

**Western Virginia Workforce Development Board
Workforce Center & Services Committee**

August 11, 2020 2:00pm

Zoom Meeting:

<https://vccs.zoom.us/j/91227779920?pwd=U0o0VHRrNk5yVVFCTVJ1OWILQUJKUT09>

I.	Call to Order	Crystal Hall
II.	Review of Electronic Meeting Process	Leah Gibson
III.	Public Comment	
IV.	Meeting Minutes Approval – November 6, 2019	Crystal Hall
V.	Old Business <ul style="list-style-type: none">• GO Virginia Grant(s) Update• Pathways to the American Dream Grant Update• WIOA Title I Youth Program Update• Economic Equity Grant Update	Leah Gibson
VI.	WIOA Title I Adult & Dislocated Worker Program Operations	Michelle Brennan
VII.	New Business <ul style="list-style-type: none">• Wagner-Peyser Program Services• VCW Roanoke Center Re-Opening• One Stop Operator Update	Morgan Romeo
VIII.	Policy Updates <ul style="list-style-type: none">• Supportive Services Policy• ITA Policy• Eligibility Policy• File Information & Maintenance Policy	Leah Gibson
IX.	Upcoming Meetings <ul style="list-style-type: none">• Next WCSC Meeting October 22, 2020 9:00am Location TBD• Next WVDDB Meeting September 18, 2020 8:30am Location TBD* (tentative)	
X.	Adjournment	

**Western Virginia Workforce Development Board
Workforce Center & Services Committee**

February 5, 2020, 2:00pm

Virginia Career Works – Roanoke Center
3601 Thirlane Road, Suite 2, Roanoke, VA 24019

Members	Present
Crystal Hall, Chair	
Jo Nelson	X
Angela Williams	X
Joe Brinley	X
Kathy Hodges	X
Milan Hayward	X
Angela Oginz, for Steve Martin	X
Mary Ann Gilmer	X
Joyce Kessinger	X

WVWDB Staff	Present
Morgan Romeo	X
Leah Gibson	X
Mark Holman	X

Welcome

Leah Gibson called the meeting to order at 2:02pm.

Public Comment

There were no guests present for public comment.

Meeting Minutes Approval – November 6, 2019

The group reviewed the minutes from November 6, 2019.

Workforce Center & Services Committee Action: A motion was made by Jo Nelson to approve the minutes as presented. Joe Brinley. The motion was carried by a roll call vote:

Jo Nelson	Yes
Angela Williams	Yes
Joe Brinley	Yes
Kathy Hodges	Yes
Milan Hayward	Yes
Angela Oginz, for Steve Martin	Yes
Mary Ann Gilmer	Yes
Joyce Kessinger	Yes

Old Business

GO Virginia Update

Leah Gibson provided an update on the GO Virginia Grants. The report from the CTE Study is expected to be provided to the Board in the coming months. The Talent Collaborative GO Virginia Grant with the Lynchburg region is moving along, and we are providing existing worker training through that grant for our regional businesses.

Pathways to the American Dream Grant

Leah Gibson shared with the group that Jill Quinlan left her position with this grant in December 2019. Since then, Morgan and Leah have been working on meeting the goals of the grant for our local area. The administrative staff with the New River/Mount Rogers Workforce Development Board, who is the grant recipient, agreed to allow Leah & Morgan to provide the Navigator services for the program participants. Leah & Morgan are also contacting local schools to reach local enrollment goals before the end of the grant.

WIOA Title I Youth Program Update

Leah Gibson shared the Youth Program performance report with the group. The Workforce Board staff took over enrollments for the Youth program in October and enrollments since then have been consistent but not quite where we would like them to be moving forward. However, our contractor, the WorkPlace, has not yet onboarded their staff to provide the Youth Elements, so right now our Youth Program Manager is the only staff working on the Youth program. The WorkPlace expects to have one employee on board in the coming weeks to work towards provision of the Youth program elements.

