**Operational Policy NO. OP- 426 – Change 1**

**Subject:      WCCNM Participant File Policy**
**Effective:     PY21 –10/18/2021**
**Rescissions:  None**

**BACKGROUND:**

Beginning January 1, 2015, the New Mexico Department of Workforce Solutions began requiring that all participant file documentation be scanned into the NMWCOS system. To comply with this directive the Workforce Connection of Central New Mexico set policy guidelines to direct local participant file documentation, while complying with NMDWS requirements regarding E-Filing. OP- 425, Change 1, Electronic File Storage and Documentation Imaging Standards, which became effective on May 11, 2020 (PY19), authorized a Board approved E-File pilot to facilitate the Central Region's transition to E-File standards. The pilot, which provided temporary NMDWS compliant steps to allow for the transition, is complete and Adult, Dislocated Worker and Youth Services Providers are now required to implement and follow the full NMDWS requirement of electronic file storage and imaging standards.

**OBJECTIVE:**

This policy provides guidance to WCCNM Adult, Dislocated Worker and Youth Service Providers regarding participant file requirements in the Central Region, and implements the state policy regarding electronic file storage and imaging standards for workforce programs utilizing the New Mexico Workforce Connection Online System (NMWCOS).

**POLICY:**

The state has established a standard for an electronic file (e-file) which includes a paperless registration, eligibility determination, and program enrollment. Effective October 18, 2021, all new program enrollments are required to be completed in an e-file format. **(All files from July 1, 2021 through October 17, 2021 will be required to be updated to reflect this e-file format no later than January 31, 2022).** The results are a real time environment for storing and viewing applicant verification and eligibility determination documents. Authorized personnel are required to scan, import, and save all verification documents at the time they are being reviewed during the application process in NMWCOS per distinct program requirements.

For all new program applicants beginning October 18, 2021, a complete electronic file shall be maintained. **(All files from July 1, 2021 through October 17, 2021 will be required to be updated to reflect this e-file format no later than January 31, 2022).** In addition to required e-files, service providers/case managers have the option to maintain hardcopy files, which are to be secured and protected from misuse. All subsequent monitoring and audits will be conducted on the electronic file and supporting documentation stored in the NMWCOS document module.

## DEFINITION OF AN E-FILE:

E-files for purposes of this policy, and all programs related to this policy, refers to the comprehensive storage of participant files in an electronic format using the NMWCOS. The program application, related activities, case notes and all other relevant individual/entity information are captured and stored solely in NMWCOS, the State integrated management information system, and all documentation and eligibility verifications specific to each applicant are scanned and stored in the Content Management System in the NMWCOS.

Accepted methods for producing an e-file consist of:
- Scanning and/or importing a document into the NMWCOS Content Management System (This may include supplemental forms developed by Local Workforce Development Boards and required to be included in program files.)
- NMWCOS system generated forms or documents (application, IEP, etc.)


## ROLES & RESPONSIBILITIES:

All verification documents must be scanned, imported, reviewed, and saved by program staff at the time the verification is conducted.

## CONTENT MANAGEMENT PRACTICES :

### Content Management Access
- Content Management access for all users shall be granted based on the users' security access profile.

### Scanned Image Legibility
- Any and all pertinent documentation that is scanned is required to be legible in view and printed form. Illegible images must be removed and the document must be rescanned until a legible image has been captured.

### Deleting Images
- The process of deleting an image that has already been saved to an applicant's electronic file can only be performed by the state or local System Administrator or their designee. Scenarios requiring the deletion of images may include the following:
  - Image was saved to an incorrect program applicant's file, or image was saved under an incorrect document type.

### Individual User Accessibility
- All scanned documents shall only be viewed by staff with the user accessibility option set to "No" as outlined in the "Content Management System Guide"

attached.

### Scanning Documents

- Documents scanned into the NMWCOS content management system are required to be scanned and uploaded into NMWCOS by case management staff. Once uploaded, hard copy documents must be processed, maintained or discarded by case management staff according to established protocol to ensure the confidentiality of PII and other information and to safeguard against misuse.

## <u>MRCOG ADMINISTRATIVE ENTITY (AE) AND FISCAL AGENT (FA) PARTICIPANT CONTRACT APPROVALS, INVOICING, ETC.:</u>

All current procedures regarding participant contracts, invoicing and other communications between the service providers/case managers and the MRCOG AE/FA remain unchanged. All employer/participant forms/contracts, including but not limited to ITAs, OJTs, CTs, internships, timesheets, invoices, etc., will be submitted to the fiscal agent for payment in the same manner as previously submitted.

## <u>PROGRAM MONITORING:</u>

Use of Content Management in accordance with this policy provides opportunities for monitoring to be performed remotely. Information is readily available and files are current due to the real time entry of all documentation.

WCCNM AE/FA is responsible for completing the full scope of monitoring as outlined in federal, state and local policy including all elements of notification, reporting, entrance and exit conferences and associated timelines. Transition to e-files and utilization of the content management system expands opportunity for remote monitoring as appropriate but does not eliminate any of the requirements for program administration and monitoring.

## <u>RECORD RETENTION:</u>

The required length of retention for all contents of WIOA Title I program records (e-file and hardcopy file) is **at least five (5) years following** the date on which the final expenditure report charged to a program year's allotment is submitted or until all audit and litigation issues are resolved, whichever is later. This retention period pertains to mandatory E-Files, as well as optional hardcopy files case managers and service providers choose to maintain.

## <u>MANDATED E-FILE CONTENT MANAGEMENT STANDARDS:</u>

Under this policy, effective October, 2021 all Adult, Dislocated Worker and Youth Service Providers are required to adhere to the following participant E-File requirements, including the use of the following Document Tags (categories) for documents scanned into the NMWCOS Content Management System, **(All files from July 1, 2021 through**

**October 17, 2021 will be required to be updated to reflect this e-file format no later than January 31, 2022).** :

       E=Eligibility Documents (including Eligibility Checklist)
       O=Orientation/Grievance, Welcome forms and other supplemental information
       A=Assessment information
       S=Supportive Service documents
       I=Stipends/Incentives
       X=Exit Documentation
       C-ITA=individual training
       C-OJT=on the job training
       C-CT=customized training
       C-WE=work experience
       C-INT=Internships
       C-Transitional Jobs
       C-PVT=pre-vocational training

See NMDWS website for additional detail on State Technical Assistance Guide (STAG), Electronic File Content Management STAG May 2015.pdf


**<u>INQUIRIES:</u>**

WIOA Manager 505-724-3658
This Policy has received approval by the Workforce Connection of Central New Mexico Board and rescinds any policy previously in effect