



## Howard County Office of Workforce Development, Mid-Maryland WIA

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**TO:** All Staff

**FROM:** Francine Trout, Director, Mid-Maryland WIA

**DATE:** February 12, 2015

**EFFECTIVE DATE:** Immediately

**SUBJECT:** *Client Records Management Policy*

Effective **immediately** the following records management procedures are to be followed:

1. Review eligibility documents for accuracy when completing the WIA application. Do not enter the application if the documents are not accurate. Please find acceptable documents on Attachment A
2. The date of dislocation on the WIA application must be supported by one of the following:
  - a. a signed application or;
  - b. a signed, dated self-attestation or;
  - c. a letter from the employer of dislocation
3. The following documents must be **reviewed** with the customer and **signed** by the customer prior to receiving a training voucher. There are no exceptions to this rule:
  - a. WIA application
  - b. IEP
  - c. Receipt of Information sheet
  - d. Release of information
  - e. Publicity release form
  - f. Other
4. All customers who do not possess a bachelor's degree must take the TABE test prior to being approved for training.
5. The scores of the TABE must be entered into VOS and a copy of the test must be placed in the customer file.
6. Case notes must tell the customer's story from program entry to program exit using the BROCRIP method:

- a. Tell the story regarding all services that are provided
  - b. Show the dates that the customer actually started and ended each funded training
  - c. Record the actual start and end date of the training and it must correspond to the dates on the participant voucher
  - d. Explain any changes to the dates
  - e. Course information must be verified before it is entered into VOS
7. Customers attending HCC are required to sign an HCC release of information form and a copy of the form should be placed in the customer file.
  8. All services provided to a customer must be documented in VOS. Services must be documented when they occur. However, there should never be more than a **60 day** gap between services.
  9. Receipt of credentials must be **documented** in the case notes and some form of **proof** of the credential must be included in the file.
  10. Electronic records **must** be reviewed for accuracy before the record is allowed to soft exit.
  11. Quarterly follow-up must be completed before the file is placed in the file room.
  12. Always release and confirm the release of a customer record in VOS before viewing another customer's record.
  13. All required documents must be printed and placed in the exited customer's file before it is placed in the file room.
  14. The date of exit **must** be recorded on the file label. The exit date must be the same as the exit date in VOS.

\*\*Veterans and eligible spouses will be given priority of service in time and funding.

Equal Opportunity Employer Program: As an equal opportunity employer/program; discrimination in WIA Title I financially assisted programs or activities is prohibited by federal law and Howard County Government; auxiliary aids and services are available upon request to individuals with disabilities. If you need an accommodation, please contact Stephanie Hill at 410-290-2620, TTY 410-312-0827.

**ATTACHMENT A**  
**(WIA ELIGIBILITY)**

## DOCUMENTATION REQUIREMENTS FOR WIA TITLE 1 PROGRAM ELIGIBILITY

The following chart details the acceptable source documentation for each eligibility criterion, with references. *Attachment A – WIA Eligibility Definitions* provides definitions for certain eligibility criteria that may require further detail.

