

PEE DEE LWDA INSTRUCTION NUMBER:

17-008

TO: Pee Dee Workforce Development Area Contractors

SUBJECT: Record Retention and Storage

ISSUANCE DATE: September 1, 2017

EFFECTIVE DATE: Immediately

Purpose: To transmit revised procedures for the storage and retention of Workforce Innovation and Opportunity Act participant files to comply with data validation directives from the U S Department of Labor. ***This instruction supersedes Pee Dee Local Workforce Investment Area Instruction WIA 12-006.***

Background: The Pee Dee Local Workforce Investment Area now known as the Pee Dee Local Workforce Development Area issued a records retention policy outlining procedures for maintenance of participant files for a time period sufficient to cover data validation and audits. Hard copy case files, including WIA now known as WIOA eligibility case files, for all participants who exit between April 1st and March 31 must be maintained for five years.

In order to comply with file maintenance requirements, the LWIA now known as LWDA also adopted a policy of maintaining a single hard copy case file per SCWOS application identification number.

Action Required: For ease of monitoring data validation, the contractor will continue to provide eligibility determination/registration and enrollment for program services. The Pee Dee LWDA is striving to be paperless and has modeled our scanning system on TAA State Instruction 14-01. Effective July 5th, 2016 staff will be required to scan all related WIOA documents into SCWOS which includes eligibility documents and data validation items for all *new* WIOA enrollees. Archived participant files should be boxed and stored by Program Year which includes exits that occur between April 1st and March 31st.

Case Files of WIOA Registered Participants

1. WIOA hard copy case files should be archived **by Exit Year** as soon as all follow-up has been completed. All separate, locked documents, to include medical and other sensitive information, pertaining to that case should be remain in office, stored in a locked file until the destroy date has passed. No PII should be released to the off-site storage facility.
2. These case files, file drawers and/or boxes, should be clearly marked with the appropriate destroy date.

3. Each participant should have only one hard copy case file per APPID number. The file must be maintained from eligibility determination/registration to enrollment through participant follow-up. In order to ensure accountability for forms prior to being uploaded into SCWOS, the center manager should sign-off on each completed certification packet verifying all required eligibility documentation is present. There should be no confidential and/or sensitive data being uploaded that would violate TAA State Instruction 14-01. The contractor will be liable for any missing documentation. Staff should refer to the LWDA Best Practice for Scanning Policy.

The Youth service providers will follow the same guidelines.

4. If exited individuals reapply for WIOA, a new WIOA application must be entered into SCWOS, and this will create a new APPID number and require a *new* hard copy case file. The APPID number should be written on the outside of the hard copy case files to prevent any confusion during monitoring and/or data validation.
5. There should be a standard order for documents in hard copy case files.
6. Inactive cases will be filed in a central location within the local area. The Pee Dee LWDA has elected to use American Specialty Office Supply for storage of all its archived records. This will facilitate retrieval of records on short notice (1 to 2 days) for monitoring, data validation, and audit purposes. A list of participant files along with the original New Box Input Form must be submitted to the attention of Teresa Jacobs as a compilation of records which have been released to the LWDA for storage at American Specialty. The contractor should maintain a copy of the participant list and the New Box Input Form for their records. The retrieval of records previously stored must also be requested in writing. When the records are returned, a LWDA representative will acknowledge receipt of the returned record(s) by indicating the return on the written request. The cost for appropriate boxes (i.e. 1 cube banker box), and the cost of storing the records off-site is borne by the LWDA. At the time that a request for storing of records is being made, appropriate arrangements will be made regarding how records will be transported from the contractor's office to American Specialty.
7. To reduce storage costs, we ask that each contractor file the minimum number of documents in the hard copy case file as specified in the attached Best Practice for Scanning list. The individual's official case file is electronic SCWOS file. The hard copy case file is required to contain only the documents listed on the Pee Dee LWDA Best Practice for Scanning Policy and any other required documents that are not contained in SCWOS. It is *not* necessary to maintain copies of all SCWOS screens, SCWOS case notes, etc. By moving to an electronic system, we should be reducing the amount of paper in the case files.
8. In order to keep storage procedures simple and easy for our storage provider, the LWDA asks that the contractor complete the New Box Input Form and both ends of the banker storage boxes according to the attached samples.

