

## Response to Employment & Training Programs (ETP) Electronic Document Storage (EDS) Policy Public Comments

### Academic Assessments

1. **Could you provide some clarification on the document type stored in WF1 under the category of Academic Assessment (i.e., Test for Adult Assessment (TABE), Comprehensive Adult Student Assessment Systems (CASAS), Wonderlic Gain, etc.)? Is it referring to the score of the assessment or is it referring to the actual assessment that someone took?**

**DEED's Response:** The academic assessment category within EDS is referring to a document that contains the score of an academic assessment. See the **EDS Document Navigation Guide** with the path to saving and naming documents in EDS.

### EDS Timelines Requirements

2. **The policy states that *"All participant documents related to a participant's file must be uploaded and saved electronically in EDS within 15 business days."* Please clarify when the clock starts for the 15 business days. Is it from the date the document is received? Or from the date of the participant meeting?**

**DEED's Response:** The 15-business day requirement aligns with DEED's WF1 case management policy. The date of upload into EDS should occur within 15-business days upon receipt. DOL recently recommended DEED shorten this time frame to ensure greater data accuracy. While this time frame may be shortened in the future, DEED is maintaining the current requirement across our policies at 15-business days.

3. **Only allowing 15 days for the upload of documents is too limited given Employment Counselor's have two months to enter "participation hours" into WF1 for the MFIP Program.**

**DEED's Response:** The 15-business day requirement aligns with DEED's WF1 case management policy. The date of upload into EDS should occur within 15-business days upon receipt. DOL recently recommended DEED shorten this time frame to ensure greater data accuracy. While this time frame may be shortened in the future, DEED is maintaining the current requirement across our policies at 15-business days. The EDS policy applies to the Employment and Training Programs (ETPs) funded by DEED. Please refer to DHS EDS requirements for MFIP.

### Retention of Paper Documents

4. **Can you confirm that electronic data in WF1 will remain available and accessible in the event of a government shutdown? In the past, this has resulted in access to WF1 being denied which is why some agencies may keep paper files as backups.**

**DEED's Response:**

In the 2011 government shutdown, WF1 was unavailable for one week while the legislature determined essential services. Once programs that use WF1 were determined essential, WF1 was made available. We would expect a similar situation in the event of a future shutdown because while the legislature is determining the essentialness of programs that use WF1, there would not be state staff available to support WF1 or monitor the security of WF1. We would expect that the legislature would deem programs that use WF1 essential as they did in 2011.

5. **If a partner chooses to maintain hard copy participant documents, what is the timeline for retention of these hard copies? At what point can they be destroyed?**

**DEED's Response:** The purpose of the EDS Policy is to transition all ETP grantees from paper (hard) copy participant files to maintaining electronic participant records using Workforce One (WF1). The retention of the electronic records is managed by DEED's WF1 Team. Grantees that choose to maintain hard copy files will be responsible for following the approved record retention schedule for each program your organization administers to ensure confidentiality, file retention, storage, and disposal schedule. See DEED's Record Retention Policy.

### Comments Re: Functionality of EDS

6. **Please allow WDAs (and local grantees) with the ability to add their own specific EDS categories & defined name to WF1 to better fit and store our agency-created documents.**

**DEED's Response:** The standardization of EDS categories and folders within EDS provides the ability to organize and identify documents across a wide range of programs within WF1. We understand the organization of the folders are not as intuitive as we would like across programs so DEED created an **EDS Document Navigation Guide** to help direct grantees with the path needed to save and name documents within EDS.

Additionally, WDAs and grantees may request suggested changes to the EDS configuration by submitting a WF1 EDS Configuration Request. To do this, log in to WF1 and select References > EDS Configuration > EDS Configuration Request. Another way to further define documents is for grantees to create instructions for their staff to use the "User Defined Names" field within EDS WF1 to meet the needs of agency-specific documents. DEED Recommends plain, simple language that ties to policy, performance measures and data validation, when possible.

### The Naming of Local Documents within EDS

7. **Please add a "Local Document" option (kind of like a "local flag" activity), so WDAs (and local grantees) may use this and then manually type in a user defined name for EDS storage.**

**DEED's Response:** We understand that there will be challenges as we transition to electronic participant files. DEED expects that we will likely need to work closely with DEED's WF1 team to initiate future enhancements to improve the usability of EDS. In the meantime, we are suggesting grantees use the "**User Defined Name**" field to help meet the needs of naming local agency-specific documents. Please also refer to the **EDS Document Navigation Guide** for the path to follow when uploading and saving documents in WF1.

8. **The difficult part of moving to paperless and using WF1 as our main source of storage for documents is that we have no control over the naming of the forms.**

**DEED's Response:** Grantees can define, and name uploaded documents in the "**User Defined Name**" field in EDS. DEED Recommends plain, simple language that ties to policy, performance measures and data validation, when possible.

9. **We request that DEED provide naming conventions to ensure consistency across staff and agencies in labeling EDS files. This will ensure monitors can easily find the documents they are searching for, and that staff who take over cases will be able to quickly understand the client file and be able to keep it organized.**

**DEED's Response:** Please refer to **Attachment I: EDS Document Navigation Guide** of the EDS Policy for the path to follow for uploading and naming conventions to use when uploading files into EDS.

#### **Example Grantee Staff Roles with the Management of Electronic Files**

10. **Most organizations are not large enough to have these four roles differentiated. Instead, individual staff play multiple roles. Please provide additional detail about what each of the roles listed would be responsible for, and whether this responsibility needs to be separated out from the other roles listed – keeping in mind that organizations have limited availability to create separate roles unless mandated and supported by funding.**

**DEED's Response:** We understand smaller organizations may not have the capacity to employ dedicated staff for the management of electronic case files so DEED:

1. Created an **EDS Document Navigation Guide** to help grantee staff understand the path to uploading participant documents into EDS.
2. Is **offering EDS Training Webinars** to all grantee staff.
3. Will post a recording of EDS Training to DEED's website, and will
4. Share all training materials and tools with grantees via DEED's website.

The staff roles provided within the policy are a sample of how some larger organizations may choose to manage their electronic data and case files. These roles aren't required by DEED, rather it is an example.

Per the EDS Policy,

**"Sample grantee staff roles could include:**

- **Management Information System (MIS) Manager** – responsible for agency-wide data and data practices.
- **Program Manager/Supervisor or Data Compliance Specialist** – responsible for case management file reviews.
- **Intake Supervisor** – responsible for the eligibility and monitoring of specific data entry and file retention.
- **Intake Staff/Technician/Administrative Specialist** – responsible for scanning or uploading documents.”

### Medical Records Confidentiality

**11. Since we ask on our program applications whether a participant is disabled, does this mean that every application on which the participant identifies they have a disability needs to be marked “private”?**

**DEED’s Response:** No, it is not required for grantees to mark a WF1 file “private” when a participant discloses that they have a disability.