WIOA Title I Training Funding Limitations

Leah Gibson asked the group for their thoughts on the previously agreed upon training funding limitations for our WIOA Title I programs. The committee previously recommended to the board to place a cap on funding for CDL training within our programs, due to an excessive amount of funding that was spent on this specific training in the past. The group held a discussion regarding the impact of the policy being in place right now and where we stand with budget expenditures currently. Leah shared that Ross had acknowledged they had met the cap to Board staff verbally, but once the finances were reviewed, there was still funds available for CDL training in the Adult & Dislocated Worker programs. As a result, of the discussion, the group agreed to keep the funding language in place in the ITA policy.

WIOA Title I Provider Performance

Leah Gibson shared with the group that the current WIOA Title I Adult & Dislocated Worker program provider had not been successful in meeting goals thus far. As a result, and per decision of the Board and CLEO, a Request for Proposals had been released for provider of these programs. The RFP deadline is today, February 5, 2020.

New Business

Economic Equity Grant Application

Leah Gibson shared that Board staff had submitted a second application for the Economic Equity Grant through VCCS and were informed just a few days ago that the application had been approved. More information will be forthcoming, but this will allow Board staff to work closely with our local community colleges and Adult Education partners to provide cohort-style learning for short-term, credential-based trainings. The cohort participants will receive soft skills related to their credential from Adult Education staff as well as support ongoing through their classroom training. Participants will be co-enrolled with WIOA Title I programs.

OnRamp Program Update

Leah Gibson shared that Russ Poindexter is no longer working for TAP as the OnRamp Program Coordinator. TAP is in the process of hiring a replacement for this position. Services through the grant continue smoothly, with the assessment in place at the Roanoke Center and referrals being made to external partners through that program.

Upcoming Meetings

The next Workforce Center & Services Committee meeting will be May 6, 2020 at 2pm at the Virginia Career Works – Roanoke Center. The next WVWDB Meeting is February 7, 2020 at 9am at the Virginia Career Works – Roanoke Center.

Adjournment

Leah adjourned the meeting at 3pm.



Title: Supportive Services	Related Forms: Yes
Effective Date: 1/27/2017	Revised Date: 7/8/2020

Purpose:

To establish guidelines for provision of supportive services using WIOA funds.

References:

PUBLIC LAW 113–128 Workforce Innovation and Opportunity Act (WIOA) Section 3 (59) and Section 134

Policy 401-05 Provision of Supportive Services

Policy:

Supportive services may be provided only to WIOA clients who are participating in WIOA programs and who are unable to obtain supportive services through other programs. No program operator may provide supportive services funded by a WIOA program until other local area programs (which generally provide the supportive service needed by the client) have been contacted. If a non-WIOA program is capable of providing the supportive service needed by the client, a referral will be made by the program operator. However, if alternative resources cannot be found, then supportive services may be provided using WIOA funds, if it is necessary to enable eligible individuals to participate in program activities under WIOA.

Supportive services may include such services as:

1. Transportation;
2. Child care;
3. Assistance with the purchase of uniforms for occupational skills training, or appropriate work attire for work activities;
4. Training/work-related tools, and other reasonable expenses required to keep a participant in intensive services or training, or
5. Other program activities – for example, auto repairs, test fees, rent, etc.

Needs related payments are not currently offered by the Western Virginia Workforce Development Board.

Procedure:

Supportive services may be provided either in kind or through cash assistance. In order to obtain payment for any supportive service, the participant or the service-providing vendor must provide appropriate documentation. Such documentation will include, at a minimum, the following:

1. Justification for the need for supportive services (which must include training attendance records, documentation of miles traveled, receipts, etc.);
2. A description of the supportive service provided;
3. A list of all organizations contacted and why supportive services could not be obtained through such programs; and



4. An invoice or receipt for payment received (itemized and dated) for the supportive service.

Supportive services are intended as temporary assistance and should not be considered or provided as long-term support. Provision of supportive services is not guaranteed and is contingent on availability of funding. All payments must be made directly to the vendor.

