



WIOA Priority of Service & Wait List Policy

Policy Memorandum 16-01

Date: June 8, 2016

To: All WIOA Service Providers

Purpose: To provide guidance to contractors (service providers) enrolling participants in the WIOA program.

Rescissions: WIA Priority of Service Policy (October 30, 2013)

References: WIOA Section 134(c)(3)(E)

Background:

Under the Workforce Investment Act (WIA) a priority of service was implemented if funds allocated for adult and dislocated workers training activities were limited. WIOA removes that provision and adds criteria for additional priority of service populations.

Policy:

A. General Provisions

WIOA Section 134(c)(3)(E) states that individualized career services and training services funded with WIOA **adult** funds, priority of service must be given to recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient. Veterans and eligible spouses continue to receive priority of service among all eligible individuals.¹

Basic career services (formerly core and intensive services under the Workforce Investment Act) are not subject to the priority of service requirement (Attachment I). However, individualized career services (Attachment I) and training services are subject to the requirement.²

Priority of service status is established at the time of eligibility determination and does not change during the period of participation. Priority does not apply to the **dislocated worker** population.³

B. Outreach and Recruitment

Contracted service provider will provide outreach and recruitment consistent with local procedures and priority of service policy. Contractor will recruit participants for WIOA services and ensure that participants have access to self-directed services through CalJOBS (<https://www.caljobs.ca.gov>).

C. Participant Selection and Eligibility

Contracted service provider will select and screen participants for WIOA eligibility, and enroll selected participants into the WIOA program. All interested applicants are to be reviewed for eligibility within 30 days of submitting a WIOA application. Participants who are screened and determined to be ineligible for WIOA will receive basic career services.

¹ WIOA Section 134(c)(2)(A)(xii)

² Title 20 CFR NPRM Section 680.150

³ WSD15-14, dated January 22, 2016

Contractor will ensure they meet the mandated enrollment date criteria. To ensure the data uploads to the state performance roster are met, all participants must be entered into the case management system and have a WIOA activity assigned within 30 days of the eligibility date.

D. Eligibility Criteria

Contracted service provider will be responsible for WIOA Adult and Dislocated eligibility determinations and for collecting verification documents as required by WIOA regulation.

WIOA Eligibility Criteria is summarized below.

WIOA Adult Eligibility

To be eligible to receive WIOA services as an adult in the adult and dislocated worker programs, an individual must:

1. Be 18 years of age or older;
2. Be a citizen or noncitizen authorized to work in the US; and
3. Meet Military Selective Service registration requirements (males only).

WIOA Dislocated Worker Eligibility

To be eligible to receive WIOA services as a dislocated worker in the adult and dislocated worker programs, an individual must:

1. Be a citizen or noncitizen authorized to work in the US;
2. Meet Military Selective Service registration requirements (males only); and
3. Meet the definition of dislocated worker at WIOA §3(15).

Definition of Dislocated Worker

A dislocated worker is an individual who meets **one** of the following criteria

1. The individual:
 - a) has been terminated or laid off, or has received a notice of termination or layoff, from employment;
 - b) is eligible for or has exhausted entitlement to unemployment compensation, or has been employed for a duration sufficient to demonstrate attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under the state's Unemployment Insurance law; and
 - c) Is unlikely to return to a previous industry or occupation.
2. The individual:
 - a) has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility, or enterprise;
 - b) is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or
 - c) for purposes of eligibility to receive services other than training services described in section 134(c)(3), career services described in section 134(c)(2)(A)(xii), or support services, is employed at a facility at which the employer has made a general announcement that such facility will close.
3. The individual
 - a) was self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters.
4. The individual

- a) is a displaced homemaker.

