

State Policy

Workforce Innovation and Opportunity Act (WIOA)

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	Administrative Requirements
	Effective date
	July 31, 2019
	Supersedes
	Records Management (effective October 11, 2017)

Records Management, Change 1

REFERENCE

Federal and state laws, regulations, rules, and other guidance and documentation relied upon for the development of this policy are cited in footnotes.

BACKGROUND

Recipients and subrecipients of Federal financial assistance are required to keep records that are sufficient to:¹

- trace funds to a level of expenditure adequate to ensure that funds have been spent lawfully;
- prepare required reports on program performance and outcomes; and
- verify that the reported performance data are valid, accurate, reliable, and comparable across programs.

¹ WIOA Secs. 116(d)(5) and 185(a) – (g); 2 CFR Parts 200 and 2900

ACTION

This policy supersedes and cancels the State's² Records Management policy (effective date October 11, 2017). Questions and comments on this policy may be submitted in writing to the WIOA policy mailbox at ndol.wioa_policy@nebraska.gov.

(a) Local WIOA Title I programs

For local Title I programs (youth, adult, and dislocated worker), each local board must ensure creation, management, and maintenance of records according to the requirements of this policy and the requirements of WIOA³ and its implementing regulations and related subregulatory guidance, grant agreements, and the Uniform Guidance.⁴

(b) NDOL-administered programs

For programs administered by the Nebraska Department of Labor (NDOL), which are listed in [Section I\(b\)](#), program management must ensure creation, management, maintenance of records according to the requirements of this policy and the requirements of each program's authorizing legislation, implementing regulations, subregulatory guidance, grant agreements, and the Uniform Guidance.

CHANGES

This policy establishes the following material changes to the cancelled policy.

- Section II(a)(1) in the cancelled policy regarding the use of third-party systems for documentation and management of local Title I programs has been rescinded.
- [Section II](#) now states that NDOL record and source documentation management systems must be used by all local Title I programs and NDOL-administered programs; and clarifying revisions have been made to Section II regarding use of source documentation management systems.
- Sections III(a) and (b) in the cancelled policy regarding electronic records and case notes have been revised and relocated to [Appendix I](#) as part of the definition of source documentation types. Section III(c) in the cancelled policy regarding exclusion of participants has been deleted and will be made part of the State's policy on performance. The remaining provisions of Section III have been revised and incorporated into [Section II](#) and the following sections of the policy have been renumbered accordingly.
- [Section IV](#) has been revised to clarify records retention requirements.
- [Section VI](#) has been added to establish data validation and monitoring requirements.

² State refers to the Nebraska Workforce Development Board and the Nebraska Department of Labor (acting on the Governor's behalf pursuant to the Governor's Executive Order No. 15-03).

³ WIOA refers to the Workforce Innovation and Opportunity Act of 2014.

⁴ WIOA Secs. 116(d)(5) and 185(a) – (g). *Uniform Guidance* refers to 2 CFR Parts 200 and 2900.

- [Appendix I. Definitions](#) has been revised to include a definition for source documentation types.
- [Appendix II. Acceptable source documentation for common data elements](#) has been added.

POLICY

This policy establishes records management requirements for local Title I programs and NDOL-administered programs.

This policy is organized into six sections and two appendices.

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Section I. General requirements

As Nebraska's recipient of state-level funding for local Title I programs, NDOL is required to submit reports to the US Department of Labor (USDOL) concerning the operations and expenditures of the programs at the state and local level.⁵

The required reports must include information necessary to comply with the nondiscrimination provisions of WIOA Sec. 188 and 29 CFR Part 38, as well as information about:⁶

- demographic characteristics (including race, ethnicity, sex, and age) and other related information regarding participants;
- programs and activities in which participants are enrolled and the length of time participants are engaged in the programs and activities;
- outcomes for participants taking part in programs and activities, including information on participant occupations and placement of participants in nontraditional employment; and
- costs of the programs and activities.

In addition, NDOL is required to submit reports to USDOL concerning the operations and expenditures of the NDOL-administered programs. Reporting requirements for these programs

⁵ WIOA Sec. 185(c)

⁶ WIOA Sec. 185(d)

are defined in each program's authorizing legislation, implementing regulations, subregulatory guidance, grant agreements, and the Uniform Guidance.

In order for NDOL to prepare and submit the required reports, local Title I programs and NDOL-administered programs must create, manage, and maintain records concerning the operations and expenditures of their respective programs as described in this policy.

(a) Local Title I programs

Each local board must, for reporting, monitoring, data validation, and evaluation purposes:⁷

- ensure the utilization of NDOL's records and source documentation management systems to enable uniform compilation, cross tabulation, and analysis of programmatic, participant, and financial data, including data necessary to comply with the nondiscrimination provisions of WIOA Sec. 188 and 29 CFR Part 38; and
- submit and make available through electronic means the required records, source documentation, and data.

Records for local Title I programs must be created, managed, and maintained according to the requirements established in this policy and the requirements of WIOA and its implementing regulations and related subregulatory guidance, grant agreements, and the Uniform Guidance.

(b) NDOL-administered programs

NDOL administers the following Federally funded programs:

- Jobs for Veterans State Grant program;
- Trade Adjustment Assistance program;
- Wagner-Peyser Employment Service; and
- discretionary grant programs.

Program management for each NDOL-administered program must, for reporting, monitoring, data validation, and evaluation purposes:

- ensure the utilization of NDOL's records and source documentation management systems to enable uniform compilation, cross tabulation, and analysis of programmatic, participant, and financial data, including data necessary to comply with the nondiscrimination provisions of WIOA Sec. 188 and 29 CFR Part 38, as applicable; and
- submit and make available through electronic means the required records, source documentation, and data.

