



SAN JOAQUIN COUNTY WORKNET EMPLOYMENT AND ECONOMIC DEVELOPMENT DEPARTMENT POLICIES AND PROCEDURES DIRECTIVE

| DIRECTIVE NO. | EFFECTIVE DATE | APPLICABILITY | PAGE |
|--|-------------------|---------------|--------|
| 23-04 | February 26, 2024 | CMD, FMD, GMD | 1 of 7 |
| SUBJECT: WIOA DATA VALIDATION AND SOURCE DOCUMENTATION | | | |

I. <u>PURPOSE</u>

The purpose of this directive is to establish the procedures regarding the Workforce Innovation and Opportunity Act (WIOA) program participant source documentation requirements. This policy applies to the following programs: Title I Adult, Dislocated Worker, Youth, and National Dislocated Worker Grant (NDWG).

II. GENERAL INFORMATION

As the administrator of California's Title I Adult, Dislocated Worker, and Youth, Title III Wagner-Peyser, TAA, NDWG, and JVSG programs, the Employment Development Department (EDD) is required by federal regulations to submit accurate participant reports to the Department of Labor (DOL) on a quarterly and annual basis. WIOA Data Validation Source Documentation (WSD22-15) requires Local Workforce Development Area (LWDA) staff to enter timely and accurate data into CalJOBS.

Data validation is a series of quality assurance techniques established to verify the accuracy, validity, and reliability of data entered in CalJOBS and reported to the DOL. The establishment of a shared data validation framework that requires a consistent approach across programs ensures all program data routinely and accurately reflects the characteristics and performance of each program. Ultimately, the purpose of validation procedures are as follows:

- Verify the performance data reported to the DOL are valid, accurate, reliable, and comparable across programs.
- Identify anomalies in the data and resolve issues that may cause inaccurate reporting.
- Outline source documentation required for data elements.
- Improve program performance accountability through the results of data validation efforts.

The EDD Central Office Workforce Services Division's CalJOBS and Program Accountability Section administers data validation activities and conducts Data

Element Validation (DEV) on program participant files annually. DEV is conducted by comparing data entered in CalJOBS against source documentation. The EDD utilizes the data validation findings to assess the accuracy of program participant data obtained from CalJOBS and reported to the DOL.

REFERENCES

- Workforce Innovation and Opportunity Act (WIOA) (Public Law 113-128) Sections 3(15) A-E, 116(d)(5), 134 (c), (2), (xiii), 185(a)(3)(c), and 188
- TEGL 23-19, Change 2, Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs (May 13, 2023)
- TEGL 7-18, Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA) (December 19, 2018)
- <u>Title 20 Code of Federal Regulations (CFR), Part 678.430</u> and <u>Part</u> 680.660
- Title 10 United States Code, Sections 101 and 991
- Title 38 United States Code, Section 101 (2)
- WSD22-15, WIOA Data Validation Source Documentation (June 27, 2023)
- WSD22-01, Performance Guidance (July 18, 2022)
- WSD20-10, CalJOBS Participant Reporting (April 8, 2021)
- WSD19-06, CalJOBS Activity Codes (December 27, 2019)
- WSD18-02, Data Change Request Form Procedure (July 31, 2018)
- WSD17-01, Nondiscrimination and Equal Opportunity Procedures (August 1, 2017)
- WSD16-08, Release of Confidential UI Information (October 3, 2016)
- WSD14-04, WIA Title I Eligibility (September 25, 2014)

III. POLICY

It is the administrative policy of the EEDD to ensure data entered in CalJOBS and reported to the DOL by EDD is accurate. EEDD staff is required to collect and maintain the applicable source documents for each program participant at the date of program entry, during the period of participation, and after program exit. For more information about WIOA Source Documentation and CalJOBS Data Element Entry Locations, staff should reference (WSD22-15, attachments 1 and 2).

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 is validating that data entered in CalJOBS is accurate. Some of the data elements and their allowable source documents may overlap with eligibility documentation requirements. For DEV purposes, where self-attestation is identified as an acceptable source document, the lack of source documentation beyond self-attestation must not delay or prevent

enrollment and receipt of services in a program. Please reference WIA Title I Eligibility (WSD14-04) for additional guidance on eligibility documentation.

The following five data elements require source documentation that falls under the purview of the WIOA Section 188 Nondiscrimination:

- Data Element 200 Date of Birth
- Data Element 202 Individual with a Disability
- Data Element 701 Pregnant or Parenting Youth
- Data Element 803 English Language Learner
- Data Element 806 Single Parent at Program Entry
- Data Element 923 Other Reasons for Exit (if medical related option is selected)

For more information about data information collection and maintenance for nondiscrimination data, please see Nondiscrimination and Equal Opportunity Procedures (WSD17-01).

