

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[®] 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[®], 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[®] 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[®] / PA CareerLink[®] 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[®] locations are required to use CWDS/PA CareerLink[®] as the common information management system. CWDS/PA CareerLink[®] 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[®] 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.

All participant, employer, and provider data must be entered into CWDS within 30 calendar days of the actual date of occurrence (e.g., service start date, end date, entered employment, certifications, Measurable Skills Gains, assessments, program exit dates).

PA CareerLink® sites will use CWDS/PA CareerLink® as the job match system when job seekers are looking for employment and employers are searching for candidates.

PA CareerLink® Digital Intake Form is the official standard and default method for collecting customers' demographic and barrier information upon intake in all PA CareerLink® offices. The digital intake form must be used on all new and returning PA CareerLink® customers. This includes mobile, comprehensive, affiliate, and other sites.

It is critical that the PA CareerLink® Digital Intake Form, whether digital or paper, be completed prior to services being rendered. Paper forms may be used as necessary, but all data will need to be entered into CWDS within ten (10) business days. Acceptable uses for the paper form: internet/power outage; large on-site events; off-site services where technology use is limited.

If using paper forms, once data is entered into CWDS, the paper documents must be shredded to maintain maximum safekeeping of PII. If completed paper forms must be transported to another location, the NWP Job Connect PII policy must be followed to ensure maximum safekeeping of PII.

File Management

Providers of programs must maintain electronic and/or hard copy files for all participants who receive services. As recommended by BWDA guidance, maintaining WIOA View Histories, Common Measures Activity Logs, Service Records, and Case Progress Notes are no longer required in participant case files. This information is reviewed in CWDS, so it is important this information is accurate and up-to-date in CWDS.

The participant hard copy files will include the following:

- Credentials/Certifications (these should be uploaded into CWDS)
- Eligibility paperwork not uploaded into CWDS
- Secondary Staff Review for WIOA Eligibility
- Supporting documentation for all expenditures
- Training documentation (including contracts, attendance, etc.)
- Assessment documentation
- Medical Information must be stored in a separate HIPAA file.

For those participants who are exited from the WIOA Program, post exit follow-up services and case notes will be documented in CWDS. Files will be stored for the time period as stated in the NWP Job Connect Records Retention Policy.

In addition, the maintenance of both the electronic and hard copy files must adhere to the NWP 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.

Non-Commonwealth CWDS users who no longer require access to the system must have their logins disabled on users' last day of work or the first business day after. Local office system administrators will disable the user.

REFERENCES

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

NWPA Job Connect Personally Identifiable Information (PII) Policy #306

HISTORY

Name	Date	Rev Level	Description of change	Effective Date
Deb O'Neil	6/18/2019	A	New Policy	07/10/2020
Susan Richmond	5/25/2022	B	Updated to include disabling non-CWDS users; time frame for entering data into CWDS	07/08/2022
Susan Richmond	6/9/2023	C	Updated to include Digital Intake process	09/08/2023
Susan Richmond	2/26/2024	D	Updated to align with the Commonwealth's recommendations for eliminating documents in paper files.	05/10/2024