportive service (or incentive for youth only)
      iv. Amount of the supportive service request.
      v. List of items to be purchased.
      vi. Vendor name
      vii. Signature of the authorized service provider representative.
   b. Title the supportive service authorization, *"SS Authorization"*.

IV. <u>Supportive Service Tracking Log</u>:
   a. An up-to-date and legible supportive service tracking log must be uploaded into the most current supportive service touchpoint recorded in ETO. The log must include:
      i. The date a supportive service was provided to the participant.
      ii. Items that were purchased.
      iii. Total cost of the purchase.
      iv. Vendor name.
      v. An up-to-date running total of supportive services spent to-date.
      vi. When applicable, disallowed supportive services must also be tracked on the supportive service log.
   b. Title the supportive service tracking log, *"SS Tracking Log"*.

V. <u>Receipt, Supporting Documentation</u>:
   a. Copies of supporting documentation including itemized receipts, must be uploaded in the applicable supportive service touchpoint recorded in ETO. Title the document what it is. For example:
      i. Title a receipt of the purchase, *"Receipt"*.
      ii. For a bus pass, *"Bus pass"*.
      iii. For payment of a utility bill, *"Utility bill payment"*.
      iv. Follow the same naming convention for all other supportive services.
   b. <u>Supporting Documentation-examples</u>: When using WIOA Title I funds for supportive services, service providers must collect various forms of

documentation to verify the expenses are reasonable, allowable, and allocable. Below are examples of supporting documentation for common supportive services. This list is not intended to be all inclusive. Please reach out to WorkForce Central for documentation requirements for supportive services not included here.

    i. **Incentives** (WIOA Title I Youth Only)**:**

        1. There is no ETO Service for WIOA Title I Youth incentives:

            a. ESD does not consider WIOA Title I Youth incentives a service. There is no service in the WorkSource Services Catalog for the provision of WIOA Title I Youth incentives. Therefore, <u>a service is not recorded in ETO</u> when WIOA Title I Youth incentives are provided.

        2. Instead, upload applicable incentive documentation to an <u>Uploaded Files</u> touchpoint in ETO.

            a. In the identifier field, title the touchpoint, *"Incentive"* followed by the date of the incentive.

            b. <u>Incentive documentation</u> may include but is not limited to copies of the service provider's receipts showing proof of purchase of the incentive, or copies of gift cards (including the front and back of the gift card and amount). Title the uploaded documents, *"Incentive Docs"*.

        3. Upload an up-to-date <u>incentive tracking log</u> to the Uploaded Files touchpoint. Title the tracking log, *"Incentive Tracking Log"*. The log must include:

            a. The date the incentive was provided to the young adult.

            b. The total cost of the incentive.

            c. A running total of incentives provided to date.

            d. If applicable, identified disallowed incentive costs must also be tracked on the incentive tracking log.

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

            a. The WIOA Title I Youth program service and milestone achieved, or

            b. Attainment and retention of unsubsidized employment resulting from participant in one of the youth program elements, and

            c. Incentive amount paid for the achievement.

        5. Service providers must maintain appropriate and identifiable expenditure records of incentive payment for the purpose of federal, state, and local 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 be documented in case notes recorded in ETO. The following are examples of various forms of transportation assistance and appropriate supporting documentation. This list is not intended to be all inclusive.

