
Workforce System of Record Policy

Purpose:

This policy provides guidance regarding workforce system data entry, user management and tracking participants, employers, and providers using CWDS (state system of record).

Audience:

This policy pertains to all CWDS users.

Definitions:

Commonwealth Workforce Development System (CWDS)- the management system of record used for all data collection and reporting.

Case Progress Notes- detailed accounts of the services being requested and provided to the job seekers, participants, and employers.

Date of Participation- date of the initial program-funded qualifying service.

Exit Date- The date after a participant has not received a qualifying service for 90 days and is not scheduled to receive future services.

Individual Employment Plan (IEP)- a plan used for Adult and Dislocated Workers to identify employment goals, achievement objectives, and the appropriate combination of services to achieve the goals.

Individual Service Strategy (ISS)- a plan used for Youth participants that maps out educational, employment, and individual development goals with necessary services to obtain the goal(s).

PA CareerLink®- registered trademark name for Pennsylvania's one-stop delivery system, including the centers and the on-line job matching system for job seekers and employers.

PA CareerLink® Digital Intake Form- official standard method for collecting demographic and barrier information upon intake at all PA CareerLink® locations, including mobile service sites.

Background:

Federal regulations require the Pennsylvania Department of Labor & Industry to submit quarterly participant reports and validate individual participant dates, along with financial reports to the U.S. Department of Labor. CWDS is the system of record used to track workforce development activities for participants, employers, and providers funded under

WIOA, Wager-Peyser Act, TAA, and related grants. All workforce activities must be entered into CWDS to ensure compliance with federal and state statutes, regulations, and policies.

CWDS is also the system of record for all financial reporting by the local workforce board.

Policy:

A. Digital Intake:

- The Digital Intake form will be used on all new and returning PA CareerLink® customers. This includes mobile, comprehensive, affiliate, and other sites.
- This form must be completed prior to services being provided.
- Paper forms are allowable (internet/power outage; large on-site events; off-site services where technology is limited) but all data must be entered into CWDS within ten (10) business days.
 - Paper forms, when used, must be shredded, once data is entered into CWDS, to maintain maximum safekeeping of Personally Identifiable Information (PII). If completed paper forms must be transported, a lock box must be used.

B. Staff responsibilities:

- Staff must provide PA CareerLink® customers with information about available services in the local workforce area. Multiple formats must be used such as orientations/workshops, printed handouts, and social media posts.
- Staff must assist participants in deciding on appropriate steps for employment, training, related services, and job referrals.
- Staff must assist participants in assessing their barriers to employment/training and referring to other agencies, as needed.

C. Provider Responsibilities:

- Program providers must maintain electronic and/or hard copy files for all participants who receive services.
- The following information must be entered into CWDS **within 30 calendar days** of the actual date of occurrence:
 - Participant registrations including eligibility documentation
 - Secondary staff review for WIOA Eligibility
 - Employer registrations and any applicable documentation
 - Job Postings
 - Job Matching
 - Financial Data
 - Career Planning Services
 - Training Services with applicable documentation uploaded

- Supportive Services with applicable documentation uploaded
- Case Progress Notes
- Activities, such as assessments, IEP/ISS
- Outcomes, which include employment, certifications, Measurable Skills Gains and applicable supporting documentation uploaded
- Note** Medical information, which can be uploaded into CWDS for eligibility purposes, must also be stored in a separate HIPAA file.
- All information, whether stored electronically or hard copy files, must adhere to the NWPA Job Connect Privacy, Security, and PII Policy.

D. Individual Employment Plan (IEP)/Individual Service Strategy (ISS):

WIOA requires Adults, Dislocated Workers, and Youth participants to develop an IEP or ISS. These plans identify employment goals, educational goals (youth), achievement objectives, and the combination of services to achieve the goal(s).

- The IEP/ISS will be created in CWDS with participant input.
- All WIOA Title I participants must have a signed IEP/ISS in CWDS.
- The plans must include the following:
 - Goal
 - Objectives (Steps) for reaching the goal
 - Assessment results
 - Work experience
 - Barriers (for supportive services support)
- Staff will update the plans to reflect regular progress, outcomes, and changes with the participant as needed. Signatures are required.
 - As noted above, these updates must be entered into CWDS within 30 days of the updates.
- Objectives must be closed upon completion, keeping one open objective until post-exit follow-up is complete.

E. Exits:

- Staff must exit a participant when services are no longer needed, or 90 days is reached with no qualifying services.
- Exit date is the last day on which a qualifying service was provided.
- Exited participants move into Post Exit Follow Up status.

F. Post Exit Follow Up:

- Staff must provide post-exit follow-up services to WIOA Title I Adult and Dislocated Workers who are exited to employment for one year after exit (WIOA Regulations). Locally, **all** exited participants will receive post-exit follow-up services for one year after exit.
- Staff must provide post-exit follow-up services to all exited WIOA Title I Youth participants.
- Exclusions for post-exit follow-up services include:
 - Those exited to health/medical reasons.

- Those exited to incarceration.
- Those exited to death.
- Those participants who request no follow-up services (this must be documented in a case note).

G. Paper Files:

- If paper files are maintained, files will be stored for the time frame specified in the NWPA Job Connect Records Retention Policy.
- Files must be locked with access provided to only those who need to review the information. (Maintaining confidentiality and privacy).
- Files only need to hold the information that is not uploaded or stored in CWDS.

H. Other Information:

- The use of alternative systems is prohibited for all workforce activity, data entry, and tracking purposes, except for career planning activities.
 - As per WSP Workforce System of Record Policy, career planning activities must first be entered into CWDS. Data comparisons will be conducted.
- Individuals who have access and authorization to use CWDS must acknowledge and adhere to Pennsylvania's Workforce System of Record Policy.
- Non-Commonwealth CWDS users who no longer require access to the system, must have their logins disabled on the user's last day of work or the first business day after. Local office system administrators will disable the user.

REFERENCE

WIOA Section 134 (c)(2)(A)(xiii)(II)

WIOA Section 129 (c)(1)(B)

20 CFR 678.402 (2)

20 CFR 681.320(3)

USDOL Training and Employment Guidance Letter (TEGL) No. 10-16, Change 3

USDOL TEGL 19-16

USDOL TEGL 21-16

WSP Pennsylvania's Workforce System of Record 10/15/2025

HISTORY

Name	Date	Rev. Level	Description of change	Effective Date
Susan Richmond	2/26/2026	A	Combined policies/restructured policy	07/10/2026

Recissions:

NWPA Job Connect #207 Title I Program Participant Services Policy

NWPA Job Connect #208 Individual Employment Plan/Individual Services Strategy

NWPA Job Connect #314 System of Record and File Management