The following are special regulations established by the WVVDB to govern the provision of supportive services:

1. Travel Allowance: A travel allowance may be paid for travel to and from the training facility. The written request must document the need for the increase in the travel allowance. Travel allowances will be paid for actual days participated only, and must be documented by an attendance record, which is signed by the appropriate activity representative at the facility and by the participant. Actual round-trip miles per day must be reported correctly by the participant. Attendance documentation must be kept, and in no instance will payment be made in advance. The participant will be required to sign a receipt documenting payment received for the applicable period. Travel reimbursement should be paid at the mileage rate set by the IRS annually, which can be found at <https://www.irs.gov/credits-deductions/individuals/standard-mileage-rates-at-a-glance>. Travel/mileage will be reimbursed for no more than \$2,000 per program year per participant.
2. Child Care: To receive child-care payments, participants must show evidence of need, and such payments can be made only when participants cannot afford to pay the child care themselves. Payment will be made only for those days the participant attends training. To document the actual cost of child care that has been provided, the participant must furnish a Documentation of Child Care Form, which gives the dates and hours per day of child care, and the signature of the child-care provider (including date form is signed) and the cost of the child care provided. As stated above, attendance documentation must be kept, and in no instance will payment be made in advance. The participant will be required to sign a receipt documenting payment received for the applicable period. Child Care expenses will be reimbursed for no more than \$2,000 per program year per participant
3. Assistance with Training Uniforms, Work Attire and Related Tools: To receive assistance with training uniforms or appropriate work attire and training/work-related tools, the participant must show evidence of need and the inability to pay for the items himself or herself. Documentation will consist of a completed Supportive Service Documentation form and an invoice (itemized and dated) for the items purchased. The participant will be required to sign a receipt documenting payment received for the applicable period. Uniforms, tools, and attire will be reimbursed for no more than \$2,000 per program year per participant
4. Other: Other needed supportive services to help an individual remain in training or be able to successfully complete program participation, not specified in the above sections, and which the trainee cannot afford, may be provided on a case-by-case basis. Each situation will be evaluated as the need arises, and determination of whether support is needed will be made by the Board Director by way of a waiver request from staff. Proper

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documentation and verification are required. The participant will be required to sign a receipt documenting payment received for the applicable period.

Funding of training and supportive services combined may not exceed a total of \$8,000 in a 12-month period. All WIOA registrants will be made aware of any excess cost of training not covered by the program and for which they will be responsible. Program operators are expected to work closely with participants to determine the individual's ability to contribute to the cost of training and negotiate a funding plan that will adequately meet the needs of the participant while using WIOA funding in the most efficient manner possible.

Payments to clients must be sufficiently documented (i.e.: computer printout showing funds loaded to card, copy of check payment/voucher, client signature acknowledging they received payment).

Waivers

A waiver to the above maximum specifications may be requested from WVWDB director on a case-by-case basis. Waivers must be submitted to and approved by the Director prior to the expenditure of funds. The necessity for waiver must be sufficiently justified documented in order for a waiver to be approved.

Related Forms:

Waiver Request
Documentation of Child Care
Training Attendance Sheet
Supportive Services Documentation

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Title: Individual Training Accounts (ITA)	Related Forms: Yes
Effective Date: 1/27/2017	Revised Date: 12/13/2019

Purpose

The purpose of training is to provide eligible customers with the means to obtain the necessary skills to become gainfully employed or re-employed. This policy is intended to define and establish parameters for Individual Training Account (ITA) development and expenditures.

Reference

Workforce Innovation and Opportunity Act (WIOA) Title 1
00-8 Virginia's Training Voucher System under WIA
VWL #05-08, Individual Training Accounts for Out-of-School and/or Older Youth

Policy

A WIOA-eligible registrant is enrolled in a training program if the Individual Employment Plan (IEP) supports that the training is necessary to transition the participant into the workforce. The training must support the stated purpose of WIOA and be in accordance with the description of training as contained in the Act. Whenever feasible, training vendors will be requested to allow participants to receive credit for required courses when equivalent courses have been completed and can be documented from other training institutions. Additionally, costs associated with College Level Examination Program (CLEP) Testing will be treated as a training cost if the testing relates to the curriculum of study.

Procedure

Eligibility

All recipients of training funds must be eligible based upon criteria established under the Act. WIOA requires the coordination of training costs with funds available under other grant assistance (Section 134). WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources, including PELL Grants, to pay the costs of their training or require assistance beyond that available under grant assistance from other sources, including PELL Grants but excluding loans, to pay the costs of such training to avoid duplication of payment. Individuals must maintain an active application status for PELL assistance. The exact mix of funds shall be determined based on the availability of funding for either training costs or supportive services, with the goal of ensuring that the costs of the training program the participant selects are fully paid, and that necessary supportive services are available so that the training can be completed successfully. The total school budget will be supplied by the vendor based upon a formula used by institutions that determine financial aid. This total school budget is not inclusive of childcare assistance.