Definition of Displaced Homemaker: An individual who has been providing unpaid services to family members in the home and who:

a) has been dependent on the income of another family member but is no longer supported by that income; or

b) is the dependent spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) and whose family income is significantly reduced because of a deployment (as defined in section 991(b) of title 10, United States Code, or pursuant to paragraph (4) of such section), a call or order to active duty pursuant to a provision of law referred to in section 101(a)(13)(B) of title 10, United States code, a permanent change of station, or the service-connected (as defined in section 101(16) of title 38, United States Code) death or disability of the member; and

c) is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

5. Is the spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of title 10, United States code), and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such members; or is the spouse of a member of the Armed Forces on active duty and who is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment (section 3 paragraph (16)(B)).

E. Priority of Service Policy

It is the policy of the Workforce Investment Board to implement a *Priority of Service* for designated populations of WIOA customers/applicants for those interested in individualized career services and training services.

Priority shall be given for individualized career services and training services at all times and not only when funds are limited to the following:

- Recipients of public assistance and other low-income individuals. This does not apply to dislocated workers;
- Individuals who are basic skills deficient;
- Veterans;
- Spouses of veterans; and
- Residents of Santa Cruz County

F. Priority of Service Procedure

WIOA Case managers will use the WIOA Pre-application (Attachment II) for individualized career services and training services screening purposes of all applicants for priority of service determination. If the priority applies it will be indicated on the case file when assigned to WIOA staff.

All current WIOA enrollment guidelines apply. Applicants must have an assessed need for any service they receive (individualized career services and training services) and the need must be documented in the case file via a case note entry.

See Attachment IV for a list of acceptable documentation to verify whether an adult participant qualifies for priority of service under WIOA.

G. Public Assistance Recipient ~Priority

Priority of service is given to an individual that receives federal, state, or local government cash payments for which eligibility is determined by a needs or income test.

H. Low-income ~Priority

Priority of service is given to an individual that meets one of the four criteria below:

1. Receives, or in the past six months has received, or is a member of a family that is receiving, or in the past six months has received, assistance through the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance For Needy Families (TANF), program supplemental security income program, or state or local income-based public assistance;
2. In a family with total family income that does not exceed the higher of the following:
 - a. The poverty line; or
 - b. 70 percent of the Lower Living Standard Income Level (Attachment III)
3. A homeless individual; or
4. An individual with a disability whose own income does not exceed the income requirement, but is a member of a family whose total income does.

I. Basis Skills Deficient ~Priority

Priority of service is given to an individual that is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society⁴. Criteria used to determine whether an individual is basic skills deficient includes the following:

- Lacks a high school diploma or high school equivalency and is not enrolled in post-secondary education.
- Enrolled in a Title II Adult Education/Literacy program, e.g English language acquisition program.

ADULT EDUCATION.—The term “adult education” means academic instruction and education services below the postsecondary level that increase an individual’s ability to—
(A) read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent;
(B) transition to postsecondary education and training; and
(C) obtain employment.

ADULT EDUCATION AND LITERACY ACTIVITIES.—The term “adult education and literacy activities” means programs, activities, and services that include adult education, literacy, workplace adult education and literacy activities, family literacy activities, English language acquisition activities, integrated English literacy and civics education, workforce preparation activities, or integrated education and training.

ENGLISH LANGUAGE ACQUISITION PROGRAM.—The term “English language acquisition program” means a program of instruction—
(A) designed to help eligible individuals who are English language learners achieve competence in reading, writing, speaking, and comprehension of the English language; and
(B) that leads to—
(i)(I) attainment of a secondary school diploma or its recognized equivalent; and
(II) transition to postsecondary education and training; or
(ii) employment.

- English, reading, writing, or computing skills at an 8.9 or below grade level.

⁴ WIOA Section 3[5]

- Determined to be Limited English Skills proficient through staff-documented observations.

J. Veterans and their Spouses ~Priority

An individual must first qualify for WIOA before a priority of service can be applied. When veterans are identified as eligible applicants for Adult or Dislocated Worker WIOA individualized career services and training services they will become priorities for such services.

The veteran's priority is not to be construed as an entitlement for WIOA service, but eligible veterans are given priority over non-veterans for all available services. Dislocated workers who are veterans will receive priority for individualized career services and training services over non-veteran dislocated workers.

