



## COVID-19 MEMO: ELECTRONIC ENROLLMENT AND ELIGIBILITY VERIFICATION REQUIREMENTS

### Purpose:

To ensure individuals and employers can continue to receive services during the COVID-19 health crisis, this document provides guidance on the appropriate use of electronic signatures and eligibility verification for program enrollment, including Workforce Innovation and Opportunity Act (WIOA) Title I and Temporary Assistance for Need Families (TANF) Youth program services. This guidance is in effect until further notice and may be rescinded when requirements to social distance are lifted by the Commonwealth of PA and the Centers for Disease Control. Staff should refer to the Partner4Work WIOA Adult and Dislocated Worker Eligibility Policy and/or WIOA and TANF Youth Eligibility Policy for the full eligibility, self-certification, and self-attestation requirements for their program.

### Applicable Parties:

This guidance applies to all Pittsburgh/Allegheny County WIOA Title I Adult, Dislocated Worker, and Youth participants, TANF Youth participants, and to individuals interested in enrolling in these programs. All WIOA Title I program staff, TANF Youth program staff, and Partner4Work program staff are responsible for implementing this guidance.

### Definitions:

- **Commonwealth Workforce Development System (CWDS):** CWDS is the sole data-management and reporting system of record used for all data collection and reporting related to all WIOA Title-I and Title-III, Wagner-Peyser Act and Trade Act-related activity in Pennsylvania.
- **Electronic Signature:** The term “electronic signature” means an electronic sound, symbol, or process, attached to or logically associated with a contract or other record and executed or adopted by a person with the intent to sign the record. Acceptable electronic signature formats may include, but are not limited to:
  - A hard copy document that is signed and then electronically sent or uploaded for submission.
  - An email or other form of written notification that is sent electronically stating acceptance of a document as submitted. *NOTE: A copy of this written notification must be signed by a case manager and stored in both the electronic and hard copy forms of the client’s case file. For WIOA programs, this information must be uploaded to CWDS for electronic storage.*
  - A signature through the use of an electronic signature software or program (DocuSign, Panda Doc, Adobe, etc.).
- **Self-Attestation:** Self-attestation (also referred to as an applicant statement) occurs when individuals state their status for a data element, such as “runaway youth,” and then signs and

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dates a form acknowledging this status. The key elements for self-attestation are: (a) the individual identifying his or her status for permitted elements and (b) signing and dating a form attesting to this self-identification.

- **Self-Certification:** Self-certification means an individual's signed attestation that the information said individual submitted to demonstrate eligibility for a program is true and accurate.

## **Requirements:**

### Electronic Signatures and Program Activities

Service providers **must receive written approval** from Partner4Work prior to implementing a system for obtaining client signatures and documents electronically. The following are areas for which electronic signatures and eligibility verification may be used:

#### *Program Enrollment*

Electronic signatures or signed self-attestations may be used in program enrollment, including for signatures on the WIOA/TANF application and the Release of Information, Equal Opportunity, and Client Grievance Statement forms. If this method is used, a copy of the email or other form of written notification being considered a customer's electronic signature, must be signed by the case manager and included in the electronic case file and in any existing paper case file. For WIOA programs, this information must be uploaded to CWDS for electronic storage. All activity related to the submission and review of electronic signatures must be properly documented in the service record and case notes.

#### *Eligibility Verification*

Electronic signatures during eligibility verification are only allowable when using self-attestation or self-certification and only in cases where self-attestation or self-certification is allowable in accordance with requirements set in Partner4Work's eligibility policies. Eligibility documents not able to be verified using self-attestation or self-certification may be submitted by sending or uploading electronic copies of these documents through a secure system in accordance with requirements set in Partner4Work's Personally Identifiable Information (PII) Policy. As mentioned, Partner4Work must provide written approval on any system before it can be used by service providers. All eligibility documents must be included in the client's electronic case file and in any existing paper case file. For WIOA programs, this information must be uploaded to CWDS for electronic storage. All activity related to the verification of eligibility documents electronically must be properly documented in the service record and case notes.

#### *Case Management*

Electronic signatures are allowable when creating or updating an individual employment plan (IEP) or, in the case of Youth participants, an individual service strategy (ISS). As mentioned above, if this method is utilized, a copy of the written notification must be signed by the case manager and entered into the

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electronic and paper case file. Electronic signatures may include those on documents printed, signed and scanned for return by the customer. If a customer does not have the option of printing documents for a physical signature, the document may be emailed to the customer and upon review and approval, the customer may respond to said email stating acceptance of the document as submitted. All activity related to the submission and review of electronic signatures must be properly documented in the service record and case notes.

## Protection of Personally Identifiable Information (PII)

All transmitting or storing of personally identifiable information must be conducted in accordance with Partner4Work's Personally Identifiable Information (PII) Policy. This includes the requirement that all communication from the case manager must be sent from approved work accounts and equipment only. Transmitting or storing PII on personally owned equipment, at off-site locations (e.g. employee's home), and on personal email accounts is not permitted. Where hard copies of documents are required to be included in a client's file, service providers should wait to print, file, and store these documents until they are able to do so at their organization's site of business.

## Oversight and Monitoring

Partner4Work oversight and monitoring staff will conduct regular reviews to ensure compliance with the requirements of this memo. Compliance with these requirements will also be reviewed as a part of Partner4Work's standard monitoring procedures.

**Date: April 6, 2020**