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Subject of Policy:	**MJL Documentation Requirements**		Policy No.	**PY15-21**
To:	· Title I Program Managers & Staff · BES Managers & Staff · LWDBs		From:	Edward Upham, Director Bureau Employment Services
Issuance Date:	· July 1, 2016		Status:	**ACTIVE**
Reference/ Authority:	· TEGL 17-15 and USDOL EDVRS & TAA Handbooks · WIOA Final Rules			
Note – DEV requirements are subject to change as new WIOA reporting requirements are published, this document will be revised accordingly.				

Purpose:

The purpose of this policy is to inform staff of requirements pertaining to the upload and storage of participant eligibility and data element validation documents to ensure data and reporting integrity under MJL as a paperless system.

All new MJL enrollments will require that data documentation be uploaded to the participant file using the methods established in this policy. All required paper documents must be uploaded into each participant file; this will reduce the need for paper file storage and reduce the burden of data element validation documentation on staff.

It is of the utmost importance that personal customer information is protected at all times. In addition to this policy, staff must learn and understand the requirements of Policy PY15-10 - Confidentiality and Protection of Personally Identifiable Information. This PII policy was originally embedded in the MDOL Financial Manual but is being reissued with this policy to ensure that all staff is fully aware of the requirements for protecting personally identifiable data.

DATA VALIDATION and PROGRAM ELIGIBILITY REQUIREMENTS:

A: Eligibility & Data Validation Requirements per Level of Service

The level of service provided will dictate the data and source documentation requirements necessary for compliance with federal policy related to program eligibility and data element validation.

1. Registrants accessing MJL **Self-Service/Informational Basic Career Services only** - are considered "**registrants**" not "participants" and as such *are not* included in performance reporting, so no additional data element documentation is required for registrants at this level of service.

2. Participants receiving **Staff-Assisted Basic Career Services ONLY –**
   Participants who have undergone an eligibility determination and have received **Staff-Assisted Basic Career Services** are considered "**enrolled participants**" and *are* included in performance reporting. If a participant is not expected to receive services beyond Staff-Assisted Basic Career Services local staff verification and/or participant self-attestation of MJL information is all that is necessary to comply with data element validation requirements. Information verifying data elements for this level of service must be documented as indicated in Attachment-A of this document.

3. Participants receiving **Individualized Career Services** and/or **Training Services** must have the highest level of documentation scanned and uploaded into MJL as indicated in Attachment-A of this policy.

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Auxiliary aids and services are available upon request to individuals with disabilities.

B. Methods of Documenting Required Data Elements for Eligibility and/or Data Element Validation

1. **Self-Attestation:** also referred to as a participant statement, occurs when a participant self-attests to his or her status for a particular data element. The participant must enter his/her digital signature on the MJL Self-Attestation. Data being self-attested to in MJL must be thoroughly reviewed by the case manager prior to entering the participant entering his/her digital signature on the Self-Attestation form. It is imperative that this information be correct prior to documenting the participant's self-attestation.

   Therefore:
   a. Staff must review all participant demographic characteristics recorded as part of the participant's demographic snapshot prior to the participant's enrollment to be sure the data entered is correct and the appropriate level of element documentation is verified.   The participant then self-attests that the information reviewed prior to the program enrollment is true and correct by entering his/her digital signature (MJL password).   At that point staff may proceed to enter the appropriate WIOA first staff-assisted service. *NOTE: some managers may wish to implement a manager approval step at this point; this is optional and dependent upon local office practice or local board requirements.*

   b. It if is later determined that the demographic information entered prior to the digital signature and enrollment was not accurate, a request for a correction to the snapshot can be made to the designated administrative staff person. If the snapshot is corrected or changed after the initial self-attestation, the participant is required to return to the office and digitally resign the snapshot in the in the presence of the participant's case manager. The case manager witnessing the correction must enter a case note identifying this at the time it occurs.

2. **Staff Verification** consists of staff reviewing the document(s) provided by the individual to determine the allowability of it as a source document for data element validation purposes. This method of documentation is only be allowed for <u>some</u> staff-assisted basic career services as identified in Attachment-A of this policy **if/when:**

   Staff reviews the allowable source document to determine accuracy of the data item being verified and ensures the corresponding MJL entry matches the information on the allowable source document. Staff then records this in an MJL Case Note that includes the following information:

   a. Specific data element being verified;
   b. Specific source document reviewed;
   c. Date the verification occurred; and
   d. Pertinent data presented on the source document.

   NOTE: The staff person verifying the source document must be the one entering the case note documenting the information.

3. **Phone Verification** is another method of documenting eligibility criteria and the validity of certain data elements as indicated in Attachment-A. The information must be documented by staff completing the local "Telephone Verification Form" which must identify: the participant ID number, the element being verified, the name and title of the person verifying the element, the address of the entity from which the element is being verified, and the date the verification takes place. The form must then be scanned and uploaded using the method below.