1. Bus tickets/bus passes:
   a. Copy of the front and back of the bus ticket/bus pass.
   b. Itemized receipt of the purchase of the bus ticket/bus pass.
   c. Proof of payment which may include a screen shot from the transit provider showing the fare price.
2. Gas:
   a. Copy of the participant's valid driver's license.
   b. Copy of the vehicle registration in the participant's name.
   c. Copy of the participant's valid and current auto insurance with the individual listed as covered.
      i. WorkForce Central authorization for exception to the above list must e documented in case notes recorded in ETO.
   d. Gas cards must be "gas only", itemized receipt not applicable.
   e. For gas purchases made without a gas card, itemized receipt/proof of payment to the vendor.
3. Driver license expenses such as driver's education, or acquiring or renewing a driver's license:
   a. Copy of the certificate of completion for driver's education.
   b. Copy of the new/renewed driver's license.
   c. Copy of invoice paid to the vendor.
4. Vehicle insurance:
   a. Copy of the participant's valid driver's license.
   b. Copy of the vehicle registration in the participant's name.
   c. Copy of invoice paid to the vendor.
5. Vehicle repair:
   a. Copy of the participant's valid driver's license.
   b. Copy of the participant's valid and current auto insurance with the participant listed as covered.
   c. Copy of the vehicle registration in the participant's name.
   d. Copy of vendor's repair estimate.
   e. Copy of invoice paid to the vendor.

iii. **Childcare:** Must be a licensed childcare provider. WIOA Title I funded childcare is authorized only for the days/hours when the participant is engaged in WIOA Title I program activities.
1. Childcare provider's W-9
2. Copy of itemized receipt showing dates of childcare provided
3. Proof of payment to the childcare provider.

iv. **Rental or other housing assistance:** Referrals to housing resources must

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

1. A legible copy of the current rental/lease agreement, or mortgage statement in the participant's name, with signatures.
2. A copy of the landlord's W-9.
3. Rental/lease agreement: Only upload the legible pages with the participant's name, rental address, rental amount, rent due dates, and signatures. It is not necessary to upload the entire rental/lease agreement.
4. Copy of invoice paid to vendor.

v. **Utilities:** An itemized utility bill in the participant's name must be obtained prior to making a payment.

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

vi. **Food** (i.e., meals, groceries)-**WIOA Title I Youth only**: Follow guidelines outlined in WorkForce Central's Supportive Service 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 applicable supportive service touchpoint in ETO:

1. Itemized list of basic food needs.
2. Action plan (either hard copy or documented in case notes recorded in ETO) that identifies strategies to address food inadequacies, including community resources, financial plan/budgeting, meal planning, etc.
3. Copy of itemized receipt.

vii. **Medical and prescription services**:

1. Proof of payment

viii. **Reasonable accommodations for individuals with disabilities:**

1. Proof of payment

ix. **Expenses for out-of-state job search:**

1. Evidence of interview, training, or activity that is not paid by the prospective employer.
2. Itemized receipt for travel expenses (e.g., airfare, hotel, car rental, etc.)
3. Proof of payment to vendor(s)

x. **Expenses for relocation:**

1. Evidence of new job.
2. Itemized receipt for relocation expenses not paid for by the new employer.
3. Proof of payment to vendor(s).

xi. **Training related expenses (other than tuition)**:

1. Legible syllabus, registration, training enrollment form, or other similar documentation that includes:
   a. Participant's name.
   b. Name of school.
   c. Title of training program/class.
   d. Time period of instruction.
   e. The specific items necessary for the student's participation in the specific training program.
2. Record a case note documenting the provision of training related expenses via supportive services (as opposed to an ITA) as required in ESD Policy 5602, Rev. 5.

xii. **Gift cards for supportive services other than gas**:
   1. Legible itemized copy of the receipt of purchases made with the gift card is required. The receipt must include the date of purchase and amount paid.
   2. If the receipt is lost, the participant and service provider must sign a statement saying the participant received the supportive service and the exact cost included in the statement.

Exceptions

Written WorkForce Central authorization is required for any permissible exception to this policy. Authorized exceptions must be uploaded into the applicable supportive service touchpoint in ETO.

Program Completion Case Note

The following case notes must be recorded in the most recent Outcomes, Program Completion touchpoint in ETO documenting the participant's completion of the WIOA Title I program.

I. Date of program completion.
    a. The date of program completion recorded in case notes must be the date of the last qualifying service and match the program completion date recorded in ETO.
II. Reason for program completion.
    a. See below for case note details if exited due to enrollment into postsecondary education (WIOA Title I Youth only), unsubsidized employment, or other reason for program completion.
III. WIOA Title I Youth only: School status at program completion. See details for this case note, below.
IV. Types and duration of planned follow-up services.
    a. If applicable, date and reason the participant opted out of receiving follow-up services.
V. When applicable, the plan for collecting performance outcomes 2nd and 4th quarter after exit.
    a. If applicable, upload the signed authorization to contact the participant's employer.

