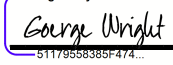




Local Workforce Innovation and Opportunity Act (WIOA) Policy No. 2025-PL-02

To: All Delegate Agencies, American Job Centers and Sector Centers

From: Signed by:

51179558385f474...
CEO, Chicago Cook Workforce Partnership

Subject: Use of Alternative Signature

Date: September 16, 2025

Purpose: To transmit guidance allowing alternative methods of obtaining customer signatures.

Issuances Affected:

- A. References: Workforce Innovation Opportunity Act of 2014, Public Law 113-128, as amended
USDOL Training and Employment Guidance Letter (TEGL) No. 39-11, Guidance on the
Handling and Protection of Personally Identifiable Information (June 28, 2012).

Background:

To ensure timely services to customers, The Chicago Cook Workforce Partnership (The Partnership), is following guidance from the USDOL and Illinois Department of Commerce and Economic Opportunity Office of Employment and Training, regarding streamlining the documentation process to enhance a customer-centered system. Since physical signatures and required documentation needed for eligibility determination may not be readily available at the time of intake, or if a customer is participating virtually, The Partnership allows for use of electronic signatures and self-attestation where applicable.

Electronic signatures offer several advantages, including:

- **Improved turnaround time** for document execution and approval
- **Enhanced accessibility**, allowing signatories to complete documents remotely
- **Secure and auditable tracking**, ensuring compliance with regulatory standards
- **Reduced Administrative Burden**, spending less time and effort

The USDOL posted guidance regarding how career planners may determine customer eligibility remotely/virtually:

Eligibility determination is a critical and non-waivable function of ETA (Employment and Training Administration) programs, and grantees should keep documentation files used to determine eligibility. There are multiple mechanisms to review and save such documentation. For example, program staff can obtain and save a screenshot of the



eligibility documentation to a particular participant file, if the grantee policy allows. Whatever mechanism is used, appropriate information security and privacy must be maintained. Grantees are ultimately responsible for ensuring the accuracy and validity of documents. Eligibility processes should include some type of validation (see Workforce GPS website at: <https://www.workforcegps.org/resources/2020/03/18/23/35/Coronavirus-COVID-19-Resources>).

Additionally, the US Department of Labor posted the following guidance regarding “presumptive eligibility” based on self-attestation:

There are multiple forms of acceptable source documentation for WIOA eligibility. Self-attestation may be used for a number of eligibility criteria as noted in ETA program and performance guidance; however it should not be used as a first resort. Local areas and grantees should attempt to collect other source documentation demonstrating eligibility when possible. During this time during where COVID-19 is impacting programs’ ability to physically collect documentation, documentation may be accepted verbally as long as it is clearly documented in the case file.

While these practices were promoted during the COVID-19 emergency, the U.S. Department of Labor has indicated that these practices may continue.

Components:

When career planners accept signatures in this manner or take documentation verbally, they must request a follow up email from the customer verifying the use of the signature and the information provided. Once received, the career planner must upload the email as a document and include detailed case notes in the data system of record, as applicable.

If the customer completes a hard-copy application that includes a signature and supporting documentation to verify eligibility, the above procedure does not apply. The career planner must upload any hard copy application, or any document received by mail or in another form (e.g. a picture of the application) into the data system of record.

Signatures collected by fax, photo, keypad, PIN or secure tools such as DocuSign are considered valid electronic signatures and are not treated the same as verbal or virtual signatures.

In the event that an individual receives services before the confirmation of eligibility determination, the costs associated with the services provided to the non-eligible individual are considered questionable costs. They are subject to repayment using non-federal funds.

Effective Date:

This notice is effective upon release