

Technical Assistance Guidance

TAG 59-2023

Issued Date: August 31, 2023

Subject: WIOA Title I Paperless/Electronic Participant Records

Purpose

This TAG provides guidance for uniform paperless/electronic documentation of participant records and includes instruction for the collection, dissemination, storage, and protection of information contained within the MIS (currently EmployNV). This guidance includes the naming convention requirements for all documents uploaded into the MIS, instructions for adding and removing of participant documents, standards for case note quality, and timely data entry requirements.

References

Workforce Innovation and Opportunity Act (P.L. 113-128); Training and Employment Guidance Letter (TEGL) 10-16 Change 1, TEGL 39-11; TEGL 7-18; TEGL 23-19; Paperwork Reduction Act of 1995; Government Paperwork Elimination Act of 1998; E-Government Act of 2002; SCP 5.10; WC Policy GEN-050-07 Data Recording and Management

Background

Section 185 of the WIOA requires recipients of Title I funds to keep records that are sufficient to prepare reports on program performance and outcomes and permit the tracking of expenditures to adequately ensure that funds have not been spent unlawfully. This guidance applies to electronic file storage and documentation imaging standards in the administration of WIOA Title I programs and other federally funded grant and state funded programs. This guidance originates from multiple regulations related to government agencies' transition from paper to digital files. Among these are:

- E-Government Act of 2002
- Government Paperwork Elimination Act of 1998
- Paperwork Reduction Act of 1995

Guidance

Electronic Case Files

All WIOA Title I Service Providers must record and document activities for all participants enrolled in WIOA Title I (Youth, Adult, and Dislocated Worker) programs and applicable discretionary grant programs in EmployNV to ensure compliance with federal and state statutes, regulations, and policies.

EmployNV eliminates the need for paper applications for participant registration and ensures that the WIOA Title I Service Providers are using identical criteria to determine participant eligibility. In order to case manage participants, the WIOA Title I Service Providers must use EmployNV to:

- Create participant applications.
- Record program services.
- Upload supporting documentation to verify eligibility and proof of service delivery.
- Provide case notes regarding interactions with participants to include information that addresses the 'who', 'what', 'where', 'when', 'why', and 'how' of service delivery.

All paid services provided to a participant will need to be documented on EmployNV with the correct service code, required documentation, and through case notes. Payments must be added

to the voucher within the service and copies of invoices and/or receipts, and other documentation requirements for each service must be uploaded to the payment made on the service. Case notes for each service payment must include the date and description of the service provided and paid for. This allows for ease of reference during monitoring and review.

If the service provided is not utilized by the participant (i.e., clothing voucher, gas voucher, etc.) a case note must be entered explaining that the service was not used and an email must be submitted to support@snvwc.org to void the service if possible.

Timely Data Entry

All data entry must be processed immediately upon a participant receiving services. Delays in data entry can adversely affect the quarterly and annual performance of the state and the local workforce areas and result in inaccurate federal reports. To address the impact of delayed data entry, all transactions (eligibility, receipt of services, outcomes, exit, and contact with participants) must be entered into EmployNV within **eight (8) business days** from the completion of the process. For example, once the customer has been determined eligible and has received their first service, the participation information must be entered into EmployNV within **eight (8) business days**. All eligibility intake information and documentation must be uploaded into EmployNV upon receipt. This also applies to the exiting of participants once they have completed all programs and are no longer receiving services.

Performance Indicators are based on the exit outcomes of these individuals. It is imperative that accurate information (including documentation to support credentials, measurable skill gains, or employment attainment) is entered into EmployNV in a timely manner in order to generate appropriate reports at the State and Federal levels.

Naming Convention for Data Entry into the MIS (currently EmployNV)

Service providers are expected to enter all verification documents, upon receipt, into EmployNV for all active and exited participants. Please make sure to use the naming convention in Attachment 1: WIOA Title I EmployNV Document Naming Conventions.

