North Central
Workforce Development Area

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LOCAL DIRECTIVE

Directive #:	17-160 REV 5	Date:	September 12, 2025

TO:	SkillSource Staff and Service Providers
FROM:	Lisa Romine, Executive Director
SUBJECT:	Participant File Maintenance and Data Entry
SUPERCEDES:	Directive # 17-160 Rev 4

Summary of Revisions:

1) Directs local procedure for case file storage and organization, including where and how participant information is documented and stored in the state's MIS and in paper files.
2) Updates references throughout.

This directive is meant to provide guidance and standardized expectations for real-time data, service entry for WIOA Title I activities, and participant information storage, in accordance with TEGL 10-16, WorkSource Policy 1029, and WorkSource Policy 1020 Rev 2. The expectation is that participant information is accurately, completely, and efficiently recorded, and securely stored.

REAL TIME DATA ENTRY

- Time limits for entering Basic and Individualized, Training, and Support services: Immediately, no later than 14 calendar days after service delivery.
- Staff should update and/or edit Activity End Date, Notes, Actual Outcomes, and other fields in Basic or ITS services as appropriate.
- Changes/corrections to certain data elements may need to be performed by Department Heads (Managers, Managing Director, and Performance Analyst) per instructions outlined in WorkSource Policy 1020 Rev 2. Managers will ensure compliance with data entry timeline requirements.

SERVICE ENTRY ACCURACY

- When a service is provided, identify the appropriate qualifying service (located in the WorkSource Services Catalog). The service provided must correspond to the definition provided in the Services Catalog.
- The first service touchpoint that triggers enrollment must be accompanied by a program enrollment touchpoint on the same date.
- Follow-up services, self-service, and providing workforce info do not trigger or extend participation or factor into performance.
- Enter services on the Basic Services Touchpoint, the ITS Touchpoint, or the Follow-Up Touchpoint.
- Endeavor to enter all case notes 'inside' the corresponding service touchpoint as opposed to entering a case note touchpoint AND a separate service touchpoint.

- Record all services received by participant that contribute to IEP goals, including training paid for by non-WIOA funds. Specify fund source used for the activity.
- Emails or phone messages left for participants do not constitute services in and of themselves.
- Utilize the last date of service as the program completion date.
- A participant is system exited when 90 days have passed with no qualifying service.
- Application procedure requests Participant disclose their SSN. However, services may not be withheld if the participant chooses not to. Refer to Attachment A of WIN 0081 Change 3 for procedures to create a participant record in ETO for an individual who does not disclose their SSN. Refusal or inability to disclose the SSN should be mentioned in the eligibility application case note.
- When entering WIOA Eligibility Application, trainers should impersonate the participant in WorkSourceWA (using the "Access Seeker/Participant Account" button on the ETO dashboard) to verify that the participant has a job match account. If not, create the account and enter the participant's data as necessary.

CASE NOTES

Initial Note: First note should always indicate the date of application. Tell the applicant's story - briefly.

> ***Vitals:*** Name, age, family status, employment history (type of work), education status.
> ***Interest****:* What have they told you they want?
> **Assessment:** What does their assessment tell you? (Skill levels, interests/ barriers)
> ***Plan:*** What is the plan? Brief description of the plan developed with the customer (i.e.: will attend basic skills brush up while attending computer literacy, will explore a work experience and possibly OJT for occupational skills)
> ***Eligibility***: State clearly what program they are eligible for and will be enrolled in (i.e.: Adult, DW, Youth, other 10%, etc.). If employed at application, state whether they are underemployed (not self-sufficient). For Adults, indicate Priority Level 1-5.

Ongoing Notes:

Start each note with the appropriate date of service, as ETO records display the date of note entry, not the date of service.)

- Make monthly contacts at minimum, more frequent if necessary.
- When assigning a training activity, justify the need for the training. Describe why this training is necessary in terms of skills needed in comparison to their work history and experience. For ITA, describe all other program resources the participant has explored for the training.
- All status changes (new activities/services) entered into ETO should be reflected in the case note with a brief explanation/rationale and corresponding date.
- **Ongoing or progress case notes for duration services such as (OJT, ITA, WEX, etc) are to be added to the case note in the original service touchpoint. Begin each entry with the date of the update or site visit keeping the most recent note at the top.**
- When documenting counseling/coaching sessions, describe the agreed upon expectations in a measurable way. (i.e.: Brad has been arriving late to work periodically for the past two weeks. Brad has committed to leaving home 10 minutes earlier to make sure he gets to work by 8:00 every morning.) This will help you to assist them with accountability.
- Avoid duplicating information that can simply be inserted in the file (i.e.: listing all classes and resulting grades when the grade report from the school is inserted)
- Recap progress discussions with participants and supervisors/instructors. On site visits must be made monthly, at minimum, for WEX, INT, OJT.
- As a general rule: be descriptive yet concise.
- Avoid the use of uncommon or local acronyms and jargon in case notes (i.e. "Adult Priority 2" instead of "LAP2").
- Medical and disability-related information must be kept in a separate file in a secure location apart from the participant file. Access to this information must be limited to appropriate training staff. Case notes in the ETO record may be written to document effects or limitations imposed on the participant instead of disclosing specific medical or disability-related information (for example, say

"participant cannot lift more than 20 pounds or stand for longer than one hour" instead of describing medical condition). See WorkSource Policy 1031 for specific guidance.