Records for these programs must be created, managed, and maintained according to the requirements established in this policy and the requirements of each program's authorizing

⁷ WIOA Sec. 185(c); TEGL 10-16 Change 1

legislation, implementing regulations, subregulatory guidance, grant agreements, and the Uniform Guidance.

Section II. Records management systems

NEworks is the system of record for the State of Nebraska for Federal reporting purposes for local Title I programs and NDOL-administered programs. The Enterprise Content Management system (ECM) and NEworks Document Manager (NDM) are NDOL's source documentation management systems. Local Title I programs and NDOL-administered programs must use NEworks and ECM or NDM to record and document all program activities and services electronically. Paper records are not permitted and are not considered for data validation and monitoring purposes.

Regarding the use of ECM and NDM, the Greater Lincoln and Greater Nebraska Workforce Development Areas and all NDOL-administered programs currently use ECM for source documentation management. The Greater Omaha Workforce Development Area currently uses NDM for source documentation management. NDOL has a transition plan in place for migration of Greater Lincoln and Greater Nebraska Title I programs and NDOL-administered programs to NDM for management of source documentation, which should occur by the end of Program Year 2019.

Section III. Records corrections

Records in NEworks, ECM, and NDM that contain errors must be corrected. However, requests for correction of records will not be processed if the records are included in an annual performance report that has been submitted to USDOL. To request a record correction in NEworks, ECM, or NDM, staff must complete and submit a record correction form according to the process established by local area management staff for local Title I programs or program management staff for NDOL-administered programs. The request must include source documentation. All requests must (a) include source documentation evidencing the need for the correction and (b) be reviewed and approved by local area management or program management prior to submission to NDOL's NEworks System Administrator for processing.

Records corrections must not be used to enhance program performance or distort actual events.

Section IV. Records retention

(a) Local Title I programs⁸

Subject to the exceptions described in [Section IV\(c\)](#), each local board must ensure that the following records relating to each of its Title I programs are retained for a minimum of three years from the date of NDOL's submission of the final expenditure report to USDOL for the applicable program year:

⁸ 2 CFR § 200.333

- financial records;
- source documentation;
- statistical records; and
- all other records pertaining to the programs.

A local board may request the date of NDOL's submission of the final expenditure report by sending an email to Kim Schreiner at kim.schreiner@nebraska.gov.

The Greater Lincoln and Greater Omaha Workforce Development Boards may be subject to additional record retention requirements based on state, county, or city laws.

The Greater Nebraska Workforce Development Board may be subject to additional records retention requirements under the Nebraska Records Management Act.⁹ Greater Nebraska program management must refer to the records retention and disposition schedules established by Nebraska's Secretary of State, which are accessible at http://www.sos.ne.gov/records-management/labor_schedule.html.

(b) NDOL-administered programs

NDOL-administered programs are bound by the same three-year retention period described above. In addition to the three-year retention requirement, NDOL-administered programs are subject to additional records retention requirements under the Nebraska Records Management Act. Program management must refer to the records retention and disposition schedules established by Nebraska's Secretary of State, which are accessible at http://www.sos.ne.gov/records-management/labor_schedule.html.

(c) Exceptions¹⁰

USDOL is not permitted to impose record retention requirements upon NDOL other than those stated in the Uniform Guidance, except under the circumstances described in items 1 through 6 below. Likewise, NDOL and local boards are not permitted to impose record-retention requirements upon their respective subrecipients other than those stated in the Uniform Guidance, subject to the requirements of the Nebraska Records Management Act and applicable county and city laws, except under the circumstances described in items 1 through 6 below.

1. If any litigation, claim, or audit is started before the expiration of the applicable retention period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
2. The retention period must be extended when the applicable entity is notified in writing to extend the retention period and the written notification is provided by USDOL, NDOL, a local board, other cognizant agency for audit, oversight agency for audit, or cognizant agency for indirect costs.

⁹ Neb. Rev. Stat. §§ 84-1201 – 84-1229

¹⁰ 2 CFR § 200.333

3. Records for real property and equipment acquired with Federal funds must be retained for three years after final disposition of the property and equipment.
4. When records are transferred to or maintained by USDOL or NDOL, the three-year retention requirement no longer applies to the local board.
5. *Records for program income transactions after the period of performance.* In some cases, recipients of Federal funds must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the non-Federal entity's fiscal year in which the program income is earned.
6. *Indirect cost rate proposals and cost allocations plans.* This paragraph applies to the following types of documents and their supporting records: indirect cost rate computations or proposals, cost allocation plans, and any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).
 - (a) *If submitted for negotiation.* If the proposal, plan, or other computation is required to be submitted to the Federal government (or to the pass-through entity, such as NDOL or a local board) to form the basis for negotiation of the rate, then the required retention period for its supporting records starts from the date of submission.
 - (b) *If not submitted for negotiation.* If the proposal, plan, or other computation is not required to be submitted to the Federal government (or to a pass-through entity, such as NDOL or a local board) for negotiation purposes, then the applicable retention period for the proposal, plan, or computation and its supporting records starts from the end of the fiscal year (or other accounting period) covered by the proposal, plan, or other computation.

Section V. Records access

(a) Right of access¹¹

The Federal awarding agency, Inspectors General, Comptroller General of the United States, NDOL, local boards, and any of their respective authorized representatives must have the right of access to any documents, papers, or other records of a non-Federal entity that pertain to the Federal award in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the non-Federal entity's personnel for the purpose of interview and discussion related to such documents.

(b) Expiration of right of access¹²

The rights of access described above are not limited to the required retention periods described in [Section IV](#). The rights of access last as long as the records are retained by the non-Federal

¹¹ 2 CFR § 200.336(a)

¹² 2 CFR § 200.336(c)

entity. Federal awarding agencies and pass-through entities (such as NDOL and local boards) must not impose any other access requirements upon non-Federal entities.

