OCCommunity Resources

DYLAN WRIGHT
DIRECTOR
OC COMMUNITY RESOURCES

CYMANTHA ATKINSON
ASSISTANT DIRECTOR
OC COMMUNITY RESOURCES

JOANNE VEEDOR
DIRECTOR
ADMINISTRATIVE SERVICES

MONICA SCHMIDT
DIRECTOR
OC ANIMAL CARE

JULIA BIDWELL
DIRECTOR
OC HOUSING & COMMUNITY
DEVELOPMENT

RENEE RAMIREZ
DIRECTOR
OC COMMUNITY SERVICES

PAM PASSOW
DIRECTOR
OC PARKS

JULIE QUILLMAN
COUNTY LIBRARIAN
OC PUBLIC LIBRARIES

Date: October 30,2024

To: WIOA Subrecipients of the Orange County Workforce Development Board

From: Nancy Cook
Director of Workforce and Economic Development

Subject: CalJOBS Document Imaging and Scanning
Information Notice No. 24-OCWDB-10
Supersedes Information Notices No. 18-OCDB-13

_____

PURPOSE
This policy provides guidance on document scanning and electronic signature procedures required when using the Document Imaging and Scanning Module in the CalJOBS system.

EFFECTIVE DATE
This policy is effective on the date of issuance.

REFERENCES
* WIOA (Public Law 113-128), Section 185
* CALJOBS Staff User Guide, Section 30: Manage Documents
* Training and Employment Guidance Letter (TEGL) 39-11 – DOL Guidance for Protecting PII
* US DHHS – Summary of HIPAA Privacy Rule
* Workforce Services Directives WSD-22-15, Subject: WIOA Data Validation Source Documentation
* 29 CFR § 97.42 - Retention and access requirements for records
* 20 CFR 683.220 – WIOA Requirements for PII
* WSD18-03- Pathway to services, referral, and enrollment

BACKGROUND
WIOA Section 185 of the Workforce Innovation and Opportunity Act (WIOA) requires recipients of Title I funds to keep records to permit the preparation of reports required by Title I. This policy applies to electronic file storage and documentation imaging standards in the administration of WIOA. As a form of process improvement, the County is transitioning to a paperless environment using the Document Management and Scanning Module in CalJOBS. In addition, the use of document imaging leads to other efficiencies such as a reduction in the reliance on hard- copy files and the ability for monitoring of files electronically. The scanned documents will be stored in CalJOBS a secure, central database.

POLICY AND PROCEDURES

Document Scanning and Maintenance of Paperless Files

Service Providers are required to maintain source documentation as physical files and/or as electronic files. All participant information should be scanned and uploaded to CalJOBS and will take the place of hard files for verification, monitoring, and audit purposes. Service Providers must retain a physical file of the participant eligibility documents. Service Providers should follow the uniform guidance 29 CFR § 97.42-Retention and Access Requirements for Records. Once documentation is properly scanned into the CalJOBS system, paper records should be destroyed (i.e. shredded) and any documents that have been saved to a computer hard drive, desktop, removable media, Cloud storage, or other environments shall be deleted to protect Personally Identifiable Information (PII) and/ or Personal Health Information (PHI) data collected from participants.

In the event of a CalJOBS system failure, Service Providers shall resort to the completion of paper-based WIOA applications. Service Providers are required to upload the signed WIOA applications and all supporting documentation to the CalJOBS system within five (5) business days following the restoration of system functionality. Service Providers must annotate case notes in CalJOBS to indicate that the WIOA application process was completed during a period of system failure, detailing the date of application completion. Following the successful upload of all documents to CalJOBS and verification of the accuracy and completeness of the electronic records, Service Providers should shred all paper applications and supporting documentation to maintain confidentiality and compliance with data protection standards.

Service Providers must ensure that all scanned documents into CalJOBS are complete, legible, and properly aligned. Compare uploaded documents to original to ensure all pages are included.

The original content of a scanned document must not be altered or modified once it has been finalized. While scanning the original document is preferred, scanning legible verified documents provided by partners may serve as sufficient documentation. Documents uploaded into the CalJOBS system must always be current and kept current through program participation. In addition, case notes must identify the intent and purpose of all documents that are uploaded into the CalJOBS system.

Service Providers must upload verification documents in CalJOBS as soon as documentation is made available and follow eligibility guidelines, timeframes, and data element validation requirements following Workforce Services Directives WSD-22-15. Service Providers must ensure that participant information is accurately reported in CalJOBS and that documents are uploaded for all fields that require verification.

Attaching Documents to Case Notes and/or Activities

All documents pertinent to participant activities should be linked/attached to their respective case notes and/or activities to support those entries. Subrecipient-specific forms that aid in assessing the needs of the participant (e.g., supportive services determination, training eligibility determination, etc.) must be attached to the case notes of specific activities.

Service Providers must also link/attach documents to case notes and/or activities for documentation of services that are provided under the appropriate activity (e.g., job referral verification, resume assistance, etc.)

Electronic Signatures

Document Imaging includes the addition of electronic signatures to any necessary documents or forms. Signatures may be captured within CalJOBS or using electronic software such as pDoc Signer or DocuSign. Service Providers are encouraged to use electronic signatures for participant convenience.

When signed within CalJOBS, signed copies of the WIOA application, OAS and IEP are automatically saved within the participant's Documents (Staff) Folder. However, any documents signed with the pDoc signer or DocuSign must be uploaded onto a participant's Documents (Staff) Folder in CalJOBS.

All scanners and signature pads purchased with County of Orange funds are the property of the County of Orange and staff must observe the proper care and use of the equipment. This equipment must also be listed on the subrecipient's Inventory List.

File Naming Convention

When uploading documents into the CalJOBS system, Service Providers must provide detailed names for the uploaded documents, following the naming convention in Attachment I.

Procedures for Uploading Medical and/or Disability-Related Information

When uploading medical and/or disability-related information into CalJOBS, Service Providers shall ensure that these documents are password protected before uploading. Service Providers shall ensure that these passwords are available only to staff and to the County of Orange, should the need arise to review these documents.

Examples of medical and/or disability-related information include:
- Medical/health history
- Disability information
- Doctor's notes
- Disability benefits
- Driver's License indicating the need for corrective lenses
- Individualized Education Program (IEP)

If the document is password protected, please add **"+PASSWORD"** at the end of the filename.

ACTION

Bring this policy to all staff and relevant parties.

INQUIRIES

If you have any questions regarding this policy, please email info@ocworkforcesolutions.com.

ATTACHMENTS

Attachment I: CalJOBS Document Scanning and File Naming Instructions and Procedures