K. Santa Cruz County Residents ~Priority

Priority of Service for Santa Cruz County Residents is effective at all times for the ADULT program and not when funds reach a certain threshold or dollar allocation. WIOA Case managers will use the WIOA Pre-application for individualized career services and training services screening purposes to determine priority as a Santa Cruz County resident. Three (3) different forms of verification to prove residency are required:

1. Rental agreement, mortgage statement or property tax bill, and
2. Utility bill (ex. P G & E bill) and one of the following:
 - a. California Drivers License or California Identification Card, OR
 - b. Bank statement, OR
 - c. Other acceptable documentation, i.e. financial aid paperwork

NOTE: All residency verification/documentation must include and list a Santa Cruz County address.

L. Exception to Policy

The WIOA case manager, through the assessment process, can identify any individual that would benefit from a training scholarship. The exception must be approved by the WIOA Program Manager and documented in case notes, with "exception to priority of service" in the case note subject line.

M. Wait List Policy

It is the policy of the Workforce Investment Board to review the monthly WIOA training commitments and determine whether or not to implement a *Wait List* for designated populations of WIOA customers/applicants who are interested in obtaining a training scholarship, otherwise known as an Individual Training Account (ITA).

WIOA management staff review training commitments and expenditures on a monthly basis. When commitments reach the 90% threshold, a wait list procedure may be implemented. The policy becomes effective at the direction of the local WIB Director. The WIB Director will notify WIOA staff via a *WIB Communication* should it become necessary to implement or suspend the policy.

Should it become necessary to implement a wait list, this decision is disseminated to all workforce partners. During the WIOA orientation, customers will be informed that a wait list is being established for training scholarships and will be instructed to complete the WIOA pre-application with their email or mailing address contact information. This information will be used to contact the individual when the wait list will begin to be served.

N. Training Services

This section imposes requirements under WIOA and replaces the WIB approved *Immediate Referral to Training Services Policy* dated 10/29/2014.

Under WIOA, there is no sequence of service requirement for career and training services. Staff may determine training is appropriate regardless of whether the individual has received basic or individualized career services first. When referring the customer immediately to training, staff will base the evaluation/ review on the criteria below:

- Staff will review the WIOA pre-application (Attachment II) and reason for referral (why partner believes customer will benefit from WIOA training) listed on the Universal Referral form;
- Evaluation of assessment results;
- Work history, education, skills, experience and abilities, and
- Type of training customer selected.

The plan for immediate training will be documented on the Individual Employment Plan (IEP) and the evaluation decision will be so noted in case notes for the individual participant.

Action: All WIOA Service Providers shall comply with the attached Priority of Service & Wait List policy. This policy memorandum is on-going and effective immediately.

Inquiries: Any questions regarding this policy memorandum may be directed to the WDB Director.

Attachments:

- I. List of Basic and Individualized Career Services
- II. WIOA Pre-Application
- III. Lower Living Standard Income Level (LLSIL) & Poverty Guidelines
- IV. List of Acceptable Documentation

This policy authorized by: Workforce Investment Board, June 8, 2016

Attachment 1

Basic Career Services must be made available to all individuals seeking services served in the one-stop delivery system, and includes:

