

Secondary Review Policy #P-2-7.22

Re: Reviewed for Updates: Revision Approved:

Most Recently Updated: April 17, 2026
Update Approved: N/A

Originated: July 1, 2022
Approved: August 4, 2022

References: Secondary Review of WIOA/TANF YDP Participant Eligibility
WORKFORCE SYSTEM GUIDANCE; Guidance Regarding
Supervisory/Second Level Review of Eligibility Determinations, April 27,
2012
TEGL 23-19, Change 2

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Related Forms:

1. **PA DV Guide to Codes and Defs for Validators (2026 Feb 2)**
 - a. Go to CWDS HELP CENTER > Documents > How-To's > WIOA Common Measures Data Validation Policies & Procedures and Program Checklists > **PA WIOA Common Measures Data Validation Guide (1/2026)**
2. **WIOA Adult Program Data Validation Checklist (2-4-26)**
 - a. Go to CWDS HELP CENTER > Documents > How-To's > WIOA Common Measures Data Validation Policies & Procedures and Program Checklists > **WIOA Title I Adult Data Validation Checklist (2/2026)**
3. **WIOA Dislocated Worker Program DV Checklist (2-4-2026)**
 - a. Go to CWDS HELP CENTER > Documents > How-To's > WIOA Common Measures Data Validation Policies & Procedures and Program Checklists > **WIOA Title I Dislocated Worker Data Validation Checklist (2/2026)**
4. **WIOA Youth Program Data Validation Checklist (2-4-26)**
 - a. Go to CWDS HELP CENTER > Documents > How-To's > WIOA Common Measures Data Validation Policies & Procedures and Program Checklists > **WIOA Title I Youth (OSY/ISY) Data Validation Checklist (2/2026)**

Attachments: 2026 SECONDARY REVIEW ELIGIBILITY VERIFICATION RECORD

I. Purpose:

- A. To ensure that individuals are eligible to receive services funded through WIOA or TANF YDP.

1. In accordance with WIOA Final Rule, the contract between SCPa Works and vendors requires a documented, secondary staff review of eligibility determination for all WIOA/TANF YDP participants by the sub-recipient of grant funding, referenced as the vendor in this policy. Accurate data must be entered into the Commonwealth System of Record (CWDS) by vendor staff to track WIOA/TANF YDP participant registration, documentation, and eligibility, as well as document the secondary eligibility review in the participant file.

II. Background:

- A. Eligibility determination for all programs and services follows guidelines for documentation validation as required by the Commonwealth. Eligibility documentation is carefully reviewed by Title I WIOA Adult, Dislocated Worker, and Youth staff, and TANF YDP Youth staff, and a secondary review is then completed by a supervisor.
- B. Where allowable according to federal and state regulations and expectations, telephone verification may be used as necessary as is self-certification, but as a last resort. Where telephone verification or self-certification have been used as data element validation in CWDS, case notes must describe the reason that these tools are being utilized. Individuals with barriers may be challenged with providing validating documentation, and therefore, WIOA/TANF YDP vendors shall support participants in gathering that documentation as a basic career service.
- C. A secondary review of participant eligibility is completed to ensure that:
 1. All participant eligibility documentation verification has been properly collected, copied into the participant's physical case-record file, uploaded to CWDS, and accounted for in a CWDS case note.
 2. All documentation collected is current and up-to-date.
 3. All documentation collected is valid and included as source documentation on the DOL-issued Source Documentation for WIOA Core/Non-Core Programs DOL- only Data Element Validation.