School Status at Program Completion (WIOA Title I Youth only)

I. Record the following in the Outcomes, Program Completion touchpoint:
    a. School status at exit, if known.
        i. If school status at exit is unknown, record the last known school status at the time of program enrollment or any time during program participation.
    b. TEGL 23-19, Change 1: If applicable, upload any of the following documents to validate the earning of a high school diploma or GED during program participation:
        i. Copy of HS diploma or 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: If the young adult is in secondary or post-secondary education at the time of program completion, record the following in case notes in the Outcomes, Program Completion touchpoint:
    a. School status at exit.
    b. Date of enrollment.
    c. Name of school.
    d. Training program.
    e. Anticipated completion date.

  f. Anticipated credential to be earned.
  g. Future dates and methods to collect training status and outcomes (including credentials earned) in the 2nd and 4th quarters after exit.

Exit Due to Post-Secondary Enrollment (Positive performance outcome for WIOA Title I Youth only):

If the youth is exiting the WIOA Title I Youth (Young Adult) program as a result of enrollment in post-secondary education, record the following in case notes in the Outcomes, Program Completion touchpoint.

 I. Date of post-secondary enrollment.
 II. Anticipated or actual start date of post-secondary education or training.
 III. Education/training program.
 IV. Name of school.
 V. Anticipated completion date.
 VI. Anticipated credential to be earned.
 VII. Future dates and methods to collect education/training outcomes 2nd and 4th quarters after exit.

Exit Due to Unsubsidized Employment (Positive performance outcome for all WIOA Title I programs)

Record the following case notes in the Outcomes, Program Completion touchpoint.

 I. Start date of employment
 II. Name of employer
 III. Job title
 IV. Wage
 V. Full- or part-time
 VI. If the employment is on a pathway to meeting the participant's self-sufficiency needs or is comparable to previous employment, when applicable.
 VII. Future dates and methods to collect employment status and wages in the 2nd and 4th quarters after exit.

Other Reasons for Exit (Participant is excluded from positive performance outcomes)

If a participant exits the WIOA Title I program for any of the following circumstances, they are excluded from WIOA Title I performance outcomes. Record the reason for the program exit in case notes in the Outcomes, Program Completion touchpoint in ETO.

- Lost contact
- Incarceration or institutional care
- Medical condition that will prevent participation in the WIOA Title I program for more than 90 days.
- Deceased.

- Reserve military or National Guard called to active duty.
- WIOA Title I Youth only: Receiving foster care services and moved out of Pierce County.

Employer Consent Forms

I.   Prior to contacting an employer to verify a participant'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. *Title the document, "Consent to Contact Employer".*

II. Record a case note indicating the consent form is uploaded in the Uploaded Files touchpoint.

Case Notes

On a minimum quarterly basis, and more frequently if appropriate, document the individual's progress/status updates while in follow-up in standalone case notes recorded in ETO. Title the case note, *"Follow-up Update"*.

Opt-Out

If a participant opts out of receiving follow-up services, the date and reason the participant opted out must be documented in case notes recorded in the Outcomes, Program Completion touchpoint.

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.

If providing supportive services during follow-up, upload the appropriate supportive service documentation in an Uploaded Files touchpoint. The identifier for the Uploaded Files touchpoint must include the type of follow-up supportive service and the date the service was provided.

Measurable Skill Gains (MSG)

Measurable skill gains (MSG) are defined as **documented** academic, technical, occupational, or other forms of progress towards a credential or employment. Department of Labor (DOL) requires MSG source documentation to include the **month, date, and year** of the measurable skill gain. The date of an MSG recorded in ETO is the month/date/year the MSG was earned, not the date the MSG documentation was received, or the date recorded in ETO.

