



Hennepin-Carver

Workforce Development Board

WDA 09 WIOA Adult, WIOA Dislocated Worker, MN Dislocated Worker: Electronic Document Storage

Summary

This policy outlines the requirements for the implementation and use of Electronic Document Storage (EDS) for all federal and state adult and youth Employment and Training Workforce Development Programs under the authority of the Department of Employment and Economic Development (DEED). Local Workforce Development Associations (LWDAs), and other Employment and Training Program (ETP) Partners are required to use EDS in the Workforce One (WF1) System for participant file management.

Relevant Laws, Rules, or Policies

[WIOA Performance Reporting \(DOL\)](#)

[WIOA Public Law 133-128](#)

[TEGL No. 7-18 Joint Data Validation Guidance Per WIOA \(Dated 12-19-18\)](#)

[TEGL No 10-16, Change 2 Performance Accountability Guidance for WIOA \(Dated 9-15-22\)](#)

[TEGL No 14-18 Aligning Performance Guidance Across ETP \(Dated 3-25-19\)](#)

[TEGL No 14-21 Performance Guidance for PY21 & PY22 \(Dated 10-27-21\)](#)

[TEGL No 23-19, Change 1 Data Validation Guidance \(Dated 10-25-22\)](#)

[TEGL No 23-19, Change 2 Clarifying Data Validation Instructions \(Dated 5-12-23\)](#)

[2 CFR 200.328 Fiscal and Performance Reporting](#)

[20 CFR 667.300 Reporting Requirements](#)

[20 CFR 677.240 State Data Validation Requirements](#)

[81 FR 55792 Joint Rule Performance \(Dated 8-19-2016\)](#)

[81 FR 73140 OMB WIOA Information Collection \(Dated 10-24-2016\)](#)

[Government Performance and Results Act \(GPRA\) of 1993 \(Public Law 103-62; 107 Stat. 285\)](#)

[2180.2 CIO GSA Rules of Behavior for Handling Personally Identifiable Information \(PII\) Chapter 13 – Government Data Practices \(Minnesota\)](#)

Effective Date: March 18, 2026

Last Updated:

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Local Policy Required

Local program providers must develop and maintain a local Electronic Document Storage (EDS) policy. This policy may serve as the adopted local policy or may be referenced in a local policy under a different name, but it must contain the required actions listed in this policy. *This policy adopts that of the Minnesota Department of Employment & Economic Development.*

Background

In 2017, the State of Minnesota launched Workforce One (WF1) Electronic Document Storage (EDS), which allows local Employment and Training Program Partners to upload, search, and maintain participant file documents. Previously this documentation was stored in a paper file or other document management systems. The EDS functionality in WF1 provides local program partners with the ability to transition from paper to digital files, storing all required participant information and required source documents in one central file.

Policy Summary

Local state and federal Employment and Training Program Partners must transition from paper (hard) copy participant files to maintaining electronic participant records using Workforce One (WF1), which includes the upload of all required participant source documentation into Electronic Document Storage (EDS) also known as Document Summary within WF1. By doing so, this ensures records are available for data validation, reporting, and monitoring. Additionally, the participant's personal information will be protected by limiting the use of paper documentation and storage.

Employment and Training Programs (ETP) subject to using EDS to maintain participant source documentation include (not exhaustive):

- Adult Career Pathways (ACP)
- Direct Appropriations
- Minnesota Youth Program
- Minnesota Jobs Skills Programs (MJSP)
- National Dislocated Worker (DWG)
- Robotics
- State Dislocated Worker
- Trade Adjustment Assistance (TAA)
- WIOA Adult
- WIOA Dislocated Worker
- WIOA Youth
- Youth At Work
- YouthBuild

Capital grants and other Employment and Training Programs that do not provide case management to participants are exempt from this requirement, which must be noted within the DEED grant contract.

Purpose

To assist grantees with designing and implementing an effective EDS policy, procedure, and practice utilizing EDS to safeguard participants personal identifying information by limiting the use of paper documentation and to improve data access, collection and accuracy needed for performance as a state.

Benefits of EDS

- Allows for the immediate sharing and retrieval of documents.
- Provides secured document storage for confidential and sensitive information.
- Ensures the documents are preserved and do not get lost or damaged.
- Eliminates paper files, which reduces the need for storage space and specialized filing cabinets.
- All files are centrally stored in EDS WF1.
- Documents are accessible by all parties who are monitoring and/or providing services to enrolled/co-enrolled participants.
- Ease of case transfer from one agency to another. No need to transfer paper files.
- Ensures federal and state compliance with reporting and data validation.

