Northern Area Local WORKFORCE DEVELOPMENT BOARD

WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)
PROGRAM POLICY NOTICE NO: 30

EFFECTIVE DATE: June 13,2025

SUBJECT: Electronic File Policy (100%)

POLICY STATEMENT

The State has established a standard for an electronic file (e-file) which includes paperless registration, eligibility determination, and program enrollment. Effective January 1, 2015, **all new program enrollments are required to be completed in an e-file format.** The results are a real time environment for storing and viewing applicant verification and eligibility determination documents. Authorized personnel are required to scan, import, and save all verification documents at the time they are being reviewed during the application process in NMJOBS per distinct program requirements.

PURPOSE OF POLICY

To establish the state policy regarding electronic file storage and imaging standards for workforce programs utilizing www.jobs.state.nm.us

BACKGROUND:

Content Management Practices

The program application, related activities, case notes and all other relevant individual/entity information as defined by the NALWDB are captured and stored solely in www.jobs.state.nm.us. All documentation and eligibility verifications specific to each applicant are scanned and stored in the Content Management System in the www.jobs.state.nm.us, including all financial documentation (contracts, agreements, supportive services, paid basic career services, time sheets). The contents of an individual/entity e-file shall be determined based on the requirements of each distinct program.

This policy will not be retroactive to previous program years. This policy will be effective starting August 1st, 2025, and the expectation will be that the sub-grantees transition to a 100% electronic file beginning Program Year 25. All previously established hard files out of follow-up status shall be transitioned to the Board office quarterly. These hard files shall be updated according to previous expectations until they are out of follow-up status. The only files expected to be 100% electronic are new enrollments beginning program year 25 and any enrollments thereafter.

A. Action:
Accepted methods for producing an e-file consist of:
• Scanning and/or importing a document into Content Management System (This will include supplemental forms developed by the NALWDB and required to be included in program files.) This includes legible photographs (as long as the source documentation is deleted from the work mobile device upon upload).
• System generated forms or documents (application, IEP, etc.).

Scanned Image Legibility:
• Any and all pertinent documentation that is scanned is required to be legible in view and printed form. Illegible images must be removed, and the document must be rescanned until a legible image has been captured.

Deleting Images:

• The process of deleting an image that has already been saved to an applicant's electronic file can only be performed by the state or local System Administrator or their designee. Scenarios requiring the deletion of images may include the following:

1. image was saved to an incorrect program applicant's file, or
2. image was saved under an incorrect document type, or
3. image was a duplicate document uploaded (if necessary), or
4. PII was accidentally uploaded without appropriate redaction.

Individual User Accessibility:
• All scanned documents shall only be viewed by staff with the user accessibility option set to "No" as outlined in the "Content Management System Guide" below.

Scanning Documents:
• Documents scanned into the content management system are required to be scanned by Service Provider case management staff. Uploaded documents must be processed, maintained or discarded by Service Provider case management staff according to the established protocol below to ensure the confidentiality of information and to safeguard against misuse.

- The board is responsible for auditing, monitoring, and training staff to make sure that compliance is maintained.
- Frontline Staff are responsible for uploading, updating, correcting, and proper disposal of paper documentation.
- Service Provider management is responsible for maintaining compliance with this policy.

B. Content Management System Protocol

- **Record Retention**

The NALWDB and any sub-grantees shall retain all such records in accordance with federal regulations and State record retention laws. If the sub-grantee has a secure storage space for documentation, they may use that as they see fit.

- **Program Monitoring**

This policy will be regularly monitored to ensure compliance with applicable regulations and to identify areas for improvement. All monitoring and audits will be conducted on the electronic file and supporting documentation stored in the document module and will include periodic reviews, audits, and assessments. The Northern Area Local Workforce Development Boards is responsible for completing the full scope of monitoring as outlined in federal, state and local policy including all elements of notification, reporting, entrance and exit conferences and associated timelines. E- files and utilization of the content management system expand opportunities for remote monitoring as appropriate but does not eliminate any of the requirements for program administration and monitoring.

