



# THE COORDINATING & DEVELOPMENT CORPORATION

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**Jack "Bump" Skaggs, President and CEO**

## GUIDANCE LETTER ISSUED APRIL 23, 2020

- Subject:** LWDA 70 WIOA Electronic Enrollment and Eligibility Verification Requirements during COVID-19 Pandemic
- 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 for Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, and Youth program services. This guidance is in effect until further notice and may be rescinded when requirements to social distance are lifted by Louisiana Governor John Bel Edwards and the Centers for Disease Control.
- Procedure:** Account Executives should refer to Louisiana Workforce Commission policies OWD 2-24.2 and OWD 2-21-2 for full eligibility requirements in addition to Department of Labor TEGs 19-16 and 21-16.

### Definitions:

● **Helping Individuals Reach Employment (HiRE):**

HiRE is specifically designed for job seekers, students, case managers, employers, training providers, workforce professionals, and others seeking benefits and services. The system data-management and is a 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 Louisiana.

● **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 account executive and uploaded to HiRE for electronic storage. ○ A signature through the use of an electronic signature software or program (DocuSign)

● **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 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.  
accurate.

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- **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.

## **Collection of Eligibility Documentation**

The WIOA Application:

The WIOA application is available through website or LAWORKS.NET system. Account executives conduct "virtual" eligibility over the phone (i.e. conference call number) or through a visual-virtual application (i.e. Zoom, FaceTime). Each participant must have a designated account executive assigned to conduct eligibility during the stay home order. The account executive should conduct eligibility through a scheduled orientation where program services are discussed and required eligibility forms are reviewed and completed alongside the participant. The information collected during the orientation must also be entered on the WIOA Application and the Objective Assessment in LAWORKS. Each participant must develop a process for conducting eligibility, the WIOA Application, Objective Assessment, and Plan (IEP/ISS) during the stay home order.

Electronic versions of the WIOA application may be completed online then printed from The Coordinating & Development Corporation or the LAWORKS system and forwarded to WIOA applicants through email or other electronic means, such as Docusign – in order to obtain the signature of the applicant. The signed document may then be scanned or photographed to be returned, electronically, to the account executive.

An electronic version of the WIOA application may be forwarded to applicants through email, but care must be used in reviewing the document to ensure that no changes were made to the format of the document once it is submitted by the applicant. Additionally, a thorough quality review should be performed of the information submitted within the soft copy WIOA application to ensure that all required information has been reported correctly. The document returned to the account executive must possess the signature of the applicant.

Care must be used to ensure that individual's Personal Identifiable Information (PII) is protected during this time. Emails should be sent using secure options as a method of protecting sensitive PII data. Additionally, as account executives' coaches work remotely, extra care must be administered with the handling of applicant and participant data outside of our normal work facilities.

### **Requirements:**

Electronic Signatures and Service Providers must receive written approval from The Coordinating & Development Corporation prior to implementing a system for obtaining WIOA participants 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 application. If this method is used, a copy of the email or other form of written notification being considered a participant's electronic signature, must be signed by the account executive. This information must be uploaded to HiRE for electronic storage. All activity related to the submission and review of electronic signatures must be properly documented in the participants 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 The Coordinating & Development Corporation'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 Personally Identifiable Information requirements.

All eligibility documents must be uploaded into HiRE for electronic storage. All activity related to the verification of eligibility documents electronically must be properly documented in the participant 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 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 participant and upon review and approval, the customer may respond to said email stating acceptance of the document as submitted, or utilize a e-signature through the use of an electronic signature software such as DocuSign. All activity related to the submission and review of electronic signatures must be properly documented in the participant record and case notes.

**Signature Solution Providers**

The Coordinating & Development Corporation will be responsible to determine acceptable technologies and eSignature providers consistent with best practices to ensure the security and integrity of the data and the signature. In March 2020, The Coordinating & Development Corporation piloted software to see if it was feasible and realized the software helped with the barriers that were faced with as a result of Covid 19. Therefore, in April 2020, The Coordinating & Development Corporation entered into an agreement with DocuSign© to provide electronic signature capabilities and services to LWDA 70 staff and participants.

**Protection of Personally Identifiable Information (PII)**

All communication from the LWDA 70 account executives must be sent from approved work accounts and equipment only. Transmitting or storing PII on personally owned equipment, or 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 assigned office.

**Oversight and Monitoring**

The Coordinating & Development Corporation 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 CDC's monitoring procedures.

Please ensure that casefiles are maintained at the same level as prior to this pandemic. Casefile reviews and desk audits will continue to be a part of program monitoring on an ongoing basis.

Due to the essential nature of workforce services, CDC is issuing this guidance which is intended to allow more flexibility in the gathering and maintenance of documentation and for service provision under WIOA during the COVID-19 pandemic.

CDC provides this guidance to inform LWDA staff and service providers of acceptable methods of using technology whenever possible to ensure the timely provision and continuity of services to WIOA applicants and participants.

Respectfully,



Candle Sattler

Interim Director of Workforce Development