



Participant Payments Required Documentation

Effective Date

3/31/2025

Purpose

To establish guidelines for the documentation of all participant payments under Title I of the Workforce Innovation and Opportunity Act (WIOA) to ensure compliance with applicable federal, state, and local requirements.

Scope

This policy applies to all subrecipients of WIOA Title I funds responsible for administering participant payments, including but not limited to supportive services, training-related costs, and incentives.

Policy Statement

Subrecipients are required to maintain adequate documentation for all participant payments to ensure accountability, transparency, and compliance with WIOA regulations. Payments must be appropriately documented and substantiated to demonstrate that they are reasonable, necessary, and allowable.

Policy

Required Documentation for Participant Payments:

All participant payments must be supported by the following documentation:

1. Case Note Requirements - Payments

- All participant payment documents must be uploaded in a case note in the IowaWORKS participant file.
- The case note must include the following details along with the attached documentation:
 - ✓ Service Type
 - ✓ Dates Covered
 - ✓ Payee (Vendor or Participant)
 - ✓ Date Paid
 - ✓ Amount
 - ✓ Documentation of Payment

2. Payment Request Documentation

- A completed and signed payment request form specifying the type of payment (e.g., supportive services, training payments, reimbursements, incentive).
- Case Note justification for the payment, including the specific need addressed and alignment with the participant’s IEP or ISS. Refer to the Support Service Policy for all required case note documentation. Documentation of payment calculation, receipts, etc.
- If this is a recurring payment (TRN, DPC, etc.), the initial justification for justification must be addressed in the initial service case note.

3. Proof of Cost or Need

- Receipts, invoices, or other evidence of actual costs incurred by the participant.
- If payment is for a predetermined allowance (e.g., stipends), supporting documentation justifying the amount (e.g., hours attended for training or participation).

4. Authorization and Approval

- Signed approval from an authorized case manager or program supervisor.
- Documentation of compliance with the organization’s internal controls and approval processes.
- The same person cannot authorize and approve any payments.
- QA must ensure that all appropriate documentation by the Workforce Consultant is entered in IowaWORKS (Service on the Ribbon Tab, Case Note with all required information.)

5. Proof of Payment

- Copies of checks, payment stubs, or electronic payment records must be uploaded and case noted in IowaWORKS.

6. Compliance with Limits and Guidelines

- Evidence that payments align with established WIOA cost limits and local policy guidelines (e.g., caps on supportive service payments).
- Compliance with Uniform Guidance – Cost Principles as outlined in the Uniform Guidance (2 CFR Part 200 – Subpart E) including being necessary, reasonable, and allocable.

Retention and Accessibility of Documentation



Local Policies – Participant Services

- Subrecipients must retain all documentation related to participant payments for a minimum of 5 years or as specified by federal and state regulations.
- Documentation must be accessible for review by monitoring entities, auditors, and other authorized parties upon request.

Monitoring and Compliance

- Subrecipients must implement procedures to ensure compliance with this policy, including quarterly review and monitoring of participant payment records. Noncompliance may result in corrective action, disallowed costs, or other consequences as determined by the Northeast Iowa Workforce Development Board (NEIWDB), State of Iowa or the Department of Labor or other oversight entities.
- Annual training is required to ensure compliance and adherence to this policy.

Policy Review

- This policy will be reviewed as needed annually and updated as necessary to ensure compliance with applicable regulations and to address organizational needs.