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Date: October 30, 2024

To: WIOA Subrecipients of the Orange County
Workforce Development Board

From: Nancy Cook 
Director of Workforce and Economic Development

Subject: WIOA Documentation Requirements Policy
Information Notice 24-OCWDB-13
Supersedes Policy and Procedure No. 20-OCWDB-09,
10-OCWDB-04

PURPOSE

This policy provides guidance on acceptable documentation for validating data elements and determining eligibility. It ensures that the data entered into CalJOBS is reliable, providing an accurate report on performance for the Workforce Innovation and Opportunity Act (WIOA) Adult, Dislocated Worker, and Youth programs.

EFFECTIVE DATE

This policy is effective on the date of issuance.

REFERENCES

- WIOA (Public Law 113-128)
- Training and Employment Guidance Letter (TEGL) 09-22: Workforce Innovation and Opportunity Act Title I Youth Formula Program Guidance
- TEGL 7-18: Data Validation Attachment 1 Source Documentation for WIOA Core Programs
- TEGL 23-19: Change 2, Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S.
- WSD 22-15 WIOA Data Validation Source Documentation
- WSD 24-04 WIOA Title I Eligibility Technical Assistance Guide
- WSD 23-03: Performance Guidance
- WSD 18-03: Pathways to Services, Referral, and Enrollment
- WSD 17-07: Youth Program Requirements
- WSD 16-18: Selective Service Requirements

BACKGROUND

Service Providers are responsible for collecting and retaining adequate documentation to verify WIOA eligibility, track services, and ensure accurate performance reporting to the Department of Labor (DOL).



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DEFINITIONS

Registration – The process of collecting information to support a determination of eligibility for the WIOA Adult, Dislocated Worker, and Youth programs. This information may be collected through methods, including electronic data transfer, personal interview, or an individual's application.

Source Document – Physical or electronic document(s) or record(s) that supports the data captured in CalJOBS and reported to DOL.

Data Element – A standardized unit of information with a unique meaning that is captured in CalJOBS and reported to the DOL.

Data Element Validation (DEV) – The process of validating source documentation against data reported in CalJOBS, and ultimately, to the DOL.

Data Validation – Data validation is the series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data.

POLICIES AND PROCEDURES

This policy provides guidance and outlines procedures for participant documentation requirements under the WIOA Adult, Dislocated Worker, and Youth programs. It ensures compliance with the collection, verification, and reporting of source documents. Service providers are required to determine eligibility by reviewing source documents and ensuring the appropriate source documentation is collected for all relevant data elements to be entered into CalJOBS, as stated within this policy.

Allowable Data Source Documentation for Title I WIOA Programs

Each program that undergoes Data Element Validation (DEV) has specific data elements that must be verified against source documentation. The WIOA Title I – Source Documentation List (Attachment IV) contains a list of data elements, the allowable types of source documents for each data element, the data element entry location and prompt found in CalJOBS, if applicable. All WIOA Title I Adult, Dislocated Worker, and Youth programs may use the list to identify source documentation that is allowable to confirm validation. For additional guidance and definitions regarding the data elements, refer to WSD 22-15, Attachment 2.

The eligibility verification process and the list of acceptable documents to determine eligibility, are not the same as DEV. While DEV may verify the existence of acceptable documentation for certain eligibility criteria and vice versa, DEV does not verify participant eligibility. While the collection of source documentation for data validation often takes place at the same time as the determination of an individual's program eligibility, these actions serve different purposes. Eligibility determination confirms that an individual meets the requirements of a program before becoming a participant in the program, whereas DEV validates that the data elements entered in CalJOBS are accurate.

Acceptable Documentation for Eligibility Determination

Eligibility documentation must be collected and entered in CalJOBS for each enrolled program participant. Attachment I, Attachment II and Attachment III provide a detailed list of allowable source documents needed to verify eligibility under each section. Most eligibility criteria offer multiple documentation options to ensure the eligibility process is not too burdensome for applicants to complete.