III. Participant Intake, Eligibility Determination, and Enrollment Procedure:

- A. Vendor staff will collect documentation from the individual in need of services to determine eligibility and enter the information into CWDS by creating a WIOA or TANF YDP application.
- B. Before services are entered, the WIOA/TANF YDP participant case record file will be referred to a vendor supervisor or designated secondary-level professional for review.
- C. SCPa Works allots for a period of five business days from the date of an application for vendors to complete a secondary review.
- D. Using the Secondary Review Eligibility Verification Record Form, the file is reviewed for thorough accuracy across the following SCPa Works mandates:
 1. All eligibility documentation collected by the vendor must be entered into the CWDS WIOA or TANF YDP application and recorded as:
 - a. Collected;
 - b. Verified;
 - c. Documented; and
 - d. Included in a formal enrollment case note.
 2. If, during the secondary review, the reviewer finds that the file is incomplete or that the data is inaccurate, the case is returned to the intake specialist or case manager for corrections.
 3. Once the file is reviewed and verified as complete and eligible, the reviewer will sign and date the Secondary Review Eligibility Verification Record Form and return the file

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This document is reviewed for edits every 365 days by the SCPa Works Policy Department and was last reviewed on 04.17.2026.

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- to the intake specialist or case manager.
 - a. A case note is entered to indicate that a secondary review is complete and eligibility has been determined.
- 4. At the time that case eligibility is approved, the intake specialist or case manager will enter value-added service codes into CWDS corresponding to the actual date that the services were rendered, and will include a case note reflecting service code entry.
- 5. The above process serves both WIOA and TANF YDP administration with the following exceptions:
 - a. In addition to the use of the Secondary Review Eligibility Verification Record, TANF YDP Applications will be used along with the Customer Tracking form to list services.
 - b. Vendors will utilize the TANF YDP Preliminary Screening Tool to determine TANF YDP eligibility prior to the collection and documentation of eligibility elements.

IV. Secondary Review Eligibility Verification Record Upload in CWDS Procedure

- A. To ensure compliance with monitoring requirements and proper documentation of case file reviews, vendor staff are required to upload the secondary review form into the participant’s record in CWDS.
- B. Vendor Staff are required to detail the action in a case note promptly following the action of uploading the secondary review document in CWDS.
- C. There are three points of compliance in completing a secondary review.
 - 1. The first point is to complete the secondary review within five business days from the date on a participant’s application.
 - 2. The second point of compliance is to upload the secondary review into CWDS on the same day that it was completed.
 - 3. The third point of compliance is to create a case note in CWDS on the same day, detailing the elements of the secondary review.
- D. To properly upload the secondary review form, vendor staff are required to log into CWDS and apply the following steps:
 - 1. From the dashboard, vendor staff should click on the search drop down menu and click on search participant.
 - 2. Type the name or identification number of the participant.
 - 3. Click on the correct participant name.
 - 4. Move the cursor to the left of the screen and scroll down to click on the documents option.
 - 5. In the box titled Uploaded Documents, click on the UPLOAD NEW DOCUMENT button.
 - 6. Enter the title of the completed secondary review form.
 - 7. In the drop down menu under DOCUMENT CATEGORY, choose “other.”
 - 8. Enter the date of the secondary review.
 - a. This date should match the date on the secondary review, which should match the date of upload in CWDS, and the date of the case note creation.
 - b. Choose the file and upload the document into the Uploaded Documents list.

V. Summary of Changes: This policy is reviewed every 180 days by the SCPa Works Policy Department for necessary changes, edits, updates, and revisions.

Date of Change:	Changed by:	Summary of Change(s):	Effective Date

07/01/2022	Saranne Miller 	Formatted content, added author line, added footer, added page number. Created and added new procedural content.	08/04/2022
08/11/2022	Saranne Miller 	Added approval date.	08/11/2022
12/29/2022	Saranne Miller 	Clarified the TANF YDP process.	12/29/2022
07.12.2024	Saranne Miller 	Added BWDA updates to include: CWDS PA DV Guide to Codes and Definitions for Validators (2024 June 14) CWDS WIOA Adult Program Data Validation Checklist (6-21-24) CWDS WIOA Dislocated Worker Program DV Checklist (6-21-24) CWDS WIOA Youth (OSY/ISY) Program Data Validation Checklist (6-20-24)	08.01.2024
04.17.2026	Saranne Miller 	Added section IV, Secondary Review Eligibility Verification Record Upload in CWDS Procedure	N/A