(c) Public access to records¹³

Unless required by Federal, state, local, or tribal statute, non-Federal entities are not required to permit public access to their records. No Federal awarding agency may place restrictions on a non-Federal entity that limit public access to the entity's records pertaining to a Federal award, except:

- records that include protected personally identifiable information; or
- when the Federal awarding agency can demonstrate that the records will be kept confidential and would have been:
 - exempted from disclosure pursuant to the Freedom of Information Act (FOIA);¹⁴ or
 - deemed as controlled unclassified information¹⁵ pursuant to Executive Order 13556, if the records had belonged to the Federal awarding agency.

Records provided to a Federal agency by a non-Federal entity are, in general, subject to FOIA and applicable exemptions.

Section VI. Data validation, monitoring, and quality assurance

(a) Data validation

Data validation is a series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data. NDOL is required to establish data validation procedures.¹⁶ The purposes of data validation procedures are to:¹⁷

- verify that the performance data reported to USDOL are valid, accurate, reliable, and comparable across programs;
- identify anomalies in the data and resolve issues that may cause inaccurate reporting;
- identify source documentation required for data elements; and
- improve program performance accountability through the results of data validation efforts.

¹³ 2 CFR § 200.337

¹⁴ 5 USC § 552. FOIA does not apply to records that remain under a non-Federal entity's control, except as required under 2 CFR § 200.315 (intangible property).

¹⁵ Controlled unclassified information (CUI) is unclassified information belonging to the Executive Branch of the US Government that requires safeguarding or dissemination controls.

¹⁶ WIOA Sec. 116(d)(5); TEGL 07-18

¹⁷ TEGL 07-18

For Title I programs and the Wagner-Peyser Employment Service, NDOL is required to perform regular data element validation on the 24 common data elements listed in [Appendix II](#).¹⁸ Appendix II also identifies the acceptable source documentation that is necessary to validate the data elements.

(1) Procedures

(i) System-automated data validation

Data is validated quarterly and annually through large-scale, system-automated data validation, which occurs at the state-level through the following processes.

1. NDOL's vendor for NEworks provides a full PIRL¹⁹ file to NDOL on a daily basis through secure file transfer, which is then uploaded to the WIPS²⁰ data validation and reporting clearinghouse during quarterly and annual reporting cycles, as defined by USDOL.
2. The full PIRL file passes through a preliminary data validation and edit check protocol, which scans all individual and programmatic data elements. The edit check searches for date range errors and inconsistencies, anomalies, and waterfall errors (i.e., if element a = 1, element b cannot = 2).
3. Once the full PIRL file successfully clears the edit check protocol, the full PIRL reports can be certified by the responsible NDOL Workforce Services Administrator.
4. A similar data validation and edit check process for wage data occurs simultaneously in the WRIS²¹ clearinghouse during quarterly and annual reporting cycles, as defined by USDOL. The data goes through an import/export/validation process within NEworks and is then inserted as aggregate data into the full PIRL file, after which the data is retired from NEworks.

(ii) Manual data validation

NDOL's State WIOA Monitor must perform data validation for Title I programs and the Wagner-Peyser Employment Service on an annual basis.²² Data validation is performed according to the following guidelines and processes.

(I) Records sampling

In order to maximize the chances of a representative sample, selection of participant cases for data validation must be performed according to the principle of EPSEM (**E**qual **P**robability of

¹⁸ Ibid.

¹⁹ PIRL means Participant Individual Record Layout, a format for reporting program data to USDOL.

²⁰ WIPS refers to the Workforce Integrated Performance System, the system by which states report on the performance of workforce programs.

²¹ WRIS refers to the Wage Record Interchange System, which facilitates the exchange of wage data among participating states for the purpose of assessing and reporting on state and local employment and training program performance, evaluating training provider performance, and for other purposes allowed under the WRIS Data Sharing Agreement. WRIS will be replaced by the State Wage Interchange System (SWIS) in early 2020 [<https://www.doleta.gov/performance/swis.cfm>].

²² TEGL 07-18

SElection Method).²³ To follow the EPSEM principle, a sample of participant cases is selected so that every participant case in a program population has an equal probability of being selected. A participant case is the set of records documenting services provided to a program participant. A program population is the total number of participants who have exited a program during the previous full program year (the data validation timeframe). Samples for each Title I program and the Wagner-Peyser Employment Service are obtained according to the following process.

1. On an annual basis, the NEworks System Administrator provides the State WIOA Monitor with four program population lists for the data validation timeframe, one for each Title I program (youth, adult, and dislocated worker) and one for the Wagner-Peyser Employment Service. The lists are provided to the State WIOA Monitor on the latter of the first working day of November or within 15 days of the Federal reporting due date.
2. The required number of participant cases is then selected by the State WIOA Monitor from each program population list through systematic sampling,²⁴ where only the first participant case is randomly selected and every n th case thereafter is selected (n th = the total program population divided by the required sample size). For example, if the sample is drawn from a list of 247 total participant cases and the required sample size is 37, n th = 7. If participant case #13 is randomly selected as the first case, then the second case will be #20, the third #27, and so on until the required number of samples is selected.

Table 2 lists the number of cases that must be selected from each program population for data validation purposes.

Table 2. Required sample size per program

Program population size	Confidence level	Confidence interval	Sample size
1 - 99	95%	15%	30
100 - 199	95%	15%	35
200 - 299	95%	15%	37
300 - 399	95%	15%	39
400 - 499	95%	15%	39
500 - 599	95%	15%	40
600 - 699	95%	15%	40
700 - 799	95%	15%	41
800 - 899	95%	15%	41
900 - 999	95%	15%	41
1000 - 1999	95%	15%	42
2000 - 4999	95%	15%	42
5000 - 9999	95%	15%	43
10000 - 14999	95%	15%	43
15000 - 19999	95%	15%	43
20000 - 24999	95%	15%	43
25000 - 29999	95%	15%	43
30000 +	95%	15%	43

²³ Joseph F. Healey, *Statistics, A Tool for Social Research* (United States: Thomson Wadsworth, 2005), 150.