General program eligibility for all WIOA-funded services under Title I programs includes criteria such as age, authorization to work in the United States and compliance with Selective Service System requirements when applicable, which must be verified and available for subsequent review.

WIOA Adult and Dislocated Worker eligibility requirements depend on the level of services provided to the participant. The documentation required increases as participants move from basic career services, which trigger participation, to individualized career services or training services. For participants receiving only basic career services, Service Providers may accept information provided during the intake process at face value, without requiring source documentation.

For more information regarding eligibility requirements, refer to the Adult and Dislocated Worker Program Eligibility Policy.

WIOA Youth program eligibility documentation does not vary between types of services or program elements received. Youth's eligibility is determined at the time of enrollment. If an individual's situation changes while receiving services, the individual remains eligible until program exit. For example, an Out-of-School youth (OSY) who is 24 years of age (the cut off age for OSY) at the time of enrollment and subsequently turns 25 years of age, is still considered an OSY until exited from the program.

For more information regarding eligibility requirements, refer to the WIOA Youth Program - Participant Eligibility Requirements Policy.

In addition to the general program eligibility requirements for all programs, when applicable, the following data elements must be verified and made available for review:

- Income Eligibility
- Veterans Status
- Dislocated Worker Eligibility
- Barriers

Additional Methods of Allowable Source Documentation

Below are additional types of Source Documentation Service Providers may use, if permissible, to verify eligibility or data element.

1. Telephone or Electronic Communication

In instances where telephone or electronic communication is acceptable and used, the case file must contain the name of the agency representative, the date of the conversation, and the result of verification.

Service Providers must use the WIOA Telephone Eligibility Verification Form (Attachment V), to document telephone communication. If a telephone communication is used to verify dislocation, the case file must contain the date and reason for termination, and a possible recall date, if applicable.

2. Self-Attestation

Self-Attestation occurs when a participant declares their status, for an eligibility or set of eligibility criteria, and then signs and dates a form acknowledging the status.

The key elements for self-attestation are:

- The participant identifying their status for permitted eligibility criteria; and
- Signing and dating the form attesting to this self-identification (e.g., a signed WIOA Program Application, Self-Attestation Verification Form (Attachment VI)).

Note that self-attestation is not to be used as the primary method of gathering documentation to verify data elements. Self-attestation as a documentation source is only to be used when the preferred options of paper documentation or third-party corroboration are not available.

The self-attestation is not a blanket verification for all eligibility components as noted in the Allowable Eligibility Documentation Forms. Within the self-attestation, the individual must document which specific elements of eligibility they are attesting (e.g., authorization to work, proof of termination or layoff, etc.) and how they meet the eligibility criteria.

Service Providers must be cognizant that not all eligibility source documentation may be verified with self-attestation. Therefore, self-attestation does not alleviate or replace the need to collect documentation of some eligibility elements from the individual.

3. Case Notes

Case notes refer to statements placed in CalJOBS by the case manager and identify, at a minimum, the following:

- A participant's status for a specific data element or eligibility criteria;
- The date on which the information was obtained; and
- The case manager who obtained the information.

If case notes are used as allowable source documentation, the case note(s) must provide a documented trail back to the source of information verified. All documents pertinent to participant activities should be scanned through with case notes and/or activities to support those entries.

4. Cross-Match

A cross-match requires the Service Provider staff to acquire detailed supporting evidence, for applicable data element(s), using another database (e.g., public assistance records). An indicator or presence of a social security number in a database alone is not sufficient evidence to document WIOA eligibility; additional details such as the date of the eligibility determination, date of participation, and services rendered should be obtained from the cross-match to confirm the accuracy and currency of the information. The WIOA Title I – Source Documentation List (Attachment IV) identifies the allowable databases to cross-match.

5. Electronic Records

Electronic records are participant records created, stored, or transferred in a form that can only be processed in a computer and maintained in CalJOBS. However, an indicator such as a checkmark or date on a computer screen is not considered acceptable source documentation.

