



## **Workforce Innovation and Opportunity Act**

# **Data Integrity Policy**

No individual in the United States may, on the basis of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship or participation in any WIOA Title I-financially assisted program or activity, be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any WIOA Title I-financially assisted program or activity.

# Data Integrity Policy

## I. PURPOSE

To provide guidance and establish Northeast Workforce Development Board's (NEWDB) policy standards and practice for ensuring the integrity of data collected and stored in OKJobMatch (OJM) and in hardcopy format for participants enrolled in Workforce Innovation and Opportunity Act (WIOA) Title I Programs and the Wagner-Peyser Employment Services as amended by Title III. This policy is established in accordance with Oklahoma Office of Workforce Development (OOWD) policy issuance OWDI # 08-2017 Change 2, WIOA, and all other applicable federal, state and local laws, rules, and regulations.

## II. BACKGROUND

The Oklahoma Office of Workforce Development (OOWD) as the Governor's administrative entity for the Workforce Innovation and Opportunity Act (WIOA) provides this issuance as guidance to communicate Oklahoma's guidelines under which Local Workforce Development Boards (LWDBs) must develop and implement procedures for the oversight, monitoring, and review of participant data entered in OJM. The NWDB policy provides guidance regarding the procedures for the oversight, monitoring, and review of participant data entered into OJM. Such procedures ensure the timely, complete, and accurate entry of participant data.

Data entered in the State's case management system OJM must accurately reflect the services provided to participants in order for the State and Local areas to evaluate and project performance, returns on investment (ROI), and program outcomes. Accurate, complete, and up-to-date data is essential to protect data integrity and to ensure that local, state, and federal reporting are supported with appropriate documentation. Changes that impact federal reporting requirements including performance and data validation are managed through the appropriate State Agency.

## III. REFERENCES

- The Workforce Innovation and Opportunity Act (WIOA)
- 20 CFR 683.220
- 20 CFR 38.43
- Training and Employment Guidance Letter (TEGL) No. 39-11
- OWDI #08-2017, CHANGE 2

**BABEL NOTICE:** (29CFR 38.9(g)(3)): This document contains vital service information. If English is not your preferred language, please contact:

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Or,

*Karla Jackson*  
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To enable telephone conversation between people with speech or hearing loss and people without speech or hearing loss please call Oklahoma Relay at 711 (<http://www.oklahomarelay.com/711.html>) or TDD/TTY: 800-722-0353.

## IV. POLICY

All current workforce system staff with access to OKJobMatch who will have access to sensitive, confidential, proprietary, and/or private data, must be advised of the confidential nature of the information, the safeguards required to protect the information, and that there are civil and criminal sanctions for noncompliance with such safeguards that are contained in Federal and State laws.

**Service Provider Responsibilities:** The contracted WIOA Title I Service Provider is responsible to ensure timely and efficient documentation of WIOA program services and activities. Failure to adhere to the documentation requirements and timelines outlined in this policy, which affect the expenditure of program funds, may be subject to disallowed cost. This includes the expenditure of funds that may be prorated based on date of program entry.

### A. General Guidelines

#### 1. Demographics:

Demographic information must be complete and accurate at the time of eligibility to ensure appropriate eligibility determination and subsequent reporting.

#### 2. Data Elements and Source Documentation:

The elements required for data element validation focus on eligibility, performance, and services provided. Only one of the documents listed as source documentation for each element is required for validation. However, if multiple sources of information are collected for the same data element, the most rigorous, credible, and reliable source must be used. Source documentation that is uploaded must be a legible scan and must either match the data entered in the system or support the data with verifiable information according to the

requirement in the source documentation policy. Document uploads must be entered into OJM at the time of service or no later than 48 hours, excluding weekends and/or holidays.

**3. Service Entry:**

Services should be entered at the time the services are provided, and no later than five calendar days after service delivery. The service date must always reflect the actual date of service. Only actual services delivered to a participant should be entered into the system. Eligibility must be determined before services are entered.

Follow-up services must be entered at the time services are provided, and the service date must reflect the actual date of serve. Follow-up services must be services that benefit the exiter and the service must be clearly documented in the service and training plan note. An attempted contact with the participant or contact made for collection of documentation or performance measures are not acceptable follow-up services and should be documented as detailed case notes/program notes.

