

ALABAMA WORKFORCE INVESTMENT SYSTEM

Department of Commerce
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April 15, 2021

GOVERNOR'S WORKFORCE INNOVATION DIRECTIVE NO. PY2020-02

SUBJECT: WIOA Participant Documentation File/Data Storage

1. **Purpose** This Directive provides guidance for standardized file/data storage of Workforce Innovation and Opportunity Act (WIOA) participant documentation in all Local Workforce Development Areas and Career Centers Statewide.
2. **Discussion** The Workforce Innovation and Opportunity Act (Section 185 (a) (3) *Maintenance of Standardized Records*), states that:

In order to allow for the preparation of the reports required under subsection (c), such recipients shall maintain standardized records for all individual participants and provide to the Secretary a sufficient number of such records to provide for an adequate analysis of the records.

This guidance originates from multiple regulations related to government agencies' transition from paper to digital files. Among these are: The E-Government Act of 2002, Government Paperwork Elimination Act of 1998, and, the Paperwork Reduction Act of 1995. Section 185 of the Workforce Innovation and Opportunity Act (WIOA) requires recipients of Title I funds to keep records that are sufficient to prepare reports and permit the tracing of expenditures to adequately ensure that funds have not been spent unlawfully. This guidance applies to electronic file storage and documentation imaging standards in the administration of the following programs: WIOA, Trade Act Co-Enrollment Documentation, and all special grants administered by the Alabama Department of Commerce.

The Alabama Department of Commerce Workforce Development Division is in the process of transitioning to a paperless data system by using electronic document imaging and data storage. *AlabamaWorks!* is Alabama's new WIOA electronic data system.

Electronic data storage will accomplish the following:

- Increase the capability of data storage
- Expedite data retrieval
- Reduce duplication
- Minimize local storage space
- Increase staff productivity
- Streamline Local, State and Federal monitoring reviews
- Improve data shareability and searchability

While the need for locally retained documents (hard copies) still exists, electronic document management (paperless) is the direction that the Department of Commerce is moving toward. During this period of transition, the following guidelines will apply:

- Beginning PY20, all WIOA Eligibility documentation must be scanned/uploaded into the *AlabamaWorks!* system
- Beginning PY20, all Case Management documentation must be scanned/uploaded into the *AlabamaWorks!* System
- Beginning PY20, all documentation not scanned/uploaded into the *AlabamaWorks!* system must be retained in hard copy files. This documentation can be arranged in any predetermined order, but a document log must be included at the beginning of the file detailing what documents are in the file and in what order.
- Beginning PY21, all new Participant file documentation must be scanned/uploaded into the *AlabamaWorks!* system, including Eligibility, Case Management, and all other documentation previously kept in a hard copy participant file. Source documentation and forms may be kept for a period of up to 30 days to ensure they have been accurately scanned/uploaded into the *AlabamaWorks!* system, then they are to be shredded. PY20 and previous hard copy files will remain as is until their retention date has expired.
- All documentation scanned/uploaded into the *AlabamaWorks!* System must be legible, organized, and clearly labeled.
- Participant medical records containing identifiable health information, also known as protected health information (PHI) under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), such as disabilities, health status, provision of health care, or payment for health care, must be maintained under lock and key in a secure area in hardcopy format only. This will be the only participant data stored in hardcopy format and will be subject to current documentation retention policy.

This policy applies to all Local Workforce Development Area and Career Center participant documentation. All required Documentation for recipients of WIOA Grant funds and any additional special grants administered by the Alabama Department of Commerce must comply with this policy.

Program and Service Providers may maintain hardcopy files as long as they contain a document log that shows the documentation included within the file and their order.

To the extent possible, case managers should use *AlabamaWorks!* to its fullest capacity as both a reporting and case management tool. This Directive applies to all funding streams administered by the Department of Commerce WDD and supersedes all previous Directives regarding locally retained WIOA participant documentation and their required file order.

3. **Action**

Effective immediately, all Local Workforce Development Area and Career Center Staff must implement this new WIOA Participant Documentation File/Data Storage Directive. When staff are working in currently active files (PY20 or later), they should scan/upload all WIOA Adult, Dislocated Worker and Youth documents that are required for that Program Year into the *AlabamaWorks!* System. All remaining hardcopy documentation must be placed in the appropriate file, in the Career Center's predetermined order, and a document log noting the included documents and the order of their arrangement must be included. The preceding Directive requirements do not apply to PY19 documentation or prior years.

4. **Contact**

Questions regarding this Directive should be referred to Jan Dame, Supervisor, Workforce Development Division, State Program Integrity Section at (334) 242- 5175 or jan.dame@commerce.alabama.gov.

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Date