



WOWDB Memorandum #M-01-2020

To: WOWDB Service Providers

From: WOWDB Executive Director, Christi Porter

Date: 03.24.2020

Subject: CoVid-19 Enrollment Procedures

Purpose: To provide guidance on procedure for enrollment during the CoVid-19 Pandemic until normal operations of the American Job Centers have resumed.

Procedures:

The procedures outlined in this memo are reflective of procedures provided by OOWD in [TA 01-2020](#). These procedures will only be in effect until normal operations of the American Job Centers have been resumed. Technology resources that will assist in serving clients digitally include:

- Google Voice - <https://voice.google.com/u/0/calls> - Provides a free “alternate” phone number that can be utilized via internet web browser or cell phone. This enables contact with clients via text-messaging in a way that does not utilize staff’s personal phone number.
- Tiny Scanner – see here for [Apple](#); see here for [Android](#); Tiny Scanner enables staff or clients to take a picture of a document and convert the picture into a PDF. This is a free app on both the Android and Apple platforms.

Documents with identifying information for participants must be transmitted in a secure way. This security will be ensured by the following processes:

- CM will inform client via phone call and email that:
 - The information they are sending, such as their Eligible to Work documents and their Demographic Snapshot information contains personally identifiable information;
 - This sending and receiving of this information relies on basic email security, and is not encrypted;
 - The participant informs the Case Manager that they are aware of the risks associated with transmitting this information via email or text message.
 - Verification of this message will be uploaded along with the participant’s demographic snapshot.

During the time that these processes are in place, WOWDB requires the following actions take place to ensure oversight occurs as these uncharted processes roll out:

- 1) A list of new enrollments will be submitted to WOWDB’s Monitor daily at COB to be reviewed the next morning.
- 2) A list of requests for Supportive Services or Training Resources will be submitted to WOWDB’s Monitor by COB the date that the request from a client takes place. A list of on-going requests will be created by the Service Provider in Drop Box and shared with WOWDB.

OOWD has outlined in TA 01-2020 the following items to allow new enrollments and IEPs for **Adult & Dislocated Worker customers:**

- For the collection of Eligibility Documentation:
 - Eligibility documents may be sent to Case Manager via email via a secure email, regular mail, or text message via Google Voice.
- For entering a demographic snapshot:
 - The Case Manager will review the information located in the Demographic Snapshot with the client over the phone. No digital signature will be entered when opening the enrollment.
 - The Demographic Snapshot will be saved as a PDF and emailed, or sent by mobile snapshot to the client.
 - The client will then complete a virtual/digital signature to attest to the accuracy of the information in the demographic snapshot.
 - The signed Demographic Snapshot will then be returned to the Case Manager via email, or mobile snapshot.
 - The enrollment may only be created **after** receiving the signed demographic snapshot details from the participant.
 - The signed Demographic Snapshot must be uploaded into Oklahoma Job Match in the Enrollment Uploads
 - A program note must be entered documenting that all of the above processes have taken place.
- For creating an IEP:
 - The IEP will be developed over the phone with the client.
 - The IEP will be entered into OK Job Match.
 - The IEP will be saved as a PDF and sent to the client via email, or mobile snapshot.
 - The participant will sign and return the IEP via email, or mobile snapshot.
 - Once received by the CM, the signed IEP will be uploaded into the participants Enrollment Uploads.
 - A program note will be entered documenting that all of the above processes have taken place.
- For other documents and documents requiring signatures:
 - Any additional documentation needs that would normally require signatures may be sent to a client via email, mail or mobile snapshot. Any Document “saved as a PDF” will allow the client to virtually sign and return to CM. Normal documentation requirements are still in effect. Requests for a variation of documentation requirements due to causing undue hardships on participants will be evaluated on a case-by-case basis by submitting a request to WOWDB.
 - Clients will complete documents required for enrollments, ITA’s, Training Vouchers, Supportive Services, etc.; and return the documents to Case Managers via mail, email or mobile snapshot.
 - Documents will be uploaded per normal upload requirements.
 - A program note will be entered detailing how required documents were obtained from participants or other required parties (i.e.: landlords, training providers, vendors for supportive services, etc.).

For the provision of Youth Services:

- Documentation of Youth Eligibility:
 - All efforts must be taken do document eligibility for youth services, via 3rd party documentation, in alignment with OWDI 02-2019. In the event that documentation cannot be attained to support eligibility, a Client Self-Attestation may be used to support eligibility for services. In order to document the self-attestation of eligibility, the following items must occur:
 - The client must submit a signed or digitally signed document attesting to eligibility barrier status and school status (such as pregnant, parenting, offender, etc.).

- The signed document must be uploaded into the participant's OK Job Match enrollment uploads.
- A program note must be entered detailing efforts taken to validate participant's eligibility barriers.
- OOWD, in Memo 01-2020 outlines the following as it relates to documentation of Youth Eligibility:

Under these circumstances, we have to rely on other mediums such as the internet, including social media-direct mail options (when dealing with personal information), and other electronic mailing systems including email to streamline local procedures as much as possible under the circumstances to maintain the integrity of the WIOA Youth program with as much consistency and minimum disruption of services to an already vulnerable population; while exercising the rational, prudent and reasonableness in judgement when determining eligibility for the WIOA Youth Program, through the self- attestation process when warranted.

In such cases, local areas must note that supporting documentation is not uploaded due to COVID-19 since the social service, employment service or employer for example that normally provides the verification is either not available or may not be able to deliver or respond within a reasonable timeframe for the local area service provider to verify eligibility and enroll the individual within a reasonable timeframe due to staffing limitations and/or shutdowns as a result of the pandemic.

The 14 program elements will remain available to participants. There will be limitations and additional barriers that our clients will endure during this COVID-19 epidemic. However, the investment that fuels this program requires us to think innovatively in order to achieve the ultimate goal of ensuring that our clients have access to the services needed to achieve their workforce goals agreed to in the individual service strategy (ISS).

Reminder: The premise behind utilizing an attestation is to enable an individual to certify information pertaining to their eligibility, a particular demographic or services when there is an absence of 3rd party documentation or another party who would normally verify the presence of a client's attendance or attempt to attend a program service is not available.

- Youth Demographic Snapshot and ISS
 - In addition to action items listed above to validate youth Eligibility, completing the Demographic Snapshot and ISS will be done in accordance with like items listed for Adult and Dislocated Worker clients above.