**4. Case Notes/Program Notes:**

Case notes/Program notes should be entered at the time services are delivered or at the time contact with the participant is made. Regardless of the method, the case notes/program notes must be entered no later than 48 hours of either instance, excluding weekends and/or holidays. Case notes/Program must be detailed, accurately support the coordinating service entries, and reflect a comprehensive picture of participant activities and staff interactions concerning the participant. At a minimum, case notes/program notes must include relevant information related to the specific data element or service provided, the date on which the information was obtained, and the case manager who obtained the information. Client contact is required, as a minimum standard, of no less than every 30 days and documented by a program note

Confidential information is not required to be entered into the case notes/program notes regarding medical conditions or disabilities. Stating that a participant has a medical condition or a disability without documenting specific details is sufficient. Where self-attestation is required, the attestation form must be uploaded in OJM.

All confidential medical information must be kept in a separate, secure location with access limited only to staff who are providing direct case management or to staff who are verifying eligibility-based information in the secure file. (e.g., secured filing cabinets and/or encrypted Internet files). 29 C.F.R. §§ 38.41-38.45. Medical and/or disability-related information is not be kept in the participant's program file; rather, only the accommodation requested, if any, is maintained in the participant's file.

**B. Data Edit Request:**

An OJM Data Edit Request, including the ability to add, modify or delete participant data, may

be allowed up to 20 days after the end of the applicable quarter. The Service Provider must submit the formal request to the NEWDB within 10 days after the end of the applicable quarter. This allows a reasonable amount of time to identify errors and request corrections, and a reasonable amount of time for NEWDB staff and State staff to make corrections, analyze data, and prepare quarterly reports for submission to the U.S. Department of Labor and other federal oversight agencies.

The timeline for an OJM Data Edit Request is based on the Federal WIOA performance reporting schedule:

1. Program Year: A program year runs July 1st to June 30st with four quarterly reports during the year. Approximately 45 days after the end of a program year, the state is required to report data on the complete program year.
2. Quarterly Performance Reports: Federal WIOA quarterly performance reports are due approximately 45 days after the end of each quarter, September 30th, December 31st, March 31st, and June 30th.

Table 1: Quarterly Performance

Quarter 1			Quarter 2			Quarter 3			Quarter 4		
July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	April	May	June

**C. Processes:**

The request must first be analyzed by the Service Provider to determine whether or not a request will be approved before submission to the NEWDB. Questions that should be reviewed by the Service Provider include:

- Is the change fully justified in the request?
- Are the changes documented and supported throughout the participant’s record, in case notes, with documentation, or support for start and end dates of other services, etc.?
- Does the addition, change, or update align with established policy?

Following the analysis by the Service Provider, the Service Provider will submit the Data Edit Request form, via email, to the NEWDB. Requests will be denied if the following are observed:

- Do not comply with policy;
- Are not supported by case notes or documentation;
- Are incomplete;
- Are missing a required data field or justification;
- Will change the quarter in which the participation date and/or exit date of period of



participation falls;

- Will create a new period of participation, in which services have already been provided.

The Data Edit Request form (A) and Process Examples (C) are included as attachments to this policy.

#### **D. Timeline:**

Upon review by NEWDB staff, the Service Provider will receive a written response within five business days regarding the board analysis of the request to add, modify or delete data. Upon review, if NEWDB staff finds documentation to support the request to add, modify or delete data the request for Title I programs, NEWDB staff will submit the request form to the OOWD help desk at: [support@oowd.zendesk.com](mailto:support@oowd.zendesk.com) or to the Title III programs at the Oklahoma Employment Security Commission (OESC) helpdesk at: [RES-techsysup@oesc.state.ok.us](mailto:RES-techsysup@oesc.state.ok.us)

#### **E. Secure Stewardship of Personally Identifiable Information (PII):**

Before being granted access to OKJobMatch, LWDB staff, partners, grantees and contractors must sign a confidentiality agreement acknowledging their understanding of the confidential nature of the data and the safeguards with which they must comply in their handling of such data as well as the fact that they may be liable to civil and criminal sanctions for improper disclosure.