²⁴ Ibid. 152.

(II) Validating

Data validation of the 24 elements listed in [Appendix II](#) by the State WIOA Monitor for Title I programs and the Wagner-Peyser Employment Service is based on the following guidelines.

1. Each case in each sample is evaluated, comparing the information in NEworks for the data element to the source documentation provided in ECM or NDM, to determine if source documentation is:
 - a. present for each of the 24 elements that are applicable to the respective program;²⁵ and
 - b. an acceptable form of source documentation is present for the applicable data element, as described in Appendix II.
2. For most data elements, the validation guidelines in Appendix II provide multiple forms of acceptable source documentation. If multiple types of source documentation²⁶ are present in ECM or NDM for the same data element and the sources conflict, the most objective source should be used to determine if the data element is valid and accurate.

Following the completion of data validation, the State WIOA Monitor provides a report to the NEworks System Administrator for evaluation.

(b) Program-level data monitoring and validation

Local Title I programs and NDOL-administered programs are individually responsible for development and implementation of program-level data monitoring and validation procedures to ensure data accuracy. At a minimum, program-level data monitoring and validation procedures must:

- be performed based on a regular basis, but no less frequently than quarterly;
- insure that recorded program activities are accurately supported by acceptable source documentation as required by each program's authorizing legislation, implementing regulations, subregulatory guidance, grant agreements, and the applicable requirements of the Uniform Guidance;
- be performed based on a sampling methodology established by local area or program management responsible for oversight of the program;²⁷
- include a process for providing technical assistance to local area or program staff when data monitoring and validation reveals invalid data; and

²⁵ Not all data elements in [Appendix II](#) apply to all Title I programs and the Wagner-Peyser Employment Service. For example, data element 1303 (Type of training service #1) does not apply to Wagner-Peyser because Wagner-Peyser does not provide training services.

²⁶ Refer to [Appendix I](#) for a definition of types of source documentation.

²⁷ Programs are strongly encouraged to utilize the sampling methodology and validating process described in [Section VI\(a\)\(1\)\(ii\)\(I\)-\(II\)](#).

- include procedures for submitting and managing timely record corrections of case files in NEworks that have been self-identified as having invalid data, subject to the requirements of [Section III](#).

Each program may implement additional source documentation requirements for program-specific data elements.

(c) Quality assurance

On a quarterly basis, NDOL may conduct quality assurance reviews of NDOL-administered programs to determine whether programs are complying with the requirements of this policy and the programs' established procedures for conducting program-level data monitoring and validation procedures to ensure data accuracy.

(d) Staff training

NDOL provides local area and program staff with access to monthly training on the use of NEworks and ECM. Once all local Title I programs and NDOL-administered programs are migrated to NDM, NDOL will provide training on its use. Requests for additional training on NEworks and ECM must be submitted by email to Brian Potters at brian.potters@nebraska.gov.

NDOL also provides annual training for the State WIOA Monitor and local area and program staff on data validation and monitoring, including training on records sampling and acceptable source documentation.

DISCLAIMER

This policy is based on NDOL's reading of the applicable statutes, regulations, rules, and guidance released by the US Government and the State of Nebraska. This policy is subject to change as revised or additional statutes, regulations, rules and guidance are issued.

APPENDIX I. Definitions

PURPOSE. Definitions in this appendix are provided as supplemental information that supports the provisions of the policy. The terms and phrases defined in this appendix should be read and understood in the context in which they are used in the policy and not as stand-alone information independent of that context.

1. exit (program exit)²⁸ and common exit²⁹

Exit (or *program exit*) is the last date of service provided to a participant under a program listed below. The last day of service cannot be determined until at least 90 days have elapsed since the participant last received services and there are no plans to provide the participant with future services. Services do not include self-service, information-only services or activities, or follow-up services. This criterion for determining program exit applies to the:

- local Title I programs;
- Jobs for Veterans State Grant program;
- Trade Adjustment Assistance program; and
- Wagner-Peyser Employment Service.

Common exit means a participant is exited only when all *exit* criteria described above in the definition of *exit* are met for each program in which the participant is enrolled.

Example: Joe is enrolled in the Trade Adjustment Assistance Program and is co-enrolled in a dislocated worker program and the Wagner-Peyser Employment Service. Joe's last date of service under Wagner-Peyser is August 1. Joe's last date of service under the dislocated worker program is September 15. Joe's last date of service under the Trade program is October 1. Joe receives no additional services from any of the programs. Joe's common exit date is October 1.

2. Federal financial assistance

Federal financial assistance means assistance that non-Federal entities receive or administer in the form of:³⁰

- | | |
|--|--|
| ▪ grants | ▪ food commodities |
| ▪ cooperative agreements | ▪ other financial assistance, excluding: |
| ▪ non-cash contributions or donations of property (including donated surplus property) | ○ loans and loan guarantees |
| ▪ direct appropriations | ○ interest subsidies |
| | ○ insurance |

²⁸ 20 CFR § 677.150(c)

²⁹ 20 CFR § 677.150(c)(3)(ii)

³⁰ 2 CFR § 200.40

3. non-Federal entity

Non-Federal entity means a state, local government, Indian tribe, institution of higher education, or nonprofit organization that carries out a Federal award as a recipient or subrecipient.³¹ For purposes of the policy, non-Federal entity may refer to NDOL, local boards, or other entities.

4. pass-through entity

Pass-through entity means a non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program.³² For purposes of this policy, pass-through entity may refer to NDOL or local boards, depending on the context.

5. recipient³³

Recipient means a non-Federal entity that receives a Federal award directly from a Federal awarding agency to carry out an activity under a Federal program. The term *recipient* does not include subrecipients. For purposes of this policy, recipient refers to NDOL.