<b>Documentation Requirements for WIA Title 1 Program Eligibility</b>		
ELIGIBILITY CRITERIA	REFERENCES	ACCEPTABLE DOCUMENTATION
<p><b>SOCIAL SECURITY NUMBER</b></p> <p>Note: Per TEGL 5-08, local grantees should request a Social Security number from all applicants to aid in performance reporting, but services cannot be denied to anyone for refusing to furnish a Social Security number when their citizenship/alien status can be documented via other means.</p>	<ul style="list-style-type: none"> <li>• TEGL 05-08</li> </ul>	<ul style="list-style-type: none"> <li>• DD-214, Report of Transfer or Discharge (if SSN is listed)</li> <li>• Driver’s License (if SSN is listed)</li> <li>• Employment Records</li> <li>• IRS Form Letter 1722</li> <li>• Letter from Social Services Agency</li> <li>• Pay Stub with full SSN</li> <li>• Social Security Administration NUMI Printout</li> <li>• Social Security Benefits</li> <li>• Social Security Card W-2 Form</li> </ul>
<p><b>CITIZEN OR AUTHORIZED TO WORK IN U.S.</b></p>	<ul style="list-style-type: none"> <li>• WIA Sec. 188(a)(5)</li> <li>• WIFI 10-04, Change 1</li> </ul>	<ul style="list-style-type: none"> <li>• Alien Registration Card indicating Right to Work (INS Forms I-151, I-551, I-94, I-688A, I-197, I-179)</li> <li>• Baptismal Certificate (If place of birth is shown)</li> <li>• Birth Certificate</li> <li>• DD-214, Report of Transfer or Discharge (If place of birth is shown)</li> <li>• Food Stamp Records</li> <li>• Foreign Passport Stamped Eligible to Work (Unexpired)</li> <li>• Hospital Record of Birth</li> <li>• Naturalization Certification</li> <li>• Public Assistance Records</li> <li>• U.S. Passport</li> <li>• Native American Tribal Document</li> <li>• Voter Registration Card</li> </ul>
<p><b>SELECTIVE SERVICE REGISTRANT</b></p>	<ul style="list-style-type: none"> <li>• WIA Sec. 189(h)</li> <li>• WIFI 08-11</li> <li>• TEGL 11-11, Change 1</li> <li>• TEGL 11-11, Change 2</li> </ul>	<ul style="list-style-type: none"> <li>• Selective Service Acknowledgement Letter</li> <li>• Form DD-214 “Report of Separation”</li> <li>• Screen printout of the Selective Service Verification site: <a href="http://www.sss.gov/RegVer/wfVerification.aspx">www.sss.gov/RegVer/wfVerification.aspx</a> (For males who have already registered, this website can be used to confirm their Selective Service number as well as the date of registration, by entering a last name, social security number, and the date of birth)</li> <li>• Selective Service Registration Card</li> <li>• Selective Service Verification Form (Form 3A)</li> <li>• Stamped Post Office Receipt of Registration</li> </ul>

## Documentation Requirements for WIA Title 1 Program Eligibility

ELIGIBILITY CRITERIA	REFERENCES	ACCEPTABLE DOCUMENTATION
BIRTH DATE/AGE	<ul style="list-style-type: none"> <li>• WIA Sec. 101(1)</li> <li>• WIA Sec. 101(13)(A)</li> <li>• TEGL 6-14</li> </ul>	<ul style="list-style-type: none"> <li>• Baptismal Record</li> <li>• Birth Certificate</li> <li>• DD-214, Report of Transfer or Discharge Paper</li> <li>• Driver's License</li> <li>• Federal, State or Local Government Identification Card</li> <li>• Hospital Record of Birth</li> <li>• Passport</li> <li>• Public Assistance/Social Service Records</li> <li>• School Records/Identification Card</li> <li>• Work permit</li> <li>• Cross match with Department of Vial Statistics</li> <li>• Tribal Records</li> </ul>
TEMPORARY ASSISTANCE TO NEEDY FAMLIES (TANF)	<ul style="list-style-type: none"> <li>• TEGL 6-14</li> </ul>	<ul style="list-style-type: none"> <li>• Cross match with TANF public assistance records</li> </ul>
OTHER PUBLIC ASSISTANCE RECIPIENT (GENERAL ASSISTANCE, REFUGEE CASH ASSISTANCE, FOOD STAMP ASSISTANCE)	<ul style="list-style-type: none"> <li>• TEGL 6-14</li> </ul>	<ul style="list-style-type: none"> <li>• Copy of authorization to receive cash public assistance</li> <li>• Copy of public assistance check</li> <li>• Medical card showing cash grant status</li> <li>• Public assistance records</li> <li>• Refugee assistance records</li> <li>• Cross match with public assistance database</li> </ul>
HOMELESS INDIVIDUAL AND/OR RUNAWAY YOUTH	<ul style="list-style-type: none"> <li>• TEGL 6-14</li> </ul>	<ul style="list-style-type: none"> <li>• Written statement from an individual providing residence, shelter or social service agency</li> <li>• WIA intake or registration form Self-attestation</li> </ul>
OFFENDER	<ul style="list-style-type: none"> <li>• WIA Sec. 101(27)</li> <li>• TEGL 6-14</li> </ul>	<ul style="list-style-type: none"> <li>• Documentation from juvenile or adult criminal justice system</li> <li>• Documented phone call with court or probation representatives</li> <li>• WIA intake or registration form Self-attestation</li> </ul>
LOW INCOME (Family Income)	<ul style="list-style-type: none"> <li>• WIA Sec. 101(25)</li> <li>• TEGL 6-14</li> </ul>	<ul style="list-style-type: none"> <li>• Alimony Agreement</li> <li>• Applicant statement</li> <li>• Award letter from veteran's administration</li> <li>• Bank statements</li> <li>• Compensation award letter</li> <li>• Court award letter</li> <li>• Pension statement</li> <li>• Employer statement/contact</li> <li>• Family or business financial records</li> <li>• Housing authority verification</li> <li>• Pay stubs</li> <li>• Public Assistance records</li> <li>• Quarterly estimated tax for self-employed persons</li> <li>• Social Security benefits</li> <li>• UI documents</li> </ul>

