

OFFICE OF THE GOVERNOR

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DEPARTMENT OF COMMERCE

GREG CANFIELD  
SECRETARY OF COMMERCE

September 11, 2023

MEMORANDUM  
WDD PY 23-01

TO: Stephen Smith, Administrator  
Alabama State Employment Service

FROM: Tammy Wilkinson, Director  
Workforce Development Division

Handwritten signature of Tammy Wilkinson in blue ink, with the initials 'TW' written below it.

THROUGH: Tracey Smith, Workforce Development Manager  
Governor's Local Workforce Areas

Handwritten signature of Tracey Smith in blue ink.

SUBJECT: Workforce Development Division's Revised Procedures for Workforce  
Innovation and Opportunity Act (WIOA) Eligibility, Enrollment and  
Case Management

The Workforce Development Division's (WDD) training team recently conducted Workforce Innovation and Opportunity Act (WIOA) Case Management training for all local areas in the state. In addition to Case Management, training included an overview of eligibility, youth services, Individual Training Accounts (ITAs) and On-the Job Training (OJT). This memo serves to issue the revised instructions for the Career Center WIOA process discussed at training and rescinds previous WDD instructions for applicant intake, enrollment, and case management in the AlabamaWorks! (AW!) data system. The Workforce Development Division has contracted with the Alabama Department of Labor (ADOL) to provide WIOA Career Services in the Career Centers serving the local workforce development areas. Therefore, these instructions only apply to WIOA procedures for eligibility, enrollment and services provided by ADOL Career Center staff.

***The WIOA process changes listed below are effective immediately:***

➤ **Customer Information Form (CIF):**

- All questions on the Customer Information Form (CIF) must be completed by the customer with a signature and date. The CIF is the initial assessment of their occupational skills, job readiness, barriers, and service needs used for referrals to WIOA and other appropriate programs.

- The date on the CIF must be the same as the date of enrollment. If the CIF has already been signed and dated, the case manager can line through the date, correct it, then initial the change. Do not use white-out correction tape or pen.
- If a youth applicant is under the age of 19, the parent/guardian signature is required on the CIF. The Career Center Case Manager does not have to witness the parental signature. The parent/guardian can sign the CIF in advance of the eligibility interview.
- If a participant signs the CIF more than 30 days before they are seen in the Career Center for WIOA eligibility and all information on the CIF remains the same, you can strike through the date, update, and initial the change. Only strike through with one line so we can see the change; do not scribble or white out.

➤ **WIOA Eligibility and Enrollment:**

- Eligibility and enrollment into WIOA services can be accomplished either in-person or virtually. Applicants who have transportation issues cannot be required to come to a Career Center for an eligibility interview. Forms required for enrollment can be emailed to the applicant or the Youth Provider (if applicant is a youth) before the interview and emailed back to the Case Manager when completed.
- The applicant's signature is required on the following WIOA forms:
  1. Customer Information Form
  2. Grievance and Complaint Procedures
  3. Participant Information Release Form (revised April 2023)
  4. Customer Agreement Form (Revised July 2022)
  5. Individual Service Strategy (ISS)/ Individual Employment Plan (IEP)

After signature, these forms must be uploaded into the applicant's AW! file. These documents can be uploaded in one file and labeled as eligibility documentation. A typed name is not an acceptable signature.

- Career Center Case Managers are no longer required to print the WIOA application for signature or upload it into AlabamaWorks! **if** the Customer Information Form has been completed, signed, and dated by the customer. The customer's completed WIOA eligibility, enrollment and services information can be viewed in AW! by any Career Center or WDD staff who need to review it.
- The Objective Assessment can also be viewed in AW! It should no longer be printed for signature and uploaded.

- The ISS/IEP is printed from AW! *unless* a youth provider has completed the ISS found in the Staff Online Resources. If this form is sign and dated, the ISS in AW! does not have to be printed and signed.

➤ **Revised WIOA Forms:**

- The WIOA Contact Verification/Document Inspection Form has been updated and may be completed by the Case Manager when verifying information by telephone or document inspection. This form must be uploaded into AW!
- The Information Release Form was updated to include a line for parental signature, if needed.
- The Document Checklist has been revised based on the latest guidance for acceptable documentation for Data Validation.

