

**THE OREGON CONSORTIUM & OREGON WORKFORCE ALLIANCE
POLICY MEMORANDUM #WIA-39-08/06**

DATE: August 24, 2006

SUBJECT: Direct Participant and Training Payments

PURPOSE:

To ensure that required Workforce Investment Act (WIA) Title 1B participant and services information is correctly coded into the MIS provided in a timely and accurate manner by Regional sub-grant recipients and contractors of The Oregon Consortium/Oregon Workforce Alliance (TOC/OWA) and that MIS coding and client casenotes directly support regional sub-grant recipient or contractor expenditure and reimbursement requests meeting reporting requirements established by the US Department of Labor (DOL), the Oregon Workforce Board (OWIB), Oregon Department of Community College Workforce Development (OCCWD) and TOC/OWA.

REFERENCES:

- Workforce Investment Act Sections: 101(46); 129(a) (4-5); 134(e) (1 & 2); 185(a),
- 20 CFR 667.300 and 663.700 through 663.840
- TEGL 3-03 Change 1 Data Validation
- TEGL 17-05 Common Measures Policy
- CCWD Policy 589-30.6 Access to Training for WIA Participants
- CCWD Policy 589-50.1 Data Collection, Transmission and Reconciliation
- CCWD Management Information System (MIS) Manual
- TOC/OWA Policy WIA-7-R08/06 Data Collection, Transmission, Validation, and Reconciliation
- TOC/OWA WIA Program Guide

POLICY:

Each regional sub-grant recipient and contractor is responsible for accurately coding participant information, services and case notes into the Management Information System addressing compliance reporting requirements and maintaining adequate internal control processes supporting management and oversight of the program.

Data that is required to be collected and reported to TOC/OWA are specified in the CCWD MIS Manual and the WIA Program Guide. In addition, it is essential that direct participant expenditure for support services, stipends and training are captured through accurate coding, and appropriately documented by case note directly in the MIS. These requirements assure that TOC/OWA is able to produce the data required by the WIA Standardized Program Information Report (WIASRD) for CCWD and DOL in an accurate and timely manner, that methods of data collection and reporting are consistently applied, that compliance requirements for payments of this type are addressed and documented, and that a tool supporting adequate internal control processes supporting management and oversight of the program is in place.

Regional sub-grant recipients and contractors will correctly and accurately code into the MIS and will transmit all required and participant data including staff case notes related to staff contacts with each individual participant to TOC/OWA in accordance with the requirements of the CCWD MIS manual, the guidance and methods detailed through TOC/OWA Policy #WIA-7-R08/06 and the WIA Program Guide, and the procedures laid out by this policy.

PROCEDURES:

1. The regional sub-grant recipient or contractor must have a policy in place detailing the criteria required for the each specific type of participant payment or training support that is being provided and each participant payment and training support expenditure must be within the scope of that policy.
2. The MIS record for each enrolled client receiving a direct participant payment or training support will include:
 - a. A casenote detailing the results of an initial assessment by staff, the clients occupational and educational goals, barriers impeding the attainment of these goals, and plan for remediation of barriers will be entered into the MIS for each enrolled participant or the Individual Employment Plan (IEP) integrated into the MIS will be used to provide this documentation.
 - b. A record showing an open enrollment or an alternative eligibility (i.e., eligible for WIA 1B follow-up), and must also be eligible for the type of support provided (i.e., WIA 1B Adults or Dislocated Workers must have completed the eligibility for Intensive services).
 - c. A casenote providing the rationale and addressing the requirements for the progression of an Adult or Dislocated Worker from Core to Intensive to Training services will be included in the MIS record for each client making these transitions.
 - d. A casenote showing that the client:
 - i. Is in good standing within the program in terms of gaps in service and appropriate progress toward their educational or career objective;
 - ii. Has successfully addressed the specific accountabilities detailed in policy that relate to the specific type of payment; and that
 - iii. Provides the date and basis for each direct participant payment or training support will be included and coded into the MIS record for clients receiving such payments.

For example:

- 1) Award of a stipend or incentive requires the client to successfully meet accountabilities established in policy and that the stipend or incentive amount to be within the limits of policy. The casenote for a stipend or incentive must indicate that the accountabilities have been successfully addressed and include the amount and date of the stipend or incentive award.

- 2) Provision of a support payment requires that a policy be in place establishing the criteria for and limits of support payments, and that the support payment is necessary to provide for continued participation or attachment to the program. The casenote for a support service must indicate that the accountabilities have been successfully addressed, and describe the reason for, amount and date of the support payment.
 - 3) Provision of a payment in support of training requires that a policy be in place establishing the criteria for and limits of training support and the accountabilities on the part of the client in terms of maintaining good standing in the training program, documentation of progress toward training goals and regular contact with the program. The case note for a training support payment must indicate that the accountabilities have been successfully addressed and describe client progress towards the training goal, amount and date of the payment.
- e. The correct MIS activity code supporting the payment type (see the WIA Program Guide for guidance on coding) must be coded into the client record in the MIS, and must be open during the period that the payment is made.
3. The regional sub-grant recipient or contractor must ensure the participant documents the amount and receipt of a direct participant payment by signature. This verification will be kept in the participant file, and a copy of the check and/or gift certificate will be kept on file until instructed to dispose as outlined in policy #WIA-15-R03/05.

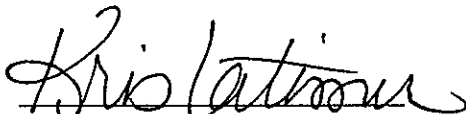
In all cases, the MIS record including casenotes must be complete and each direct participant payment or training support payment must comply with established program policy for payments of that type. Regional sub-grant recipients and contractors will establish internal controls, management practice and oversight, and quality assurances process which ensure compliance with this policy. When preparing and prior to processing of participant or training support payments, regional sub-grant recipients and contractors are required to verify that these transactions are correctly coded and supported by the MIS record.

ACTION:

The TOC/OWA administrative office, regional sub-grant recipients, and contractors shall follow this policy. This policy will remain in effect from the date of issue until such time that a revision is required.

INQUIRIES:

Inquiries should be addressed to the Chief Operations Officer at 1-866-888-4TOC.


Kris Latimer
Chief Executive Officer