Policy Area: Governance and Administrative Standards	
Title: Digital Documentation and Records Management	**Number:** GAS-DRM-25-V1
Effective Date: October 01, 2025 **Revision Date(s):**	**Approved by:** Scott A Adkins
Review by Date: October 01, 2026	**Approval Date:** August 12, 2025

PURPOSE

The purpose of this policy is to establish the Mid-Atlantic Career Consortium (MACC) system as the official digital repository for all WIOA Title I documentation. This centralized system ensures consistent data management, program accountability, regulatory compliance, and ease of monitoring across all participating entities.

BACKGROUND

This policy governs the collection, management, and secure digital storage of all documentation required under the Workforce Innovation and Opportunity Act (WIOA) Title I. It supports uniform practices across WIOA-funded programs administered by the State and local workforce areas, ensuring compliance with federal, state, and local requirements.

SCOPE

This policy applies to all staff and partner entities involved in the collection, labeling, uploading, storage, and management of federally required documentation within workforce development programs using the MACC system. It establishes responsibilities related to proper documentation practices for both participant and employer records.

- **Covered Entities and Personnel**
  This policy is mandatory for the following individuals and entities:
    - Local Workforce Development Board (LWDB) staff
    - WIOA Title I Adult, Dislocated Worker, and Youth program staff
    - Program managers and supervisors
    - Fiscal agents and administrative staff
    - Subrecipients, contractors, and service providers
    - Any personnel responsible for collecting or uploading documentation into the MACC system.

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REFERENCES

- Workforce Innovation and Opportunity Act (WIOA) Sec. 185
- TEGL 39-11
- 20 CFR 683.220
- 2 CFR Part 200 (Uniform Administrative Requirements)

POLICY

All WIOA Title I documentation **must** be uploaded to the MACC system and organized into participant or employer files. Required documentation includes, but is not limited to:

- **Participant Files**
  - **WIOA Title I: Intake and Eligibility**
    Use for all intake and eligibility-related documentation, including:
    - WIOA applications
    - Identification and wage documentation
    - Selective Service registration
    - Other eligibility verification materials
  - **WIOA Title I: Assessment Process**
    Use for documentation related to assessments and career planning, including:
    - Labor Market Information (LMI) research
    - Career exploration records
    - Soft skills assessments (e.g., driving records)
    - Past Academic Transcripts
    - Testing documentation (e.g., TABE, WorkKeys)
  - **WIOA Title I: Training and Education**
    Use for documentation supporting training and education activities, such as:
    - Individual Training Accounts (ITA), On-the-Job Training (OJT) agreements, and other training contracts
    - Individual Development Plans (IEP/ISS)
    - Documentation from other funding streams
    - Course syllabi, academic maps, or training schedules
  - **WIOA Title I: Support Services**
    Use for all documentation supporting the provision of support services, such as:
    - Transportation, childcare, or work-related supply purchases
    - Housing assistance records
    - Incentives and Stipend documentation

- ○ **WIOA Title I: Outcomes**
  Use for follow-up documentation and outcomes, including:
    - ■ Measurable Skill Gains (MSGs)
    - ■ Credential attainment documentation
    - ■ Follow-up wage documentation
    - ■ Other follow-up correspondence
- **Employer Files**
  - ○ **Contracts and Agreements**
    - ■ Includes: Work-based learning agreements (OJT, IWT, CT), employer verification, and related correspondence.

ROLES AND RESPONSIBILITIES

Each party plays a critical role in ensuring data integrity, compliance, and timely document management.

- **Program Staff**
  - ○ **Must** collect all required documentation in accordance with the procedures outlined in the Document Collection section of this policy.
  - ○ **Must** follow the procedures outlined in the Document Collection section when documentation is not immediately available, to ensure timely follow-up and proper documentation of all attempts to obtain the required information.
  - ○ **Must** upload all received documentation into MACC within three (3) business days of the date of receipt.
  - ○ **Must** ensure all case notes are entered within three (3) business days of the service or interaction, regardless of when supporting documentation is received.
  - ○ **Must** ensure that all uploaded documents are complete, legible, and accurately labeled.
- **Program Managers**
  - ○ **Must** train program staff on documentation procedures.
  - ○ **Must** conduct regular monitoring to ensure compliance.
  - ○ **Must** address and report deficiencies or gaps.
- **State Administrative Entity**
  - ○ **Must** provide technical assistance and training.
  - ○ **Must** monitor program performance and data quality.
  - ○ **Must** maintain the MACC system's technical integrity.

PII UPLOAD RESTRICTIONS AND SECURE STORAGE REQUIREMENTS

PII Protection Requirement:
To protect participant privacy and ensure compliance with federal, state, and local regulations, all documents uploaded to the MACC system must be carefully reviewed and redacted as necessary. Sensitive information should only be retained if specifically required for program verification.