➤ **Assessments:**

- My Next Move is not a required assessment for WIOA applicants. Similar assessments such as the one under Career Services in AlabamaWorks! can be used. Under the Menu button, scroll down to the *Assisted User Menu – Services for Individuals* and choose *Career Services*. The Career Services screen lists five options including the Career Explorer assessment:
  - Career Tips - View a guide to the steps you should take to follow the path of selecting the ideal career or occupation.
  - Career Explorer - If you do not have a specific career in mind, select this option to learn what career or type of job best suits you as well as areas for which you might want to receive more training and education.
  - Your Career Match - Choose this option to review how your background and skills match up to your desired occupation. See information on wages, education, experience, and available jobs.
  - Career Informer - If you have a career in mind, select this option to highlight a specific occupation and display information on wages, employers, and jobs that are available as well as the details of available education and training, the job requirements, and the nature of the work involved.
  - Job Market Explorer - Choose a career or occupation by analyzing the Current labor market trends where you want to work, including wages, employment projections and educational requirements.

➤ **Case Management:**

- Effective immediately, Career Center Case Managers are required to contact active participants every 90 days or once per quarter. Monthly contacts are no longer required and must not be put into AlabamaWorks! The quarterly contact case note should not be a generic email sent to all participants then copied and pasted into the case notes ribbon. Refer to Case Management PowerPoint in Staff Online Resources.
- When entering training related employment, the O\*NET code of the training related employment must match the O\*NET code for the employer. If the O\*NET code does not match, AW! changes the answer to No for training related employment once the “Recheck Training Related Employment” hyperlink is selected.
- Complete all follow-up information on the AW! follow-up ribbon even though performance is based on the 2<sup>nd</sup> and 4<sup>th</sup> quarters. Answer every section of both the CIF and the AlabamaWorks! application/enrollment screens.
- Case notes should only contain information relevant to the participant’s case. No information should be listed about the participant’s personal affairs unless it relates to the assistance they are receiving. When referring to a date it should include the month, day, and year.
- Self-attestation can be used as a last resort to verify the following: date of birth, disability status, veteran status, long term unemployment, date of dislocation, low income at program entry, and to verify a displaced homemaker.
- Measurable Skill Gains for OJT’s should be listed as a “Training Milestone” for both the halfway mark and the completion of the training.

➤ **Frequently Asked Questions:**

Following this memo are the questions and answers from each training session. This Q & A is also available in AW! Staff Online Resources under Commerce WDD - Case Management - FAQ from Training,.

If there are questions concerning the recent Case Management training and/or the revised Career Center procedures for WIOA, please submit your questions to the

following email addresses based on the topic:

- Youth related questions – email: [youth@commerce.alabama.gov](mailto:youth@commerce.alabama.gov)
- Adult and Dislocated Worker: [WIOAcontracts@commerce.alabama.gov](mailto:WIOAcontracts@commerce.alabama.gov)
- ITA: [ITA@commerce.alabama.gov](mailto:ITA@commerce.alabama.gov)
- OJT: [OJT@commerce.alabama.gov](mailto:OJT@commerce.alabama.gov)
- State Reporting/Performance:  
Donna Rowe at [Donna.Rowe@commerce.alabama.gov](mailto:Donna.Rowe@commerce.alabama.gov) or  
Cesalie Norsworthy at [Cesalie.Norsworthy@commerce.alabama.gov](mailto:Cesalie.Norsworthy@commerce.alabama.gov)

Workforce Development Division  
Workforce Innovation and Opportunity Act (WIOA)  
Case Management Training - Spring 2023  
Frequently Asked Questions

1. Can a case manager sign a telephone verification for employment if they talk to employer over the phone?
  - a. The case manager may complete and sign the Participant Employment Follow Up survey using verified information from the participant or employer.
2. If you can verify employment but all attempts at verifying wages have failed, can you still enter employment information in follow up?
  - a. Yes. You must enter a default wage value and number of hours
    - i. For full time employment as known: enter 8\$ an hour for 40 hours weekly
    - ii. For part time employment as known: enter 8\$ an hour and estimate hours.
  - b. Then, create a case note detailing the attempts at verification of wages and the decision to use the default wage and hours estimation.
3. Is the date of entry into WIOA title 1 services the application date or the date of the first service?
  - a. These dates should be the exact same. As mentioned in training, if the CIF date does not match the first service date, then it must be corrected either through the strikethrough (if within 30 days) method or by obtaining a new CIF.
  - b. WIOA date of program entry is defined as the date of the first staff-assisted service. In Alabama, the first staff-assisted service is the initial assessment or objective assessment as appropriate.
  - c. Completion of these assessments is verified using the CIF. Therefore, the date of the CIF must also match the date of the first staff-assisted service.