I. **Basic Skills Deficiency (BSD)/Educational Functioning Level (EFL)**

Participant received instruction below the post-secondary education level and achieved at least one EFL gain as verified by one of the following documents (*source: [ESD Policy 1003, Rev. 5, Attachment B](#)-Date of Most Recent Measurable Skill Gain-EFL*. Title the document, *"MSG-BSD/EFL"*:

    a. **Source Documentation (must include month/date/year):**
        i. Pre- and post-test results measuring EFL gain.
        ii. Adult High School transcript showing EFL gain through the awarding of credits.
        iii. Post-secondary education or training enrollment determined through data match, survey documentation, or program notes.
    b. **Recording MSG in ETO**:
        i. The following instructions are applicable for recording both the pre- and -post tests.
        ii. Create a new Tests and Results touchpoint.
            1. On the Record Type Tab:
                a. Select, "Tests and Results" from the Record Type dropdown.
            2. On the Test and Results tab:
                a. Select the appropriate program from the Associated Program Enrollment dropdown.
                b. Select the "Pre Test" or "Post Test" radial button.
                c. Select the appropriate category from the Assessment Category dropdown.
                d. Select a date from the Test Date field.
                    i. For the post-test to count as an MSG, it must take place on or after the date of the pre-test, and in the same participation episode, and during the reporting period.
                e. Select an appropriate level from the Educational Functioning Leve dropdown.
                    i. The post-test EFL must be higher than the pre-test EFL to count as an MSG.

a. Upload a copy of the source documentation used to verify the skill gain in the Test Record Upload box.

II. **Secondary Diploma/GED**

Participant attended secondary education and earned a "C" grade or better on most recent transcript or report card as verified by one of the following source documents (*source: [ESD Policy 1003, Rev. 5, Attachment B](...)-Date of Most Recent Measurable Skills Gain-Secondary Transcript/Report Card*). Title the document, *"MSG-Secondary"*.

    a. **Source documentation (must include month/date/year)**:
        i. Transcript
        ii. Report card
    b. **Recording MSG in ETO:**
        i. Follow the steps below for [Post-Secondary Progress](...).

III. **Post-Secondary Progress**

Participant attended post-secondary education and earned a "C" grade or better on the most recent transcript or report card as verified by one of the following source documents (*source: [ESD Policy 1003, Rev. 5, Attachment B](...)-Date of Most Recent Measurable Skills Gain-Postsecondary Transcript/Report Card*). Title the document, *"MSG-Postsecondary"*.

    a. **Source documentation (must include month/date/year)**:
        i. Transcript
        ii. Report card
    b. **Recording MSG in ETO:**
        i. Create a Transcript/Report Card on the Test and Results touchpoint.
            1. On the Record Type tab:
                a. Select "Report Card or Transcript" from the Record Type dropdown.
            2. On the Report or Transcript tab:
                a. Select the appropriate program enrollment from the Associated Program Enrollment dropdown.
                b. Enter an appropriate date in the Date of Report Card or Transcript field.
                c. Select the appropriate school type from the Secondary or Postsecondary dropdown.
                    i. If the school type is "Postsecondary School", enter the appropriate response in the *"How many credits/units did the participant complete?"* field.
                d. Select the appropriate radial button on the *"Does the transcript or report card meet the state unit's academic standards?"* (Must be a "C" grade or better to meet WA State academic standards.)
                e. Upload a copy of the source documentation used to verify the skill gain in the Document Upload box.

