



Illinois
Department of Commerce
& Economic Opportunity

OFFICE OF EMPLOYMENT & TRAINING

JB Pritzker, Governor

WIOA NOTICE NO. 19-NOT-06, Change 1

TO: Chief Elected Officials
Local Workforce Innovation Board Chairpersons
Local Workforce Innovation Board Staff
WIOA Fiscal Agents and Grant Recipients
WIOA Program Services Administrators
Illinois workNet® Operators
WIOA State Agency Partners
Other Interested Persons

SUBJECT: Use of Alternative Signatures

DATE: July 23, 2025

I. PURPOSE

To transmit guidance allowing alternative methods of obtaining customer signatures.

II. ISSUANCES AFFECTED

A. References:

Workforce Innovation and 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)

B. Rescissions:

WIOA Notice No. 19-NOT-16, Use of Alternative Signatures and Self-Attestation (May 7,
2020)

III. BACKGROUND

To ensure timely services to customers, the Department of Commerce and Economic Opportunity's Office of Employment and Training (OET) is 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 in intake virtually, the OET allows the use of electronic signatures and self-attestation where applicable.

Electronic signatures offer several advantages, including:

- **Improved turnaround time** for document execution and approvals
- **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 U.S. Department of Labor 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 the Workforce GPS web site at: <https://www.workforcegps.org/resources/2020/03/18/23/35/Coronavirus-COVID-19-Resources>).

Additionally, the U.S. 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 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 .

IV. COMPONENTS

Local Workforce Innovation Boards (LWIBs) should establish local policies and procedures to allow customers to provide verbal or virtual signatures and self-attestation as allowed for "presumptive eligibility." This applies to programs funded by the U.S. Department of Labor's Employment and Training Administration, including but not limited to the WIOA formula, rapid response, statewide activities, Trade Adjustment Assistance, apprenticeship, and national dislocated worker grants. Additionally, career planners may complete applications over the phone or virtually.

At a minimum, the local policy and procedures must adhere to the provisions listed in this Notice, including ensuring that all procedures to protect personally identifiable information (PII), such as electronic information security protocols, are followed.

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 Illinois Workforce Development System (IWDS) or Career Connect, as applicable. Technical instructions on uploading documents into IWDS are provided in Attachment A.

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 of the application or document received by mail or in another form (e.g., a picture of the application) into IWDS.

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

In the event 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.

V. ACTION REQUIRED

All Local Workforce Innovation Areas, recipients, and subrecipients must review this Notice and distribute it to all relevant individuals within their organizations.

VI. INQUIRIES

Inquiries related to this application should be directed to the Office of Employment and Training Regional Managers, Kelly Lapetino at Kelly.Lapetino@Illinois.gov, Ruth Whitis at Ruth.Whitis@illinois.gov, or Bryan Ellis at Bryan.Ellis@illinois.gov.

VII. EFFECTIVE DATE

This notice is effective upon release.

VIII. EXPIRATION DATE

This notice will remain in effect until amended or rescinded by the Office of Employment and Training.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julio Rodriguez', with a stylized flourish at the end.

Julio Rodriguez, Deputy Director
Office of Employment and Training

JR:ld

Illinois Workforce Development System (IWDS) Instructions for Uploading Documents

Go to the **Application Menu**. Search for the applicant record for which you will attach the document. In the bottom of the middle menu column, select **"List All Documents"**. When that is selected, it will bring up the **"List All Documents"** screen.

Application Menu
[Susie WIOA](#) [Application Summary](#)
SSN: 1234 App LWA:6

Application <ul style="list-style-type: none">• Guided Application• Application Definition• Assessment Summary• Concurrent Programs• Characteristics and Barriers• Employment Characteristics• Education Status• Tests• Public Assistance• Family Characteristics• Income Calculation• Dislocated Worker Characteristics• LWA Specific Data• Eligibility Determination	Profile <ul style="list-style-type: none">• Contact Information• Additional Contacts• Private Information• Veterans Information• Employment History• Credentials• Education Status - In Program Update• Measurable Skill Gains• List All Documents ←	Services <ul style="list-style-type: none">• List Enrolled Services Exit <ul style="list-style-type: none">• Exit Summary• View Wages
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From the **"List All Documents"** screen, select **"Add Document"**. When that is selected, it will bring up the **"Upload Document"** screen.

List All Documents
[Susie WIOA](#) [Application Summary](#)
SSN: 1234 App LWA:6

Doc ID	Screen	Document Type	Date Stored	Date Reviewed	Reviewed By
There is nothing to display.					

From the “**Upload Document**” screen on the “**Path**” line, select “**Browse**” and locate the stored document on your computer that you want to attach to the record. This is documentation you would have previously scanned to your computer, examples might be the client’s signed and dated application, or a client’s self-attestation to support an eligibility criteria item. Select the desired stored document from computer files and it will attach under the “**Path**” field on the screen.

Upload Document

Path:

Type:

Remain on the “**Upload Document**” screen and click on “**Type**”. This will display a list of acceptable support document labels. (Note: the example below is just a partial listing, you will be able to scroll down for all possible supporting documentation options.) Select the applicable type. Click on “**Upload**” and then the upload is complete.

Upload Document

Path:

Type:

Copyright Notice.

- A letter from Veterans' Administration
- Acceptable Documents for INS Form I-9
- Accountant Statement
- Acknowledgment Letter
- Alien Registration Card (INS I-151, I-551, I-94, I-688A, I-197, I-179)
- Alien Registration Card indicating Right to Work
- Alimony Agreement
- Appeals Documentation
- Applicant Statement
- Applicant Work History as collected by the SDA or by DHS
- Appropriately Completed I-9
- Approval Letter from ICCB
- Approval Letter from ISBE
- Armed Forces Issued Dependent ID Card - showing client is the spouse of Active Duty Service Member
- Assessed by a Generally Accepted Standardized Test
- Assessment Records
- Attendance Record
- Attestation from customer on financial ability if no UI/TRA
- Authorization to Obtain Food Stamps
- Award Letter from Veterans Administration
- Bank Statements (Direct Deposit)
- Bankruptcy Proceedings
- Baptismal Certificate / Church Record (If Place of Birth is Shown)
- Birth Certificate
- Birth Certificate of Minor Child
- Birth Certificate/Court Records
- Business Records
- By Core Partner
- By LWIA

Follow the same instructions for each document that needs to be attached to the IWDS client record.