



# IMPERIAL COUNTY WORKFORCE DEVELOPMENT BOARD

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POLICY	ORIGINAL DATE	LAST REVISION
CalJOBS Participant Reporting Policy	FISCAL YEAR 2020-2021	May 26, 2021

## **POLICY OVERVIEW:**

This policy provides guidance and establishes procedures to be used by the Imperial County Workforce Development Board (ICWDB), the Imperial County Workforce and Economic Development Office (ICWED), America’s Job Center of California (AJCC) staff and Workforce Innovation and Opportunity Act (WIOA) funded service providers regarding participant reporting requirements for Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, and Youth, Title III Wagner-Peyser, as well as Trade Adjustment Assistance (TAA), Jobs for Veterans State Grant (JVSG), National Dislocated Worker Grant (NDWG), and National Farmworker Job Programs (NFJP).

## **REFERENCES:**

- WIOA (Public Law 113-128 [PDF])
- DOL Training and Employment Guidance Letter (TEGL) 14-18, Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor (DOL) (March 25, 2019)
- TEGL 10-16, Change 1, Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, Title VI Core Programs (August 23, 2017)
- Workforce Services Directive WSD20-02, Calculating Local Area Performance and Nonperformance (September 18, 2020)
- WSD18-02, Data Change Request Form Procedure (July 31, 2018)
- WSD16-23, Mandate Use of One Integrated Data System – Directive Key Entry in CalJOBS (June 20, 2017)

## **BACKGROUND:**

The Employment Development Department (EDD) is required by federal regulations to submit accurate participant reports and validated individual participant data to the Department of Labor (DOL) on a quarterly and annual basis. The DOL requires WIOA individual participant data be reported quarterly by each state via the Participant Individual Record Layout (PIRL) process. The PIRL is mandated to have one combined record per client, rolling up the entire plan of services provided to the client from WIOA Title I and Title III core and partner programs. The PIRL data is used to calculate the WIOA Primary Indicators of Performance, create the Quarterly Performance Reports, and the WIOA Annual Report. As part of this reporting requirement, the DOL requires coordination and co-enrollment between WIOA Title I and Title III core and partner programs to ensure a common record is maintained for each participant served with these funding streams.

**CalJOBS is the State of California’s federally recognized “system of record” for the participant tracking and reporting of WIOA Title I and Title III, JVSG, TAA, and two of California’s NFJP grantees.** As the system of record, CalJOBS provides a unified and streamlined intake and case

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management system that enables co-enrollment across programs, while reducing the duplication of services provided to program participants.

CalJOBS will allow a participant to simultaneously have one active Wagner-Peyser application, one active TAA application, one active NFJP application, and/or multiple active WIOA applications—as long as the Local Workforce Development Area (Local Area) is different on each active WIOA application. Within a WIOA application, the participant can be enrolled in multiple grants (including, but not limited to locally defined grants, statewide projects, formula funds, and NDWGs). An active application includes program eligibility and services funded by the associated program, and has not yet exited.

**Per Directive WSD16-23, WIOA Title I and Title III core and partner programs are required to direct key into CalJOBS in a timely manner to ensure a common record is maintained at all times, and when appropriate, a common exit is applied.**

The EDD is issuing this Directive to ensure participant data is entered into CalJOBS within acceptable timeframes and in the correct manner.

**POLICY AND PROCEDURES:**

**All WIOA Title I and Title III core programs, and TAA, JVSG, NDWG, and select NFJP programs are required to enter individual participant data via the CalJOBS system within a 30-day period from when the activity occurred.** This includes all participants served under a WIOA funded program regardless of whether the individual is served, or partly served, with matching funds required by the WIOA-funded program.

All sub-recipients shall:

- Ensure strict adherence to all State and local requirements related to CalJOBS;
- Establish quality control procedures to protect the integrity of data pertaining to participants, services and outcomes;
- Establish a review process for CalJOBS reports that include participant rosters and other reports provided by the ICWED;
- Ensure strict adherence to proper handling of personally identifiable information (PII) and other confidential participant information.

On a quarterly basis, the EDD must report a complete participant data set including base wage information to the DOL. In order to ensure base wage matching is completed, the base wage process begins a month prior to federal report deadlines, so timely participant data entry is required.

**The EDD requires timely data entry to ensure the single common record is maintained according to federal requirements.** Failure to perform data entry can result in, but is not limited to the following:

- Inaccurate data in CalJOBS that is reported to the DOL.
- Failure to meet the six primary indicators of performance (see Performance and Nonperformance Directive [WSD18-02]).
- Individuals not submitted for base wage matching.
- Individuals incorrectly common exited due to lack of data entry.
- Increase in errors leading to submission of Data Change Requests (DCR) (see Data Change Request Form Procedure [WSD18-02]).
- Denial of DCRs.

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- Loss of CalJOBS data quality for all partners.
- Trade Readjustment Allowance (TRA) Benefits not captured/uploaded in CalJOBS (TAA only).
- Monitoring and/or audit findings.
- Required entry of additional case notes.

If any data needs to be added or changed, the Data Change Request Form Procedure (WSD18- 02) must be followed.

#### **Data Entry for Non-Federally Reported Data**

**If the data is not required for federal reports or needed to determine eligibility, the data is not required to be entered in CalJOBS. However, the information must still be available for monitoring. This includes, but is not limited to: case notes, Objective Assessments, and Individual Employment Plans.**

Failure to meet these requirements may lead to a monitoring finding.

#### **MONITORING:**

In order to ensure that sub-recipients are able to successfully implement data validation, ICWED will ensuring regular and on-going monitoring. Monitoring will include, but is not limited to, checking CalJOBS data, conducting on-site visits and phone/email communication.

#### **ACTION:**

Please bring this policy to the attention of WDB, AJCC system staff and appropriate WIOA funded service providers and sub-recipients. This policy is effective immediately. All submitted forms are live documents and subject to change according to local, State, and Federal needs. Once the forms and exhibits pertaining to this policy are approved by the ICWDB, they will not require board approval if other changes occur, unless the change affects protocols. Should you have any questions, please feel free to contact ICWDB staff at (442) 265-4974, (442) 265-4959 or the Program and Compliance Manager (442) 265-4963.