Staff should determine and document clearly the need for training for each participant in both the Individual Employment Plan (IEP) as well as in case notes in the system of record, the Virginia Workforce Connection (VaWC).

Occupational Areas of Training



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The training provided through ITAs is for the sole purpose of facilitating transition into the workforce. All training will be for occupations identified as in demand in the labor market and determined to be of priority by the Western Virginia Workforce Development Board (WVWDB) in the Local Plan.

Staff may request a waiver for participants that are interested in training outside of these target sectors and occupations. Waivers must be requested, with all required documentation, and approved by the WVWDB Director prior to approving funding for the participant. Waiver documentation must include, at a minimum:

- justification within the participant's IEP identifying occupation interest and/or aptitude;
- barriers to employment and/or training in the target sectors and occupations;
- and local labor market information including LMI data as well as at least 3 different current job openings paying a self-sufficient wage (as defined in our Eligibility policy) for the occupation connected to the training.

These items must be attached to the waiver request form to the WVWDB Director. Waivers may be available for no more than 5% of funds budgeted annually by line item and by program (i.e.: 5% of the Adult ITA budget, etc.).

Training funded specifically for Commercial Driver's License (CDL) may not exceed 25% of the total occupational skills training budget, per program, per year.

Training Selection

Training will be provided for priority occupations only as determined by the Board by an institution or organization certified as meeting the criteria and having completed the procedures outlined in the Eligible Training Provider Certification policy. Participants have choice of any approved provider and approved program that is on the statewide ETPL housed within the system of record, VAWC. Approval for local funding, however, will be based on criteria listed within this policy as well as funding limitations within supportive services that may be required for trainings.

Length of Training

The purpose of training services is to provide eligible customers with the means to obtain the necessary skills to become gainfully employed or re-employed. Training length will vary according to the type of training and the requirements outlined in the vendor agreement. Because entering or returning to the workforce is a priority under WIOA training, training cannot exceed more than 24 calendar months. Training should lead to an industry-recognized certification and employment that earns a sustainable wage. Participants whose IEP includes training lasting more than 24 months must request a waiver from the WVWDB Director PRIOR to beginning the training and expenditure of funds. Participants whose training was planned for less than 24 months but who require additional time to complete the program of study must request a waiver.

Repeat Training

The WVWDB will NOT provide funding for courses/programs previously funded but not successfully completed.

Cost Limitation

The local WVVWDB limits training cost to no more than \$3,500 per participant within a twelve-month period, except as approved by the WVVWDB Director prior to the expenditure of funds. Funding of training and supportive services combined may not exceed a total of \$6,000 in a 12-month period. All WIOA registrants will be made aware of any excess cost of training not covered by the program for which they will be responsible. Program operators are expected to work closely with participants to determine the individuals' ability to contribute to the cost of training and negotiate a funding plan that will adequately meet the needs of the participant while using WIOA funding in the most efficient manner possible.

WIOA Title I training funding is always a payor of last resort. This means any and all other funding sources should be explored for potential payment, prior to WIOA Title I funds being obligated and/or expended for training. Examples may include: scholarships, federal financial aid, other private or public grant funding, etc. Furthermore, if a participant chooses a training which has a cost higher than that of the approved ITA limit, the WVVWDB does not encourage participants to secure loans to pay the difference. The source of payment for remainder of amount due would be participant responsibility and should be verified PRIOR to obligating or expending WIOA Title I funds.

Administration

All requests for ITA funding must be supported in the participant's IEP. Contact with the participant is required. All participants are also required to complete performance reviews with their case manager on a quarterly/ semester/module basis in accordance with the timeframes outlined on the IEP. ITA funding is authorized on a semester/quarterly/module basis and requires documentation that the participant has successfully completed previous work. Discontinuation of funding for students who are not performing or demonstrating satisfactory progress toward completion of training goals is allowed. Students are expected to maintain no less than a cumulative 2.0 grade point average for the year in order to continue to receive WIOA funding. Invoices from training providers must be placed in customer files with vouchers to substantiate payments. Vouchers must have all signature lines successfully signed prior to payments being made. Payment are made to training providers on behalf of an individual participant. Payments are not made to participants directly and are not made as reimbursements for expenses paid by participants prior to program enrollment and/or approval from program operator.

