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I. APPLICABILITY/SCOPE

This policy applies to services delivered through the Workforce Innovative Opportunity Act (WIOA Title IB) ARIZONA@WORK City of Phoenix Youth Workforce Development Program and impacts all internal and external partners who are part of service delivery system.

II. PURPOSE

The purpose of this policy is to keep intact and accessible all financial records, supporting source documents, statistical records, and other records pertinent to performance and compliance under WIOA Title IB. The records retention and custodial requirements extend not only to the records of the Local Workforce Development Area (LWDA), but also to those of its subrecipients.

I. BACKGROUND

The Arizona Job Connection (AJC) system was created to maintain documentation for WIOA Title IB participants. The WIOA Title IB participant's official case file is the electronic AJC program file. LWDAs and providers must retain original documentation in each participant's program file.

II. POLICY

Youth providers must maintain a hard copy, physical file to document eligibility requirements in accordance with State requirements. Also, all documents that require an original applicant signature must be maintained in the hard copy file. All Youth providers are required to use the **File Review Checklist** (Refer to Section VII.B.1.) on all WIOA Title IB Youth participants. Information and documentation that must be maintained in the file includes but is not limited to eligibility information, AJC enrollment printout, assessment information, financial information, Work Experience Agreement (WEX) / Occupational Training Agreement (OTA), other contracts, and miscellaneous information.

A. Hard Copy File

The following documents (hard copy) are required in the individual's case file:

- 1. WIOA Title IB Youth Application;
- 2. All documents required by AJC to document applicable eligibility items are:
 - a. Citizenship Proof
 - b. Date of Birth Documentation
 - c. Low-Income Verification (if needed)
 - d. Family Income
 - e. Family Size

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- f. Existing Pell Grant Information
- g. Receipt of Public Assistance Documentation
- h. Right to Work Documentation
- i. Social Security Number Proof
- j. TABE test scores
- k. Substance Abuse (if needed)
- I. Substantial Disability (if needed)
- m. Underachiever (if needed)
- n. Youth Barriers
- 3. Current **Equal Opportunity Is the Law /Complaint Procedures** (*Refer to Section VII.B.2.*) signed and dated by the applicant;
- 4. **Authorization to Release Information** (*Refer to Section VII.B.3*) signed and dated by the applicant;
- Career and College Blueprint (Refer to Section VII.B.4) signed and dated by the applicant and staff. Proof of Employment (Employment verification form, fetters from employer or school, pay-check stubs, etc.), copy of credential and date;
- 6. Out-of-School Youth status at exit/follow up (Advanced training or Post-secondary education, employment.), and relevant documentation;
- 7. In-School Youth status at exit/follow up (for attained H.S. diploma or HSE), and relevant documentation, (attendance records);
- 8. In-School Youth placement information at exit/follow up;
- 9. Other exit reason (Institutionalized, health/medical, deceased, reservist called to active duty);
- 10. GAP in service (Waiting for planned activities or health/medical or time and attendance records);
- 11. Receipts, invoices, etc. for supportive services;
- 12. Any other documents requiring the applicant/participant signature or required by AJC;
- 13. Objective Assessment documentation;
- 14. Case Notes:
- 15. WEX documentation;
- 16. OTA documentation; and
- 17. Any other relevant documentation, such as progress reports & attendance records.

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B. <u>Uploading Documents into AJC</u>

As provided in the City of Phoenix Guidance Letter 16-005, dated September 9, 2016. Youth providers will now be required to upload eligibility and data validation documents into AJC. Below are additional details and expectations regarding this process:

- 1. Documents are to be uploaded as part of the eligibility process, so they are available for the supervisor's review during the AJC pending enrollment approval process. Documents must be in a PDF format.
- 2. Documents are to be saved in the designated shared drive within the Local Workforce Development Area and deleted once the upload process is completed due to containing Personally Identifiable Information (PII). Youth providers shall discuss secure storage options with the appropriate agency security staff to determine the most secured space for temporary storage. Youth provider's use of email for scanning eligibility documents also poses a risk and should be a practice of last resort, only if security measures are sufficient to ensure that only those with appropriate clearances have access to the documentation. PII shall never be stored in an email.
- 3. The process starts with the document that is being used to establish eligibility and/or for validation of a required data entry field in AJC. Once eligibility is completed and documents uploaded, further uploading of documentation is likely for data validation purposes, such as validating the receipt of a credential, for documenting supplemental wages, and/or test scores.

C. Record Retention

The official AJC records are maintained by the State of Arizona. However, hard copy file records of WIOA Title IB local participants must be retained for five years after exit. Applications that do not result in registration are maintained on file for one year after the date of application, including supporting documentation. The City of Phoenix Business and Workforce Development Division reserves the right to ask for the records throughout the duration of the five years.

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Administrative revisions to the policy may be made by the Phoenix Business and Workforce Development (PBWD) Board Executive Director, with notice to the PBWD Board's Executive Leadership Committee. All other substantive revisions will go to the PBWD Board's Advancing Youth Workforce Committee for review and recommendation to the PBWD Board for approval.

VII. ADDITIONAL OR MISCELLANEOUS INFORMATION

- A. Related Workforce Development Program References
 - Department of Economic Security Policy and Procedure Manual -Workforce Innovation and Opportunity Act (WIOA) https://des.az.gov/services/employment/workforce-innovation-and-opportunity-act/policy-and-procedure-manual-workforce
- B. Youth Provider Forms
 - 1. Attachment A: File Review Checklist
 - 2. Attachment B: Equal Opportunity Is the Law/Complaint Procedures
 - 3. Attachment C: Authorization to Release Information Form
 - 4. Attachment D: Career and College Blueprint