What should be noted on the box end?

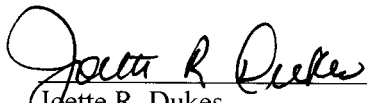
1. Box Number
 2. Beginning and Ending Exit Dates for the Program Year
 3. Destroy Dates
 4. Contents of Box
 5. Contractor Name and Workforce Center (if applicable)
9. A list of participant files included in the box should be securely attached to the outside top *as well as* the inside of the lid of the banker boxes.

For Case Files of WIOA Applicants Who Were Never Enrolled

Hard copy case files for WIOA applicants who have completed applications but were not enrolled within 90 days of eligibility determination or were determined ineligible for WIOA services **must be uploaded into SCWOS** and maintained for **three years past the eligibility determination date**. At the conclusion of each program year, these files will be properly boxed, labeled, and forwarded to the LWDA for storage at the facility leased for this purpose. Each file should be placed in a standard manila folder labeled with the following: Name, State ID, APPID, and eligibility date.

For Case Files of WIOA Applicants with a Partial WIOA Application

Hard copy cases files for individuals with partial WIOA application must be **must be uploaded into SCWOS** and maintained for **three years past the application date**. At the conclusion of each program year, these files will be properly boxed, labeled, and forwarded to the LWDA for storage at the facility leased for this purpose. Each file should be placed in a standard manila folder labeled with the following: Name, State ID, APPID, and eligibility date.



Joette R. Dukes
Workforce Development Director

*Pee Dee Local Workforce Development Area
Participant Scanned Checklist*

Customer's Name _____ Last 4 Digits SS# _____

Eligibility Determination Date _____

Check One: Adult _____ Dislocated Worker _____ Youth _____

<u>Form/Document (Where allowable, self-attestation should be used only by exception. In all cases, attempts to gather required documents and a signed statement of self-attestation must be documented.)</u>	<i>Yes</i>	<i>No</i>	<i>N/A</i>
Signed SCWOS WIOA Application			
Supplemental Information Sheet			
Participant Rights Handout			
Receipt of Information (RI-1)			
Authorization for Release of Information			
DEW UI Wage Inquiry (as applicable)			
Declaration of Unemployment Page (as applicable)			
<u>Citizenship/Alien Status</u> (I-9 list A, one item each from I-9 list B and C)			
<u>Verification of Social Security Number</u> (Staff viewing of: Social Security Card, DD-214 Report of Transfer or Discharge, Employment Records, IRS Form Letter 1722, Letter from Social Service Agency, Pay Stub, Social Security Benefits, W-2 Form)			
<u>*Verification of Date of Birth</u> (Driver's License, government-issued identification card, birth certificate, public assistance/social service records, DD-214, hospital birth record, passport, school records/identification, work permit if date of birth is shown, Baptismal Record with date of birth, public assistance/social service record, cross-match with Department of Vital Statistics, Tribal Record with date of birth, employer record)			
<u>*Verification of Address</u> (voter registration card, computer printout from government agency, driver's license, government-issued identification card, food stamp award letter, homeless-primary nighttime residence, housing authority verification, insurance policy (residence and auto), landlord statements, lease, letter from school or social service agency, library card, Medicaid/Medicare card, phone directory, property tax record, postmarked mail addressed to applicant, public assistance records, rent receipt, school identification card, selective service registration card, utility bill, applicant statement with corroborating witness)			
<u>*Verification of Selective Service Registration</u> (screen printout from the Selective Service Verification website at www.sss.gov, Selective Service Registration Card, stamped post office receipt of registration, Form DD-214 "Report of Separation", LWDA waiver with supporting documentation as shown in Pee Dee LWIA Instruction 11-014)			
<u>*Verification of Veteran Status</u> (DD-214 Report of Separation)			
<u>*Highest Grade Completed/School Status</u> (copy of diploma, GED or degree, school records, school verification, drop-out letter, self-attestation if no other documentation available)			

