

Effective control and management of WIOA programs requires accurate and timely record keeping. Valid data provides necessary information to managers regarding the effectiveness of current programs and facilitates planning of future programs. The VOS is the state's recognized data system for WIOA performance, data validation, and participant information.

All information pertaining to WIOA participants, including activities, beginning and ending dates, participant status, and any other information required to be reported on the VOS system for all participants who receive services from WIOA, must be entered on the VOS system by WIOA staff or contractor staff within two business days of the time information is available for entry on VOS.

An internal controls policy must be developed and maintained on the topic of deleting participants from VOS. The policy must directly disallow the manipulation of data for performance or reporting benefit, limit the number of individuals with authority to delete registrations from VOS and include a checks and balances process with a minimum of two individuals for each participant deletion. This policy must be submitted to the LWSM prior to each applicable programmatic review, and/or by request at any time.

## **I. Contents of the WIOA Participant File:**

Certain information is required by federal regulations and state policy for all WIOA program participants. The following information is required and must be maintained in a hard copy format in the permanent case file for each WIOA adult, dislocated worker, National emergency Grant (NEG), National Dislocated Worker Grant and youth participant:

- A signed and dated copy of the WIOA Registration Form
- Copies of documentation of eligibility and criteria used for verification of eligibility, unless the information can be retrieved electronically.
- A copy of Educational Functioning Level test scoring sheets that show the date, total score, and grade level equivalent for each test
- Written notice of exit for an ineligible participant
- "Equal Opportunity is the Law" statement signed by the participant or a signed acknowledgement that the participant received a copy of this statement.
- The following information is not required to be maintained in a hard copy format in the permanent file for each WIOA participant, provided there is an electronic format that contains the information which is accessible for review:

- ISS/IEP, or Educational Development Plan
- Objective assessment results, including the name of the assessment instrument(s) utilized

It is recommended that a local procedure for a standardized file structure be implemented. Benefits of a standardized file structure include:

- Assistance in providing Priority of Service
- Established procedures for obtaining relevant documentation
- Differentiation between eligibility and data validation

**References:**

Notice of Proposed Rule Making (NPRM) 20 Code of Federal Regulation {CFR}  
 680.110(0) NPRM 20 CFR 680.180  
 NPRM 20 CFR 380.230  
 NRPM 20 CFR 681.420  
 Training and Employment Guidance Letter {TEGL} 38 -14

**II. Simplification of internal and external monitoring for WIOA eligibility**

**A. File Maintenance Policy –**

- To ensure effective control and management of LWSM WIOA youth and adult programs, accurate and timely record keeping is performed. Comprehensive recordings of valid data provide information to managers regarding effectiveness of current programs and facilitate planning of future programs. VOS as Tennessee's recognized data system for WIOA performance, data validation, and participant information serves as a local internal control.
- All information pertaining to WIOA participants including activities, beginning and ending dates, participant status, case notes, and follow-up in VOS must be entered by LWSM staff or authorized contractor staff within 90 days of the time information is available for VOS entry. For fluid management, standardization and ease of monitoring, a file document checklist is attached to every youth and adult folder for quick reference of status. Combinations of hard copies and electronic versions of documents are readily available. Priority of Service is continually monitored.

## **B. Financial Management –**

- The implementation plan should be used as a tool to measure planned versus actual activity as a means of tracking progress toward goal achievement, planned performance outcomes, and to ensure that the LWSM spending is occurring as a rate consistent with the amounts budgeted in order to fully utilize all grand funds by the end of the grant period.
- The implementation plan should be used as a tool to measure planned versus actual activity as a means of tracking progress toward goal achievement, planned performance outcomes, and to ensure that the LWSM spending is occurring as a rate consistent with the amounts budgeted in order to fully utilize all grand funds by the end of the grant period.

**101 Sam Watkins Blvd, Mt Pleasant, TN 38474**

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Title: LWSM Policy

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Effective Date:

Duration: Indefinite

Authorized By:

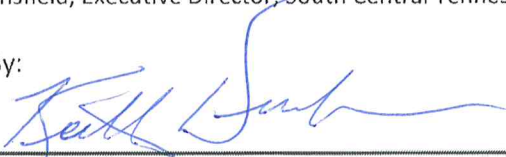


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Jerry Mansfield, Executive Director, South Central Tennessee Development District

Date

Approved By:



12/21/2018

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Keith Durham, Board Chair, Southern Middle Tennessee Local Workforce Board

Date