

**Source Documentation Policy for the
Northeast Ohio Consortium Council of Governments
Workforce Innovation and Opportunity Act Policy C-09**

I. Purpose.

The purpose of this policy is to communicate the documentation requirements necessary to support eligibility determination made with respect to the WIOA Adult, Dislocated Worker, and Youth programs.

II. Effective Date.

July 1, 2015.

III. Background.

WIOA establishes general and specific program eligibility criteria. As recipients of WIOA Title I, Subtitle B funds, the Workforce Development Area is 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.

Workforce WIOA staff 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. No documentation is required, but may be gathered nonetheless, in order to provide Basic Career Services, and/or Staff Assisted Career Services that involve minimal staff assistance.

In all situations, Area staff are advised and encouraged to refer and adhere to “**Allowable Source Documentation for WIOA Program Eligibility**,” drafted by the Ohio Department of Job and Family Services (“ODJFS”), attached and incorporated as part of this Policy as **Appendix A**. The placement of the documentation listed for each item of eligibility documentation within the individual’s file shall satisfy the documentation requirements required by both ODJFS and the Workforce Area. This policy is intended to compliment Appendix A, by providing additional 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 all federal, state, and local program and fiscal monitors and auditors for auditing and 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 most cases, WIOA staff can and will use 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, the method is permissible for the particular eligibility criteria or data element being verified.

1. Telephone or Electronic Communication.

In instances where telephone or electronic communication is used by the WIOA staff, 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,**” **attached as Appendix B**, 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.

2. 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.

WIOA staff must use the **JFS 13186, Self-Attestation, Attached to this Policy as Appendix C**, or the **JFS 13187, Citizenship Status/Authorization to Work Self-Attestation. Attached to this Policy as Appendix D**.

3. 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.

4. 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.

5. 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 this Workforce Area 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. However, in many cases the **Workforce Area's Document Retention and Destruction Policy**, and/or the policies of the program provider requires retention for a longer period of time.

V. Monitoring.

The Area will conduct oversight and monitoring of the implementation of all WIOA programming by all OMJ Center operators, partners, and/or providers pursuant to Area Workforce Policy D-3. Any issues discovered will be handled through the area's monitoring resolution process.

VI. Technical Assistance.

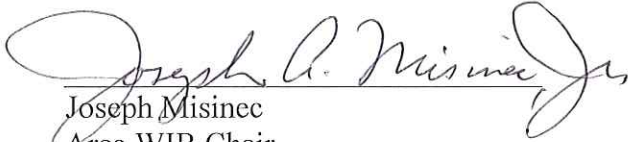
To get questions answered and technical assistance regarding this policy or issues regarding administration of WIOA, you are urged to contact the Executive Director of the Area Workforce at craigsernik@neohio.twcbc.com.

The question/issue will be researched, analyzed, and a formal written response will be provided. If a second opinion is required, the director is not available, or there is no clear answer to the question/issue, either the Executive Director or any OMJ Center or provider staff may seek additional guidance by submitting the same to the Office of Workforce Development: WIAQNA@jfs.ohio.gov; and by copying your request to the Executive Director of the NOC COG.

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.
- 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.

VIII. Signatures.


Joseph Misinec
Area WIB Chair

7/1/15
Date


Dan Claypool
Ashtabula County Commissioner
Northeast Ohio Consortium Council of Governments,
Chief Elected Official

7-13-15
Date

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Subsequent Revisions:

Appendix A
Allowable Source Documentation for WIOA Program Eligibility

Appendix B
JFS 13188, WIOA Telephone Eligibility Verification

Appendix C
JFS 13186, Self-Attestation

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