6. source documentation types

Acceptable *source documentation types* include:³⁴

a. Cross-match

A cross-match requires the validator to find detailed supporting evidence for the data element in a database. An indicator or presence of a Social Security Number in an administrative non-WIOA database *is not* sufficient evidence for a cross-match. A non-WIOA database is a database that is not maintained by a WIOA core program, such as database maintained by the Nebraska Department of Motor Vehicles. A validator must confirm supporting information such as dates of participation and services rendered when using a cross-match as source documentation.

b. Self-attestation

Self-attestation (also referred to as a participant statement) occurs when a participant states their status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status. The key elements of self-attestation are:

- the participant identifying his or her status for permitted data elements; and
- signing and dating a form attesting to this self-identification.

The form may be completed electronically in NEworks with an electronic signature or completed and signed using a paper form. When using a paper form, the form must be

³¹ 2 CFR § 200.69

³² 2 CFR § 200.74

³³ 2 CFR § 200.86

³⁴ TEGL 07-18

scanned and uploaded into ECM or NDM once it has been completed and signed by the participant.

c. Case notes

Case notes refers to electronic statements entered into NEworks by a case manager that identify, at a minimum:³⁵

- a participant's status for a specific data element (i.e., program activity or service);
- the date on which the information was obtained from the participant; and
- the name of the case manager who obtained the information.

If a program activity is planned to last more than one day, the case manager must document actual service delivery in case notes.

Case notes add context to services provided to a participant that are not clearly evidenced by the recording of program activities or services in NEworks, such as details relating to participant enrollment and discussions regarding possible training services, including consultations relating to the Eligible Training Provider List which must be documented.³⁶ It is important to note that case notes are necessary supplemental information that support recorded services, and they are considered during data validation and monitoring.

d. Electronic records

Electronic records are participant records created, stored, and maintained exclusively in NEworks, ECM, or NDM, including:

- | | |
|------------------------------|--|
| ▪ program applications | ▪ exits and follow-ups |
| ▪ eligibility determinations | ▪ case notes |
| ▪ participant enrollments | ▪ all other information relevant to program activities |

7. subrecipient³⁷

Subrecipient means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program. The terms *subrecipient* does not include an individual that is a beneficiary of a Federal program, meaning a program participant.

³⁵ TEGL 07-18

³⁶ Refer to the State's policy on Eligible Training Providers for information on consultation requirements. The policy is accessible at <https://dol.nebraska.gov/EmploymentAndTraining/LCRWP/WIOA/Policies>.

³⁷ 2 CFR § 200.93

APPENDIX II. Acceptable source documentation for common data elements

PIRL data element #	Data element name	Date type / field length	Data element definition/instructions	Code value	Source documentation requirements
900	Date of program entry	DT 8	<ul style="list-style-type: none"> Record the date on which an individual became a participant as referenced in 20 CFR 677.150 satisfying applicable programmatic requirements for the provision of services. Leave blank if this data element does not apply. 	YYYYMMDD	One of the following: <ul style="list-style-type: none"> individual plan for employment electronic records program intake documents, such as eligibility determination documentation or program enrollment forms
901	Date of program exit	DT 8	<ul style="list-style-type: none"> Record the last date the participant received services that are not self-service, information-only, or follow up services. Record this last date of receipt of services only if there are no future services that are not self-service, information-only, or follow up services, planned from the program. For Titles I and III, record the last date of funded service(s). Leave blank if this data element does not apply to the participant. 	YYYYMMDD	One of the following: <ul style="list-style-type: none"> copy of letter sent to the participant indicating the case was closed WIOA status/exit forms electronic records attendance records review of service records identifying the last qualifying service (and lack of a planned gap)
923	Other reasons for exit	IN 2	<ul style="list-style-type: none"> Record 01 if the participant exits the program because he or she has become incarcerated in a correctional institution or has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center during the course of receiving services as a participant. Record 02 if the participant exits the program because of medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program. Record 03 if the participant is deceased. Record 04 if the participant exits the program because the participant is a member of the National Guard or other reserve military unit of the armed forces and is called to active duty for at least 90 days. 	01 = institutionalized 02 = health/medical 03 = deceased 04 = Reserve Forces called to Active Duty 05 = foster care 06 = ineligible (VR only) 07 = criminal offender 00 = no	One of the following: <ul style="list-style-type: none"> file documentation with notes from program staff information from partner services WIOA status/exit forms electronic records withdrawal form with explanation information from institution or facility

PIRL data element #	Data element name	Date type / field length	Data element definition/instructions	Code value	Source documentation requirements
			<ul style="list-style-type: none"> Record 05 if the participant is in the foster care system as defined in 45 CFR 1355.20(a), and exits the program because the participant has moved from the area as part of such a program or system (Youth participants only). Record 06 if the participant, who was determined to be eligible, is later determined not to have met eligibility criteria. NOTE: This circumstance applies only to the VR program, in which participant eligibility is routinely revisited during the participation period. For Titles I, II, and III program eligibility is determined at the time an individual becomes a participant. Record 07 if the participant is a criminal offender in a correctional institution under Section 225 of WIOA. Record 00 if the participant meets none of the above conditions. 		
1303	Type of training service #1	IN 2	<ul style="list-style-type: none"> Use the appropriate code to indicate the type of approved training being provided to the participant. NOTE: If OJT or skill upgrading is being provided as part of a Registered Apprenticeship program, choose Code 09. NOTE: Code 06 should only be utilized when other codes are clearly not appropriate. Record 00 if the participant did not receive a training service. Leave blank if this data element does not apply to the participant. 	01 = on-the-job training (non-WIOA Youth) 02 = skill upgrading 03 = entrepreneurial training (non-WIOA Youth) 04 = ABE or ESL (contextualized or other) in conjunction with training 05 = customized training 06 = occupational skills training (non-WIOA Youth) 07 = ABE or ESL (contextualized or other) NOT in conjunction with training (funded by Trade Adjustment Assistance only) 08 = prerequisite training 09 = Registered Apprenticeship 10 = youth occupational skills training 11 = other non-occupational-skills training 12 = job readiness training in conjunction with other training 00 = no training service	One of the following: <ul style="list-style-type: none"> copy of enrollment record file documentation with notes from program staff cross-match between dates of service and vendor training information vendor training documentation electronic records Individual Training Account attendance records
1310	Type of training service #2	IN 2	<ul style="list-style-type: none"> If the participant received a second type of approved training, record the appropriate code to indicate the type of approved training being provided to the participant. 	01 = on-the-job training (non-WIOA Youth) 02 = skill upgrading 03 = entrepreneurial training (non-WIOA Youth)	One of the following: <ul style="list-style-type: none"> copy of enrollment record file documentation with notes from program staff