IV. Training Milestone/Progress Report

Participant engaged in an employer training program such as an OJT and received a satisfactory or better progress report towards established milestones as verified by one of the following source documents (*source: ESD Policy 1003, Rev. 5, Attachment B-Date of Most Recent Measurable Skills Gain-Training Milestones*). Title the document, *"MSG-OJT (or Apprenticeship)"*.

    a. Source documentation (must include month/date/year):
- i. Documentation of a skill gained through OJT or registered apprenticeship
- ii. Contract and/or evaluation from employer or training provider
- iii. Progress report from employer documenting skills gain

    b. Recording MSG in ETO:
- a. Create a Training Milestone on the Test and Results touchpoint.
  - i. On the Record Type tab:
    1. Select "Progress Report" from the Record Type dropdown.
    2. Select the appropriate program enrollment from the Associated Program Enrollment dropdown.
    3. Select the appropriate progress report type, either "Apprenticeship" or "OJT" from the Progress Report Type dropdown.
    4. Enter an appropriate date in the Date of Progress Report field.
    5. Select the appropriate response for the *"Is the progress satisfactory?"* radial button.
    6. Upload a copy of the source documentation used to verify the skill gain in the Document Upload box.

V. Industry Exams or Skills Progression

Participant successfully passed an exam that is required for a particular occupation, or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams as verified by one of the following source documents (*source: ESD Policy 1003, Rev. 5, Attachment B-Date of Most Recent Measurable Skills Gain-Skills Progression*). Title the document, *"MSG, Industry"*:

    a. Source documentation (must include month/date/year):
- i. Results of knowledge-based exam or certification of completion
- ii. Documentation demonstrating progress in attaining technical or occupational skills through an exam or benchmark attainment.
- iii. Documentation from the training provider or employer.
- iv. Copy of credential that is required for a particular occupation and earned only after the passage of an exam.

    b. Recording MSG in ETO:
- i. Create a Skills Progression on the Test and Results touchpoint.

1. On the Record Type tab:
    a. Select "Progress Report" from the Record Type dropdown.
2. On Progress Report tab:
    a. Select the appropriate program enrollment from the Associate Program Enrollment dropdown.
    b. Select "Skills Progress" from the Progress Report Type dropdown.
    c. Enter an appropriate date in the Date of Progress Report Field.
        i. The date of a skill gain is the date the skill was earned, not the date the gain is recorded in ETO, or the date documentation is received.
    d. Select the appropriate response for the "*Did the participant successfully pass an exam that is required for a particular occupation, or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams?*" radial button.
    e. Select the appropriate response for the "*Is the progress satisfactory?*" radial button.
    f. Upload a copy of the source documentation used to verify the skill gain in the Document Upload box.

Credentials

A recognized post-secondary credential is awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. These technical or industry/occupational skills generally are based on standards developed or endorsed by employers or industry associations.

A recognized post-secondary credential is defined as a:
- Credential consisting of an industry-recognized certificate or certification
- Certificate of completion of an apprenticeship
- License recognized by the State involved or Federal government
- Associate or baccalaureate degree

Credentials should be counted using the month/date/year on which they occur, not the date when the credential documentation is received or the date they are recorded in ETO or the.

I. **Source documentation (must contain month, date, and year):**
    a. Copy of credential
    b. Copy of school record
    c. Follow-up survey from program participants (defined in TEGL 14-18 as a *"signed self-attestation from program participants"*)

II. **Recording a credential in ETO:**
   a. Ensure the appropriate "Credential Earned" outcome is recorded for the applicable service in ETO.
   b. There are two locations in ETO where credentials are recorded:
      i. Upload one of the source documents, listed above, in the **applicable service touchpoint** recorded in ETO. Title the document, *"Credential Verification"*.
      ii. Record the type of credential in the **Outcomes, Program Completion** touchpoint, "Credentials" tab for WIOA Title I Adult and Dislocated Worker programs and in the "Youth" tab for WIOA Title I Youth programs.
         1. Complete the tab, including answering all the questions on the tab.
         2. Upload one of the source documents listed above. Title the document, *"Credential Verification"*.
      iii. If more than one credential is earned, an Outcomes, Program Completion touchpoint must be entered for each credential earned.
   c. Record the type of credential earned in case notes in standalone case notes.

WIOA Title I service providers must ensure accurate and timely ETO reporting of the following two (2) performance measures during the 2nd and 4th quarters after a participant is system exited from ETO.