<p>*Employment Status (UI Records, pay stubs, employer statement/contact, bank statements (direct deposit), farm or business financial records, Notice of Termination/Separation, self-attestation if no other documentation is available)</p>			
<p>*Dislocated Worker Verification (Cat. 1 or 2 -- Separation notice <u>and</u> UI records <u>and</u> no work available in occupation/industry in the area <u>or</u> UI profiled > 40% <u>or</u> if work is available in occupation/industry proof of work search)</p> <p>(Cat. 3 -- WARN notice or letter of authorization from State WIOA Administrative Department <u>or</u> closure listed on the Layoff & Closure Report in SCWOS <u>or</u> layoff labeled “Substantial” on the Layoff & Closure Report in SCWOS (the individual’s layoff date must be within 30 days of the Layoff Date on the report and “Substantial” must be “Yes”)</p> <p>(Cat. 4 – Documentation of general announcement)</p> <p>(Cat. 5 – Receipt of notice of foreclosure or intent to foreclose, proof of failure of the farm, business or ranch to return a profit during the preceding 12 months, entry of individual into bankruptcy proceedings, proof of inability to make payments of loans secured by tangible business assets, inability to obtain capital necessary to continue operations, a debt-to-asset ratio sufficiently high to be indicative of the likely insolvency of the farm, ranch or business, other events indicative of the likely insolvency of the farm, ranch or business)</p> <p>(Cat. 6 – Category 6 is verified in the <i>Displaced Homemaker</i> barrier)</p> <p>(Cat. 7- active duty Armed Forces spouse employment loss related to duty station change.</p> <p>(Cat. 8- active duty Armed Forces spouse is unemployed/underemployed and having difficulty obtaining/upgrading employment.</p>			
<p>*Displaced Homemaker (public assistance records, court records, divorce papers, bank records, spouse’s layoff notice, spouse’s death record)</p>			
<p>Disability Verification – (Must be kept in a locked file) (letter from drug or alcohol rehabilitation agency, medical records, social service records/referral, physician’s statement, psychiatrist’s statement, psychologist’s diagnosis, rehabilitation evaluation, school records, sheltered workshop certification, worker’s compensation record, social security administration disability records, veterans administration letter/records, vocational rehabilitation letter, self-attestation unless accommodations are requested or disability will be used to determine applicant a family of one)</p>			
<p>*Verification of Family Size (Public assistance/social service agency records, birth certificate(s), decree of court, proof of disability if applicable, divorce decree, marriage certificate/license, most recent tax return supported by IRS documents (e.g. form letter 1722), public housing authority records if resident or on waiting list, written statement from a publicly-supported 24-hour care facility or institution, corroboration of third party who knows the family – signed and in file, self-attestation if no other documentation is available)</p>			
<p>*Verification of Family Income (pay stubs for previous 6 months (can use year-to-date on one pay stub if it shows at least 6 months), alimony agreement, UI documents/printout, award letter from Veterans Administration, bank statements showing direct deposits for previous 6 months, compensation award letter, court award letter, employer statement/contact, farm or business financial records, housing authority verification, pension/annuity statement, public assistance records, quarterly estimated tax for self-employed persons, Social Security benefits, Self-Attestation for Family Size and Family Income form completed and signed by applicant)</p>			
<p>*Supplemental Security Income (SSI) (public assistance records/printout listing applicant as SSI recipient, copy of authorization to receive cash public assistance (SSI), copy of public assistance check, medical card showing cash grant status, medical card showing cash grant status, refugee assistance records)</p>			

