Overview
This Guidance Letter provides interim guidance on the responsibilities of grantees and sub-recipients for documenting participant information. This is effective immediately, and shall remain in effect until rescinded/revised by the Office of Community Colleges and Workforce Development (CCWD) or superseded by guidance from a federal grantor (e.g., the US Department of Labor (DOL)).

Technical/Program Assistance
Under WIA, Oregon established a standard for paperless WIA title IB Adult and Dislocated Worker and Wagner-Peyser program registration, eligibility determination, and initial program participation based on the definition of self-attestation and implemented through the WorkSource Oregon Management Information System (WOMIS) Customer Registration program. All local areas are required to continue this process under WIOA, unless/until new guidance is issued.

WOMIS Customer Registration must be utilized to collect registrant identification, demographic and eligibility data, and to initially determine program eligibility. This process also applies to participants in Department of Labor funded National Dislocated Worker Grants and statewide assistance projects.

Registrants must self-attest to the truth and accuracy of the data they provided in the WOMIS Customer Registration program, and staff must examine an eligible registrant’s acceptable document(s) to attest that the registrant’s date of birth on the document(s) matches the date of birth recorded in the WOMIS Customer Registration program. Verification of the date of birth and name will be accomplished through the staff attestation mechanism in the WOMIS Customer Registration program including entering the type of document used to verify date of birth and any identifying numbers, such as driver’s license number, or other uniquely identifiable information on the document.

Exceptions:
Eligible registrants whose date of birth has been verified according to the procedure above may access all Basic and Individualized Career services, with the following exceptions:

- They may not receive a direct WIOA title I funded financial payment to, or on behalf of, the registrant until additional WIOA eligibility documentation is completed, according to the local workforce development board’s (LWDB) documentation policies or procedures.
  - Examples include supportive service payments, fees for short-term education or vocational classes (e.g., ESL; forklift, flagging certification; code boot camp, etc.), other WIOA title I funded cash assistance, etc.

- They may not access/receive services that results in a WIOA title I funded resource with a specific cash value until additional WIOA eligibility documentation is completed, according to the LWDB’s documentation policies or procedures.
  - Examples include gas vouchers, bus passes, check/vouchers for tools or textbooks, etc.
Additionally, registrants may not receive any WIOA title I funded Training services (as defined by WIOA) until additional WIOA eligibility documentation is completed, according the LWDB’s documentation policies or procedures.

**Additional Requirements:**
- In the case of WIOA title I funded supportive and/or Training services or when any non WIOA-formula grant narrative calls for further documentation, documentation should be obtained and kept in accordance with state and LWDB record retention policy(ies).
- Documentation can be copied and kept in paper files, or scanned and kept in a secure electronic file, in accordance with state and LWDB record retention policy(ies), and must be made available for examination upon request of monitors.
- Storage Service providers must maintain documents and forms in an appropriate storage space that ensures security and confidentiality.
- Access to customer information should be restricted to authorized entities associated with the operation and performance of workforce programs.
- Any customer medical information should be recorded on separate forms and stored separately.
- Participant/applicant information that is stored electronically must be password protected to ensure confidentiality.

**Action(s)**
LWDBs are required to follow the provisions in this document at the grant recipient, fiscal agent, and local board levels; and provide this information to all local WIOA title I funded service providers, along with any applicable locally developed policies that might supplement these state-level requirements.

LWDBs are required to establish, implement, and maintain document collection and storage processes that ensure compliance with the prescribed rules and regulations.