



## Virtual Enrollment in Title I and III Services

**Effective Date: April 6, 2020**

**Duration: Indefinite**

**Purpose:** To provide guidance to NETLWDA Title I and Title III regarding virtual (internet-based and phone communications) enrollment and/or other required documentation processes and services to potential Title I and III applicant and /or participants.

**Scope:** Office of the Governor, Tennessee Department of Labor and Workforce Development (TDLWD); Division of Workforce Services (WFS); Tennessee Department of Economic and Community Development (ECD); Tennessee Department of Education (TNED); Tennessee Department of Human Services (DHS); State Workforce Development Board (SWDB); Title I – Adult, Dislocated Worker, and Youth Programs, Title II – Adult Education and Family Literacy Act Program(AE); Title III – Wagner-Peyser Act Program (WP); Title IV– Vocational Rehabilitation Program (VR); Regional Planning Council (RPC); Local Workforce Development Boards (LWDB); Local Workforce Development Areas (LWDA); American Job Center (AJC); One-Stop Operator (OSO); Workforce System Sub-Recipients (Sub-Recipients); Workforce System Partners (Partners)

- I. **Virtual Services** - The provision of virtual services is an allowable activity under 20 CFR 678.305(d)(3). However, the NETLWDB and its service providers must ensure that all Federal, State and program requirements are followed. For allowable services reference TEGL 19-16 and 21-16; and WFS Virtual Enrollment in Title I and Title III Policy.
- II. **Collection of Eligibility and/or Other Required Documentation** – Eligibility or Other Required Documentation requirements for program applicants and/or participants will not change regardless if services are provided virtually, in-person, or through other NETLWDB physical collection options outlined in this policy. Pre-established WIOA regulations for eligibility and/or other requirements for the WIOA Title I program will not change.
- III. **Collecting Eligibility Documentation Virtually**
  - A. **Electronic Collection** – The NETLWDB incorporates the State Workforce Development Board’s recommendation that Title I and Title III utilize Jobs4TN, where applicable, to collect eligibility or other Title I and Title III required documentation. In order to do this effectively, the case manager must:
    - Ensure that the applicant and/or participant has establish a Jobs4TN account
    - Instruct the applicant and/or participant of the documentation that is required (may need to mail/email documents for signature)
    - Provide guidance on where the applicant and/or participant must upload their documentation
    - Change the naming convention of uploaded documentation to meet State standards and ensure it is uploaded in Jobs4TN

WIOA, TDLWD and the NETLWDB do not intend to delay enrollment, create barriers to enrollment or access to other appropriate WIOA services. If at all possible, applicants and participants will be encouraged to provide documentation virtually by utilizing their own equipment or utilizing family or close friends to upload such documents directly into Jobs4TN as recommended by TDLWD and the SWDB.

**B. Physical Collection** – Applicants and/or participants may be required to provide a physical copy of requested eligibility or other required documentation. During a time where AJCs are not open to the public or other accessibility issues arise such as, but not limited to, needing a Youth parent's signature, the NETLWDB has adopted both methods of collection of required documents based on the TDLWD and SWDB policy guidance. The use of Physical Collection is to be used only when Electronic Collection options are not available or appropriate. These two options are outlined below.

1. Documents, or envelope, may be mailed to the applicant and/or participant to collect signature on eligibility or other required documentation. An envelope with pre-paid postage must be provided for the potential participant to be mailed back to the location chosen by the NETLWDB staff in conjunction with Title I and Title III.
2. Documents may be mailed to the applicant and/or participant or requested documentation is provided to the applicant and/or participant. NETLWDA Title I and Title III, respectively, may secure a drop off box established at a location determined in conjunction with NETLWDB staff for the potential applicant and/or participant to provide requested or required documentation. The case manager who collects the documentation must confirm with an email receipt with the applicant and/or participant through these processes established by the NETLWDB Board staff in association with Title I and Title III staff.

**C. Other Means of Collection**

If the NETLWDB decides to provide another means of collection, such as another case management system, outside of Jobs4TN, the NETLWDB must request approval by the State in order to carry out those established functions. The Career Service Provider must ensure all eligibility and other documentation are uploaded into Jobs4TN.

**D. Use of Personal Equipment for Staff**

The use of personal equipment is not advised when collecting or communicating eligibility documentation. The use of a personal cell phone or computer poses a significant security risk that will put potential participants Personal Identification Information (PII) at risk for exposure. Also, the use of this equipment is subject for review if an open records request is made or if an audit is conducted. If current practices are utilizing these personal devices, then those practices should cease immediately.

**References:**

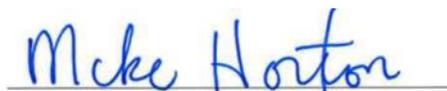
20 CFR 678.305; TEGL 19-16; TEGL 21-16; WFS Virtual Enrollment in Title I and Title III

**Contact:**

For any questions related to this policy, please contact the Executive Director, Kathy Pierce, at [kpierce@ab-t.org](mailto:kpierce@ab-t.org).

**This policy will remain in effect until amended, modified, or set aside by the Northeast Tennessee Local Workforce Development Board.**

**APPROVED:**



**Mike Horton**  
**NETLWDB Board Chair**