
Electronic Enrollment and Eligibility Verification of Services

PURPOSE

The purpose of this policy is to provide guidance on the appropriate use of electronic signatures and eligibility verification for program enrollment and services for the Workforce Innovation and Opportunity Act (WIOA) programs and special projects administered by Pacific Gateway Workforce Innovation Network (Pacific Gateway).

BACKGROUND

Due to the impact of the coronavirus (COVID-19) outbreak, the Employment Development Department (EDD) recognizes the need for Local Workforce Development Areas have maximum flexibility in providing WIOA services. In response to the California Department of Public Health's guidance regarding COVID-19, the America's Job Center of California (AJCC) system has begun to make changes to their service delivery models by offering in-person services on an appointment-only basis or transitioning to remote options. The goals are to minimize disruption to service delivery while protecting the health and safety of the workforce development community, and to ensure that both WIOA requirements and the needs of individuals are being met.

In alignment with the Executive Order N-33-20 (PDF) issued by Gavin Newsom on March 19, 2020 to shelter-in-place, the Local Areas have been given authority to use self-attestation and temporarily waive the requirement for a wet or electronic signature on all enrollment forms for WIOA Title I programs. This temporary allowance will remove barriers and offer individuals easier access to WIOA services.

POLICY

Self-Attestation

Self-attestation (verbal or email verification) is acceptable in lieu of wet or electronic signatures on all enrollment forms for WIOA Title I programs and special projects.

The method of self-attestation (verbal or email verification) must be documented in the CalJOBS case notes. If verbal verification is used, staff may attest in writing that the information is true and correct on behalf of the participant. If email verification is used, the email verification must be placed in the participant's case file (electronic or paper).

Electronic Signatures

The use of an electronic signature is allowable for all program documents requiring the participant's signature, including but not limited to, the Network Eligibility Application, EO Customer Complaint Procedures, Information Release and Privacy Statement, Customer Statement, Individual Employment Plan (IEP), Individual Service Strategy (ISS), and Supportive Service Request Form.

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.
- A signature through the use of an electronic signature software or program (DocuSign, Adobe, etc.).

When feasible, efforts should be made to obtain the participant's wet signature on documents that were sent electronically or used an electronic signature.

PROCEDURE

Eligibility Verification

Eligibility documents not able to be verified using self-attestation may be submitted via email through a secure system. Photos of eligibility documents are acceptable and may be emailed to staff, provided the documentation is legible. All eligibility documents must be maintained in the participant's file (electronic or paper). All activity related to the verification of eligibility documents submitted electronically must be properly documented in CalJOBS case notes.

Program Enrollment

Electronic signatures or self-attestation may be used for program enrollment into services and activities. Self-attestation or the participant's electronic signature must be verified by staff and included in the file. All activity related to the submission and review of electronic signatures must be properly documented in CalJOBS case notes.

Career Services and Training

Electronic signatures are allowable when creating or updating an Individual Employment Plan (IEP) or an Individual Service Strategy (ISS). Electronic signatures are also permissible for supportive service requests and all training documentation, including but limited to, Individual Training Accounts (ITA), On-the-Job Training, Customized Training, and Work Experience. All activity related to the submission and review of electronic signatures must be properly documented and recorded in CalJOBS case notes.

Protection of Personally Identifiable Information (PII)

The transmitting or storing of personally identifiable information must be conducted in accordance with Pacific Gateway's Protecting Personal and Sensitive Information Policy (P-WIOA-PPSI-1.A). This includes the requirement that all communication from staff 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 prohibited.

REFERENCES

- Workforce Services Information Notice WSIN19-40, "Temporary Changes to WIOA Registration and Eligibility Determinations Due to COVID-19" (April 7, 2020)
- Protecting Personal and Sensitive Information Policy, P-WIOA-PPSI-1.A (April 11, 2017)

INQUIRIES

For questions or assistance related to this policy, please contact Pacific Gateway Workforce Innovation Network staff at (562) 570-3748.