Staff are required to maintain source documentation as physical files and/or as electronic files. Staff will utilize electronic records in CalJOBS, through the Document Management and Scanning module, whenever possible. For more information on using the CalJOBS Document Management and Scanning Module, refer to the CalJOBS Document Management and Scanning Module Guide Card located in the Staff Online Resources section of CalJOBS. Staff are responsible for ensuring the data in CalJOBS is accurate and timely. If data in CalJOBS is found to be incorrect, staff should follow the guidance outlined in Data Change Request Form Procedure (WSD18-02).

The EDD Central Office Workforce Services Division's CalJOBS and Program Accountability Section administers data validation activities. EEDD Grants Management Division reviews source documentation and data validation activities during the program year. To facilitate local review and DEV, staff will follow procedures required by this policy.

IV. PROCEDURE

Allowable Source Documents

Acceptable source documents are physical or electronic documents or records that support the data captured in CalJOBS and reported to the Department of Labor (DOL). Documents uploaded to CalJOBS to serve as allowable source documents will be named in accordance with the attached document naming conventions (CalJOBS Source Document File Naming Conventions, Attachment 2). An individual or participant may sign documents using a physical ("wet") signature or digitally using the CalJOBS electronic signature or by a method approved by the Executive Director of EEDD. Allowable documents for a program or activity must be valid at the time of enrollment in the relevant program or activity.

Eligibility Determination/Documents Verification

When a determination is made that a customer needs WIOA Individualized or training services, it is required that the customer register for the program. To be registered, eligibility determination must be made. The following procedures will be used to determine eligibility:

- 1. The case manager will schedule an appointment with their customer and complete an initial assessment to determine if they appear to be eligible for WIOA-funded services. The case manager will determine the level of service required, the appropriate funding source (Adult and/or Dislocated Worker or Youth) and will refer them to an Intake and Referral Specialist. The Intake and Referral Specialist will provide the customer with a list of documents they will need to bring with them to verify eligibility. Staff will refer to WIOA Data Validation Source Documentation, (WSD22-15, attachment 1) for a comprehensive list of documents that can be used to verify each applicable eligibility factor.
- 2. Documentary evidence of eligibility factors is required. However, if documentary evidence is not verifiable, not readily available, or will entail privation or suffering (undue hardship) for the customer to obtain such documentation, an "Applicant Statement" may be used. This will require a formal request (Applicant Statement, Attachment 1) by the case manager to the Division Manager for approval. Every possible effort must be made (and documented) to collect all necessary documentation to verify eligibility prior to using an Applicant Statement.
- 3. Upon completion of final eligibility determination, the WIOA application is forwarded for entry, and verified documents are uploaded into the CalJOBS Statewide system. A completed copy of the application is forwarded to a case manager for registration into the WIOA Program. Verification documents used for program eligibility, and qualifications must be shredded upon uploading into the CalJOBs system or stored in a secured location (if the document is copied or printed).
- 4. Refer to WIOA Source Documentation and CalJOBS Data Element Entry Locations (WSD22-15, attachments 1 and 2) for a full listing of allowable source documents to be uploaded to CalJOBS.

CalJOBS Activity Codes

Staff must enter CalJOBS Activity Codes within five days of the date the service is provided. Staff should refer to WIOA Source Documentation and CalJOBS Data Element Entry Locations (WSD22-15, attachment 1, table 3) for a full listing of data elements that use Activity Codes and allowable source documentation. If an Activity Code error is identified or is not entered within 30 days of the date a service is provided, staff must immediately notify the appropriate supervisor who will determine if it is still possible to submit a Data Change Request to EDD. For

additional information on Activity Codes, staff should refer to CalJOBS Activity Codes (WSD19-06). EDD requirements for data change requests is detailed in Procedure is detailed in Data Change Request Form Procedure (WSD18-02).

Case Notes

Case notes refer to electronic statements in CalJOBS by the case manager regarding services provided to an individual. Case notes must be entered within five days of the date of contact with the participant. Case notes must include:

- 1. The contact date must reflect the date of <u>contact</u>, not the date the case note was created. Case notes documenting messages (voice, text, email, letter, etc.) left by the case manager or received from the participant do not reflect a service, nor are they considered a contact. A service requires interaction between case manager and participant.
- 2. The LWDB/Region, Office, Program, and Application ID must all be selected.
- 3. If the case note refers to a specific CalJOBS activity, the case note subject must begin with the relevant Activity Code number.
- 4. The Contact Type must be selected.
- 5. The Case Note Description must include a participant's status for a specific data element.
- 6. Protected information must not be included in case notes but must be maintained in a separate file in a secure location.
- Case notes must be relevant to the case.
- 8. Case notes must not include personal opinions.
- 9. If the case note is entered by staff other than the case manager who provided the service, the name of staff who obtained the information must be included in the body of the case note.