PIRL data element #	Data element name	Date type / field length	Data element definition/instructions	Code value	Source documentation requirements
			<ul style="list-style-type: none"> NOTE: If OJT or skill upgrading is being provided as part of a Registered Apprenticeship program, choose Code 09. NOTE: Code 06 should only be utilized when other codes are clearly not appropriate. Record 00 if the participant did not receive a training service. Leave blank if this data element does not apply to the participant. 	04 = ABE or ESL (contextualized or other) in conjunction with training 05 = customized training 06 = occupational skills training (non-WIOA Youth) 07 = ABE or ESL (contextualized or other) NOT in conjunction with training (funded by Trade Adjustment Assistance only) 08 = prerequisite training 09 = Registered Apprenticeship 10 = youth occupational skills training 11 = other non-occupational-skills training 12 = job readiness training in conjunction with other training 00 = no training service	<ul style="list-style-type: none"> cross-match between dates of service and vendor training information vendor training documentation electronic records Individual Training Account attendance records
1315	Type of training service #3	IN 2	<ul style="list-style-type: none"> If the participant received a third type of approved training, record the appropriate code to indicate the type of approved training being provided to the participant. NOTE: If OJT or skill upgrading is being provided as part of a Registered Apprenticeship program, choose Code 09. NOTE: Code 06 should only be utilized when other codes are clearly not appropriate. Record 00 if the participant did not receive a training service. Leave blank if this data element does not apply to the participant. 	01 = on-the-job training (non-WIOA Youth) 02 = skill upgrading 03 = entrepreneurial training (non-WIOA Youth) 04 = ABE or ESL (contextualized or other) in conjunction with training 05 = customized training 06 = occupational skills training (non-WIOA Youth) 07 = ABE or ESL (contextualized or other) NOT in conjunction with training (funded by Trade Adjustment Assistance only) 08 = prerequisite training 09 = Registered Apprenticeship 10 = youth occupational skills training 11 = other non-occupational-skills training 12 = job readiness training in conjunction with other training 00 = no training service	One of the following: <ul style="list-style-type: none"> copy of enrollment record file documentation with notes from program staff cross-match between dates of service and vendor training information vendor training documentation electronic records Individual Training Account attendance records
1332	Participated in postsecondary education during program participation	IN 1	<ul style="list-style-type: none"> Record 1 if the participant was in a postsecondary education program that leads to a credential or degree from an accredited postsecondary education institution at any point during program participation. Record 0 if the participant was not in a postsecondary education program that leads to a credential or degree from an 	1 = yes, participated in postsecondary education 0 = no, did not participate in postsecondary education	One of the following: <ul style="list-style-type: none"> data match with postsecondary data system copy of enrollment record file documentation with notes from program staff school records transcript or report card

PIRL data element #	Data element name	Date type / field length	Data element definition/instructions	Code value	Source documentation requirements
			<p>accredited postsecondary education institution during program participation.</p> <ul style="list-style-type: none"> ▪ Leave blank if this does not apply to the participant. ▪ NOTE: This data element relates to the credential indicator denominator and those who are recorded as 1 are included in the credential rate denominator. This element is a subset of PIRL 1811. ▪ Do not record 1 if the participant was first enrolled in postsecondary education after exiting the program. 		
1401	Enrolled in secondary education program	IN 1	<ul style="list-style-type: none"> ▪ Record 1 if the participant was enrolled in a secondary education program at or above the 9th grade level. A secondary education program includes both secondary school and enrollment in a program of study with instruction designed to lead to a high school equivalent credential. Examples may include adult high school credit programs and programs designed to prepare participants to pass recognized high school equivalency exams such as the GED, HiSET, or TASC. Programs of study designed to teach English proficiency skills or literacy skills below the 9th grade equivalent <i>are not</i> considered secondary education programs. States may use this coding value if the participant was either already enrolled in education or training at the time of application to the program OR became enrolled in an education or training program at or above the 9th grade level at any point while participating in the program. ▪ Record 0 if the participant was not enrolled in a secondary education program at or above the 9th grade level. 	<p>1 = yes 0 = no</p>	<p>One of the following:</p> <ul style="list-style-type: none"> ▪ copy of enrollment record ▪ file documentation with notes from program staff ▪ school records ▪ transcript or report card ▪ data match to state K12 data system
1406	Date enrolled in post-exit education or training program leading to a recognized	DT 8	<ul style="list-style-type: none"> ▪ Record the date the participant is enrolled in an education or training program that leads to a recognized postsecondary credential after program exit. ▪ Leave blank if this data element does not apply to the participant. 	YYYYMMDD	<p>One of the following:</p> <ul style="list-style-type: none"> ▪ copy of enrollment record ▪ file documentation with notes from program staff ▪ school records ▪ transcript or report card

