

ADMINISTRATIVE ENTITY STATE POLICY –

WIOAP # 01-2021

Effective Date: July 1, 2021

TO: All WIOA Subrecipients

From: Danilo Cabrera, Program Operations Manager *Danilo Cabrera*

Subject: **MANAGEMENT INFORMATION SYSTEM**

Statutory Reference: Federal and State laws, regulations, rules, and other guidance and documentation relied upon to develop this policy: WIOA Secs. 185(a)(1), (c), (d) and (e)(1); 2 CFR Parts 200 and 2900; TEGLs 10-16 Change 1, 22-15; and the Privacy Act Sec. 7(a)(1)

BACKGROUND

Recipients and subrecipients of Federal financial assistance, including WIOA funds, are required to keep records that are sufficient to:

- prepare required reports on program performance and outcomes; and
- trace funds to a level of expenditure adequate to ensure that funds have been spent lawfully.

POLICY

The State provides a thirty (30) day review period for this policy, during which questions and comments may be submitted in writing to the WIOA policy mailbox at WIOAPlan@labor.idaho.gov.

This policy establishes records management requirements for:

- local WIOA Title IB (Youth, Adult, and Dislocated Worker) programs; and
- the following programs administered by IDOL:
 - WIOA Title III (Wagner-Peyser) program;
 - Trade Adjustment Assistance (TAA) program;
 - Jobs for Veterans State Grant (JVSG) program;

- Migrant and Seasonal Farmworker program;
- UI Claimants (Reemployment Services and Eligibility Assessment-RESEA);
- Apprenticeship grants; and
- applicable discretionary grant programs.

This policy also provides guidance for uniform, paperless documentation of participant files and includes instructions to protect customer information. Standardizing the collection of participant information expedites participant eligibility determinations and allows WIOA program staff more time to focus on providing services.

Section I. General requirements

As the State’s WIOA Administrative Entity, the Idaho Department of Labor (IDOL) must report on the data elements specified in the participant individual record layout (PIRL) issued by the US Department of Labor (USDOL) Employment and Training Administration.

(a) Local WIOA Title IB (Youth, Adult, and Dislocated Worker) programs

Each local board receiving WIOA Title IB (Youth, Adult, and Dislocated Worker) funds must, for reporting, monitoring, and evaluation purposes:

- ensure the establishment and maintenance of a local area management information system designed to facilitate the uniform compilation, cross-tabulation, and analysis of programmatic, participant, and financial data, including data necessary to comply with the nondiscrimination provisions of WIOA Sec. 188 and 29 CFR Part 38; and
- submit or make available through electronic means the reports, records, supporting documentation, and data required under WIOA Title I.

(1) Required reports, records, and data

The reports, records, and data required under WIOA Title I include information regarding programs and activities, including:

- demographic characteristics (including race, ethnicity, sex, and age) and other related information regarding participants;
- program enrollments and the length of time participants are engaged in the programs and activities;
- outcomes of programs and activities for participants, including information on participant occupations and placement of participants in nontraditional employment;
- costs of the programs and activities; and
- information necessary to prepare reports to comply with the nondiscrimination provisions of WIOA Sec. 188 and 29 CFR Part 38.

(b) Programs administered by IDOL

Records for these programs must be managed according to the requirements of each program's authorizing legislation, grant agreements, and the applicable requirements of the Uniform Guidance; and conditions established in this policy:

- WIOA Title III (Wagner-Peyser) programs;
- Trade Adjustment Assistance (TAA) program;
- Jobs for Veterans State Grant (JVSG) program;
- Migrant and Seasonal Farmworker program;
- UI Claimants (Reemployment Services and Eligibility Assessment-RESEA);
- Apprenticeship grants; and
- applicable discretionary grant programs.

Section II. Records management systems

As IDOL's management information system, *IdahoWorks* is the system of record for the State of Idaho with regard to Federal reporting for all WIOA Title IB programs and the IDOL-administered programs listed in Section I(b).

(a) Local WIOA Title IB (Youth, Adult, and Dislocated Worker) programs

To meet the local board's obligations described in [Section I\(a\)](#), local area WIOA staff must use *IdahoWorks*. IDOL provides local area staff with access to and training on this system. Requests for training on *IdahoWorks* should be submitted to WIOA/TAA@labor.idaho.gov.

(b) Programs administered by IDOL's Workforce Administration Division

For the IDOL-administered programs listed in [Section I\(b\)](#), program staff must use *IdahoWorks* if supporting documentation is required according to the programs' authorizing legislation or discretionary grant award.

Section III. Electronic records/case files

The Idaho Department of Labor (IDOL) has transitioned to paperless record keeping using electronic document imaging and storage within its WIOA management and information system, *IdahoWorks*. To capitalize on the increased efficiency of data storage and retrieval, IDOL revised the State's process and maintenance of pertinent WIOA records. *IdahoWorks* allows all WIOA program partners the means to administer services to their participants efficiently.