- **Personally Identifiable Information "PII"**
  If a participant has given frontline staff PII documentation that must be maintained outside of the electronic file system they will be required to:

  1. Data Minimization: Federal programs should only collect necessary PII for legitimate business needs and regulatory compliance.

  2. Secure Storage: PII should be stored on approved central systems and not on mobile devices or portable media. Secure sensitive PII on approved networks, systems, and media, including securing paper data in locked storage. Sensitive PII should be stored on secure, encrypted central services.

  3. Access Control and Monitoring: Access to PII should be restricted to authorized personnel who require it

for their official duties. Limit who has access to PII and monitor access permissions. Electronic solutions can facilitate better control and tracking of access.

4. Handling Procedures: Remove visible PII from workspaces when not in use. Treat PII as sensitive and minimize its transmission, even when protected.

5. Data Destruction: Destroy sensitive paper PII by shredding. Establish a schedule for deleting or destroying data that is no longer needed according to record retention requirements at the sub-grantee level secondary to Board approval.

6. Adherence to Federal Regulations: Federal grant recipients must protect PII according to the standards of the granting agency. Federal agencies have internal policies for PII protection, and contractors must maintain confidentiality. Organizations should implement recommendations for effective PII protection and identify all PII within their environment.

C. Required Documentation:

NM Department of Workforce Solutions Policy # 24-005 requires all eligibility documents 1 through 17 in NMJOBS:

1.) Participant Agreement (signed by participant)
2.) Grievance (signed by participant)
3.) OAS
4.) IEP/Service Strategy
5.) Identification
6.) Selective Service Registration
7.) Income Worksheet
8.) Eligibility Documentation (PII excluded or redacted)
9.) WIOA Program Check off list (Once enrolled in paid training/BCS)
10.) Final Timesheet upon program completion/completion of hours
11.) TRSS Request Documentation and Supporting Documentation
12.) Supporting documentation for any performance measures
13.) Employment Verification Form (if applicable)
14.) Additional Household Member Information (if applicable)

15.) TABE documentation (if applicable)
16.) Self-Attestation (if applicable)
17.) Data Verification Form (if applicable)

The board is striving to be completely and fully electronic and in addition to NM Department of Workforce Solutions required documents, the documents listed must be in NMJOBS.

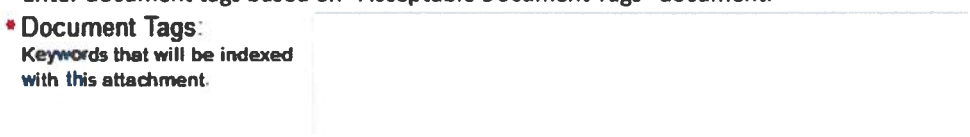
18.) Contracts (OJT/TJT/ITA/WE)
19.) Timesheets
20.) ITA: WIOA 17/18
21.) TRSS Billing documents (including reimbursable receipts)
22.) Incentive Payments and supporting documentation
23.) Copy of Paid checks or documentation of reimbursement/payment for programming/TRSS/Incentive

If documentation that pertains to eligibility or programming is not listed above, it can be uploaded to NMJOBS as long as all PII is either redacted or removed. The identified forms are unavailable at the time of this policy pending a state review but will be the identified forms moving forward for Program Year 2025.

Attachment I: Content Management System Guide

Scanning Basics

- Enter document tags based on "Acceptable Document Tags" document.



- Select the "No" radio button from "User Accessible".

Enrollments

Enter or edit the application in the Workforce Connection Online System as normal.

- Verify data elements normally.

- After selecting verification element you can scan or upload your document.

Non-Eligibility Documents

- Click "Staff's Profile"
- Click "General Profile"
- Click "Documents (Staff)"
- Click "Add a Document" or "Scan a Document"
- Under "Document Association" select your program from the "Program" dropdown.
- Select the associated application from the "Application" dropdown.
- Leave "None Selected" for "Verification Item" and "Verifications Type".