PIRL data element #	Data element name	Date type / field length	Data element definition/instructions	Code value	Source documentation requirements
	postsecondary credential		<ul style="list-style-type: none"> NOTE: This element only applies to participants who exited secondary education and obtained a secondary school diploma or its equivalency per WIOA Sec. 116(b)(2)(A)(iii). This data element applies to the credential rate indicator. 		<ul style="list-style-type: none"> data match with postsecondary data system
1600	Employed in 1st quarter after exit quarter	IN 1	<ul style="list-style-type: none"> Record 1 if the participant is in unsubsidized employment (not including Registered Apprenticeship, or the military). Record 2 if the participant is in a Registered Apprenticeship. Record 3 if the participant is in the military. Record 0 if the participant was not employed in the first quarter after the quarter of exit. Record 9 if the participant has exited but employment information is not yet available. 	1 = yes 2 = yes, Registered Apprenticeship 3 = yes, Military 0 = no 9 = information not yet available	One of the following: <ul style="list-style-type: none"> UI wage data match follow-up survey from program participants paycheck stubs, tax records, W2 form wage record match quarterly tax payment forms such as an IRS form 941 document from employer on company letterhead attesting to an individual's employment status and earnings self-employment worksheets signed and attested to by program participant detailed case notes verified by employer and signed by the counselor
1602	Employed in 2nd quarter after exit quarter	IN 1	<ul style="list-style-type: none"> Record 1 if the participant is in unsubsidized employment (not including Registered Apprenticeship, or the military). Record 2 if the participant is in a Registered Apprenticeship. Record 3 if the participant is in the military. Record 0 if the participant was not employed in the second quarter after the quarter of exit. Record 9 if the participant has exited but employment information is not yet available. 	1 = yes 2 = yes, Registered Apprenticeship 3 = yes, Military 0 = no 9 = information not yet available	One of the following: <ul style="list-style-type: none"> UI wage data match follow-up survey from program participants Paycheck stubs, tax records, W2 form wage record match quarterly tax payment forms such as an IRS form 941 document from employer on company letterhead attesting to an individual's employment status and earnings self-employment worksheets signed and attested to by program participant detailed case notes verified by employer and signed by the counselor
1604	Employed in 3rd quarter after exit quarter	IN 1	<ul style="list-style-type: none"> Record 1 if the participant is in unsubsidized employment (not including Registered Apprenticeship, or the military). Record 2 if the participant is in a Registered Apprenticeship. Record 3 if the participant is in the military. 	1 = yes 2 = yes, Registered Apprenticeship 3 = yes, Military 0 = no 9 = information not yet available	One of the following: <ul style="list-style-type: none"> UI wage data match follow-up survey from program participants Paycheck stubs, tax records, W2 form wage record match

PIRL data element #	Data element name	Date type / field length	Data element definition/instructions	Code value	Source documentation requirements
			<ul style="list-style-type: none"> Record 0 if the participant was not employed in the third quarter after the quarter of exit. Record 9 if the participant has exited but employment information is not yet available. 		<ul style="list-style-type: none"> quarterly tax payment forms such as an IRS form 941 document from employer on company letterhead attesting to an individual's employment status and earnings self-employment worksheets signed and attested to by program participant detailed case notes verified by employer and signed by the counselor
1606	Employed in 4th quarter after exit quarter	IN 1	<ul style="list-style-type: none"> Record 1 if the participant is in unsubsidized employment (not including Registered Apprenticeship, or the military). Record 2 if the participant is in a Registered Apprenticeship. Record 3 if the participant is in the military. Record 0 if the participant was not employed in the fourth quarter after the quarter of exit. Record 9 if the participant has exited but employment information is not yet available. 	1 = yes 2 = yes, Registered Apprenticeship 3 = yes, Military 0 = no 9 = information not yet available	One of the following: <ul style="list-style-type: none"> UI wage data match follow-up survey from program participants Paycheck stubs, tax records, W2 form wage record match quarterly tax payment forms such as an IRS form 941 document from employer on company letterhead attesting to an individual's employment status and earnings self-employment worksheets signed and attested to by program participant detailed case notes verified by employer and signed by the counselor
1704	Wages 2 nd quarter after exit	DE 8.2	<ul style="list-style-type: none"> Record total earnings for the second quarter after the quarter of exit. Record 999999.99 if data is not yet available for this item. Leave blank if data element does not apply to the participant. 	000000.00	One of the following: <ul style="list-style-type: none"> UI wage data match follow-up survey from program participants Paycheck stubs, tax records, W2 form wage record match quarterly tax payment forms such as an IRS form 941 document from employer on company letterhead attesting to an individual's employment status and earnings self-employment worksheets signed and attested to by program participant detailed case notes verified by employer and signed by the counselor
1800	Type of recognized credential	IN 1	<ul style="list-style-type: none"> Use the appropriate code to record the type of recognized diploma, degree, or a credential consisting of an industry-recognized certificate or certification, a 	1 = secondary school diploma or equivalency 2 = AA or AS diploma/degree 3 = BA or BS diploma/degree 4 = occupational licensure	One of the following: <ul style="list-style-type: none"> data match copy of credential copy of school records

