

Southwest Ohio Region Workforce Investment Board

POLICY: WIOAPL 15-07 Source Documentation for WIOA Eligibility

APPROVAL DATE:

PURPOSE: To provide documentation requirements necessary to support eligibility in the WIOA adult and dislocated worker and youth programs

The attached policy (WIOAPL 15-07) serves as the Source Documentation for WIOA Eligibility Policy provided by the State of Ohio and approved by the Southwest Ohio Region Workforce Investment Board.

WIOAPL 15-07 (Source Documentation for WIOA Eligibility)

Workforce Investment and Opportunity Act Policy Letter No. 15-07

July 15, 2015

To: Workforce Innovation and Opportunity Act (WIOA) Local Workforce Development Boards (WDBs), Fiscal Agents, and OhioMeansJobs Center Operators

From: Cynthia C. Dungey, Director

Subject: Source Documentation for WIOA Eligibility

I. Purpose

The purpose of this policy is to communicate the documentation requirements necessary to support eligibility in the WIOA adult, dislocated worker, and youth programs.

II. Effective Date

July 1, 2015

III. Background

The WIOA establishes general and specific program eligibility criteria. As recipients of WIOA Title I, Subtitle B funds, the Ohio Department of Job and Family Services (ODJFS), Office of Workforce Development (OWD) and the local workforce development areas are required to maintain and report accurate program and financial information. This policy lists the types of acceptable documentation to verify eligibility for the WIOA adult, dislocated worker, and youth programs.

IV. Requirements

Local areas must verify or confirm eligibility requirements through an examination of documents. Documentation requirements to support WIOA adult and dislocated worker eligibility are tied to the level of services provided to the participant. While documentation is minimal for adults and dislocated workers registered in basic career services, the documentation requirements increase for participants who receive career services to obtain or retain employment or who receive training services (refer to Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) No. 15-08, Career Services for Adults and Dislocated Workers). WIOA youth program eligibility documentation does vary between types of services or program elements received.

Attachment A to this policy letter, Allowable Source Documentation for WIOA Program Eligibility , provides guidance for the specific types of source documents that may be used to verify participant eligibility at each level of service.

A. Electronic Files

Documentation may be stored electronically. However, the documentation requirements remain unchanged and the documents must be available to the program and fiscal monitors and auditors for monitoring purposes.

B. Types of Source Documentation

For documentation of eligibility for adult, dislocated worker, and youth programs, there are multiple forms of acceptable source documentation. In many cases, a copy of a source document listed in Attachment A will be used to verify eligibility of a participant. Below are additional methods local areas may use if, according to Attachment A of this policy letter, the method is permissible for the particular eligibility criteria or data element being verified.

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

Local areas must use the JFS 13188, WIOA Telephone Eligibility Verification , 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.

Self-Attestation

Self-Attestation occurs when a participant states his or her status for a particular eligibility criteria and then signs and dates a form acknowledging this status. The key elements for self-attestation are:

- The participant identifying his or her status for permitted eligibility criteria; and
- Signing and dating the form attesting to this self-identification.

Local areas must use the JFS 13186, Self-Attestation , or the JFS 13187, Citizenship Status/Authorization to Work Self-Attestation .

Case Notes

Case notes refer to either paper or electronic statements by the case manager that identifies, at a minimum, the following:

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

Cross-Match

A cross-match requires WIOA staff to acquire detailed supporting evidence for the eligibility criteria in another database (e.g., public assistance records). An indicator or presence of a social security number in a non-WIOA database is not sufficient evidence to document WIOA eligibility. Detailed supporting evidence may include the date of eligibility determination, date of participation, and services rendered.

State Management Information System (MIS)

State MIS refers to specific, detailed information that is stored in Ohio's Workforce Case Management System (OWCMS) and supports eligibility criteria. An indicator such as a checkmark or date on a computer screen is not acceptable source documentation.

C. Retention of Records

Per rule 5101:9-9-21 of the Administrative Code, ODJFS and local workforce development areas are to retain records for a period of at least three (3) years after submittal of the final closeout expenditure report for that funding period.

V. Monitoring

At the local level, the local area must conduct oversight of the implementation of the WIOA adult, dislocated worker, and youth programs to ensure that participants are eligible for enrolled programs and documentation supporting the eligibility are contained in the case files.

Through the state's monitoring system, program monitors will review the local area's implementation of the WIOA adult, dislocated worker, and youth programs, including a participant file review, during the annual onsite monitoring review for compliance with federal

and state laws and regulations. Any issues will be handled through the state's monitoring⁹¹ resolution process.

VI. Technical Assistance

For additional information, you may send your questions to the Office of Workforce Development: OWDPOLICY@jfs.ohio.gov.

For technical assistance, you may send your request to the Office of Workforce Development: WIAQNA@jfs.ohio.gov.

VII. References

Workforce Innovation and Opportunity Act, Pub. L. 113-128

29 U.S.C. 3101 et seq.

Rule 5101:9-9-21 of the Administrative Code

ODJFS, Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) No. 15-08, Career Services for Adults and Dislocated Workers, (July 1, 2015).

Attachment A, Allowable Source Documentation for WIOA Program Eligibility

JFS 13188, WIOA Telephone Eligibility Verification

JFS 13186, Self-Attestation

JFS 13187, Citizenship Status/Authorization to Work Self-Attestation

Rescission

ODJFS, Workforce Investment Act Policy Letter No. 13-01, Source Documentation for WIA Eligibility, (June 20, 2013).