

PRINCE GEORGE'S COUNTY LOCAL WORKFORCE DEVELOPMENT BOARD

WIOA Virtual Enrollment Electronic Record Policy

POLICY NUMBER:	1.4000.100.020
EFFECTIVE DATE:	August 18, 2021
APPROVING AUTHORITY:	Board Chair Prince George's County Local Workforce Development Board
RESPONSIBLE STAFF:	Executive Director, Policy & Compliance Director
RESPONSIBLE OFFICE:	Office of the President, Employ Prince George's

SUMMARY:

Workforce Innovation and Opportunities Act (WIOA) Title I address the needs of job seekers who are Adults, Dislocated Workers (DW), and Youth. It seeks to provide universal access to employment and training programs. Incorporating virtual eligibility, case management, electronic case files, education, and training services provides Prince George's County Workforce Development area and their sub-recipient service providers with an opportunity to engage with the jobseeker virtually. The Prince George's County Local Workforce Development Board (PGCLWDB) has transitioned to paperless record keeping by using an electronic document imaging and storage system. The Maryland Workforce Exchange (MWE) allows internal and external access to provide all servicing partners the means to efficiently administer services to their participants.

PURPOSE:

The purpose of this policy is to guide on administering virtual WIOA, Special Grant Programs (including State, Local and Private Foundation funding sources). By utilizing a virtual platform, service providers can manage case files and offer employment assistance and educational assistance through alternative methods, such as online technology. Virtual services will include one on one assistance with staff, access to career assessments, career coaching, resume writing, interview preparation, job search assistance, labor market review, and access to education and training options utilizing alternative methods, including telephone and the use of online technology such as Zoom, Microsoft Teams, Google Drive, Skype, MWE etc. Having uniform, paperless documentation of participant files includes instruction for collecting, disseminating, storing, and protecting information within MWE. Furthermore, this document addresses the timely entry of participant information into MWE, including enrollment, registration in programs, and timely exit from programs. Standardized collection of participant information expedites participant eligibility determinations and allow our service providers to focus on managing participant case files.

SERVICES:

Jobseekers will have access to the following services utilizing a virtual platform:

- Individualized Career Services
- Education, Training, and Assessment Services
- Supportive Services
- Follow-Up Services

REPORTING REQUIREMENTS:

Program participation begins when the participant is determined eligible and receives staff-assisted basic career service, individualized career service, or training service funded through adult, dislocated worker, or youth programs. Service providers shall ensure the timely and accurate reporting of WIOA participants, activities, and performance information by using MWE.

MONITORING:

The PGCLWDB administrative agent shall conduct oversight of the implementation of the WIOA adult, dislocated worker, and youth programs to ensure that participants are enrolled in the programs and have been provided identified services. The State will also conduct an annual monitoring review of the local boards fiscal compliance with 2 CFR 200, as required by WIOA Section 184(a)(4). PGCLWDB staff will monitor monthly and quarterly to ensure that all program files are complete and ready for the State monitoring virtually in MWE prior to the monitoring.

Through the state's monitoring system, program monitors will review the local area's implementation of the WIOA program, including a participant file review, during the annual monitoring review for compliance with Federal and State laws and regulations. Any issues will be handled through the State's monitoring resolution process.

The PGCLWDB has established a more strategic method for programmatic and performance monitoring — through the implementation of a virtual case management system— which allows for virtual (desktop) monitoring of participant files and the upload of supporting documentation, including policies and program notes. On-site monitoring will still be conducted at a minimum of once per year. Monitoring may also occur at the discretion and as need is indicated by the PGCLWDB.

PERSONAL IDENTITY INFORMATION (PII):

The Board recognizes its need to maintain privacy and confidentiality of Personal Identity Information (PII) while providing an additional pathway to reach the job seeker where they are. Providers are to enforce the PGCLWDB 1.4000.100.001-Personal Identity Information Security, Notification and Confidentiality Policy.

Providers need to use password-protection, encryption-preferred, strong authentication procedures, and other security controls to make the information unusable by unauthorized individuals (necessary when transmitting PII through email or other electronic format; e.g. staff may not email social security numbers without encryption, even if the email is addressed to an individual that has authorized access). Immediately deleting received emails containing unencrypted PII and instructing the sender to also delete (including removing from the "deleted files" folder) the email from their "sent" and "deleted files" folders.