As described in this TAG, all documentation for program participants shall be uploaded into EmployNV to create electronic records. Document uploads shall be completed within the **eight (8) business day** timely data entry requirement. Documents may also be uploaded from the paper files of current active participants. All WIOA Title I Service Provider staff will follow “Add a Document” process as stated in the WIOA EmployNV Guide. Staff shall also “tag” uploaded documents with keywords, which will allow documents to be found using keyword searches. To ensure consistency, all WIOA Title I Service Providers must follow the naming/tagging conventions outlined in Attachment 1: WIOA Title I EmployNV Document Naming Conventions.

Records Correction and Deleting Documents

Records in EmployNV that contain errors must be corrected to ensure accurate reporting to USDOL-ETA. Requests for data correction must be submitted from Title I Service Providers to WC for review and further action. All requests for data correction and document deletion must be submitted via email to support@snvwc.org.

Case Notes

Case notes add context to elements in the electronic case file that are not clearly evidenced, such as participant factors affecting eligibility, important details about services provided to clients, and to inform the reader about the client’s progress, lack of progress and/or obstacles associated with the services and/or referrals provided. Case notes compliment activity/service entries made in EmployNV to provide further explanations of services provided. Therefore, all case notes must be

entered timely into EmployNV. Case Notes do not take the place of entering data in the appropriate sections of EmployNV. For example, a career coach should not enter service information (e.g., service codes, start and end dates) in a case note rather than create an Activities/Enrollments/Services entry. Performance related information should be entered in the appropriate sections, such as Activities/Enrollments/Services, Measurable Skills Gains, Credential Attainment, Employment, and/or Follow-up sections. Case notes are a planning tool and a source of documentation and information that can be used by career coaches, supervisors, and monitors. WIOA files can be chosen for review by multiple entities such as the USDOL-ETA, DETR, DETR-WISS, Governor's Workforce Development Board, WC, and other organizations; therefore, accuracy and completeness in case notes are very important. Case notes should tell the "who, what, where, when, why, and how" of the customer's needs and services. Case notes describe the actions taken and the reasons behind those actions, along with the expected results. Case notes must contain factual information and no opinions or comments of the career coach should be included. Anyone with approved access should be able to pick up the file and follow the story of what is happening with the client.

Confidentiality of Data or Information and Required Release Forms

Data or information acquired by a WIOA Title I Service Provider under a confidentiality agreement, to be used exclusively for statistical purposes, shall not be disclosed by an agency in identifiable form for any use other than an exclusively statistical purpose. The use of this information is prohibited except with the informed consent of the respondent (Public Law 107-347 Title V Section 512[b][1]). All WIOA Title I Service Providers must ensure a release of information form is signed and dated by the participant and the career coach. The form shall state that the participant's information may be used for reporting purposes because of federal regulations associated with the benefit of federal funds and that the participant's personal information will remain confidential. The release form will be uploaded into the participant file in EmployNV to validate that the participant agrees to the release of information for reporting purposes. The standardized form will also be made available by the Title I Service Provider staff and may be used as a stand-alone form or incorporated into other release forms used by the Title I Service Provider staff and/or WC.

Personal Identifiable Information (PII)

PII is defined as either protective or non-sensitive. Protective PII is information that is sensitive and typically includes information such as a social-security number, date of birth or bank account numbers. Non-sensitive information is personal information that, when released by itself, should not be harmful to the individual. Non-sensitive information typically includes first and last name, email address, and business address. The handling of PII must be done with caution and follow federal guidance (TEGL 39-11). Please refer to WC Policy GEN 050-07 for further guidance on PII.

Medical/Disability Records

Medical and disability related information, also known as protected health information (PHI) under the Health Insurance Portability and Accountability Act (HIPAA) of 1996 must be kept confidential and separate from EmployNV electronic case record. Such information must be kept in a paper file in a secure, locked location. A case note in EmployNV shall contain a generic explanation of the information, how it is related to eligibility, employment, and/or training opportunities, and identify the secure location of the information. (i.e., "Participant wants to be a mechanic, but needs to pursue other employment or training. See confidential file." or "Individual meets local adult eligibility priority of service group. See confidential file.").