- d. Remember that while the CIF may serve many intake functions in a Career Center, it remains the WIOA application in the State of Alabama.
- 4. Can we use disability income as proof of disability?
  - a. That's public assistance. Anyone receiving public assistance is low income.
  - b. You can upload the award letter since it doesn't mention the actual disability
- 5. Does eligibility have to be redone every semester?
  - a. Participants must show that they are passing classes with their grades. If a participant is failing any class, they are no longer eligible.
- 6. What if a short-term program doesn't have books included in their total on the ETPL?
  - a. Tell the provider to include them on the ETPL. Questions about the ETPL should go to [jill.grant@commerce.alabama.gov](mailto:jill.grant@commerce.alabama.gov)
- 7. Do you enter a supportive service for each Human Capital Development reimbursement or just one?
  - a. Just one
- 8. If we send an ITA request and don't get a received email how long should we wait to ask about it?
  - a. 2-3 days
- 9. Why does Alabama not allow youth to participate in program services until after their Junior year?
  - a. Performance requirements for WIOA ISY services mandate that participants receive a secondary credential within twelve months of exiting the system.
  - b. Typically, the timeframe from post-Junior year Summer to high school graduation is within twelve months.

10. The Department of Labor sent out an email saying our worksites had to have the Child Labor Certificate for the employment of minors ages 16/17? If they can't work until after junior year, why was that required?
- a. There are 16- and 17-year-old individuals that have already completed junior year due to accelerated education tracks or other unforeseeable scenarios such as interstate school transitions.
11. Is there a link in Alabamaworks to check with Homeland Security to verify if a non-citizen is or is not eligible to work in the US?
- a. There is no method of verifying this information through the system due to limitations at the Federal level. Case Managers are responsible for verifying this information and participants are responsible for having complete right to work documents before seeking employment in Alabama. The US Citizen and Immigration Services at <https://www.uscis.gov/i-9-central> under Form I-9 Acceptable Documents lists the documents that establish employment authorization.
12. In the Alabamaworks system under the follow up ribbon it automatically produces a case note. Are we not to use the follow up ribbon unless we speak to the client?
- a. You must use the follow up ribbon to record at least one follow up attempt each quarter, do not worry about the system generated notes. If you fail to reach a client at the beginning of a follow up window, then you should create a reminder to make another attempt before the follow up window expires.
13. CDL who must take a drug test for eligibility determination and for the CDL training provider, will both be covered under Human Capital Development Fund?
- a. The drug test must be paid for up front by the client. After completing the program send the request and receipt to [supportiveservices@commerce.alabama.gov](mailto:supportiveservices@commerce.alabama.gov).



- b. Covered in GLWA 21-01 Change 2.
14. Question with youth for WBL, that does have a HS Diploma or GED? Are they not able to go on to WBL if they do not wish to attend adult ed or youth provider?
- a. If Basic Skills Deficient (BSD), the youth must be remediated before enrolling in WBL.
  - b. If not BSD, the youth must have at least one youth barrier and one other type of youth service. Do not exit the youth once WBL is completed. Assist them with employment, On-the-job training, or an ITA.
15. Can you go over the rescind ITA process again?
- a. Write "Rescind" on the approved contract. Then send it to the ITA email and create a case note describing the situation.
16. If a client who is eligible comes requesting one semester for their LPN because they have 1 semester left, can they apply with WIOA for RN if (mobility) is 3 semesters or less?
- a. No, due to decreased funding the program design of the LPN and RN training programs has been modified. The participant may only apply for either LPN or RN training at this time, see GLWA 21-01 Change 2.
17. Can you go back over the rules of how to handle LPN to RN mobility clients?
- a. This program was discontinued due to decreased funding.
18. Why not only pay for the RN's and not the LPNs to go through the program? Since a lot of states don't require/ hire LPN's since we only pay for four semesters through WIOA.
- a. The state appraises training program outcomes including employment and earnings and the LPN program currently has very high performance and is significantly less expensive than the RN program.