Waivers

A waiver to the above maximum specifications may be requested from WVVWDB director on a case-by-case basis. Waivers must be submitted and approved by the Director prior to the expenditure of funds. The necessity for waiver must be sufficiently justified and documented for a waiver to be approved. The Executive Director may approve exceptions to the cost limit up to \$8000 maximum limit for the following: computer & information systems training and certification; healthcare training and certification; and manufacturing & processing training and certification. Please note, the eligible training provider who receives the maximum waiver amount of WIOA funds to serve a WIOA participant will need to include certification testing and placement into employment as part of their training cost.

**Related Forms:**

Waiver Request

Training Policy & Selection

Training Plan

Training Policy & Selection



Title: Adult, Dislocated Worker and Youth Eligibility	Related Forms: Yes
Effective Date: 1/27/2017	Revised Date: 12/13/2019

Purpose:

To ensure proper eligibility determinations for participation in WIOA programs and receipt of WIOA funds.

References:

VWL #15-02 Eligibility Guidelines
VWL 15-02 Attachment A: WIOA Adult Eligibility
Attachment B: WIOA Dislocated Worker
Attachment C: WIOA Youth Eligibility
Attachment D: Verification and Documentation for WIOA Eligibility
Attachment E: Selective Service Requirements
Attachment F: Family Size/Family Income
Attachment G: Self-Certification and Telephone/Document Inspection Verification Requirements
Attachment H: WIOA Definitions for Title I Eligibility
Attachment I: WIOA Eligibility Checklist for Adults and Dislocated Workers
Attachment J: WIOA Eligibility Checklist for In-School Youth
Attachment K: WIOA Eligibility Checklist for Out of School Youth
WIOA Sections 170 and 129

Policy:

It is the policy of the Western Virginia Workforce Development Board (WVWDB) to follow all federal guidelines and state guidance in determining eligibility for participants in and recipients of WIOA programs. The WVWDB and its' Service Providers will use their guidance to ensure accurate eligibility determinations are made. It is the current policy of the Western Virginia Workforce Development Board (WVWDB) to opt out of providing services to 5% of youth served that do not meet the income criterion. If this becomes a process we choose to participate in in the future, a policy will be created regarding these participants.

Procedure:**Self-Sufficiency Determination**

To better serve the adult population of our area, adults who are a member of a family whose income exceeds the Lower Living Standard Income Level (LLSIL) but not in excess of 175% may also receive WIOA services as an established priority group. Additionally, income self-sufficiency of a Dislocated Worker will be calculated as the higher of 175% of the LLSIL or 80% of the layoff wage. The LLSIL is established annually by the Department of Labor and can be found at <https://www.doleta.gov/llsil/>.

Unlikely to Return Determination

Unlikely to obtain employment in a previous industry or occupation within six (6) months from date of termination or layoff due to general economic conditions of the area. Consideration will be given to declining industries or occupations or obsolete individual skills in a demand occupation or industry that could preclude an individual from being competitive or finding reemployment in the current occupation without the upgrading of skills.

Suitability

Suitability must be determined through the assessed ability and the perceived personal commitment of the participant to attend activities, to successfully complete these activities and to acquire employment and/or post-secondary/advanced skill placement. While persons may be fully eligible for WIOA Title I programs, they may not be suitable pending resolution of immediate issues. Examples of an individual who may not be suitable include:

- An individual who does not meet eligibility requirements;
- Persons requiring extensive support beyond that of the WIOA Title I Programs;
- Persons whose needs are better served by another agency or program;
- Persons whose lives are in immediate crisis & who cannot participate at the time of determination;
- Persons who cannot commit time sufficient for participation in WIOA Title I Programs;
- Persons who consistently fail to attend scheduled meetings or appointments.

Should an applicant be determined not suitable, there must be proper documentation of the reason for denial of access to the program. Case notes must be entered to support the suitability determination.