ATTACHMENT I:

WIOA Title I EmployNV Document Naming Conventions

SECTION 1 (A, DW & YOUTH):	DOCUMENT TAGS:
<p>EmployNV Application Eligibility & Verification Documents</p> <ul style="list-style-type: none"> • I-9 List A Documents • I-9 List B & C Documents • Selective Service Documents • Proof of Residence Documents • Military Documents • Educational Level Documents • Public Assistance Documents • Self-Attestation (If Applicable) <p>Dislocated Worker (DW) Documents</p> <ul style="list-style-type: none"> • DW Affidavit • UI Docs. • Layoff Letter • Separation Notice • News Paper Article (Plant Closure) • Refer to DW Policy for additional docs. <p>Income Documentation</p> <ul style="list-style-type: none"> • Income Worksheet • Paystubs • Public Assistance Documents • UI • Tax Returns • Refer to policy for additional docs. <p>Enrollment Forms</p> <ul style="list-style-type: none"> • Release of Information • Equal Opportunity • Nepotism • Notice of Rights 	<p>Last, First WIOA App. (Participation Date) Last, First (Driver’s License, State ID, Birth Certificate, SSC, U.S. Passport, Permanent Resident Card, Selective Service, Public Assistance Letter, Social Services Letter, Proof of Residence, School Transcripts, DD 214, etc.)</p> <ul style="list-style-type: none"> • Example: Jacob, John State ID & SSC • Example: Gonzales, Aaron Selective Service • Example: Johnson, Sarah Public Assistance Letter • Example: Smith, Ashley DD 214 <p>Last, First DW Docs.</p> <p>Last, First Income Worksheet and Docs.</p> <p>Last, First Enrollment Forms (Date Completed)</p>
SECTION 2 (ADW):	DOCUMENT TAGS:
<p>Initial Assessment Individual Employment Plan (IEP) Comprehensive Assessments</p> <ul style="list-style-type: none"> • Traitify • Work Keys • CASAS/TABE • Others <ul style="list-style-type: none"> ○ Proof of Payment (if applicable) 	<p>Last, First IA (Date Completed) Last, First IEP (Date Completed) Last, First [Name of Assessment] (Date Completed) (Cost)</p> <ul style="list-style-type: none"> • Example: Smith, Karen WorkKeys Assessment 7/1/23 \$36.00
SECTION 2 (YOUTH):	DOCUMENT TAGS:
<p>Objective Assessment (OA) Individual Service Strategy (ISS) Comprehensive Assessments</p> <ul style="list-style-type: none"> • Traitify 	<p>Last, First OA (Date Completed) Last, First ISS (Date Completed) Last, First [Name of Assessment] (Date Completed) (Cost)</p>

<ul style="list-style-type: none"> • WorkKeys • CASAS/TABE • Others <ul style="list-style-type: none"> ○ Proof of Payment (if applicable) 	<ul style="list-style-type: none"> • Examples: Smith, Karen WorkKeys Assessment 7/1/23 \$36.00
<p style="text-align: center;">SECTION 3 (ADW):</p> <p>Job Search & Placement Assistance</p> <p>Short-Term Pre-vocational Skills (SPV)</p> <ul style="list-style-type: none"> • Course Documents • Attendance/Sign-in Sheets • Certificate of Completion • Proof of Payment (if applicable) <p>Financial Literacy (FL)</p> <ul style="list-style-type: none"> • Course Docs. • Attendance • Certificate • Upload all docs. together <p>Transitional Jobs (TJ)</p> <ul style="list-style-type: none"> • Transitional Jobs Documents <ul style="list-style-type: none"> ○ Pre-Award Documents ○ Agreement ○ Training Plan/Skills Gap Analysis • Progress Reports • Time Sheets • Paychecks 	<p style="text-align: center;">DOCUMENT TAGS:</p> <p>Last, First Job Search Logs (Date Received/Reviewed)</p> <p>Last, First SPV [Name of Workshop] (Dates Attended/Completed) (Amount)</p> <ul style="list-style-type: none"> • Jacobs, John Resume Workshop Docs (9/5/23 – 9/9/23) • Jacobs, John Resume Workshop Payment 1 9/5/23 – 9/9/23 \$100.00 • Jacobs, John Resume Workshop Payment 2 9/5/23 – 9/9/23 \$100.00 <p>Last, First FL Docs. (Dates Attended/Completed)</p> <p>Last, First TJ Docs (Date Completed)</p> <p>Last, First TJ Progress and Attendance Reports (Month/Year)</p> <p>Last, First TJ Paycheck/Timesheet (Amount) (Pay Period)</p> <ul style="list-style-type: none"> • Martin, Ron TJ paycheck/timesheet \$335.00 PPE 7-24-2023
<p style="text-align: center;">SECTION 3 (YOUTH):</p> <p>Tutoring/Study Skills</p> <ul style="list-style-type: none"> • Attendance Records • Progress Reports • Sign in Sheets • Proof of Payment (if applicable) <p>Alternative Secondary School Documentation</p> <ul style="list-style-type: none"> • Attendance Records • Progress Reports • Credential <p>Education Concurrent with Workforce Prep Documentation</p> <ul style="list-style-type: none"> • Attendance Records • Progress Reports • Credential <p>Financial Literacy (FL) Documentation</p> <ul style="list-style-type: none"> • Course Docs. • Attendance • Certificate • Upload all docs. together 	<p style="text-align: center;">DOCUMENT TAGS:</p> <p>Last, First [Name of Activity] Docs (Dates Attended/Completed) (Amount)</p> <ul style="list-style-type: none"> • Example: Gonzalez, Juan Tutoring Docs (4/3/23 – 4/5/23) • Example: Gonzalez, Juan Tutoring Payment (4/3/23 – 4/5/23) \$150.00 <p>Last, First [Name of Activity] Docs (Dates Attended/Completed)</p> <p>Last, First [Name of Activity] Docs (Dates Attended/Completed)</p> <p>Last, First FL Docs (Dates Attended/Completed)</p>

