

Fresno Regional Workforce Development Board

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Blake Konczal, Executive Director

OPERATIONAL DIRECTIVE

FRWDB OD # 25-21, Revision B

Date Released: September 15, 2022

To: All Fresno Regional Workforce Development Board Providers of Services

From: Blake Konczal, Executive Director

Effective Date: September 15, 2022

Subject: Health/Medical Information Handling Protocols

Applicable Program: All

Revision History: Initial Release – 11/12/21

This Operational Directive (OD) provides guidance on the requirements for the security of personal and confidential information Workforce Innovation and Opportunity Act (WIOA) Providers of Services collect from applicants/participants as part of the WIOA eligibility application process and/or for the purpose of providing other WIOA funded services (i.e. supportive services).

This Revision B updates the Information Verification form (QUA-070) and removes the security protocols, as they are no longer needed; and expands the use of the form beyond initial eligibility.

This OD outlines the steps necessary to ensure the privacy of health/medical information obtained from applicants/participants and to protect information from unauthorized disclosure.

The collection and data entry of health/medical information, including disability-related information, may be required as part of the initial WIOA eligibility application and to determine the need for additional WIOA funded services. Each Provider of Services must collect and maintain such information, in accordance with procedures prescribed by the FRWDB Equal Opportunity (EO) Officer.

Any health/medical information, including information that could lead to the disclosure of a disability, must be treated confidentially, stored in a manner that ensures confidentiality, and must be used only when appropriate for the purposes of eligibility requirements and reporting (i.e., determining eligibility for WIOA Title I-financially assisted services, providing certain supportive services, etc.).

Providers of Services must adhere to the following steps to ensure the privacy and confidentiality of health/medical information obtained from an applicant/participant.

Collection of Information:

If an applicant/participant discloses they have a disability, Provider staff must review the information provided by the applicant/participant and certify that they have reviewed the information and the applicant/participant meets the eligibility requirements for WIOA Title I-funded services, as appropriate.

Provider staff will:

- Complete and sign the WIOA Title I Document Inspection Verification Form (QUA-070).
- Return the documents to the applicant/participant.
- Not make copies of any documents.

Data Entry:

- Provider staff must check the disability box in the WIOA CalJOBSsm application.

Case Notes:

- Provider staff must case note that they have received and verified health/medical information and the WIOA Title I Health/Medical Document Inspection Verification Form has been completed.
 - Case notes, must **NOT** include any health/medical or disability-related information including, but not limited to the use of any of the following words: “health/medical, disability, reasonable accommodation, SSDI,” or anything similar.
 - Acceptable wording would be: “verification document securely uploaded”.

Digital Case File Naming Convention/Upload Process:

- The completed WIOA Title I Document Inspection Verification Form is to be uploaded and-labeled “Document Inspection Verification Form.”
- Providers are **not** to maintain or upload any copies of the documents they reviewed.

Any documents or case notes in CalJOBSsm that include health/medical or disability related information will be considered a finding for the Provider of Services during a monitoring process.

Please direct any questions to the FRWDB EO Officer.

Form:

QUA-070, WIOA Title I Health/Medical Document Verification Form