PIRL data element #	Data element name	Date type / field length	Data element definition/instructions	Code value	Source documentation requirements
			<p>certificate of completion of a Registered Apprenticeship, a license recognized by the state involved or Federal government, or an associate or baccalaureate degree attained by the participant who received education or training services.</p> <ul style="list-style-type: none"> Record 0 if the participant received education or training services, but did not attain a recognized diploma, degree, license or certificate. Leave blank if data element does not apply to the participant. NOTE: Diplomas, degrees, licenses or certificates must be attained either during participation or within 1 year of exit. This data element applies to both the credential rate indicator and the measurable skills gain indicator for all programs. 	<p>5 = occupational certificate 6 = occupational certification 7 = other recognized diploma, degree, or certificate 0 = no recognized credential</p>	<ul style="list-style-type: none"> follow-up survey from program participant case notes documenting information obtained from education or training provider
1801	Date attained recognized credential	DT 8	<ul style="list-style-type: none"> Record the date on which the participant attained a recognized credential. Leave blank if the participant did not attain a degree or certificate. 	YYYYMMDD	<p>One of the following:</p> <ul style="list-style-type: none"> data match copy of credential copy of school records follow-up survey from program participant case notes documenting information obtained from education or training provider
1806	Date of most recent measurable skills gain: Educational Functioning Level (EFL)	DT 8	<ul style="list-style-type: none"> Record the most recent date the participant who received instruction below the postsecondary education level achieved at least one EFL. EFL gain may be documented in one of three ways: 1) by comparing a participant's initial EFL as measured by a pre-test with the participant's EFL as measured by a participant's post-test; or 2) for states that offer secondary school programs that lead to a secondary school diploma or its recognized equivalent, an EFL gain may be measured through the awarding of credits or Carnegie units; or 3) states may report an EFL gain for participants who exit the program and 	YYYYMMDD	<p>One of the following:</p> <ul style="list-style-type: none"> pre- and post-test results measuring EFL gain adult high school transcript showing EFL gain through the awarding of credits or Carnegie units postsecondary education or training enrollment determined through data match, survey documentation, or program notes

PIRL data element #	Data element name	Date type / field length	Data element definition/instructions	Code value	Source documentation requirements
			enroll in postsecondary education or training during the program year. ▪ Leave blank if this data element does not apply to the participant.		
1807	Date of most recent measurable skills gain: postsecondary transcript/report card	DT 8	▪ Record the most recent date of the participant's transcript or report card for postsecondary education who complete a minimum of 12 hours per semester, or for part-time students a total of at least 12 credit hours over the course of two completed semesters during the same 12-month period, that shows a participant is meeting the state unit's academic standards. ▪ Leave blank if this data element does not apply to the participant.	YYYYMMDD	One of the following: ▪ transcript ▪ report card
1808	Date of most recent measurable skills gain: secondary transcript/report card	DT 8	▪ Record the most recent date of the participant's transcript or report card for secondary education for 1 semester showing that the participant is meeting the state unit's academic standards. ▪ Leave blank if this data element does not apply to the participant.	YYYYMMDD	One of the following: ▪ transcript ▪ report card
1809	Date of most recent measurable skills gain: training milestone	DT 8	▪ Record the most recent date that the participant had a satisfactory or better progress report towards established milestones from an employer/training provider who is providing training (completion of on-the-job training (OJT), completion of 1 year of a registered apprenticeship program, etc.). ▪ Leave blank if this data element does not apply to the participant.	YYYYMMDD	One of the following: ▪ OJT or Registered Apprenticeship ▪ contract and/or evaluation from employer or training provider
1810	Date of most recent measurable skills gain: skills progression	DT 8	▪ Record the most recent date the participant successfully completed an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams. ▪ Leave blank if this data element does not apply to the participant.	YYYYMMDD	One of the following: ▪ results of knowledge-based exam or certification of completion ▪ documentation demonstrating progress in attaining technical or occupational skills ▪ documentation from training provider or employer ▪ copy of a credential that is required for a particular occupation and only is earned after the passage of an exam

PIRL data element #	Data element name	Date type / field length	Data element definition/instructions	Code value	Source documentation requirements
1811	Date enrolled during program participation in an education or training program leading to a recognized postsecondary credential or employment	DT 8	<ul style="list-style-type: none"> Record the date the participant was enrolled during program participation in an education or training program that leads to a recognized postsecondary credential, including a secondary education program, or training program that leads to employment as defined by the core program in which the participant participates. States may use this coding value if the participant was either already enrolled in education or training at the time of program entry or became enrolled in education or training at any point while participating in the program. If the participant was enrolled in postsecondary education at program entry, the date in this field should be the date of program entry. This includes, but is not limited to, participation in Job Corps, YouthBuild, Adult Education, or secondary education programs. Leave blank if the data element does not apply to the participant. NOTE: This data element applies to the measurable skill gains indicator, and specifically will be utilized to calculate the denominator. It encompasses all education and training program enrollment. 	YYYYMMDD	One of the following: <ul style="list-style-type: none"> copy of enrollment record file documentation with notes from program staff school records transcript or report card data match with postsecondary data system
1900	Youth 2 nd quarter placement (Title I)	IN 1	<ul style="list-style-type: none"> Record 1 if the participant is enrolled in occupational skills training (including advanced training). Record 2 if the participant is enrolled in postsecondary education. Record 3 if the participant is enrolled in secondary education. Record 0 if the participant was not placed in any of the above conditions. 	1 = occupational skills training 2 = postsecondary education 3 = secondary education 0 = no placement	One of the following: <ul style="list-style-type: none"> cross-match with other agencies copy of enrollment records file documentation with notes from program staff school records transcript of report card vendor/training provider training documentation
1901	Youth 4 th quarter placement (Title I)	IN 1	<ul style="list-style-type: none"> Record 1 if the participant is enrolled in occupational skills training (including advanced training). Record 2 if the participant is enrolled in postsecondary education. 	1 = occupational skills training 2 = postsecondary education 3 = secondary education 0 = no placement	One of the following: <ul style="list-style-type: none"> cross-match with other agencies copy of enrollment records file documentation with notes from program staff school records

PIRL data element #	Data element name	Date type / field length	Data element definition/instructions	Code value	Source documentation requirements
			<ul style="list-style-type: none"> Record 3 if the participant is enrolled in secondary education. Record 0 if the participant was not placed in any of the above conditions. 		<ul style="list-style-type: none"> transcript of report card vendor/training provider training documentation