## Documentation Requirements for WIA Title 1 Program Eligibility

ELIGIBILITY CRITERIA	REFERENCES	ACCEPTABLE DOCUMENTATION
DISPLACED HOMEMAKER	<ul style="list-style-type: none"> <li>• TEGL 6-14</li> </ul>	<ul style="list-style-type: none"> <li>• Public Assistance records</li> <li>• Court records</li> <li>• Divorce papers</li> <li>• Bank records</li> <li>• Spouse's layoff notice</li> <li>• Spouse's death record</li> <li>• Self-attestation</li> </ul>
PREGNANT OR PARENTING	<ul style="list-style-type: none"> <li>• TEGL 6-14</li> </ul>	<ul style="list-style-type: none"> <li>• Copy of child's birth certificate</li> <li>• Baptismal record</li> <li>• Observation of pregnancy status</li> <li>• Doctor's note confirming pregnancy</li> <li>• Self-attestation</li> </ul>
BASIC LITERACY SKILLS DEFICIENCY	<ul style="list-style-type: none"> <li>• WIA Sec. 101(4)</li> <li>• TEGL6-14</li> </ul>	<ul style="list-style-type: none"> <li>• Standardized assessment test</li> <li>• School records</li> <li>• Case notes</li> </ul>
FOSTER CARE YOUTH	<ul style="list-style-type: none"> <li>• TEGL 6-14</li> </ul>	<ul style="list-style-type: none"> <li>• Written confirmation from social service agency</li> <li>• Case notes</li> </ul>
INDIVIDUAL WITH A DISABILITY		<ul style="list-style-type: none"> <li>• Letter from Drug or Alcohol Rehabilitation Agency</li> <li>• Letter from Child Study Team Stating Specific Disability</li> <li>• Medical Records</li> <li>• Observable Condition (Applicant Statement needed)</li> <li>• Physician's Statement</li> <li>• Psychiatrist's Diagnosis</li> <li>• Psychologist's Diagnosis</li> <li>• Rehabilitation Evaluation</li> <li>• School Records</li> <li>• Sheltered Workshop Certification</li> <li>• Social Service Records/Referral</li> <li>• Social Security Administration Disability Records</li> <li>• Veterans Administration Letter/Records</li> <li>• Vocational Rehabilitation Letter</li> <li>• Workers Compensation Records</li> </ul>
FAMILY SIZE		<ul style="list-style-type: none"> <li>• Applicant Statement</li> <li>• Birth Certificate</li> <li>• Court/Divorce Decree</li> <li>• Landlord Statement</li> <li>• Lease</li> <li>• Marriage Certificate</li> <li>• Medical Card</li> <li>• Most Recent Tax Return supported by IRS Documents (e.g. Form Letter 1722)</li> <li>• Public Assistance/Social Service Agency Records</li> <li>• Public Housing Authority (If resident of or on waiting list)</li> <li>• Written Statement from a Publicly Supported 24 Hour Care Facility or Institution</li> </ul>

## WIA Eligibility Definitions

**Basic Literacy Skills Deficient** – a person who computes or solves problems, reads, writes, or speaks English at or below the 8<sup>th</sup> grade level or is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual’s family, or in society. (TEGL 6-14, WIA Section 101(4), 20 CFR 664.205)

**Displaced Homemaker** – is a person who has been providing unpaid services to family members in the home and has been dependent on the income of another family member but is no longer supported by that income and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment (TEGL 6-14).

