COMMONWEALTH OF VIRGINIA
VIRGINIA COMMUNITY COLLEGE SYSTEM

WORKFORCE INNOVATION AND OPPORTUNITY ACT

The Virginia Community College System
VIRGINIA WORKFORCE LETTER (VWL) No. 16-03

TO: Local Workforce Development Boards

FROM: George Taratsas
Administrator, Federal Workforce Programs

SUBJECT: Standardized Participant File Format

EFFECTIVE DATE: October 27, 2016

PURPOSE:

The purpose of this letter is to provide Local Workforce Development Areas (LWDAs) and Workforce Innovation and Opportunity Act (WIOA) providers with a standardized format for participant files and guidance on its implementation.

REFERENCES:

Virginia Workforce Letter No. 14-02, Guidance on the Handling and Protection of Personally Identifiable Information

REVISION HISTORY:

This letter replaces VWL 13-08, Standardized Participant File Format.

DEFINITION:

Virginia Workforce Connection (VaWC) is the System of Record for the WIOA Title I programs in the Commonwealth of Virginia.
BACKGROUND:

The Department of Labor’s review of Virginia’s workforce system in November of 2010 included a concern that the local areas did not have a consistent approach in organizing participant files and suggested that a standardized file format would ensure consistency. This letter is intended to address this concern and ensure that paper-based participant files contain documentation that accurately reflects the participants’ journey throughout the program.

GUIDANCE:

A. File Format
The VCCS Workforce Development Services has developed a format that will standardize the layout of participant files across the Commonwealth. This format will ensure a consistent structure for all files and consistent documentation of participant activities within the files.

The file format (see Attachment A) is broken out into six different sections. Each section is numbered, has a specific order in which it is to be placed into the file, and provides a checklist of the documentation expected to be maintained in that section and the order in which that documentation should be filed.

Section One: VaWC Printouts, Intake/documentation to support eligibility
Section Two: VaWC Case Notes, Assessments, IEPs/ISSs, Staff Assisted Core Services
Section Three: Degree/Diploma, Certificate/Credential, Resumes, referrals, Correspondence
Section Four: Training
Section: Incentives, Supportive Services
Section Six: Follow-up, Employment Verification, Closure/Exit Reason, Miscellaneous Documents

The file format is ideally suited for a six tab file folder as there are six sections. However, adjustments may be made for folders with fewer tabbed sides. Local areas may select the folder set-up that best suits their needs.

1. Six tab folder set-up
   Files shall include one section per tab, working from left to right and moving through the numbers sequentially once the folder is open.
   - Section One shall be placed on the first (left hand) tab of the open folder
   - Section Two shall be placed on the second (right hand) tab
   - Section Three shall be placed on the third (left hand) tab
   - Section Four shall be placed on the fourth (right hand) tab
   - Section Five shall be placed on the fifth (left hand) tab
   - Section six shall be placed on the last (right hand) tab

2. Four tab folder set-up
   Files shall be set up from left to right moving through the numbers sequentially once the folder is opened and must follow the format below.
   - Section One shall be on the first (left hand) tab once the folder is opened.
3. Two tab folder set-up
   The set-up is three sections per tab, working from left to right.
   - Sections One, Two and Three shall be stacked on first (left hand) tab. Section One and its corresponding documentation shall be on the bottom of the stack, then Section Two and its corresponding documentation in the middle, and finally Section Three and its corresponding documentation shall be placed on top.
   - Sections Four, Five and Six shall be stacked on the last (right hand) tab. Section Four with its corresponding documentation shall be on the bottom of the stack, Section Five and its corresponding documentation shall be in the middle, and Section Six with its corresponding documentation shall be placed on top.

B. Participant File Folder Cover/Labeling Format

Participant file folders should be labeled in a consistent manner and should not include any sensitive or personally identifiable information (PII) is not displayed for others to see. To protect and safeguard participants' personal information, sensitive and personally identifiable information (PII) must not be displayed on participant file folder cover/labeling.

1. Acceptable information for the participant file folder cover/label:
   - Participant Name
   - Program Name (Adult, Dislocated Worker, Youth)
   - Participation Date
   - Center Name
   - Case Manager
   - Service Provider
   - VaWC State Identification Number

2. Information that is not acceptable for the participant file folder cover/label:
   - Social Security Number (SSN)
   - Date of Birth
   - Other sensitive/personally identifiable information (PII)
C. **Electronic File Storage**

The VCCS recognizes that local areas and service providers may begin to engage in the use of electronic file storage. Areas that use an electronic file system must adhere to the requirements outlined below.

1. Identify a storage format that aligns with the paper format provided in this letter.
2. Ensure that the electronic system meets security requirements for storage of personally identifiable and confidential information.
3. Be able to provide access to the electronic files for monitoring and auditing staff on an as needed basis or be able to print out the documentation for files requested for review or audit within a 48 hour period. Printed file documentation shall also be presented for review according to the file format provided.

**INQUIRIES:**

Direct inquiries may be made to members of the VCCS monitoring team.