



## **MANAGEMENT INFORMATION SYSTEM POLICY AND DATA VALIDATION INTEGRITY**

**Policy Number: 206, Revision 10**  
**Effective Date: July 1, 2019**  
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### **I. BACKGROUND:**

The purpose of this bulletin is to identify the Management Information System (MIS) processes for the Workforce Innovation Opportunity Act (WIOA) Adult, Dislocated Worker, Youth, and any Discretionary Programs that are administered by the South Central Workforce (SCW).

Data Element Validation (DEV) is the federally mandated process by which the State of Washington annually monitors the accuracy of reported participant data for the Participant Individual Record Layout (PIRL).

The PIRL was developed collaboratively by the U.S. Department of Labor (DOL) and the U.S. Department of Education as part of the WIOA performance accountability-related provisions. The data elements entered the state-provided database are captured by the State of Washington and reported via the PIRL to DOL for annual WIOA performance reporting. It is imperative to accurately enter data into the state-provided database to ensure quality data validation of information for performance reporting to DOL.

### **II. GENERAL POLICY:**

This policy provides parameters for the design and implementation of WIOA program information using both software and staff to identify, track, report, and analyze for performance, data collection, and validation, as well as program improvement.

This guidance is to maintain the integrity of the state-provided database system, assess compliance with applicable laws and regulations, and identify successful and positive methods and practices that serve to enhance the system.

### III. DOCUMENT STORAGE AND ORGANIZATION:

This includes, but is not limited to, all documents related to program eligibility, participation, financial records, and other participant-related documents that are subject to monitoring.

This requirement applies to the following U.S. Department of Labor-funded programs:

- WIOA Title I-B Youth
- WIOA Title I-B Adult
- WIOA Title I-B Dislocated Workers
- WIOA Title I-B Statewide Activities
- National Dislocated Worker Grant

Participant activities requiring touchpoints must be recorded in the State MIS, with corresponding backup documentation maintained in the participant's paper file. During State or DOL monitoring, sample participant paper files will be scanned and uploaded to the designated MFT site for review in a single ZIP file folder. The ZIP file folder will be organized in the following structure:

1. Program Folder for each program under review.
  - a. Within each program folder file, a separate subfolder will be created for each participant selected for review. Each participant subfolder must follow the naming convention below:
    - i. Format: **(No.) [Participant's ETO/Case #] [First Initial]. [Last Name]**
    - ii. Example: **(1) 123456 T. Doe**
  - b. Within each participant subfolder file, documents will be organized into the following groups. Each group will be labeled according to the naming convention provided. If a participant is co-enrolled in multiple programs, the program name must be included before the document group name to identify which program the documents pertain to.

<b>Document Group</b>	<b>Naming Convention Example</b>
i. Eligibility Documents	123456 T. Doe Elig Docs
ii. Exit Documents	123456 T. Doe Exit Docs
iii. Case Notes	123456 T. Doe Case Notes
iv. Incentive Payments	123456 T. Doe Incentives
v. Support Services	123456 T. Doe Support Services
vi. Training Documents & Expenses	123456 T. Doe Training Docs & Exp
vii. Training Resource Map	123456 T. Doe Training Resource Map
viii. Personal Resource Worksheet	123456 T. Doe Personal Resource Worksheet
ix. General Ledger	123456 T. Doe General Ledger
x. <i>If applicable:</i> If any of the above document groups contain confidential information, those files must be placed in a separate subfolder labeled “Confidential File” within the participant’s folder.	

#### IV. VALIDATION REQUIREMENTS:

Contractors will conduct an administrative review for timeliness, accuracy, and completeness of all forms and documents before submitting to SCW. The review will include all information entered into the state-provided database, such as Eligibility Applications, services, and supporting documentation for completeness and internal consistency.

All handwritten and signed forms completed by participants and case managers must be done in ink or via electronic means (see Attachment 3, Eligibility Policy Handbook for Remote or Virtual Eligibility Documentation Requirements, sections 203A, 203 B, or 203C). If the participant is a minor, a guardian's signature is required, or the application will not be approved. Contractors are required to utilize the following attachments when submitting paperwork to SCW:

- Attachment 1A: MIS Enrollment Transmittal Sheet
- Attachment 1C: MIS Exit Performance Transmittal Sheet

## V. MIS PROCESS AND PROCEDURE:

### A. Eligibility

The SCW is requiring the Contractor to conduct a 100% administrative review of eligibility and supporting documentation. This process will safeguard against disallowed costs. The Contracting Agency's Representative (Case Manager) and the Administrative Reviewer (Contractor's MIS) must sign the Eligibility Application attesting to its eligibility and validation.

### B. Data Entry Requirements

Entry into the state-provided database must include, at a minimum, the following:

#### 1. WIOA Enrollment

- a. A qualifying service is entered to trigger enrollment into the WIOA programs.

#### 2. Active Participation

- a. Within 60 days of enrollment, a qualifying service must be entered to maintain enrollment as an active participant.
- b. A qualifying service must be entered within 60 days before an exit occurs.
  - i. Note: If a service is not entered within 89 days of the previous service, the participant will be soft-exited.
- c. Services offered at a point in time, other than support services, must be entered every 60 days to document case management services provided to the participant (for example, progress in training or education).
- d. To further document case management, a status case note is required monthly. As this is not a service, a touchpoint is not required in the statewide database.
  - i. Note: Case managers must utilize Attachment 5, Service vs. Update Desk Aid when determining if entry into the statewide database is needed.
- e. Support services must be entered on the date they are authorized, whether the participant uses the service or not. If the support service is not used by the participant, it must be documented in case notes.