Youth in Need of Additional Assistance

Youth identified during the initial intake assessment and eligibility process as meeting one of the following may be considered an individual (including a youth with a disability) who requires additional assistance to complete an education program or secure and hold employment:

- Lacking work experience for those aged 17 years old and above
- Having difficulty keeping employment meaning an individual aged 17 years or older who has not worked for the same employer for longer than 3 consecutive months in the prior twelve months
- Residing in a single parent household
- Residing in, or has resided in during the past 2 years, a residential placement facility, including a detention facility, substance abuse treatment facility, emergency shelter, psychiatric hospital, halfway house or foster group home (this must be verified with documentation from the facility, verbal or written)
- Living with a family member in the household who is unemployed or has lost their job during the past 12 weeks (includes spouse, parent or sibling over 18)
- Natural disaster evacuees

The case file must include documentation as to how the determination was made (i.e. official documents, verification from employer or educator, etc.). Documentation must also include a



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well-articulated statement via case note by the Case Manager that clearly defines and explains the rationale for the decision to use this barrier(s) and how participation in the services selected will support the Youth's chances for securing employment or completing an education program in order to secure employment.

CoEnrollment with Partner Programs

All efforts are to be made to enroll WIOA Title I participants with any partner program that is applicable to that participant's needs & circumstances. Examples may include enrolling a 22 year old into the WIOA Title I Adult program as well as the WIOA Title I Youth program, because they would benefit from a youth program element not available through the Adult program, or enrolling a WIOA Title I Dislocated Worker participant into the Trade Act program through the VEC, for extended benefits following their employment termination. Whatever program(s) an individual is enrolled into, they must meet the participation requirements of both/all. It is the duty of the WIOA Title I Program staff to ensure open lines of communication exist between staff all parties involved and information is shared, as necessary for program services to be provided and successfully completed.

Additional Documentation Requirements

The state provided eligibility checklists must be in case files and completed accurately. Per state guidance, a letter from HUD verifying that an individual is currently receiving a rent subsidy is substantial verification for low-income status, as HUD has already verified income. For citizenship verification, the actual I-9 form does not need to be in the file, rather the documentation from the I-9 form. Clients should date all forms when they sign them as indicated on forms, only those without a date line are not required to be dated the date they are signed.

Active clients must be contacted at least once every 30 days. Cases should be updated in VAWC with a case note reflecting the individual contacted, the conversation, information received & provided, and actions taken following the contact. Case notes within VAWC must be entered timely, within 10 days of the contact date. These case notes should be entered while a case is active as well as during follow-up, to document each contact or attempted contact with the client. Telephone call log books should not be kept alone, a case note should be entered for every call made & received with clients. If kept, they must be stored in locked cabinets and surrendered to the Board with closed files.

For those items that can be verified by self-attestation, self-attestation can only be used as verification as a last resort, when absolutely no other source of verification is available. The reason and justification for using self-attestation & documentation of attempts to verify with acceptable sources must be made in a case note.

For eligibility purposes, barriers to education/employment should be documented following guidance found in Federal, State and local policy. All barriers should have tangible documentation found within the physical case file and/or the electronic system of record (VaWC).



Related Forms:

Adult and Dislocated Worker Eligibility Checklist

Out of School Youth Eligibility Checklist

In School Youth Eligibility Checklist

Telephone Verification / Document Inspection Form

Supplemental Application Questionnaire

Social Services Verification

Self-Certification Form

Offender Verification

Employment Verification

DRS Disability Verification

Consumer Report Release

Consent to Exchange Information

Follow Up Agreement

Adult/Dislocated Worker IEP

Youth IEP

VEC Release Form



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Title: File and Information Maintenance	Related Forms: Yes
Effective Date: 1/27/2017	Revised Date: 9/26/2019

Purpose:

To protect confidentiality of all WVVWDB customer private and personal information and maintain files in an organized and relevant manner.

References:

VWL #14-02 Guidance on the Handling and Protection of Personally Identifiable Information
Privacy Protection Act of 1980
VWL #16-03 Standardized Participant File Format
VWL #16-03 Attachment A, Standardized Participant File Format
29 CFR Part 37
VWL #11-03 Record Retention
VWL #14-09

Policy:

The Western Virginia Workforce Development Board (WVVWDB) is committed to protecting the personally identifiable information (PII) and other confidential information of all customers. Signed consent forms must be obtained for an individual to authorize the release of personal information. Additionally, the WVVWDB will follow all state guidelines and guidance regarding file format for WIOA programs.