Participation

Adult and Dislocated Worker - An individual becomes a participant in the Adult or Dislocated Worker programs after completing the eligibility determination, satisfying all programmatic requirements, and receiving a staff-assisted basic career service, individualized career service, or training service. An individual who uses self-services, or is assisted with information-only activities, is not considered a participant and therefore does not need to meet eligibility requirements.

Youth - An individual becomes a youth participant in the Youth program after receiving an eligibility determination, completing an objective assessment, completing an individual service strategy, and receiving a service that meets one of the 14 WIOA Youth program elements.

Individuals who use self-service and/or receive information only services or activities are considered reportable individuals and must be documented.

Exited Participant

An exit occurs when the participant has not received program services for 90 consecutive calendar days, and no additional future services are scheduled. The program exit date is applied retroactively after 90 days to the last service's actual end date. Follow-up services, self-services, information-only services or activities, and supportive services do not delay, postpone, or affect the date of exit.

The Allowable Source Documentation for WIOA Program Eligibility form (Attachment I) provides guidance for the specific types of source documents that may be used to verify participant eligibility at each level of service.

Electronic & Physical Files

Service Providers are required to ensure that all participant eligibility documentation is scanned, uploaded, and verified in CalJOBS, while also securely retaining physical copies for a minimum of three years after the final closeout expenditure report for the funding period, or as requested. Both physical and electronic copies of these documents are mandatory until official notification is provided by OCWDB requiring Service Providers to transition to fully paperless practices. For guidance on collecting and storing supporting documents in CalJOBS, refer to the CalJOBS Document Imaging and Scanning Policy. Documents uploaded into the CalJOBS system will be used for verification, ongoing monitoring, and audit purposes in accordance with WIOA and EDD requirements.

To ensure compliance, documents must be readily available upon request for program, fiscal monitors, and auditors during scheduled or unscheduled monitoring reviews. Service Providers must implement internal controls to visually inspect all scanned documents for completeness, clarity, and legibility prior to uploading into CalJOBS. This includes ensuring that the document is properly aligned and free from errors.

Original content of a scanned document must remain unaltered or unmodified once finalized. While scanning the original document is preferred, legible, verified documents provided by partners may also be sufficient for documentation purposes. Documents must be kept current throughout the participant's program involvement, and any new or updated documents must be promptly uploaded into CalJOBS to ensure accurate tracking of eligibility and participation.

Service Providers are required to upload all verification documents into CalJOBS immediately upon availability, following established eligibility guidelines and timeframes. Regular compliance checks must be conducted to ensure that all participant information in CalJOBS is

accurate, and that verification documents are uploaded for all fields requiring validation. Additionally, case notes must clearly state the intent and purpose of each document uploaded, providing a complete audit trail as required by WIOA and EDD TEGL Directives.

To maintain WIOA compliance, Service Providers must engage in regular internal monitoring of both physical and electronic files, ensuring data accuracy, completeness, and timeliness. This monitoring process will involve scheduled audits of file documentation and cross-referencing with CalJOBS entries to ensure that all required fields are accurately supported by appropriate source documentation. Any discrepancies or issues found during monitoring must be addressed promptly to maintain program integrity and avoid disallowed activities and/or costs.

Electronic Signatures

Document Imaging includes the addition of electronic signatures to any necessary documents or forms. Signatures may be captured within CalJOBS or using an electronic software such as pDoc Signer or DocuSign. Service Providers are encouraged to use electronic signatures for participant convenience.

ACTION

Bring this policy to the attention of all staff and relevant parties.

INQUIRIES

If you have any questions regarding this policy, please email info@ocworkforcesolutions.com.

ATTACHMENTS

Attachment I: Allowable Eligibility Documentation - Adult Program

Attachment II: Allowable Eligibility Documentation - Dislocated Worker Program

Attachment III: Allowable Eligibility Documentation - Youth Program

Attachment IV: WIOA Title I - Source Documentation List

Attachment V: WIOA Telephone Eligibility Verification Form

Attachment VI: Self-Attestation Verification Form