- **Prohibited Content for Upload:**
  - Full Social Security Numbers.
  - Medical or disability-related records (Protected Health Information must never be uploaded).
  - Any single document may not display more than one identifying element beyond what is strictly necessary for verification (All other identifying information must be permanently redacted before upload).
- **Redaction Requirements and Upload Standards**
  - All documents **mus**t be reviewed before upload to identify and remove any sensitive PII that is not required for verification purposes.
  - Sensitive information **must** be permanently redacted. *Temporary visual obscuring or overlays do not meet this requirement.*
  - If redaction is not possible without compromising the document's essential content, the document **must not** be uploaded. Instead, it should be stored securely in a controlled physical location, and a clear notation entered in the case file stating:
    "Document securely stored on location."

PROCEDURES

The following procedures outline the required steps for the timely collection, case note entry, organization, and upload of documentation into the MACC system. These processes are designed to ensure compliance with federal and state documentation standards, maintain the integrity and accessibility of participant and employer records, and support timely and accurate performance reporting. All program staff and partner entities **must** adhere to these procedures to ensure that files are complete, clearly organized, and readily available for ongoing case management, monitoring, and audit review.

- **Document Collection**
  Program staff **must** begin collecting required documentation at the point of intake or service delivery and continue until all necessary documents are obtained, following the timelines and follow-through procedures outlined below.

- When documentation is not immediately available (e.g., pending submission from a participant, provider, or employer), staff **must** take *documented* follow-through actions to obtain the necessary records. Specifically:
    - Initial follow-through **must** occur within **three (3) business days** of identifying the missing or required documentation; and
    - Ongoing follow-through efforts **must** be made **at least every seven (7) business days** until the documentation is received.

- **Document Upload Timelines**

  All received documentation **must** be uploaded to the MACC system within **three (3) business days** of receipt.

  Note: Day 1 is defined as the first business day following either the delivery of a service or the receipt of a document.

- **Case Note Entry**

  All case notes **must** be entered into the MACC system as close to real time as possible to accurately reflect services and interactions, but no later than **three (3) business days** after the service or interaction, regardless of when supporting documentation is received.

  Note: Day 1 is defined as the first business day following either the delivery of a service or the receipt of a document.

    - If documentation is not yet available at the time of case note entry, the case note **must** include:
        - A detailed account of the interaction or service provided;
        - A reference to the expected documentation and the anticipated timeframe for receipt;
        - Actions taken to obtain the document.
    - Once the supporting documentation is received, it **must** be uploaded into MACC within **three (3) business days**, following the standard upload procedures.

- **File Organization and Document Upload**

  All documentation must be accurately uploaded and securely stored in the appropriate participant or employer account within the MACC system. The following requirements apply:

    - **Correct File Location:** Documents must be uploaded to the Images section of the participant or employer record.
    - **Document *"Type"*:** Each uploaded file must be assigned as follows:
        - **Employer File -** "Other"
        - **Participant File - Must** be categorized under the appropriate WIOA Title I activity type (*see Document Type Selection Guidance below*)

- **Document Type Selection Guidance**
  Use the **Type** dropdown menu to select the ***WIOA Title I*** category that best matches the document being uploaded:
  Note: These categories represent the most commonly used activity types. If a document does not clearly align with one, staff should use their professional judgment to select the type that best fits the document's purpose.
  - **WIOA Title I: Intake and Eligibility**
    Use for all intake and eligibility-related documentation, including:
    - WIOA applications
    - Identification and wage documentation
    - Selective Service registration
    - Other eligibility verification materials
  - **WIOA Title I: Assessment Process**
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  - **WIOA Title I: Support Services**
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    - Transportation, childcare, or work-related supply purchases
    - Housing assistance records
    - Incentives and Stipend documentation
  - **WIOA Title I: Outcomes**
    Use for follow-up documentation and outcomes, including:

- - ■ Measurable Skill Gains (MSGs)
  - ■ Credential attainment documentation
  - ■ Follow-up wage documentation
  - ■ Other follow-up correspondence
  - ○ **File Naming:** The description must clearly identify the document and include the date of occurrence or signature (e.g., *Intake Packet 07/08/2025*).
  - ○ **Completion of Upload:** All uploads must be saved and confirmed in the system as finalized (not left in "Pending" status).

MONITORING AND ENFORCEMENT

- ● **Monitoring**

  Program managers **must** conduct routine reviews to ensure:
  - ○ All documentation is uploaded timely.
  - ○ Files are complete, properly labeled, and organized.
  - ○ Case notes align with uploaded documentation.

- ● **Enforcement**

  Failure to comply may result in:
  - ○ Technical assistance or retraining requirements.
  - ○ Corrective action or formal monitoring findings.
  - ○ Escalation under the WIOA Sanctions Policy for repeated noncompliance.

DATA SECURITY AND CONFIDENTIALITY:

- ● All staff **must** comply with data security and confidentiality requirements at the local, state, and federal levels, adhering to the most restrictive standard applicable.
- ● Sensitive information, including Personally Identifiable Information (PII) and Protected Health Information (PHI), **must** be securely stored using approved formats and systems, and handled in full compliance with applicable confidentiality laws and agency policies.

Version Control

Version	Effective Date	Description of Changes	Author/Editor	Approval Date
1.0	*10/01/2025*	*Initial Release*	*WorkForce Unit*	*August 12, 2025*