INFORMATION SECURITY:

Providers with employees working from an alternate work location will still need to adhere to the PGCLWDB 1.4000.100.001- Personal Identity Information Security, Notification and Confidentiality Policy

ELECTRONIC RECORDS:

The Maryland Workforce Exchange system eliminates the need for paper applications for participant registration and ensures that all service providers are using identical criteria to determine participant eligibility.

To case manage participants, service providers and the American Job Center (AJC) System must use MWE to:

- Create participant applications
- Record provided services
- Use of electronic signatures
- Upload supporting documentation to verify eligibility following the local guidance

- Provide precise and effective case notes on progression of services regarding interactions with participants

TIMELY DATA ENTRY INTO MWE:

All applicants must be processed immediately upon a customer receiving services. However, the allowable time to enter information into MWE is fourteen (14) business days. Furthermore, all eligibility intake information and documentation must be uploaded into MWE upon receipt. This also applies to the exiting of participants once they have completed all programs and are no longer receiving services.

The Primary Indicators of performance are based on the exit outcomes of these individuals. It is imperative that accurate information is entered into MWE system in a timely manner to generate timely reports at the State and Federal levels; therefore, this information needs to be input promptly (including documentation to support credentials or employment, when applicable).

Once participants have exited programs, follow-up procedures and documentation concerning these individuals must be entered into MWE in a timely manner.

DELETING IMAGES:

The process of deleting an already saved image to an applicant's electronic file should be requested by the Program Manager or Director to the Program Performance Department by email using the *MDOL Data Change Request* Form. Directors and Managers must review request for deletion of documents and if determined appropriate, submit request by email.

RESPONSIBILITIES:

Staff will be required to sign an acknowledgment to affirm that they have received the communication and the contents of this policy and that they have received and under the information herein. Staff will follow the *Training and Employment Guidance Letter (TEGL) 39-11" Guidance on the Handling and Protection of Personal Identifiable Information (PII)* and any related Board policies.

Approved staff must complete the *MWE Document Management User Agreement and EPG Document Management User Agreement* to allow them access to view, link eligibility documents, credentials, case notes, wage report, etc., into the participation file. In addition, all users must be granted privilege before accessing any document management system.

Approved staff will use MWE Manage Documents Module, which provides an integrated set of tools for loading and managing documents. Staff must complete the following Training Modules before receiving access:

- Introduction to Scan Documents
- DM User Guide-Step by Step
- DM Webinar (1 Hour)
- Electronic Signatures (45 mins)

They will also be required to attend as (two-day) document management user and workflow training, including handling Personal Identifiable Information and Information Security in a virtual environment.

POLICY VIOLATIONS:

N/A

REASON FOR POLICY

For safety, accessibility, convenience, and other reasons, service providers may find it necessary to use alternative methods of reaching the job seeker. A virtual platform will provide service providers with the ability to track the job seeker application in "real-time" and will increase the ability to reach the job seeker in the community

RELATED POLICY:

- Policy Issuance 2019-04 Privacy and Data Security| March 28, 2019
- Training and Employment Guidance Letter (TEGL) 39-11" Guidance on the Handling and Protection of PGCLWDB 1.4000.100.001- Personal Identity Information Security, Notification and Confidentiality Policy
- Training and Employment Guidance Letter (TEGL) 10-19
- Administrative Policy Issuance No. 2.5000.800.013-WIOA Adult & DW Career Services Eligibility Policy
- Administrative Policy Issuance No. 2.5000.800.012 - WIOA Follow-up Policy
- Administrative Policy Issuance No. 2.5000.800.014 - WIOA Performance Accountability Policy

REGULATIONS:

- 45 CFR Part 164, Security and Privacy
- 2 CFR 200, as required by WIOA Section 184(a)(4).
- 2 CFR § 200.335- Methods for collection, transmission and storage of information.
- COMAR 07.07.07 Confidentiality of Records

EXCLUSIONS TO THE POLICY:

None

FORMS:

- MWE Document Management User Agreement
- Confidentiality Certification for Access to DLLR's Maryland Workforce Exchange Virtual One Stop User Agreement
- Confidentiality Certification for Access to DLLR's Adult Education and Literacy Services Confidential Data
- Confidential Certification for Access to DLLR's Apprenticeship Confidential Data

APPROVING SIGNATURES:


Charnetia Young (Aug 20, 2021 11:49 EDT)

Aug 20, 2021

Board Chair
Prince George's County Workforce Development Board

Date