*TANF Verification (public assistance records/printout listing applicant in TANF budget, copy of authorization to receive public assistance, copy of public assistance check)			
*Food Stamp Assistance Verification (current authorization to obtain food stamps, public assistance records/printout showing applicant in food stamp budget)			
*LWDA Adult Priority for Services (documentation that supports Pee Dee LWDA Priority for Services definition)			
Youth Only (Documentation other than self-attestation MUST be provided for at least one youth barrier.)			
School Status (copy of diploma, GED or degree, school records, attendance, drop-out letter, self-attestation)			
Youth in, or aged out of, Foster Care (statement/referral from social services agency, foster care facility resident document, court/guardianship documents, phone call to DSS documented in case notes)			
Homeless/Runaway Verification (written statement from shelter, written statement from individual providing temporary assistance, written statement from social service agency, self-attestation)			
Offender (police records, court documents, letter of parole, letter from probation office, telephone call with court representative documented in case notes, Department of Corrections website/records, self-attestation)			
Basic Literacy Skills Deficiency for Youth (Copy of generally accepted standardized assessment test, school record of reading and/or math skills determined with the previous 6 month of application)			
Pregnant/Parenting Youth Verification (physician's statement, child's birth certificate, hospital record of birth, self-attestation)			
English language learner (Test Scores, Staff observations)			
A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter (9 weeks) School records, self-attestation			
A recipient of a secondary school diploma or its recognized equivalent who IS A LOW-INCOME INDIVIDUAL and IS BASIC SKILLS DEFICIENT OR AN ENGLISH LANGUAGE LEARNER;			
Youth Requires Additional Assistance (documentation from parents, counselors, teachers, or other school officials; documentation from an LEA-approved alternative secondary curriculum or program; standardized test scores; results from assessment of pre-employment work maturity skills, self-attestation)			

Comments: _____

Staff Signature: _____ Date: _____

Participant File Required Documentation

The Pee Dee LWDA is striving to be paperless and has modeled our system on TAA State Instruction 14-01. With all of the upgrades, changes and new features that are available in SCWOS, I wanted to pass along some guidance on the SCWOS Electronic Document Management and Scanning module. All WIOA staff has the ability to add, upload, scan, and view documents in the system. Eligibility applications must be scanned into SCWOS whether they are enrolled or ineligible for WIOA.

Staff will be required to scan all related WIOA documents into SCWOS which include eligibility documents and data validation items for all New WIOA enrollees effective July 5, 2016. The required source documents for all WIOA participants are:

- WIOA Program Application signed and dated by staff person and applicant (parent or guardian signature also required for applicants less than 18 years of age).
- WIOA Supplemental Information Sheet(Adults) and WIOA Pre-Assessment Data Survey (Youths)
- Eligibility verification documentation for the following (**Please refer to LWDA Instruction 12-005 Change 1-Use of self-attestation for documentation of WIA/WIOA Eligibility and the most recently transmitted Data Element Validation Guide for acceptable verification documentation sources**)
- **All Eligibility documentation must be scanned in one PDF file:**

Citizenship/Alien Status	Verification of Social Security Number
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(View ONLY)

Date of Birth	Address/Residency
Selective Service Registration	Veteran Status (as applicable)
Family Size Verification	Family Income Verification
Disability (Kept in Separate Locked File)	Employment Status
Dislocated Worker Verification	Highest Grade Completed in School
School Status	Foster Care (For Low Income)

Free/Reduced Lunch

Youth Barriers (Documentation other than self-attestation must be provided for at least one barrier)

Receipt of Public Assistance (TANF, SNAP, Supplemental Security Income [SSI]) and or/TANF/SNAP Verification form.