Measurable Skill Gains Verification

During, and up to one year after training, staff must document measurable skill gains. Once documents are obtained, information is entered on the Measurable Skill Gains ribbon and uploaded to CalJOBS. Refer to WIOA Source Documentation and CalJOBS Data Element Entry Locations (WSD22-15, attachments 1 and 2) for a full listing of allowable Measurable Skill Gains source documents to be uploaded to CalJOBS.

- For ITA: The Monthly Training Progress Report form (Progress Report, Attachment 3) documents a participant's training milestone progress, benchmark attainment, credential received, program completion, or other development during or after training. Training providers may use their own forms if they provide comparable information.
- **For OJT:** The Monthly Evaluation form (OJT Monthly Evaluation, Attachment 4) documents a participant's training milestone progress, benchmark attainment, credential received, program completion, or other development during or after training.

 For Work Experience: Participation in the Work Experience program does not require a Measurable Skills Gain, nor should one be entered on the Measurable Skill Gains ribbon. The Monthly Work Experience Evaluation documents a participant's progress toward established work experience training goals and skills necessary for successful employment and should be uploaded to CalJOBS.

<u>Credential Attainment Verification</u>

Credential verification is provided by either the training provider or the participant once training or education is completed and the participant has obtained a certificate or license for the occupation. A credential can be obtained during the program or within one year following exit. Once documents are obtained information is entered on the CalJOBS Credentials ribbon, and a copy of the credential is uploaded. Refer to WIOA Source Documentation and CalJOBS Data Element Entry Locations (WSD22-15, attachments 1 and 2) for a full listing of allowable credential source documents to be uploaded to CalJOBS.

Follow-Up Verification

Staff must ensure exited participants receive appropriate services as identified and deemed necessary during the follow-up period. These services are to be documented in case notes and supported with uploaded documents quarterly for one year after exit. Refer to WIOA Source Documentation and CalJOBS Data Element Entry Locations (WSD22-15, attachments 1 and 2) for a full listing of allowable follow-up source documents to be uploaded to CalJOBS.

V. QUESTIONS REGARDING THIS DIRECTIVE

May be referred to the Executive Director of EEDD via Managers or designee.

VI. UPDATE RESPONSIBILITY

The Executive Director of EEDD and/or designee will be responsible for updating this directive, as appropriate.

VII. APPROVED

PATRICIA VIRGEN EXECUTIVE DIRECTOR

Patricia Virgen

PV:jl

Attachment 1: Applicant Statement Attachment 2: CalJOBS Source Document File Naming Conventions

Attachment 3: Progress Report Attachment 4: OJT Monthly Report

APPLICANT STATEMENT

| I HEREBY CERTIFY, UNDER PENALTY OF PERJURY THAT I |
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| My signature below indicates that I have been informed of and understand the information contained on this form. I certify under penalty of perjury that all of the above information is true and complete. I agree that any information I have supplied is subject to verification. I understand that falsification of any item is grounds for termination from the Workforce Innovation and Opportunity Act program and may result in action to recover any moneys paid to me while participating. |
| Applicant's Signature and Date |
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| Applicant's Address |
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| OFFICE USE ONLY |
| The above applicant statement is being utilized for documentation of the following eligibility criteria: |
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| Signature and Date of Certifying Staff |

CalJOBS Source Document File Naming Conventions

Documents uploaded to CalJOBS to serve as source documents must be named in accordance with the document naming conventions below followed by a space and then the date (yy/mm/dd) the document was obtained.

EXAMPLE: The individual provided a driver's license on November 20, 2023. The file would be named DL 231120.

If a document is not listed below but is included in the WIOA Source Documentation List (WSD22-15, Attachment 1), please see your supervisor for an updated list.

| Allowable Type of Document | File Name Abbreviation |
|---|------------------------|
| Driver's License | DL |
| Baptismal Record | BR |
| Birth Certificate (United States [US] or Non-US Issued) | вс |
| DD-214 | DD214 |
| Report of Transfer or Discharge Paper | RTD |
| Federal, State, Local or Tribal Identification Card | ID |
| Matricula Consular from Mexico | мс |
| Passport (US or Non-US Issued) | PP |
| Hospital Record of Birth (US or Non-US Issued) | HRB |
| Public Assistance/Social Service Records | PASS |