Document Tags:
Categories for documents scanned into the Content Management system: E=Eligibility Documents
O=Orientation/Grievance, Welcome forms and other supplemental information A=Assessment information
S=Supportive Service documents I=Stipends/Incentives
X=Exit Documentation
C-ITA=Individual Training
C-OJT=On the job Training
C-CT=Customized Training
C-WE=Work Experience
C-PVT=Pre-Vocational Training
C-WP=Workforce Prep
Each bullet is one line of the document tag. Bullets are not used in the document tag. For example:
Doe, John 8656
Welcome Paperwork Category

5% Exception Documentation:
Last Name, First Name
State ID
5% Exception
E

Age (Date of Birth):
Last Name, First Name
State ID
Age
E

Barrier:
Last Name, First Name
State ID
Barrier
E

Basic Skills Test:
Last Name, First Name
State ID
BST
A

Comprehensive Assessment Information:
Last Name, First Name
State ID
Assessments
A

Credentials/Certificate Received:
Last Name, First Name
State ID
Credential
C

Customized Training Contract:
Last Name, First Name
State ID
Customized Training Contract
C-CT

Disability:
Last Name, First Name
State ID
Disability
E

Documentation Payment-Supportive Services other:
Last Name, First Name
State ID
Supportive Service Documentation
S

Documented Need for Supportive Services:
Last Name, First Name
State ID
Supportive Service Documentation
S

Employment Status:
Last Name, First Name
State ID
Employment Status
E

Family Size Documentation:
Last Name, First Name
State ID
Family Size
E

Hard Exit Documentation:
Last Name, First Name
State ID
Exclusion Documentation
X

Highest Grade Completed:
Last Name, First Name
State ID
Highest Grade
E

Income Verification:
Last Name, First Name
State ID
Income Verification
E
ITA Contract:
Last Name, First Name
State ID
ITA Contract
C-ITA

Layoff Reason:
Last Name, First Name
State ID
Layoff
E

Military Disability Rating:
Last Name, First Name
State ID
Vet Disability
E

Military Service:
Last Name, First Name
State ID
Vet Status
E

OJT Contract:
Last Name, First Name
State ID
OJT Contract
C-OJT

OJT Individual Time and Performance Evaluations:
Last Name, First Name
State ID
OJT Evaluation
C-OJT

Orientation Form:
Last Name, First Name
State ID
Orientation
O

Progress Grade Information:
Last Name, First Name
State ID
Grades
C-ITA

Proof of Pell/Scholarships/ Other Funds:
Last Name, First Name
State ID
School Funds
C-ITA

Public Assistance:
Last Name, First Name
State ID
Public Assistance
E

Release of Information/Grievance/Drug Policy Forms:
Last Name, First Name
State ID
Welcome Paperwork
O

Right to Work/Citizenship/Alien Registration:
Last Name, First Name
State ID
Right to Work
E

School Status:
Last Name, First Name
State ID
School Status
E

Selective Service Exemption:
Last Name, First Name
State ID
Selective Service
E

Short Term/Pre-Voc Training Agreement:
Last Name, First Name
State ID
PreVoc Training Agreement
C-PVT

Social Security:
Last Name, First Name
State ID
SSN
E

Supplemental Information:
Last Name, First Name
State ID
Supplemental Information
O

Supportive Service Agreement Form:
Last Name, First Name
State ID
Support Agreement
S

Timesheets for Class Attendance Stipends/Incentives:
Last Name, First Name
State ID
Timesheet
I

Timesheets-Supportive Service:
Last Name, First Name
State ID
Timesheet
S

7
Unemployment Compensation Status:
Last Name, First Name
State ID
UI Status
E

Work Experience Agreement
Last Name, First Name
State ID
Work Experience Agreement
C-WE

Work Experience Timesheets:
Last Name, First Name
State ID
Timesheet
C-WE

BOARD CHAIR

8-28-25
DATE