IdahoWorks eliminates the need for paper applications for registration/enrollment and ensures that all WIOA service providers are using identical criteria to determine participant eligibility. Customers will receive the same high-quality, efficient service regardless of the local area in which they reside across the State. To appropriately case manage participants, WIOA service providers must use *IdahoWorks* to:

- Create participant applications
- Record provided services
- Upload supporting documentation to verify eligibility
- Provide case notes regarding interactions with participants

All AJCs must utilize the electronic registration The use of electronic records:

- Eliminates the need for physical storage areas and storage costs associated with paper files
- Saves supply costs and decreases paper waste
- Provides for an easily accessible, single point of access for file review
- Reduces staff time accessing hard copy documentation
- Ensures more secure storage of sensitive information
- Eliminates lost or misfiled paper documents
- Increases the consistency of file documentation
- Ensures complete verification for program eligibility

The following programs must complete and document all program activities electronically:

- WIOA Title 1B
- WIOA Title III (Wagner-Peyser) programs;
- Trade Adjustment Assistance (TAA) program;
- Jobs for Veterans State Grant (JVSG) program;
- Migrant and Seasonal Farmworker program;
- UI Claimants (Reemployment Services and Eligibility Assessment-RESEA);
- Apprenticeship grants; and
- applicable discretionary grant programs.

(a) Elements

For all staff using *IdahoWorks*, the following records and data are captured and stored exclusively in *IdahoWorks*:

- program applications, which may include initial paper applications;
- eligibility determinations;
- participant enrollments;
- exits and follow-ups;
- fiscal documents (vouchers, receipts, etc.)
- case notes; and
- all other information relevant to program activities.

Career planners are strongly encouraged to utilize the WIOA 02 Checklist as it offers detail on the documentation necessary to complete a participant's file for WIOA enrollment and exit. If specific documentation is not obtained or required, case notes must explain why documentation is missing or unnecessary.

IMPORTANT: Paper records are not permitted and are not considered during monitoring or for data validation purposes. However, records containing confidential, medical, or legal information must be kept in physical paper form in a subrecipient designated locked file cabinet in a secure area.

(b) Case notes

Case notes add context to the electronic case file that is not provided, such as participant enrollment activities and consultation activities regarding training. They must be directly related to and are necessary supplemental information that supports employment and training services provided to the participant. If a program activity is planned to last more than one (1) day, the case manager must document actual service delivery in case notes.

Section IV. Records correction

Records in *IdahoWorks* that contain errors must be corrected. However, requests for the correction of records will not be processed if the records are included in an annual report that has been submitted to USDOL.

To request a record correction in *IdahoWorks*, local area staff must submit the request to WIOA/TAA@labor.idaho.gov and include supporting documentation. The request will be reviewed by the Administrative Entity grant's management staff for approval before submission to IDOL's *IdahoWorks* Automated Program System Specialists.

IMPORTANT. A correction-of-records process must not be used to enhance program performance or distort actual events.

Section V. Records retention

For the programs listed in [Section III](#), financial records, supporting documents, statistical records, and all other non-Federal entity records pertaining to a Federal award must be retained for five (5) years from the date of submission of the final service provided, as reported to the Federal awarding agency, or pass-through entity in the case of a subrecipient.

Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities, except under the following circumstances.

- If any litigation, claim, or audit is started before the expiration of the five (5) year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action is taken.
- When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
- Records for real property and equipment acquired with Federal funds must be retained for five (5) years after final disposition.
- When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the five (5) year retention requirement does not apply to the non-Federal entity.

Programmatic records for WIOA Titles will be retained within *IdahoWorks*, serving as the document repository during the retention period.

Section VI. Records access

Right of access

The Federal awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, must have the right of access to any documents, papers, or other records of a non-Federal entity which pertain to the Federal award, to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the non-Federal entity's personnel for interview and discussion related to such documents.

(a) Expiration of right of access

The rights of access described above are not limited to the required retention period described in Section VI. The rights of access last as long as the non-Federal entity retains the records. Federal awarding agencies and pass-through entities must not impose any other access requirements upon non-Federal entities.

(b) Public access to records

Unless required by Federal, State, local, or tribal statutes, non-Federal entities are not required to permit public access to their records.

No Federal awarding agency may place restrictions on a non-Federal entity that limit public access to the entity's records pertaining to a Federal award, except:

- records that include protected personally identifiable information (PII); or
- when the Federal awarding agency can demonstrate that the records will be kept confidential and would have been:
 - exempted from disclosure according to the Freedom of Information Act (FOIA); or
 - deemed as controlled unclassified information according to Executive Order 13556, if the records had belonged to the Federal awarding agency.

Records provided to a Federal agency by a non-Federal entity are, in general, subject to FOIA and applicable exemptions.

DISCLAIMER

This policy is based on IDOL's reading of the applicable statutes, regulations, rules, and guidance released by the U.S. Government and the State of Idaho. This policy is subject to change as revised or additional statutes, regulations, rules, and guidance are issued.