**Family** – The term “family” means two or more person related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories (WIA Section 101(15) and TEGL 26-14):

- (A) A husband, wife, **same-sex** spouse, and dependent children
- (B) A parent or guardian and dependent children
- (C) A husband and wife.

**Foster Care Youth** – a person who is currently in foster care or has been in the foster care system at any point during his/her lifetime (TEGL 6-14).

**Homeless Individual and/or runaway youth** – a person who lacks a fixed, regular, adequate night time residence. This definition includes any individual who has a primary night time residence that is a publicly or privately operated shelter for temporary accommodation; an institution providing temporary residence for individuals intended to be institutionalized; or a public or private place not designated for or ordinarily used as a regular sleeping accommodation for human beings; or a person under 18 years of age who absents himself or herself from home or place of legal residence without the permission of his or her family (i.e. runaway youth). This definition does not include an individual imprisoned or detained under an Act of Congress or State law. An individual who may be sleeping in a temporary accommodation while away from home should not, as a result of that alone, be recorded as homeless (TEGL 6-14, McKinney-Vento Homeless Assistance Act).

**Individual with a Disability** – an individual with a disability means an individual with any disability as defined in Section 3(2) of the Americans with Disabilities Amendments Act of 2008 (42 U.S.C. Section 12102(1) (2008)) as follows:

- (A) A physical or mental impairment that substantially limits one or more major life activities of such individual;
- (B) A record of such an impairment; or
- (C) Being regarded as having such an impairment.

**Low Income** – a person who (WIA Section 101(25), TEGL 6-14):

- (A) Receives, or is a member of a family which receives, cash payments under a federal, state or local income-based public assistance program; or
- (B) Received an income, or is a member of a family that receive a total family income, for the six-month period prior to program participation (exclusive of unemployment compensation, child support payments, payments described in subparagraph A and old-age and survivors insurance benefits received under section 202 of the Social Security Act (42 U.S.C. 402)) that, in relation to family size does not exceed the higher of (i) the poverty line, for an equivalent period, or (ii) 70 percent of the lower living standard income level, for an equivalent period, or

- (C) Is a member of a household that receives (or has been determined within the 6-month period prior to program participation) Food Stamps under the Food Stamp Act of 1977 (7 U.S.C. 2011 et seq.); or
- (D) Qualifies as a homeless individual, as defined in subsections (a) and (c) of section 103 of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302); or
- (E) Is a foster child on behalf of who State or local government payments are made; or
- (F) Is a person with a disability whose own income meets the income criteria established in WIA section 101(25)(A) or (B), but is a member of a family whose income does not meet the established criteria.

**Offender** – is a person who either (a) is or has been subject to any stage of the criminal justice process for committing a status offense or delinquent act, or (b) requires assistance in overcoming barriers to employment resulting from a record of arrest or conviction for committing delinquent acts, such as crimes against persons, crimes against property, status offenses, or other crimes (WIA Section 101(27), TEGL 6-14).

**Other Public Assistance Recipient** – a person who is receiving or has received cash assistance or other support services from one of the following sources in the last six months prior to participation in the program: General Assistance (GA), Refugee Cash Assistance (RCA), or Food Stamp Assistance. Do not include foster child payments (TEGL 6-14).

**Participant** – an individual who has been determined to be eligible to participate in and who is receiving services (except follow-up services authorized under this title) under a program authorized by this title. Participation shall be deemed to commence on the first day, following determination of eligibility, on which the individual began receiving services provided under this title (WIA 101(34)).

**Pregnant or Parenting Youth** – is a person who is either under 22 years of age and who is pregnant, or an individual (male or female) who is providing custodial care for one or more dependents under age 18 (TEGL 6-14).

**School Dropout** – an individual who is no longer attending any school and who has not received a secondary school diploma or its recognized equivalent (WIA Section 101(39)).

**Temporary Assistance to Needy Families (TANF)** – is a person who is listed on the welfare grant or has received cash assistance or other support services from the TANF agency in the last six months prior to participation in the program (TEGL 6-14).