- **Determinations** of whether the individual is **eligible** to receive assistance from the adult, dislocated worker, or youth programs;
- **Outreach, intake** (including identification through the state's Worker Profiling and Reemployment Services system of unemployment insurance (UI) claimants likely to exhaust benefits), and orientation to information and other services available through the one-stop delivery system;
- **Initial assessment** of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive service needs;
- Labor exchange services, including—
 - **Job search and placement assistance**, and, when needed by an individual, career counseling, including—
 - **Provision of information on in-demand industry sectors** and occupations (as defined in sec. 3(23) of WIOA); and,
 - **Provision of information on nontraditional employment** (as defined in sec. 3(37) of WIOA);
- **Provision of referrals** to and coordination of activities with other programs and services, including those within the one-stop delivery system and, when appropriate, other workforce development programs;
- **Provision of workforce and labor market employment statistics information**, including the provision of accurate information relating to local, regional, and national labor market areas, including—
 - Job vacancy listings in labor market areas;
 - Information on job skills necessary to obtain the vacant jobs listed; and
 - Information relating to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for those jobs;
- Provision of **performance** information and program cost information on eligible providers of training services by program and type of providers;
- Provision of **information** about how the local area is performing on local performance accountability measures, as well as any additional performance information relating to the area's one-stop delivery system;
- Provision of **information** relating to the availability of supportive services or assistance, and appropriate referrals to those services and assistance, including: child care; child support; medical or child health assistance available through the State's Medicaid program and Children's Health Insurance Program; benefits under the Supplemental Nutrition Assistance Program (SNAP); assistance through the earned income tax credit; housing counseling and assistance services sponsored through the U.S. Department of Housing and Urban Development (HUD)¹; and assistance under a State program for Temporary Assistance for Needy Families (TANF), and other supportive services and transportation provided through that program;
- **Assistance** in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA; and
- **Provision of information and assistance regarding filing claims under UI programs**, including meaningful assistance to individuals seeking assistance in filing a claim—
 - Meaningful assistance means providing assistance:
 - On-site using staff who are properly trained in UI claims, filing, and/or the acceptance of information necessary to file a claim, or
 - By phone or via other technology, as long as the assistance is provided by trained and available staff and within a reasonable time;

If one-stop center staff determine that **individualized career services** are appropriate for an individual **to obtain or retain employment**, these services must be made available to the individual. These services must be available in all one-stop centers. One-stop center staff may use recent previous assessments by partner programs to determine if individualized career services would be appropriate. These services include:

- **Comprehensive and specialized assessments** of the skill levels and service needs of adults and dislocated workers, which may include—
 - Diagnostic testing and use of other assessment tools; and In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;
- **Development of an individual employment plan**, to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve his or her employment goals, including the list of, and information about, eligible training providers;
- Group and/or individual **counseling** and mentoring;
- Career planning (e.g. **case management**);
- **Short-term pre-vocational services**, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment or training, in some instances pre-apprenticeship programs may be considered as short-term prevocational services;
- **Internships and work experiences** that are linked to careers;
- **Workforce preparation activities** that help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education, or training, or employment;
- **Financial literacy** services;
- **Out-of-area job search assistance** and relocation assistance; and
- **English language acquisition and integrated education** and training programs.

WIOA STAFF USE ONLY: ___ Adult ___ DW

Priority of Service: ___ Veteran ___ Veteran Spouse ___ Public Assistance ___ LLSIL ___ Santa Cruz County resident

Workforce Santa Cruz County

Workforce Innovation & Opportunity Act Employment Training Pre-application
18 W. Beach St., Watsonville CA 95076
(831) 763-8700

PLEASE COMPLETE THE FOLLOWING INFORMATION TO ASSIST US TO DETERMINE HOW WE CAN HELP YOU BECOME RE-EMPLOYED AND /OR ADVANCE IN YOUR CAREER.

Date: _____ Social Security: _____

Full Name: _____

Priority

Address, City, State, Zip: _____

Telephone: _____ Cell Phone: _____

Email Address: _____

Date of Birth: _____ Gender: Male: _____ Female: _____

What services are you seeking from the Career Center? _____

Have you received services from us in the past? Yes _____ No _____ If Yes, what services did you receive, and when did you receive them? _____

Ethnic Origin: _____ U.S. Citizen Yes: _____ No: _____

If you are not a citizen, is your employment authorized? Yes: _____ No: _____

Expiration date of your Alien Registration Card ____/____/____

Did you register with Selective Services? (If male, born after January 1, 1960)

Yes: _____ No: _____ Not Applicable: _____

Priority

Are you a US Veteran? Yes: _____ Separation Date: ____/____/____ No: _____

Are you married to a Veteran? Yes: _____ No: _____

Are you a Migrant Worker? Yes: _____ No: _____ Farm Worker? Yes: _____ No: _____

Are you currently employed? Yes: _____ Full Time: _____ Part-Time: _____ No: _____

DW

Have you been affected by any of the following:

Plant / Business Closure: _____ Lay-Off: _____ Rapid Response Event: _____

Name of Business/Company: _____ When: _____

If unemployed, are you currently collecting Unemployment Insurance Benefits?