Implementation Timeline

Federal grant recipients must upload and maintain participant source documentation in WF1 EDS as of July 1, 2024 for all active participants as well as new enrollees for Program Year (PY) 24 and years following. This includes the upload of any participant source documents needed for Program Year (PY) 23 to complete data validation and monitoring.

State grant recipients must upload and maintain participant source documentation in WF1 EDS as of July 1, 2025 for all active participants as well as new enrollees for State Fiscal Year (SFY) 26 and years following. This includes the upload of any participant source documents needed for State Fiscal Years (SFY) 24 & 25 to complete monitoring.

EDS Training

DEED will offer a series of EDS training webinars for all Employment and Training Partner Staff in July and August of 2024. A recording of the webinar will be posted onto DEED's website.

EDS Requirements

Each local partner is responsible for the development and implementation of an Electronic Document Storage (EDS) procedure at their local agency. Below includes some guidelines.

Local partner responsibilities:

1. Upload all required participant source documents into EDS (as applicable by program). If there are co-enrolled participants, all required documentation must be uploaded for each enrollment.
2. Follow Attachment I - WF1 Document Storage Navigation Guide for WF1 folder and naming,
3. Refer to Data Validation Policy Attachment II for a complete list of allowable and required source documents for federal programs.
4. Use consistent naming conventions when labeling documents.
5. Ensure participant source documents are complete, readable, and legible.
6. Describe any additional user defined documents not outlined within the WF1 Document Storage Navigation Guide.
7. Establish internal controls and staff roles.
8. Ensure appropriate staff are trained on EDS.

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.

EDS Timeline Requirement

All participant documents related to a participant's file **must be uploaded and saved electronically in EDS within 15 business days**. Additionally, if a local agency is using more than one tracking system and dual entry is required, the same timeline of 15 business days applies to dual entry and/or co-enrollment entries between programs – as these are manual entries. Delays must be explained within a case note.

Paper Retention

Paper documentation may be shredded once the local partner/employment counselor has verified participant source documents are legible, accurate, complete, and successfully uploaded to the correct individual.

Local partners may implement procedures requiring longer paper retention periods to meet the needs of their program and organization. **However, if a local partner chooses to maintain hard copy participant documents, they must be saved within a secured location and *cannot* be stored in unlocked office areas or in personal homes, cars, desktops, etc.**

Medical Records Confidentiality

Documents containing identifiable health information such as health status, provision of health care, or payment for health care must be marked as "private" within EDS to ensure confidentiality in accordance with all federal and state guidance related to confidentiality and the handling of protected information.

Definitions

Data Validation - A series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data.

Co-enrollment Participant - A program participant in multiple programs

EDS (Electronic Document Storage) - Electronic Document Storage (EDS) is the function within Workforce One that grantees will use to upload, search, and view case file documents saved within Workforce One.

EDS Document Name - EDS Document Name is the Workforce One Title of the Document in EDS. Grantees select the document name from a predefined list when uploading a document.

EDS Document Type - EDS Document Type is a field within Workforce One that helps identify the type of document being uploaded. Grantees select the EDS Document Type from a predefined list when uploading a document.

EDS Folder – EDS Folder is a field within Workforce One, which is used to help segregate documents. In addition to identifying an EDS Document Type, Document Name, grantees will also enter the name of an EDS Folder to documents that are uploaded into Workforce One.

Participant Source Documentation – Participant source documentation are documents maintained within a participant's file to demonstrate eligibility and services provided to a program participant. Some examples may include a program application, copy of a government ID, a self-attestation, copy of a social security card, a signed individual employment plan, a signed How we use your personal information/EEO (Tennessee) form, and other documents required per program requirements.

PII (Personal Identifying Information) – PII is any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means. Further, PII is defined as information: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e.,

indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors). Additionally, information permitting the physical or online contacting of a specific individual is the same as personally identifiable information. This information can be maintained in either paper, electronic or other media.

WF1 Document Storage Navigation Guide - A guide created by DEED to help grantees, service providers and their staff with the path needed for the upload of participant documents within WF1 Document Storage as well as the naming conventions to use to ensure consistency across agencies when labeling EDS files. See Attachment 1 of this policy for the guide.

Workforce One Connect App - WF1 Connect is a mobile app designed to allow participants enrolled in public services across multiple Minnesota state agencies, including DEED to communicate with local partner staff easily and securely as well as remotely submit documents necessary for compliance using their phone or tablet.

Related Links

- [WF1 Document Storage Navigation Guide](#)