Participant Rights/Grievance Procedures signed and dated by the applicant and appropriate staff

Receipt of Information signed and dated by the applicant and staff

Declaration of Unemployment

Self-Attestation form (as applicable)

Other Required Documentation by the LWDA

ResCare Workforce Services

- Request for Classroom Training (Adults/DWs)
- Controlled Substances/Criminal Background Check form
- ETP Acknowledgement (if applicable)
- WIOA/TAA Training Services
- Employment Verification
- Nepotism Statement (only for OJT)
- Individual Employment Plan (IEPs and revised plans)
- Individual Training Account Documentation
- Hold Status Documentation (documentation regarding legal or medical matters must be kept in a separate, secure, locked file and as such notated in the participant's file)
- Excluded exit reasons (documentation regarding legal or medical matters must be kept in a separate, secure, locked file and as such notated in the participant's file)
- Credential/Degree Attainment
- Follow-up/Performance Attainment Documentation (Only Adult/DW supplemental documentation of employment if not covered under UI Wage Records or employed in a job located in another state)
- Other documentation requiring verification as stipulated in State or LWDA policies/procedure

All required documents must be completed and signed by both the participant and WIOA staff. Documents that are scanned in SCWOS do not need to be duplicated in a hard copy file.

The following documentation below should be kept in a hard copy file:

- CareerReady101, WorkKeys, and TABE assessment scores
- Change Requests
- Receipts/Invoices
- Time/Attendance Records
- Semester Grades
- Participant File Checklist
- Authorization for Release of Information
- Customer Committee Agreement
- Scholarship Application
- Satisfactory Progress form
- On- the- Job (OJT) Contracts
- OJT Monitoring Instrument
- Employment Information Sheet

Youth Contractors

- Individual Service Strategic (ISS) and revised plans
- Objective Assessment
- WIOA Transportation referral form
- Statement of Understanding
- Incentive Policy signed by the participant (as applicable- Youth)
- Nepotism Statement (only for OJT)
- Field Trip Permission Slips
- Individual Training Account Documentation
- Hold Status Documentation (documentation regarding legal or medical matters must be kept in a separate, secure, locked file and as such notated in the participant's file)
- Excluded exit reasons (documentation regarding legal or medical matters must be kept in a separate, secure, locked file and as such notated in the participant's file)
- Credential/Degree Attainment
- Follow-up/Performance Attainment Documentation (youth attainment of degree/certification, youth literacy/numeracy EFL gains as documented by post-test scores, youth placement in employment, education or military).
- Employment/ Placement Verification
- Other documentation requiring verification as stipulated in State or LWDA policies/procedure

All required documents must be completed and signed by both the participant and WIOA staff. Documents that are scanned in SCWOS do not need to be duplicated in a hard copy file.

The following documentation below should be kept in a hard copy file:

- CareerReady101, WorkKeys, and TABE assessment scores
- Change Requests
- Receipts/Invoices
- Time/Attendance Records
- Semester Grades
- Participant File Checklist
- Authorization for Release of Information
- Satisfactory Progress form
- On- the- Job (OJT) Contracts
- OJT Monitoring Instrument
- Employment Information Sheet
- Work Experience Agreements
- Documentation to support the award of incentive programs
- Documentation from In House GED incentive program

- Documentation from AE instructors Partner GED incentive program
- Documentation to support the award of incentive payments

WIOA Participant Naming Source Document

All WIOA Source documents must be scanned into a legible and compatible format and uploaded into the SC Works Online System (SCWOS) Electronic Document Management System (EDMS) effective July 5, 2016. All required documents must be complete, dated and signed by both the participant and career specialist.

Effective July 5, 2016 the required WIOA source documents must be named the following below when scanned into SCWOS.