- b. Keep in mind that labor/employment is subject to the principles of supply and demand  
Therefore, it is imperative that case managers review the materials and research  
provided by ADOL and WDD to stay current on economic and workforce trends.
19. Does the new quarterly follow up case notes apply to participants that are currently enrolled in trainings or is it just for the ones that have exited?
- a. Please only create a case note detailing a generic status update once per quarter  
whether during participation or after exit.
  - b. As described in the case management training available on AW!, this rule only applies to  
contact made for reasons outside of a specific case management activity such as to  
update the case manager on the client’s personal life or to “check-in” on the participant.
  - c. Previously, case managers were creating a monthly case note for these generic status  
updates. We now highly recommend such contact information be logged in a Contact  
Log or similar record (there is an example of a Contact Log available on Staff Online  
Resources (SOR).
  - d. Please do not create case notes describing a single failed contact attempt. If client  
refuses contact or cannot be reached after several attempts then document this in a  
case note and move towards closure.
20. Which pre-registration activities should be uploaded? i.e.: Job Search activities. Also, should they  
be uploaded separately or as one attachment like eligibility paperwork?
- a. Keep eligibility and suitability separate from pre-reg documents.
  - b. Upload the pre-registration ITA packet to AW! as one upload.
  - c. You may upload the results of job search activities but keep these separate and label  
appropriately.
21. Do the staff signature/ date on the back of the CIF need to match the 102-service date?

- a. It should match the date of the first WIOA service which is most likely the 102 service.
22. Income- OSY- If they are 18+ and are working and living at home but not on parent's tax form as a dependent do they count as adult status? If yes, what is the set percentage or annual income amount they must make? \*I have been told they have to be totally self-sufficient. Adult kids can live at home and are not totally self-sufficient. If this is also yes, then are they homeless technically? Since they don't own or rent a place of their own.
- a. Family Size in WIOA is determined by blood or court ordered relationships i.e., marriage, adoption, etc. It is not determined only by IRS dependent status.
  - b. If multiple individuals are related through blood or court order and reside in the same residence, then they must be counted towards family size.
23. Case notes- Don't enter in case notes that say, "created AW account" or "created resume"? And is the telephone/ email log required?
- a. In general, do not create a case note if the system is already recording the information such as account registration in AW! However, it would be appropriate to record resume development as this is a service.
  - b. The contact log is recommended by the state, but always follow your Career Center/Area policy regarding use of documents and client records.
24. Does the manager have to recheck WIOA eligibility? i.e., sign off on it.
- a. Yes, unless your specific Career Center/Area policy states differently. However,
25. Does the WIOA application on AW need to be printed, signed, and re uploaded? Or do we print and have the client review it and not upload it?
- a. No. This document does not need to be reviewed at all. The CIF replaces this document.
26. Do we upload income calculations along with the pay stubs, W2, etc.?

- a. The calculation and results must be written on the CIF in the “Income Source” and “Total Household Income” areas.

27. Will you please give examples where Career Centers can say no to clients who are not suitable?

Sometimes the clients will contact Commerce to find another way to be eligible for WIOA and will lead to more clients ignoring the Career Centers decision and causes a contradiction and confusion between the Career Center staff and Commerce.

- a. While Commerce must respond to registered grievances and complaints, our policy is always to contact the Career Center/Area management to discuss the situation before making any case decisions.
- b. That said, this question states “the clients will contact Commerce to find another way to be **eligible** for WIOA” which is alarming as case manager should have reviewed all elements of eligibility during the initial assessment. Eligibility is not the same thing as suitability. In this example, Commerce was correct to inform the client of their eligibility status as this is a requirement of a federal law for which the state could be held accountable. Please ensure that you are not gatekeeping WIOA service eligibility.
- c. Suitability, however, is a determination made by the career center case manager. For example, a manufacturing training service should only be offered to participants that are prepared for a physically demanding job. A nursing training service may not be suitable for individuals that cannot manage overnight shifts or handle performing medical procedures on patients. Review the job with clients before committing them to training to ensure an alignment of goals and needs between life and career.