- f. Services that occur over a durational period must be entered when applicable (for example, Occupational Skills Training or Adult Basic Education).
3. Exit and Follow-Up
- a. The day the participant exited is the same day that Follow-Up Services begins. See Administrative Bulletin 220 Follow-Up Career Services.

Note: Case notes **must** accompany every qualifying service entered the state-provided database. See Administrative Bulletin 207 Case Notes for further information.

## VI. PAPERWORK SUBMISSION TIMELINE:

All WIOA Applications have a 60-calendar-day timeframe where the eligibility information is valid. Anything beyond that timeframe, the information is expired. All Contractors must submit all applications and supporting eligibility documentation within 45 calendar days of entering eligibility into the state-provided database. This will allow the SCW 15 calendar days to review and approve the application. Contractors may request from the SCW additional time beyond the 45 calendar days in writing. Refer to Attachment 2, Paperwork Flow Chart, for documentation submission requirements.

Services must be entered into the state-provided database within 14 calendar days, and the service date entered must always reflect the date of the actual service provided. Any services entered after the 14-day calendar timeline must have a Department Head's review and approval. The late entry case note must document the Department Head's approval, type of service, date of service, and reason for late entry.

In the interest of data integrity, it is imperative, to the fullest extent possible, that data entered into the state-provided database accurately reflect the service provided at the time the service was provided. Therefore, the minimum state-provided database entry requirements are as follows:

- a. Services must be entered at the point in time they are delivered.
- b. If a service cannot be entered at the time they are delivered, Basic services and Individualized Training and Supportive Service (ITSS) **must be entered within 14**

calendar days of service delivery. The service date entered must always reflect the date the service was delivered.

Note: Other than the two TouchPoints noted above, these data entry limitations do not impact any other TouchPoints, including the follow-up services, test and results, or placement information TouchPoints. This requirement will only limit staff to entering Activity Start Dates for the Basic Services and ITSS TouchPoints for services within 14 calendar days of providing the service. In addition, this requirement will not prevent staff from appropriately updating/editing the Activity End Date, Notes, Actual Outcome, Contract, and other data fields within the two service TouchPoints.

#### LATE ENTRIES:

For any Activity Start date of Basic and ITSS services entered after the 14-day calendar timeline, staff must correct the errors and request the Department Head review and approval of the correction. Department Head approval must be documented in a case note. The case note must identify the service name, reason for the correction, and the Department Head's review and approval of the correction.

#### ACTION:

All Contractors must have a written policy in place as to the required procedures in recording late entries and obtaining supervisor approval.

Note: Each local area has at a minimum, one designated point of contact (Department Head) to handle the appropriate exceptions to data entry after the 14-day calendar restriction. They are responsible for ensuring the appropriate documentation and data integrity of the service dates in their local areas.

#### DEFINITIONS:

- Department Head – An ETO user role with a higher level of system access than those assigned the “Staff” role. They can make data corrections related to the Performance Integrity Reporting Layout (PIRL) and delete services and program enrollments that were

entered in error. This role is generally assigned to WDA MIS personnel, Supervisors, and Administrators.

## VII. NON-REGISTERED APPLICANT FILES

Those who are not found eligible, who no longer want to participate in WIOA services before being enrolled, or have failed to complete the eligibility process (thus incomplete) are considered non-registered applicants. Once it is determined they will not be enrolled, a Program Enrollment touchpoint must be entered into the stat-provided database stating “denied.” All documentation, including the Enrollment Application signed by the case manager, must be housed by the Contractor for the retention set forth in the contract.

## VIII. SERVICE CATALOG

To ensure data consistency, SCW has defined a catalog of services related to program activities that must be entered into the state-provided database. The Contractors are required to utilize Attachment 3A SCW Service Catalog, Attachment 3B SCW Youth Only Service Catalog, and Attachment 4 SCW State EcSA Service Catalog. Discretionary programs may have a separate service catalog when applicable.

Attachment 1A: MIS Enrollment Transmittal

Attachment 1B: MIS Accepted I-9 Documentation Verification

Attachment 1C: MIS Exit Performance Transmittal

Attachment 2: Paperwork Flow Chart

Attachment 3A: SCW Adult & DW Service Catalog

Attachment 3B: SCW Youth Only Services Catalog

Attachment 4: SCW State EcSA Service Catalog

Attachment 5A: Service vs. Update Desk Aid – Flow Charts

Attachment 5B: Service vs. Update Case Note Desk Aid

## REFERENCES:

All Contractors will be monitored for compliance with the MIS procedures for timeliness, accuracy, and completeness of all forms and documents.

- TEGL 07-18, Change 1 – Guidance for Validating Jointly Required Performance Data Submitted under WIOA
- TEGL 21-16, Change 1 – WIOA Youth Program Guidance
- TEGL 23-19, Change 2 – Guidance of Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor Workforce Programs
- WorkSource System Policy 1019, Revision 12 – Eligibility Guidelines and Documentation Requirements Handbook
- WorkSource System Policy 1020, Revision 2 – Data Integrity and Performance Policy and Handbook
- WorkSource System Policy 1029 – Document Storage and Organization