<i>ResCare WIOA Source Document</i>	<i>ResCare WIOA Naming Source</i>
Eligibility Documents PDF	First initial and last name (E.Miles Eligibility)
Individual Employment Plan (IEPs) and ETP Acknowledgement (PDF)	First initial and last name (E.Miles Enrollment)
Revised Individual Employment Plans	Revise IEPs (date revise)
Request for Classroom Training	Training Request
Drug Test/ background Check Form	Acknowledgement Form
Eligible Training Provider Acknowledgement (if applicable)	ETP Acknowledgment
WIOA/TAA Training Services	WIOA/TAA Training Services
Nepotism Statement (Only for OJT)	Nepotism Statement
Individual Training Account Documentation	ITA Documentation
Hold Status Documentation(documentation regarding legal or medical matters must be kept in a separate, secure, locked file and as such notated in the participant's file)	Hold Status Doc (attached to Casenote)
Employment Verification form	Emp Ver Form
Credential /Degree Attainment	HS Diploma,GED,Certificate(ex: <i>Welding Certificate, or CDL</i>)
Follow-Up/Performance Attainment Documentation(Adult/DW supplemental documentation of employment if not covered under UI Wage)	E. Miles Supplemental Documentation

<i>Youth WIOA Source Document</i>	<i>Youth WIOA Naming Source</i>
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Eligibility Documents PDF	First initial and last name (E.Miles Eligibility)
Objective Assessment and Individual Service Strategy (ISS) One PDF	First initial and last name (E. Miles Enrollement)
Revised ISS	Revised ISS (date revised)
WIOA Transportation Referral Form	Transportation Referral Form
Statement of Understanding	Statement of Understanding
Incentive Policy signed by the participant, as applicable	Incentive Policy
Nepotism Statement (only for OJT)	Nepotism Statement
Field Trip Permission Slips	Field Trip Permission Slips
Individual Training Account Documentation	ITA Documentation
Hold Status Documentation (documentation regarding legal or medical matters must be kept in a separate, secure, locked file and as such notated in the participant's file)	Hold Status Doc (attached to Casenote)
Credential /Degree Attainment	HS Diploma,GED,Certificate(ex: <i>Welding Certificate, or CDL</i>)
Follow-Up/Performance Attainment Documentation(Adult/DW supplemental documentation of employment if not covered under UI Wage)	E. Miles Supplemental Documentation
Employment/Placement Verification	Employment/Placement Verification

SCWOS Electronic Document Management System (EDMS)

1. PDCOG recommends that all documents are scanned at application.
2. Please be sure you are continuously reviewing all your work to ensure accuracy, compliance, and completeness.
3. Ensure that there are no full SSNs on any documents and that there is no confidential or personally identifiable information (PII) in any scans.
4. Anything scanned in SCWOS does not need to be duplicated in a hard copy file.
5. Any document signed by the customer should be scanned in SCWOS.
6. Any document used for Data Validation or Verification should be scanned in SCWOS.

Please DO NOT upload any of the following:

- Documents containing social security numbers (unless they are redacted or blacked out)
- Medical and disability related documentation, or criminal records, as this would violation of medical or other privacy laws (**documentation regarding legal or medical matters must be kept in a separate, secure, locked file and as such notated in the participant's file**)
- Documents that may be found elsewhere in the system such as resumes printed case notes, etc.
- Documents that is not necessary for case management- personal notes, letters, etc.

Sample

NEW BOX INPUT FORM

COMPANY NAME: Pee Dee Regional Council of Governments	
DEPARTMENT NAME: Grantee Name (Workforce Center if applicable)	
BOX NUMBER: 10	BOX CONTENTS: Exited Participant Files
FROM DATE: April 1, 2012	TO DATE: March 31, 2013
DESTROY DATE: March 31, 2018	RECORD TITLE:
BOX LOCATION:	BOX SIZE:
DATE BOX RECEIVED:	
ADDITIONAL BOX INFORMATION: Program Year 2012 Exited Participant Files	

AUTHORIZED RM. REP. _____ DATE _____

FILE DESCRIPTION

[illegible]

Sample

Box No. N° de boîte 10	Box Location Emplacement de la boîte	Destroy Date Date de destruction 3-3-18	From Du 4-1-12	To Au 3-31-13
Contents Contenu Grantee Name (Workforce Center) Exited Participant Files 33250 PY2012				