4. **Scanned Documentation** The method required for documenting eligibility of, and validating data pertaining to, participant enrollment into **Individualized Career Services and/or Training Services** is that the document validating the data element be scanned and uploaded into the participant file before enrollment in this level

of service occurs. Staff must review the source document to be sure it matches the data recorded in MJL and must ensure the document is uploaded using a secure method (secure method options described below).

ESTABLISHNG SECURE METHODS FOR UPLOADING DOCUMENTS

Per the Confidentiality and PII policy, documents containing personally identifiable information cannot be emailed unless an encryption process is initiated by the entity emailing the document. While State email can encrypt data in the body of the email message that is identifies as PII it cannot encrypt data on an attachment. Therefore, email must **not** be used as a method of uploading documents.

Service providers **must** provide evidence that they have set up a secure method for scanning documents by August 1, 2016.

Most multi-function copiers have onboard hard-drives that allow creation of file folders on the device. This involves setting up a staff folder in the "Templates" section of the copier. When staff has a document to scan, they select the copier template folder with their name and when they return to their PC they click on the icon for their scanned folder to open the scanned document without ever having the document enter cyberspace.

One of the benefits of storing on the multi-function copier is that you can configure the copier to delete the folders after a predetermined period – usually every 7 days. Documents that are copied to your PC must be deleted as soon as they have been renamed and uploaded into MJL.

Uploaded documents must be renamed as follows **LASTNAME- DOCUMENT TYPE-DATE** so a birth certificate for participant Bob Dylan would be named: **DYLAN BIRTH CERT 7-06-16.pdf.** Staff must take caution to ensure documents are uploaded to the correct customer file. Supervisors should check that uploaded documents are named correctly and uploaded to the correct customer file when they conduct an approval review.

Staff members who scan documents directly onto their laptops via a portable scanner must get their OIT person to initiate a script that will routinely delete the contents of their laptop's "MJB Scanned Image Folder" each night as an added precaution to protect PII.

C. **Types of Validation Rules**
   1. **Match** means that the document used to verify the information exactly matches the information entered into MJL. For example, the date of birth in MJL exactly matches the date on the Birth Certificate used to validate that element.
   2. **Support** means the document uploaded to validate the accuracy of the data element in MJL provides enough information to support the accuracy of the data. For example, if the person provides both a U.S. Birth Certificate and a Picture ID these documents support that individual's eligibility to work in the United States.

D. **Manager Approvals**
   1. **Enrollment in Staff Assisted Services**: Managers may establish an approval requirement at the point of enrollment into Staff Assisted Services. Managers will verify that participant eligibility data and documentation are correct and uploaded, and will review the Participant Employment Plan that outlines the Basic, Individualized and Support Services the participant is scheduled to receive to achieve employment goals
   2. **Enrollment in Training Activities:** Managers must approve all planned training enrollments to ensure
       a. The draft participant training plan documents that all requirements for training have been met;
       b. The training budget obligating funds on behalf of the participant is within provider and LWDB guidelines.

E. Follow-Up Services
Adult & DW: WIOA allows follow up services for A, DW and Youth participants. Follow up services for Adult and DW participants can be identified in MJL, outlined in the participant employment plan, and documented in case notes.

Youth: WIOA requires that all youth be offered follow-up services for a period of not less than 12 months after program exit **unless** the participant declines to receive follow-up services or the participant cannot be located or contacted. Follow-up services may be offered beyond 12 months at the LWDB discretion. The type and duration of follow-up services must be determined based on the needs of the individual. Follow-up service must include more than only a contact attempt made to secure performance outcome data.

Youth Follow-Up Services:
- Supportive Services;
- Adult Mentoring;
- Financial Literacy Education;
- Provision of Labor market and employment information about in-demand occupations and sectors in the local area (such as career awareness, career counseling, and career exploration services); and
- Activities that help youth prepare for transition into postsecondary education and training.

DEFINITIONS

- **Adult or DW Participant**: An individual who has received Staff-Assisted Basic or Individualized Career Services.
- **Adult Priority**: Adults who are low income, recipients of public assistance or Basic Skills Deficient
- **Basic Skills Deficient**: Individual who has reading, writing or computing skills at or below the 8th grade level on a CASAS; or who is unable to read, write or speak English at a level necessary to function on the job, in a family or in society.
- **EO Data**: Data collected on every individual interested in being considered for WIOA Title I financially-assisted benefits, aid, services or training and who has signified that by submitting personal information in response to a request by from the designated service provider.
- **Registrant:** An individual who has self-accessed MJL services or information without staff assistance.
- **Youth who requires additional assistance to enter or complete an educational program or secure and hold employment** – this is a locally defined barrier for which the Local Board has identified the required documentation. Not more than 5% of In-School-Youth may be enrolled under this barrier.
- **Youth Participant**: a youth for whom collection of information to support an In-School or Out-of-School eligibility determination; who has received an objective assessment, and who has participated in any of the 14 youth service elements.

SEE WIOA Section 3 for more definitions.

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