<p>Leadership Development Documentation</p> <ul style="list-style-type: none"> • Course Documents • Attendance/Sign-in Sheets • Certificate of Completion • Proof of Payment (if applicable) 	<p>Last, First Leadership Development (Dates Attended/Completed) (Amount)</p> <ul style="list-style-type: none"> • Jones, Mary Leadership Development Docs. 5/23/23 • Jones, Mary Leadership Development Payment 1 5/23/23 \$50.00 • Jones, Mary Leadership Development Payment 2 5/23/23 \$50.00
SECTION 4 (ADW & YOUTH):	DOCUMENT TAGS:
<p>Supportive Services</p> <ul style="list-style-type: none"> • Request and Receipt for Supportive Services Form • Invoice • Check or Proof of Payment • Supplemental Documents <p>Incentives</p> <ul style="list-style-type: none"> • Request and Receipt for Supportive Services Form • Invoice • Check • Supplemental Documents 	<p>Last, First (Item(s)), (Date Provided) (Amount)</p> <p>Background Checks</p> <ul style="list-style-type: none"> • Smith, W background check for employment, 2/1/2023 \$85.00 <p>Books/School Fees/School Supplies</p> <ul style="list-style-type: none"> • Jordan, M textbooks for school or training, 2/1/2023 \$200.00 • Jordan, M fees for school, 2/1/2023 \$200.00 • Jordan, M school supplies, 2/1/2023 \$100.00 • Jordan, M training related fees, 2/1/2023 \$100.00 <p>Bus Passes</p> <ul style="list-style-type: none"> • Jones, T monthly bus pass, 7/1/2023 \$65.00 • Jones, T 14-day bus pass 7/1/2023 \$34.00 • Jones, T 2-day bus pass, 7/1/2023 \$5.00 <p>Childcare</p> <ul style="list-style-type: none"> • Johnson, K Weekly Childcare, 9/1/2023 \$175.00 • Johnson, K Bi-Weekly Childcare, 9/1/2023 \$300.00 • Johnson, K Monthly Childcare, 9/1/2023 \$600.00 <p>DMV Physicals</p> <ul style="list-style-type: none"> • Smith, W DMV physical for employment, 2/1/2023 \$100.00 • Smith, W DMV physical for CDL training, 2/1/2023 \$216.50 <p>Driver's License/State ID's</p> <ul style="list-style-type: none"> • Smith, W Driver's License new or renewal fee, 2/1/2023 \$43.75 • Smith, W State ID new or renewal fee, 2/1/2023 \$23.75 <p>Drug Testing</p> <ul style="list-style-type: none"> • Robinson, T drug testing fee, 3/1/2023 <p>Employment Related Tools/Supplies</p> <ul style="list-style-type: none"> • Ford, K, tools, 10/1/2023 \$200.00 • Ford, K, work boots, 10/1/2023 \$100.00 • Ford, K work clothes, 10/1/2023 \$150.00 • Ford, K, uniform, 10/1/2023 \$200.00 <p>Eyeglasses</p> <ul style="list-style-type: none"> • James, L eye exam, 5/1/2023 \$80.00 • James, J prescription eyeglasses, 5/1/2023 \$200.00 <p>Gas Cards/Vouchers</p> <ul style="list-style-type: none"> • William, J gas card, 8/1/2023 \$100.00 • William, J gas voucher, 8/1/2023 \$100.00 <p>Haircuts</p> <ul style="list-style-type: none"> • James, L, haircut assistance, 5/1/2023 \$45.00 <p>Minor Car Repair</p> <ul style="list-style-type: none"> • James, L car repair assistance, 5/1/2023 \$100.00 <p>Personal Protection Equipment</p> <ul style="list-style-type: none"> • James, L PPE assistance, 5/1/2023 \$50.00 <p>Rental Assistance (No Late Fees)</p>

