

## System of Record / File Management Policy

The NWPA Job Connect has a responsibility to provide guidance for participant file management for participants enrolled in programs provided by the local PA CareerLink<sup>®</sup> locations.

Recipients and subrecipients of federal funding are required to keep records that are sufficient to prepare required reports on program performance and outcomes, as well as trace funds to a level of expenditure adequate to ensure that funds have been spent lawfully.

Pennsylvania's data-management system, CWDS/PA CareerLink<sup>®</sup>, is the required entry point for all workforce development activities in Pennsylvania. All workforce development activities (to include participant and employer registrations, job postings, job matching, career planning, case progress notes, activities and outcomes pertaining to workforce programs funded through the authorization of WIOA, WIA, the Wagner-Peyser Act, TAA and related grants) must be entered into CWDS/PA CareerLink<sup>®</sup> to ensure compliance with federal and state statutes, regulations and policies.

**Commonwealth Workforce Development System, or CWDS**, is the management system of record used for all data collection and reporting.

**Pennsylvania CareerLink<sup>®</sup> / PA CareerLink<sup>®</sup>** is the registered trademark name for Pennsylvania's one-stop service delivery system, including each of the one-stop centers, as well as the online job-matching system for job seekers and employers.

PA CareerLink<sup>®</sup> locations are required to use CWDS/PA CareerLink<sup>®</sup> as the common information management system. CWDS/PA CareerLink<sup>®</sup> is the official system of record used for all data collection and reporting for all required partners for services provided to program participants. Shared information and data agreements will be used to support access to information and information sharing among partners as allowed by authorizing law and regulations.

As CWDS/PA CareerLink<sup>®</sup> is the required entry point for all workforce investment activities in Pennsylvania, the use of alternative systems is prohibited for all workforce investment activity data entry and tracking, except for career planning activities.

Providers of programs must maintain electronic and/or hard copy files for all participants who receive services and have not been exited from their enrolled program. Each participant hard copy file will include the following:

- Intake documentation
- Case notes and regular updates
- Credentials/Certifications
- Approvals for applications, career services, etc.
- Supporting documentation for all expenditures
- Training documentation (including contracts, attendance, etc.)
- Assessment documentation
- Eligibility documentation
- Exit information

In addition, the maintenance of both the electronic and hard copy files must adhere to the NWPA Job Connect Personally Identifiable Information (PII) Policy #306.

Individuals who have access and authorization to use Pennsylvania’s data management system of record, CWDS/PA CareerLink®, are required to acknowledge and adhere to the Commonwealth’s Workforce System of Record Policy.

Participant files must not contain any medical information. Subrecipients will update files with appropriate documentation in accordance with NWPA Job Connect policies to ensure that both paper files and electronic records are up-to-date.

**REFERENCES**

WSP No. 01-2015 (Change 1) July 20, 2018

**HISTORY**

Name	Date	Rev Level	Description of change	Effective Date
Deb O’Neil	6/18/2019	A	New Policy	07/10/2020