

## Comments on Chapter 12

### Section 12.1

**Commenters questioned the accuracy of whether individuals could complete WIOA Title I registration via customer self-registration on [jobcenterofwisconsin.com](http://jobcenterofwisconsin.com).**

DWD-DET has reviewed and agrees that, though the process for WIOA Title I registration can be initiated by an individual through the self-registration process on [jobcenterofwisconsin.com](http://jobcenterofwisconsin.com), WIOA Title I registration does require staff intervention. The definition of "registration" has been adjusted to reflect this.

### Section 12.2.5

**Commenters questioned whether it is required to enter a case note in each of the following circumstances:**

**1. When a career planner makes a priority of service determination.**

Yes. As required by [Chapter 8.3.2.4](#) (effective August 20, 2018) each Adult program priority of service determination must be documented in ASSET case notes.

**2. When a career planner makes a determination of Basic Skills Deficiency.**

Not necessarily. Because other source documentation will exist in the file as proof of the basic skills deficiency, a case note is not necessary, but may be entered to maintain the narrative for the participant. Please verify local policy requirements as they may be more restrictive than state and federal requirements.

**3. When career planners determine other data elements.**

Maybe. In cases where case notes are allowable documentation for a data element that requires data validation, and the case note is being used as the sole means of validation for that element, then a case note must be entered and must include the information included in the definition. A note has been added to the policy language to clarify this requirement.

### Section 12.2.6

**Commenters expressed concern that the state's directive on photocopying is more restrictive than the federal requirements outlined in TEGLs 7-18 and 23-19, and asked which standard applies.**

DWD-DET recognizes that the federal government allows photocopying and retention of certain documents that are prohibited by Wisconsin State Statute. The state is allowed to be more restrictive in its laws and policies than the federal government. Career planners must adhere to the state-level restrictions outlined in the policy. In cases where the federal government allows use of a document that is not allowed to be photocopied in the state of Wisconsin, pertinent details from the document should be recorded by the career planner on a Document Verification Form and the Document Verification Form should be retained in the file rather than a copy of the source document.

### Section 12.4.2

**Commenters noted that the visual alignment of this section appeared to be skewed, which created confusion regarding which documentation was required for each portion of the eligibility criterion.**

DWD-DET agrees and has made changes to correct the alignment on the web page.

### Section 12.5.3

**Commenters expressed concern over the language in this section, stating that it caused confusion.**

Though the comments related to this section were not specific in terms of what was confusing, DWD-DET has reviewed and attempted to clarify the language.

### Basic Skills Deficient (Adult Program and Dislocated Worker Program) Guidance

**Commenters noted that the guidance in Chapter 12 requires the use of the Basic Skill Screener for Dislocated Workers and questioned whether the Basic Skills Deficient Guidance would be updated to reflect this change.**

DWD-DET released updated draft [Basic Skills Deficient \(Adult Program and Dislocated Worker Program\) Guidance](#) with the draft Chapter 12 policy to address this.