28. Is a copy of the EBT card and verification form with current balance ok to accept?

- a. Yes.

29. Does the client need to reapply from start to finish each semester?

- a. The client should provide the grades to the caseworker so that the caseworker can send in the cost breakdown next semester.
30. Should a case note not be labeled “monthly contact” in the system? Also, do we keep a log of case notes quarterly?
- a. No, please do not enter monthly contact case notes into the system.
  - b. This applies to contact case notes **only**. As in, when you contact a client for no purpose other than checking in or similar. We recommend documenting these contacts in a contact log or similar record.
31. If ITA’s have gone back to paper files, then is there a file order?
- a. ITAs have not gone back to paper files. Documents should be stored in AW! only, excluding medical and certain legal documentation.
32. Child labor certificates- Who provides this? Would it be Sirius or the worksite and do we receive a copy at the career center?
- a. Worksite provides this to CC who sends to Sirius.
33. Is the ITA generated in AW! ok to document the Provider? OR do we need something else?
- a. The signed ITA contract documents the provider. No other document is required.
34. Will an email from short term provider be ok for provider?
- a. Yes, is it has a logo and signature
35. SNAP example for 18-year-old, will they need something showing they are in the parents SNAP budget?
- a. Get the documentation that the family is on SNAP, the CIF will verify they are the parent
36. For youth can we upload the court ordered to the program?
- a. Yes

37. Can we upload guardianship paperwork?

- a. Yes

38. Frequency of the notes, quarterly. Does that mean for follow-up too?

- a. Yes

39. CDL drug screen, physical?

- a. You can upload these because it is a program requirement

40. Verifying employment, can they use the contact verification to verify employment?

- a. Yes, please use the Participant Employment Follow Up Survey to verify employment. It should soon be uploaded into AW!

41. MSGs. Are we losing out on MSGs for students that end training at the end of the year and start in the next program year? Would we miss out on the MSG for that program year? They would be in 2 program years but won't get an MSG in the first year.

- a. The solution to the timing issues with MSGs is to record every MSG earned. It is illogical to calculate the exact number and date range of every annual MSG and detrimental to our research capacity to ignore certain MSGs, please try to record any MSGs the participant may earn.
- b. If designing or using a 2-year program, particularly for in-school youth, be mindful of the multiple MSG requirement. Contact state reporting for technical assistance as needed.

42. Applicable docs for self-employment?

- a. There are tax forms for self-employment such as a filed Schedule SE (Form 1040) or a return. These should be used to verify self-employment status.
- b. Self-employment as it relates to WIOA does not include the performance of odd-jobs or non-contracted handiwork.

43. When someone graduates from trucking, some become self-employed. How do we get proof of employment? We can get business license but nothing else.
- a. Use the Participant Employment Follow Up Survey or tax documents.
44. SNAP. Can we not call about SNAP anymore? What do we get?
- a. No can't call. Need Documentation from DHR.
  - b. We recommend contacting the DHR case worker or having the client provide them with the Partner Agency Certification form on AW! which is the easiest method of verifying status.
  - c. We are aware of the challenge of this change; please keep in mind that this change is the result of a federal law and not state policy.
45. Follow-up. If we try and can't get them do we just not document that?
- a. Still enter the follow-up with any info you may be able to acquire from other sources including family members, providers, and employers. The system generated follow-up wizard screens are all that need to be completed.
  - b. As follow-up is a requirement for WIOA services, be mindful that refusal to accept follow up may be considered when determining future WIOA service eligibility.
46. Things we can and cannot upload. Can we not say they have a felony conviction?
- a. Yes, you can say felony conviction. Just don't say what the specific charge is.
47. IF student must take training gap because mom has cancer. Do we not say mom has cancer?
- a. Just brief not to explain. Don't need doctors note.
48. Provider name. ITA contract, ok?
- a. Yes
49. If they receive MSG but they don't finish. Is it successful?

