



Workforce Services Memorandum – Virtual Enrollment in Title I and III Services

Effective Date: April 6, 2020

Duration: April 6, 2021

Purpose:

To provide guidance to Local Workforce Development Boards (LWDBs) regarding virtual (internet-based and phone communications) enrollment services to potential Title I and III participants.

Scope:

Office of the Governor, Tennessee Department of Labor and Workforce Development (TDLWD); Division of Workforce Services (WFS); Tennessee Department of Economic and Community Development (ECD); Tennessee Department of Education (TNED); Tennessee Department of Human Services (DHS); State Workforce Development Board (SWDB); Title I – Adult, Dislocated Worker, and Youth Programs, Title II – Adult Education and Family Literacy Act Program(AE); Title III – Wagner-Peyser Act Program (WP); Title IV – Vocational Rehabilitation Program (VR); Regional Planning Council (RPC); Local Workforce Development Boards (LWDB); Local Workforce Development Areas (LWDA); American Job Center (AJC); One-Stop Operator (OSO); Workforce System Sub-Recipients (Sub-Recipients); Workforce System Partners (Partners)

I. Virtual Services

The provision of virtual services is an allowable activity under **20 CFR 678.305(d)(3)**. However, the LWDBs must ensure that all Federal, State and program requirements are followed. For allowable services reference TEGL 19-16 and 21-16.

II. Collection of Eligibility Documentation

Eligibility requirements for program participants will not change regardless if services are provided in-person or virtually. LWDBs must still follow pre-established regulations for eligibility requirements for the WIOA Title I program.

III. Collecting Eligibility Documentation Virtually

A. Electronic Collection

Workforce Services is recommending that all LWDBs utilize Jobs4TN, when applicable, to collect eligibility documentation from participants. In order to do this effectively, the case manager must:

- Establish a Jobs4TN account for the participant
- Instruct the participant of the documentation that is required (may need to mail/email documents for signature)
- Provide guidance on where the participant must upload their documentation
- Change the naming convention of uploaded documentation to meet State standards and ensure it is uploaded in Jobs4TN

B. Physical Collection

LWDBs may require participants provide a physical copy of requested eligibility documentation. During a time where AJCs are not open to the public, a method of collection of documents must be established by the LWDB. One of two options can be adopted by the LWDB:

1. Documents, or envelope, are mailed to the participant to collect signature or eligibility documentation. An envelope with pre-paid postage must be provided for the potential participant to be mailed back to the location chosen by the LWDB.
2. Documents are mailed to the participant or request for documentation is provided to the participant. A secure drop off box can be established at a location determined by the LWDB for the potential participant to provide requested or required documentation. The case manager who collects the documentation must confirm receipt with the participant through an established process established by the LWDB.

WIOA does not intend to delay enrollment or create barriers to enrollment. If at all possible, participants should be encouraged to provide documentation virtually by utilizing their own equipment or utilizing family or close friends to upload such documents directly into Jobs4TN.

C. Other Means of Collection

If the LWDB has another means of collection, such as another case management system, then that LWDB must request approval by the State in order to carry out those established functions. The LWDB must ensure all eligibility document is uploaded into Jobs4TN.

D. Use of Personal Equipment for Staff

The use of personal equipment is not advised when collecting or communicating eligibility documentation. The use of a personal cell phone or computer poses a significant security risk that will put potential participants Personal Identification Information (PII) at risk for exposure. Also, the use of this equipment is subject for review if an open records request is made or if an audit is conducted. If current practices are utilizing these personal devices, then those practices should cease immediately.

References:

20 CFR 678.305; TEGL 19-16; TEGL 21-16

Contact:

For any questions related to this policy, please contact the Program Integrity Unit at Workforce.Board@tn.gov.

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