Yes: _____ Claim Exhausted: _____ Ineligible: _____

Have not applied: _____ Applied, Claim Pending: _____

Lower Living Standard Income Level

Family Income for the past 6 months: \$ _____ Family Size: _____

Have you been looking for a job? Yes: _____ For how long? _____ No: _____

What do you think is preventing you from finding a job? _____

Would any of the following affect your ability to find and keep a job:

Physical Impairment	_____	Felony or a misdemeanor	_____
Mental Impairment	_____	Homelessness	_____
Convictions	_____	Drug and/or alcohol problem	_____
Other (please specify)	_____		

Priority

Are you currently receiving, or have you received any of the following within the last 6 months:

<input type="checkbox"/> CalWorks (Cash Aid)	<input type="checkbox"/> Food Stamps
<input type="checkbox"/> SSI (Supplemental Security Income)	<input type="checkbox"/> G.A. (General Assistance)
<input type="checkbox"/> TAA/TRA	<input type="checkbox"/> Department of Rehabilitation
<input type="checkbox"/> State Disability	<input type="checkbox"/> Worker's Compensation
<input type="checkbox"/> Housing Authority	<input type="checkbox"/> Financial Aid (ex. Pell Grant, BOGW)
<input type="checkbox"/> Other: _____	Please list and include amount: _____

Education Status: Check highest grade completed:

0-11th
 GED
 HS Diploma
 AA/AS
 BA/BS
 Master's Degree
 Ph.D.

Major course of study: _____

Additional Skills: Licenses, computer skills, trainings, foreign languages:

What is your current employment goal: _____

What type of work are you looking for right now:

1st Choice: _____

2nd Choice: _____

WORK HISTORY:

Company: _____ Job Title: _____

Address: _____ Phone Number: _____

Employed from ___/___/___ to ___/___/___ Hourly Wage: \$ _____

Hours per Week: _____ Job Duties: _____

Reason for leaving: _____

Company: _____ Job Title: _____

Address: _____ Phone Number: _____

Employed from ___/___/___ to ___/___/___ Hourly Wage: \$ _____

Hours per Week: _____ Job Duties: _____

Reason for leaving: _____

Company: _____ Job Title: _____
Address: _____ Phone Number: _____
Employed from ___/___/___ to ___/___/___ Hourly Wage: \$ _____
Hours per Week: _____ Job Duties: _____

Reason for leaving: _____

LIST TWO EMERGENCY CONTACTS:

Name: _____ **Relationship:** _____
Phone Number: _____ **Address:** _____

Name: _____ **Relationship:** _____
Phone Number: _____ **Address:** _____

CAN YOU PROVIDE EMPLOYMENT REFERENCES IF REQUESTED:

Yes: _____ **NO:** _____

IS THERE ANYTHING ELSE YOU CAN SHARE WITH US TO ASSIST YOU WITH YOUR EMPLOYMENT:

Applicant Certification: I certify under penalty of perjury that all of the information is true and complete. I agree that any information I have supplied is subject to verification. I understand that falsification of any item is grounds for termination from the Workforce Innovation & Opportunity Act Program.

Signature of Applicant: _____ **Date:** _____

The following documents are needed to determine Workforce Innovation & Opportunity Act (WIOA) eligibility. Please make sure they are available upon request.

1. Right-to-work Documents:

- CA driver license **and** social security card, **or**
- Authorization to work in the United States (Mica) **and** social security card **or**
- Passport **and** social security card

2. Proof of Address:

- CA driver license or I.D. with current address **or**
- Utility bill (P.G. & E, phone statement, etc.)