	<ul style="list-style-type: none"> • Peterson, J rental assistance, 6/1/2023 \$100.00 <p>TB Testing</p> <ul style="list-style-type: none"> • Robinson, T Tb testing fee, 3/1/2023 \$65.00 <p>Testing/Certificates Fees</p> <ul style="list-style-type: none"> • Robinson, T testing fee 3/1/2023 \$300.00 • Robinson, T certification fee, 3/1/2023 \$200.00 <p>Training Related Clothing/Shoes/Tools</p> <ul style="list-style-type: none"> • Hall, C scrubs, 11/1/2023 \$150.00 • Hall, C work shoes, 11/1/2023 \$75.00 • Hall, C work tools, 11/1/2023 \$235.00 <p>Utilities (No Late Fees)</p> <ul style="list-style-type: none"> • Peterson, J Nevada Power assistance, 6/1/2023 \$100.00 • Peterson, J Southwest Gas assistance, 6/1/2023 \$150.00 • Peterson, J phone assistance, 6/1/2023 80.00 <p>Vaccinations For Training/Employment</p> <ul style="list-style-type: none"> • Robinson, T vaccination for employment, 3/1/2023 \$50.00 • Robinson, T vaccination for training, 3/1/2023 \$50.00 <p>Work Cards</p> <ul style="list-style-type: none"> • Mora, S TAM card, 8/1/2023 \$20.00 • Mora, S Health card, 8/1/2023 \$25.00 • Mora, S Guard card, 8/1/2023 \$85.00 <p>Other Supportive Services</p> <ul style="list-style-type: none"> • Scott, F Dependent Care, 7/1/2023 \$100.00 <p>Youth Incentives</p> <ul style="list-style-type: none"> • Jackson, J incentive-workshops completed 6/1/2023 \$100.00 • Jackson, J incentive-employment gained 6/1/2023 \$150.00 • Jackson, J incentive-HS diploma obtained 6/1/2023 \$100.00 • Jackson, J incentive-enrolled in post-secondary 6/1/2023 \$100.00
SECTION 5 (ADW & YOUTH):	DOCUMENT TAGS:
<p>Occupational Skills Training</p> <ul style="list-style-type: none"> • OST Documents <ul style="list-style-type: none"> ○ ITA ○ OST Acknowledgement Form ○ In-demand Occupation Verification (i.e. O*NET, NAICS, etc.) ○ Training Proposal ○ ETPL Printout ○ Financial Aid Award Letter (if applicable) • OST Progress Report • OST Certificates • OST License • OST Invoices & Checks <p>On-the-Job Training</p> <ul style="list-style-type: none"> • OJT Documents: <ul style="list-style-type: none"> ○ OJT Acknowledgement Form ○ OJT Obligation Form 	<p>Last, First OST Documents (Training Start Date) Last, First OST Progress and Attendance Report (Month/Year) Last, First OST Certificate (Date Received) Last, First OST License (Date Received) Last, First OST 1st Payment (Amount) (Date Paid) Last, First OST 2nd Payment (Amount) (Date Paid) Last, First OST Final Payment (Amount) (Date Paid)</p> <p>Last, First OJT Documents (Start Date) Last, First OJT Progress Report (Month/Year) Last, First Paycheck/Timesheet (Amount) (Pay Period)</p> <ul style="list-style-type: none"> • Martin, R OJT paycheck/timesheet \$400.00 PP 7/1-7/10/2023