| School Records or identification (ID) Cards (US or Non-US Issued) | SR |
|--|-------|
| Work Permit | WP |
| Family Bible | FB |
| Justice System Records | JS |
| Selective Service Registration | SSR |
| Signed Letter from a Parent/Guardian | PL |
| A Letter from the Veterans' Administration | VA |
| NGB-22 documenting Title 10 Federal Active Duty Service | NGB22 |
| Self-Attestation | SA |
| For Claimant, Exhaustee, or Exempt from Work Search: Documentation from Unemployment Insurance (UI) | UI |
| Verification from Employer | EV |
| Rapid Response List | RRL |
| Notice of Layoff | LN |
| Public Announcement with documentation from an UI data source (see Workforce Services Directive [WSD] 16-08, Release of Confidential UI Information, for acceptable sources) | PA |
| TANF Eligibility Verification | TANF |
| | |

| TANFR |
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| |
| TANFREF |
| SSDIR |
| SSAREF |
| SSDIV |
| SNAPV |
| FSR |
| SNAPREF |
| PAA |
| PAC |
| MCG |
| PAEV |
| PS |
| СМРА |
| CRTA |
| |

| Pension Statement | PS |
|--|-----|
| Employer Statement/Contact | ESC |
| Family or Business Financial Records | FBF |
| Housing Authority Verification | HAV |
| Quarterly Estimated Tax for Self-Employed Persons | QET |
| Social Security Benefits | SSB |
| UI Claim Documents | UIC |
| Assessment Test Results | ATR |
| Applicable Records from Education Institution (transcripts, academic assessments, or other school documentation) | ER |
| Signed IWT agreement | IWT |
| Employer Worker List | EWL |
| Designation of Eligibility Form (e.g. DE 8313C) | DE |
| Withdrawal form with explanation | WD |
| Information from institution or facility | IFI |
| Vendor Training Records (including attendance sheets) | VTR |

| Signed Training Contract | тс |
|---|-------------|
| ITA | ITA |
| Signed Individual Employment Plan or Training Plan | IEP |
| Vendor Training Certificate of Completion | СС |
| Waiver Documentation that includes initial approval and renewals at 30 day intervals (e.g. DE 8748 and 8748F) | WD |
| Transcript or report card | TRC |
| Enrollment or School records | ESR |
| Follow-up survey from program participants | FS |
| Copy of Pay Check Stubs, Payroll Slip, or Leave and Earnings Statements (minimum of two per TEGL 26-16) | PC, PS, LES |
| Income Tax Records, W-2 Form, or Other Records form the State Department of Revenue or Taxation | IT, W2 |
| Quarterly Tax Payment Forms (such as IRS Form 941) | QTP |
| Document from employer on company letterhead attesting to an individual's employment status and earnings | EDL |
| Self-Employment or Sales Commission Worksheets Signed and Attested to by Program Participants | SEW |
| Pay check stubs, tax records, W-2 form | PC, TR, W2 |

MONTHLY TRAINING PROGRESS REPORT

This form <u>MUST</u> be submitted <u>EVERY MONTH</u> to your Case Manager. Failure to submit this monthly progress report may cause a delay or may not allow us to process the payment for your training, and the invoices may be sent to you for payment.

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|---------------------------|--------------------|----------------------|
| NAME OF STUDENT: | | |
| TRAINING NAME: | | |
| DATE OF PROGRESS REPORT: | | |
| TRAINING PROVIDER: | | |
| TRAINING PROVIDER PHONE # | : | |
| | | |
| NAME OF CLASS | GRADE | INSTRUCTOR'S COMMENT |
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PRINT NAME



San Joaquin County WorkNet Trainee Performance Evaluation An evaluation must accompany the monthly invoice for each employee.

NOTE: To ensure you receive your reimbursement in a timely manner, please submit this form with <u>OJT</u> invoice and time card copies by the 10th of the following month. Thank you for your cooperation.

| Month | of: | | | |
|---------------------------|--|---------------|--|--|
| Name | of Employer: | | | |
| Name of Employee/Trainee: | | | | |
| Job Ti | tle: | | | |
| Contra | act I.D. Number: | | | |
| 2. | Has the trainee's work been satisfactory? Yes □ No □ IF NOT, please identify area of problem: How would you rate this Employee/Trainee: | | | |
| 4. | Excellent □ Good □ Above Average □ Average □ Below Average □ Please comment on favorable or unfavorable Employee/Trainee traits? | | | |
| 5. | Has the trainee achieved a measurable skills gain? Yes ☐ No ☐ A measurable slattainment could be training reports on milestones completed as the individual master required job skills, or steps to complete an On-the-Job Training. If so, please describe measurable skills gain attained: | rs the the | | |
| 6. | Is it your intent to retain this Employee/Trainee at the completion of the On-the-Job training period Yes □ No □ | | | |
| 7. | If Employee/Trainee is no longer employed , please give the last date of employment reason. Last employment date: Terminated Laid-off Quit Personal reasons Work accident | | | |
| 8. | How do you feel about this Training Agreement and your relationship with the San Joaquin County WorkNet staff? Satisfied □ Dissatisfied □ | J | | |
| | Completed by: | | | |