Procedure:

Protected PII is defined by the US Department of Labor as that which, if disclosed, could result in harm to the individual whose name or identity is linked to that information. Some examples include social security numbers, addresses, credit card numbers, bank account numbers, home telephone numbers, ages, birthdate, or marital status.

All WIOA customers must be advised of this policy. All WIOA Staff and Service Providers are required to sign a confidentiality pledge which specifies that the individual is aware of the priority placed on confidentiality and the customer's right to privacy. The WIOA Staff/Service Provider pledge will also include an understanding that when/if their role terminates/changes, all PII obtained that is no longer required for job duties must be surrendered to the WVVWDB at that time. In projects for feedback, performance or other statistical goals, results may only be reported as group data, no individual results may be reported. This same policy holds true for collection of market opinion surveys, panel or focus group findings and research of satisfaction among other customer groups.



Prior to collection of PII or sensitive personal information:

- a. Individuals shall be notified that such information will only be used for purposes of service under the WIOA-funded grant program and its attendant regulations. As part of the WIOA program application individuals shall sign a release acknowledging such.
- b. Individuals shall also be notified that with written consent, such information may be shared with other partner organizations for purposes of referral and potential coordination of services beyond WIOA.
- c. The individual may agree in writing to release all or portions of their information and be provided the opportunity to indicate what information may or may not be shared. The individual may also indicate if there are specific organization(s) to which their information may not be shared. The consent may be modified or revoked by the individual at any time by providing written notice. Customer initials should be obtained to document customer designations and subsequent changes.

Written consent for release of information will remain in effect from the date of signature for 5 years allowing for the training period and follow up to occur. The customer will be advised of this policy at the time of the signing of the release form. If the customer objects to signing due to the 5-year timeframe, an adjustment in timeframe may be made by WVVWDB staff.

In order to protect PII once collected, the following guidelines must be followed:

- a. PII of WIA participants shall not be transmitted by email or stored on CDs, DVDs, thumb drives etc. unless it can be encrypted using federally approved standards. Only the WVVWDB may grant such permission with advance written approval and, at the time of the request, will convey the necessary standards to be followed.
- b. All PII data of WIOA participants shall be stored, always, in an area that is physically safe from access by unauthorized persons and the data will be processed electronically using the state WIOA system of record as communicated. Accessing, processing and storing of WIOA grant PII data on personally owned equipment, at off-site locations and by non-grantee managed IT services is strictly prohibited unless approved by the Commonwealth of Virginia.
- c. PII and sensitive data will only be retained and destroyed in accordance with state guidance.
- d. No PII or sensitive information will be used for any purpose other than necessary under WIOA. Any information collected for customer service or continuous improvement efforts will be aggregated, reported anonymously without any connection to an individual.



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e. When/if there is a change in Service Provider/WIOA Staff, all PII that has been collected by that staff person/provider must be surrendered to the WVVDB in order to transfer it to the new provider/staff.

Files should be documented properly for any and all activities with clients. For example, if Staff Assisted Job Search is provided, a copy of the job listing or flyer for the job fair that client was referred to should be placed in file to substantiate action. Each activity should have documentation to explain and show how the activity was provided. Additionally, any & all barriers that are identified should be addressed within each client's IEP (Individualized Employment Plan). For example, if an individual is identified as being basic skills deficient, that barrier should be identified within the IEP with steps and actions to eliminate or mitigate that barrier.

All files and other work-related records shall only be in possession of staff as needed for their specific job duties. When/if any individual is no longer in need of any files or records for the duties of their job, all records & files must be returned to WVVDB administrative staff. Formal documentation of the return or surrender of records may be required. Records and files may include, but are not limited to, program participant files, access to electronic records, access to work-related software programs, work phone and/or phone information (i.e.: texts, pictures, etc.), and emails.

Related Forms:

Consent to Exchange Information

Confidentiality Pledge

Program Operation Transition Agreement