FILE STORAGE

Staff will maintain a physical paper file for all participants enrolled in WIOA Title I and related discretionary programs (EcSA, DWGs, etc.). This file will contain physical copies of eligibility applications and documentation, training contracts, support service authorizations/documentations and receipts, evidence of credential or measurable skill gain, and other pertinent documentation as required by federal and state policy. Participant files will be stored in securely locked containers (cabinets, file boxes or desk drawers) or rooms when not in active use (i.e. when SkillSource staff or other authorized system users are not present). Confidential medical and disability-related information will be stored separately from the participant file as noted above.

FILE ORGANIZATION

Staff will follow established file checklists for organization of paper files, using standard six-way file folders. Participant case note hard copies are not required to be stored in the participant file. See attachments A and B for participant file checklists.

Attachment A. Adult/DW/EcSA/DWG File Checklist

PARTICIPANT FILE CHECKLIST – ADULT/DW/EcSA/DWG			
Tab 1 – Miscellaneous/ Support Documents			
	File Checklist		Purchase orders/Payment Receipts
	Support Service Analysis & Worksheets		Exit/Placement From (Green)
Tab 2 – Eligibility			
	WIOA/Special Eligibility Application		EO Notice
	Self-Attestation (if used)		WIOA Complaint & Hearing Notice
	Verification checklist(s)		Data Sharing/SMS Opt-in
	Income and Family Size Worksheet (if used)		Release of Information
	Verification Documents (I-9 documents, DOB proof, Selective Service/DD-214, proof of low income or dislocation)		Printout of eligibility application case note
	Release for Publication		Other documentation as required
Tab 3 – State EcSA/CRP Documents			
	UW Self-Sufficiency Calculator (Initial and updates)		EcSA Monthly Incentive Plan & Progress Tracker
	EcSA/CRP Incentive Agreement Form (if applicable)		MISA Agreement, Plan and other forms (if applicable)
	EcSA & CRF Performance Reports & Incentive Forms (if applicable)		
Tab 4 – IEP & Assessments			
	Individual Employment Plan (signed, updated)		CASAS Scores
	CareerScope Results		Other Assessments
	Resume (if available)		
Tab 5 – Training/WFP Activities			
	OJT:		**ITA:**
	Contract		Contract
	Assurances A& B		ETPL Documentation
	Tool Agreement (if applicable)		Verification of Financial Aid/Application
	Employer W-9		Employer Interview Forms x 2
	OJT Estimate		Application for ITA
	Task Analysis		Training Account Agreement
	Occupation Demand documentation		CAT or Training Benefit Application (if applicable)
	Monthly Evaluations		Occupation Demand Information
	Monthly Invoices		College Refund Policy
			College Vocational Plan
	Workforce Prep/Work Readiness:		Tool Agreement (if applicable)
	Workforce Preparation plan information		
	Course descriptions/schedules		
	Progress verification		
	Certificates of Completion		
Tab 6 – Measurable Skills Gains/Credentials			
	Grades/transcripts (ITA)		Copy of credentials (Commercial Driver's License, etc.)
	Certificates of Completion		Exam Scores
	Other MSG Documentation		

Attachment B. Youth File Checklist

PARTICIPANT FILE CHECKLIST – Youth			
Tab 1 – Miscellaneous/ Support Documents			
	File Checklist		Purchase orders/Payment Receipts
	Support Service Analysis & Worksheets		Exit/Placement From (Green)
	Follow-Up Quarterly Information		
Tab 2 – Eligibility			
	WIOA/Special Eligibility Application		EO Notice
	Self-Attestation (if used)		WIOA Complaint & Hearing Notice
	Verification checklist / Youth Verification Record		Data Sharing/SMS Opt-in
	Income and Family Size Worksheet (if used)		Release of Information
	Verification Documents (I-9 documents, DOB proof, Selective Service/DD-214, proof of low income or dislocation, Open Doors application)		Printout of eligibility application case note
	Release for Publication		Field Trip Permission
Tab 3 – Assessments			
	Career Bridge		Strengths Assessment
	WorkKeys		CASAS Scores
	PAQ		Support Service Paperwork
	Rating Scale		Self-Assessment Questionnaire
Tab 4 – ISS			
	Individual Service Strategy (signed, updated)		Goals-Strategy to Attain
	Reflect Interest & Connect to Assessment		Reflect need for Support Service
Tab 5 – Education Activities			
	BASIC SKILLS:		**COMPUTER BASICS:**
	Post CASAS Diagnostic		Ic3
	Incentive Agreement Form		MOS
	Incentive Payments		Certificates of Completion
	GED Certificate/High School Diploma		
	Career Readiness Workshop Certificate		
Tab 6 – Work-Based Learning			
	WORK EXPERIENCE:		**INTERNSHIP/OJT:**
	Training Agreement (incl. Amendments)		Job Analysis
	Assurances A&B		Training Agreement/Contract (incl. Amendments)
	Worksite monitoring form		Assurances A&B
	I-9		Timesheet
	Work Readiness Evaluations		Payroll Enrollment/W4
	Timesheets		Occupation Demand Information (OJT only)
	Payroll Enrollment/W4		Tool Agreement
	Parent/School Authorization		WorkKeys Assessment

10/1/2025 AP