3. If you lost your job due to a business closure or lay off:

- Bring company layoff letter, **and**
- Unemployment benefits verification

4. If you are a male 18 years of age or older (applies if born after 01/01/60):

- Bring proof of selective service registration

5. If you are a veteran of any Armed Forces:

- Bring your DD-214 form **or** current military ID Card

Attachment III

**Priority of Service & Wait List Policy
Priority of Service Income Guidelines**

70 PERCENT LLSIL AND POVERTY GUIDELINES FOR 2015*

The Lower Living Standard Income Level (LLSIL) and poverty guidelines are used to establish low-income status for Workforce Innovation and Opportunity Act (WIOA) Title I programs.

Since the income received during the six-month period immediately prior to the individual's application for WIOA funded services is used for income determination, each chart below shows the six-month, as well as the annual, figures for each family size. A comparison of the applicant's actual family income during the six-month income determination period with the six-month figures on the charts enables the reviewer to immediately determine an individual's eligibility

Table 3—San Francisco/Oakland/San Jose Metropolitan Statistical Area							
Local Areas	Alameda County Contra Costa County Marin County Napa County NOVA Consortium	Oakland City Richmond City San Benito San Francisco City/Co. San Jose/Silicon Valley	Santa Cruz County Solano County Sonoma County				
Family Size							
	1	2	3	4	5	6	Each Add'l add
70% LLSIL							
Annual	\$11,308	\$18,530	\$25,432	\$31,395	\$37,050	\$43,332	\$6,282
6 Months	\$5,654	\$9,265	\$12,716	\$15,698	\$18,525	\$21,666	\$3,141
100%	\$16,155	\$26,471	\$36,331	\$44,850	\$52,929	\$61,904	\$8,975
Poverty Guidelines							
Annual	\$11,770	\$15,930	\$20,090	\$24,250	\$28,410	\$32,570	\$4,160
6 Months	\$5,885	\$7,965	\$10,045	\$12,125	\$14,205	\$16,285	\$2,080

Use the higher of either the LLSIL or the poverty guideline for the appropriate family size to determine low-income status. A comparison of the applicant's actual family income during the six-month income determination period with the six-month figures on the charts enables the reviewer to immediately determine income status.

*EDD Workforce Services Directive, WSD15-1; July 17, 2015

Documentation

Use the following sources to verify whether an adult participant qualifies for priority of service under WIOA:

PRIORITY OF SERVICE	
Priority of Service Criteria	Acceptable Documentation (Only the documentation sources listed below may be used.)
1. Recipient of Public Assistance	<ul style="list-style-type: none"> • Cross-match with public assistance database • Copy of authorization to receive cash public assistance • Copy of public assistance check • Medical card showing cash grant status • Public assistance records • Refugee assistance records
2. Low Income	<ul style="list-style-type: none"> • Alimony agreement • Award letter from veteran's administration • Bank statements • Compensation award letter • Court award letter • Pension statement • Employer statement/contact • Family or business financial records • Housing authority verification • Pay stubs • Public assistance records • Quarterly estimated tax for self-employed persons • Social Security benefits • Unemployment Insurance documents • Self attestation*
3. Basic Skills Deficient	<ul style="list-style-type: none"> • School Records <ul style="list-style-type: none"> ○ A referral or records from a Title II Basic Adult Education program or English Language Learner program • Results of academic assessment (e.g. CASAS test) • Case notes^ • Self-Attestation*
<p>^ Case Notes: Paper or electronic statements by the case manager that identifies, at a minimum: (1) a participant's status for a specific data element, (2) the date on which the information was obtained, and (3) the case manager who obtained the information. If case notes are used as a documentation source, the case notes must provide an auditable trail back to the source of information verified. The case manager does not need to keep a hard copy of the information verified in the participant's case file.</p>	
<p>*Self-Attestation: To be used as a documentation source only when the preferred options of paper documentation or third party corroboration are not available. Not to be used as the primary method of gathering documentation to verify data elements.</p>	