<ul style="list-style-type: none"> ○ OJT Pre-award Assessment ○ OJT Master Contract ○ OJT Skill Gap Analysis ○ OJT Training Plan ● OJT Evaluation Form ● OJT Payments <ul style="list-style-type: none"> ○ Time Sheet ○ Paychecks <p>Entrepreneurial Skills Training</p> <ul style="list-style-type: none"> ● Attendance/Sign-in Sheet(s) ● Certificate of Completion (if applicable) ● Proof of Payment (if applicable) <p>Pre-apprenticeship</p> <ul style="list-style-type: none"> ● Attendance/Sign-in Sheet(s) ● Certificate of Completion (if applicable) ● Proof of Payment (if applicable) <p>Registered Apprenticeship (RA) Training</p> <ul style="list-style-type: none"> ● Attendance/Sign-in Sheet(s) ● Certificate of Completion (if applicable) ● Proof of Payment (if applicable) <p>Internship or Work Experience</p> <ul style="list-style-type: none"> ● WEX/Internship Documents <ul style="list-style-type: none"> ○ Pre-Award Documents/ Worksite Evaluation ○ Agreement ○ Training Plan ● Progress Reports ● Time Sheets ● Copies of Paychecks 	<p>Last, First Entrepreneurial Skills Training Doc (Dates Attended/Completed)</p> <ul style="list-style-type: none"> ● Example: Williams, Malik Entrepreneurial Skills Training (3/2/23) <p>Last, First Entrepreneurial Skills Training Payment # (Dates Attended/Completed) (Amount)</p> <ul style="list-style-type: none"> ● Example: Williams, Malik Entrepreneurial Skills Training Payment 1 (3/2/23) \$75.00 <p>Last, First Pre-Apprenticeship Documents (Start Date/Dates Attended/Completed)</p> <p>Last, First Pre-Apprenticeship Payment (Start Date/Dates Attended/Completed) (Amount)</p> <p>Last, First RA Documents (Start Date/Dates Attended/Completed)</p> <p>Last, First RA Progress and Attendance Report (Month/Year)</p> <p>Last, First RA Payment (Dates/Pay Period) (Amount)</p> <p>Last, First WEX/Internship Docs.</p> <p>Last, First WEX Progress and Attendance Reports (Month/Year)</p> <p>Last, First WEX Paycheck/Timesheet (Amount) (Pay Period)</p> <ul style="list-style-type: none"> ● Martin, R WEX paycheck/timesheet \$335.00 PPE 7-24-2023
Section 6 (ADW & Youth):	Document Tags:
<p>Outcome Form</p> <p>Employment & Earnings Verification</p>	<p>Last, First Outcome Form (Date Completed)</p> <p>Last, First (Company Name) Employment Verification (Date Completed)</p> <p>Last, First (Company Name) Paystub (Date Obtained)</p>

<p>Diplomas Certificates Credentials/License Post-Secondary Education</p>	<p>Last, First (HS/College) Diploma (Date Received) Last, First (Course name) Certificate (Date Received) Last, First (HS/College/Training Course) Transcript (Date Received) Last, First [Name of License] (Date Received) Last, First Post-Secondary Education (Transcript/Schedule) (Date Received)</p>
<p>Measurable Skills Gain</p>	<p>Last, First (i.e. Diploma/Certificate/Transcript Date) (Date Received)</p> <ul style="list-style-type: none"> • Example: Jones, Kim HS Diploma (6/1990)
<p>Follow-up Services</p>	<p>(See above examples for follow-up services)</p> <ul style="list-style-type: none"> • Example: Last, First Follow-Up Job Search Assistance