- a. No. A service is successful if the client completes one or more elements on their IEP or ISS as appropriate.
  - b. For example, If they don't complete training but get a job in the field that they were training in then yes.
50. Sometimes they go to work way after they finish their training.
- a. Performance is calculated for up to a year after exit so always perform your quarterly follow up.
51. Can't pay for drug test or MVR done before eligibility.
- a. No, we cannot.
52. If LPN had to quit job to come with military husband to relocate to US can we send her to train to become a RN?
- a. No, she has a viable skillset (LPN) in the current AL job market. Please assist this type of client with a job search instead of additional training.
53. If client is not suitable as LPN because she can get a job can she not go to school for RN?
- a. No, as WIOA funding has been universally cut we can no longer afford to fund high-cost training for individuals that already possess marketable skillsets.
54. Documentation. Is a copy of Social security card ok or do we need to copy the original?
- a. A copy is fine if it is readable.
55. We cannot fund LPN to RN programs?
- a. Currently the LPN to RN program is suspended due to decreased funding.
56. Send Human Capital Development Fund to [supportiveservices@commerce.alabama.gov](mailto:supportiveservices@commerce.alabama.gov)?
- a. This goes to Elizabeth Gordon. Then Elizabeth gives to Donna and Cesalie to review, and they give it back to Elizabeth to release.
57. Uploading forms. What are the consent forms?



- a. Grievance forms, participant release forms, etc. These items are part of the WIOA intake packet your career center uses.
58. Pell award or denial letter?
- a. You can get the Pell letter from the financial aid dept. If applicant isn't eligible for Pell, you need to know why as it could affect their ITA eligibility.
59. MVR. Where do you get MVR from?
- a. Previous state if they just moved is ok and the DMV should have a copy.
60. CDL permit: If they don't require it do we have to get it?
- a. Yes, we require a copy of the permit. Always discuss future follow-up documentation collection with participants before enrolling into WIOA services.
61. Is the WIOA eligibility summary still required to print and sign and upload?
- a. No. Please don't. Only IEP/ISS is printed from AW! signed and uploaded.
62. IF someone quit because she failed what do you enter for the MSG?
- a. If the client failed and quit a training program there may not be an MSG to enter.
63. Signing the ISS/IEP?
- a. You still must print and sign the ISS/IEP until we have the new module in AW! that will allow for electronic signature
  - b. You do not have to print and sign the WIOA Enrollment or the Objective Assessment
64. They may sign the CIF more than 30 days before they are seen in the CC.
- a. Then you will need them to provide a new CIF. The CIF is currently the WIOA application regardless of other uses in the Career Center. We want to avoid the alternative, which is for multiple applications to be used for different partner agency services, so please work with the state in obtaining correct dates on WIOA forms.

- b. In general, it would be better to fill out the CIF and have them sign and date when they meet with you. For clients that may have trouble completing the form with accuracy, please assist them in completing it.
65. Selective Service Waiver: do we need the form? What TEGl says?
- a. If the participant requires a waiver which should be a rare situation, then yes it must be uploaded into AW!
66. CIF: Do the parents need to sign??
- a. Yes, if under age 19.
67. WBL: Does the Worksite agreement need to be uploaded for all participants?
- a. Yes.
68. ITAs: Sometimes they don't receive grades until less than 2 weeks before the next semester. Can they go ahead and send the ITA request without the grades?
- a. No, we cannot process the ITA if the grades have not been entered into AW!
69. Is the Youth (GED) service closed as successful if client attends even one day of class or only if they obtain their GED.
- a. Per WIOA, a WIOA service is successful if the client achieves one or more elements listed on their IEP/ISS including full-time employment, enrollment in training, GED, etc.
70. Is MyNextMove and DAVID required for all YOUTH WIOA/Launch enrollments?
- a. These are highly encouraged but not mandatory for WIOA.
  - b. We recommend using the DAVID career exploration tool.
71. Are open Youth services closed on the same day (EX: 418, 417, ISS) or as of last day service is received?
- a. Same day as completion of the specific service. Assessments and similar services may be completed the same day they are initiated.

- b. The ISS/IEP specifically should always be closed on the last day of the last open WIOA service.

72. On the WBL Training and Evaluation form do we wait to enter the actual start and end dates, or do we enter/write projected start/end dates when making form with employer?

- a. Should only be done at 195 and again at 360 hours.

73. Do “Value added services” need case notes to describe what the services were?

- a. Yes, however keep in mind that medical, psychological, and legal information must not be included in detail.

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# WDD.Memo.Case MgmtTrng.Rev.WIOA Procedures.9.11.23

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