I. **Unsubsidized employment** (all WIOA Title I programs):
    a. The percentage of participants who are in unsubsidized employment during the 2nd and 4th quarters after exit.
II. **Post-secondary education (WIOA Title I Youth only)**:
    a. For the WIOA Title I Youth (Young Adults) program only, this indicator includes young adults who are actively enrolled in education or training activities during the 2nd and 4th quarters after exit.

Participants 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 a participant's employment and training status to any time during the 2nd and 4th quarters after exit (WIOA Joint Rule, Departments' responses, page 55841).

Recording Source Documentation in ETO

I. **Employment**
    a. Create a Follow-up touchpoint.
        i. From the dropdown menu, select "Record Performance Information" and complete all tabs.
    b. Upload any of the following source documentation for participants in unsubsidized employment during the 2nd and 4th quarters after exit. Title the document, "*Q2 (or Q4) Employment Verification*":
        i. Follow-up survey from participants during the reference quarters (defined in TEGL 14-18 as *"signed self-attestation from program participants"*).
        ii. Copy of one (1) paycheck stub or other evidence of wages
        iii. Tax records, W-2 form.
        iv. Quarterly tax payment forms such as an IRS form 941
        v. Signed letter or other documentation from the employer on official company letterhead attesting to an individuals' employment status and earnings during the reference quarters.
        vi. Self-employment worksheet that reflects income after expenses during he reference quarters, signed and attested by the program participant.
        vii. Income earned from sales commissions or similar positions during the reference quarters.
        viii. Detailed case notes verified by the employer and entered by case managers during the reference quarters.

II. **Employment related to training**

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

    b. On the Follow-up touchpoint, **Follow-up Form** tab:

        i. Ensure the dropdown "Follow-up Quarter after Exit" is set to "Second (or Fourth) Quarter".

        ii. Ensure the dropdown "Entered Training-Related to Employment" is set to "Yes".

III.   Post-Secondary Education (WIOA Title I Youth only)

    a. Create a new Follow-up touchpoint.

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

        ii. Upload any of the following source documents for young adults enrolled in post-secondary education during the 2nd and 4th quarters after exit. Title the document, *"Q2 (or Q4) Training Verification"*.

            1. Copy of school registration record

            2. School records

            3. Transcript or report card

            4. Vendor/training provider documentation

            5. File documentation with notes from program staff. *(Defined in ESD Policy 1003, Rev. 5 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 include standard State MIS forms such as ISS or assessment and information obtained from outside officials (i.e., emails, records letters)").*

IV.   Credentials earned 2nd and 4th quarters after exit

    a. **Performance outcome definition:** The percentage of participants enrolled in an education or training program (excluding those in on-the-job training (OJT) and customized training) who obtained a secondary school diploma (or equivalent) or a recognized post-secondary credential during WIOA Title I program participation or within one (1) year after exit from the WIOA Title I program.

        i. **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 is <u>also employed or is enrolled in an education or training program</u> leading to a recognized post-secondary credential within one (1) year after exit from the WIOA Title I program.

    b. **Reportable Credentials:** This reporting indicator measures two types of credentials, a secondary diploma or its recognized equivalent *(see Note for High School Diploma or GED credentials, above)*, or a recognized post-secondary

credential. The following are reportable credentials:

- i. Secondary school diploma or its recognized equivalent
- ii. AA or AS diploma/degree
- iii. BA or BS diploma/degree
- iv. Occupational licensure or certification
- v. Other recognized diploma, degree, or certificate
- vi. Graduate degree programs are excluded from this measure.

c. **Source documentation (must contain month, date, and year):**

- i. Create a new Follow-up touchpoint.
    1. From the dropdown menu, select, "Record Performance Information" and complete all tabs.
- ii. At any time during the 12-months post exit, upload or record in case notes any of the following source documentation:
    1. Diplomas, degrees, licenses, certificates
    2. Copy of credential
    3. Copy of school record
    4. Follow-up survey from participants during the reference quarters (defined in TEGL 14-18 as *"signed self-attestation from program participants"*).
    5. Case notes documenting information obtained from the education or training provider.