##### **Definitions:**

1. **PII** - OMB defines PII as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.
2. **Sensitive Information** is any unclassified information whose loss, misuse, or unauthorized access to or modification of could adversely affect the interest or the conduct of Federal programs, or the privacy to which individuals are entitled under the Privacy Act.
3. **Protected PII and Non-Sensitive PII** - the Department of Labor (DOL) has defined two types of PII, (1) protected PII and (2) non-sensitive PII. The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the "risk of harm" that could result from the release of the PII.
  - a) Protected PII is information that if disclosed could result in harm to the individual whose name or identity is linked to that information. Examples of protected PII include, but are not limited to, social security numbers (SSNs), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational history, biometric identifiers (fingerprints, voiceprints, iris scans, etc.), medical history, financial information and computer passwords.
  - b) Non-Sensitive PII, on the other hand, is information that if disclosed, by itself, could not reasonably be expected to result in personal harm. Essentially, it is stand-alone information that is not linked or closely associated with any protected or unprotected

PII. Examples of non-sensitive PII include information such as first and last names, e-mail addresses, business addresses, business telephone numbers, general education credentials, gender, or race. However, depending on the circumstances, a combination of these items could potentially be categorized as protected or sensitive PII.

- All current staff with access to OJM must sign a confidentiality agreement (Attachment B) and it must be sent to appropriate state agency helpdesk within 30 days of this issuance or access will be terminated.
- New staff access request must have a signed confidentiality agreement on file with the appropriate state agency, before access will be approved.
- Confidentiality agreements must also be kept on file with NEWDB.

## **V. EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT:**

*All Recipients, and Sub recipients/Sub grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.*

## **VI. POLICY ADDITIONS AND CLARIFICATIONS:**

The NEWDB Executive Director is authorized to issue additional instructions, guidance, approvals, forms, etc. to further implement the requirements of this policy.

## **VII. ATTACHMENTS:**

- Attachment A: OKJobMatch Data Edit Request
- Attachment B: OKJobMatch Confidentiality Agreement
- Attachment C: Data Edit Request Process Examples

**Approved by NEWDB**

**May 15, 2020**



### OKJobMatch Data Edit Request Form

Participant Name:

Participant ID:

Participant Enrollment: Adult

Dislocated Worker

Youth

Job Service

TAA

RESEA

ERI

Other

Enrollment Date:

Exit Date:

OKJobMatch Change Request:

Demographic Snapshot

Services & Training

Uploaded Documentation

Other

Description and Reason for Request:

Table 2: OKJobMatch Source Documentation: (Add additional pages if needed)

Documentation Type: Program Notes <input type="checkbox"/>	Uploaded Documentation <input type="checkbox"/>	Other <input type="checkbox"/>
Date entered into OKJobMatch:		
Description of Documentation:		
Documentation Type: Program Notes <input type="checkbox"/>	Uploaded Documentation <input type="checkbox"/>	Other <input type="checkbox"/>
Date entered into OKJobMatch:		
Description of Documentation:		
Documentation Type: Program Notes <input type="checkbox"/>	Uploaded Documentation <input type="checkbox"/>	Other <input type="checkbox"/>
Date entered into OKJobMatch:		
Description of Documentation:		
Documentation Type: Program Notes <input type="checkbox"/>	Uploaded Documentation <input type="checkbox"/>	Other <input type="checkbox"/>
Date entered into OKJobMatch:		
Description of Documentation:		





## OKJOBMATCH CONFIDENTIALITY AGREEMENT

I, \_\_\_\_\_, understand that my work for \_\_\_\_\_ will involve handling sensitive personally identifiable information about Workforce Innovation and Opportunity Act ("WIOA") participants, including but not limited to participant's Social Security numbers in Oklahoma's case management system, OKJobMatch.

I understand that my employer, as a condition of providing WIOA services, has agreed to terms and conditions designed to safeguard the information obtained from WIOA participants, and to maintain confidentiality as required by law. I understand that various federal and state laws prohibit the unauthorized use or disclosure of personally identifiable information obtained from WIOA participants.

I agree to follow and be bound by those terms and conditions regarding confidentiality of personally identifiable information. I understand that I may be subject to civil and criminal liability under state and/or federal law if I violate those terms and conditions.

Signature of Employee: \_\_\_\_\_ Date: \_\_\_\_\_

Local Workforce Development Area:

### Data Edit Request Process Examples

**Examples:**

Quarter 1			Quarter 2			Quarter 3			Quarter 4		
July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	April	May	June

Example 1: Deleting a Participant Service:

Request: Request is to delete the Workforce Preparation Assistance service on 10/20/16

Requested Date: 05/30/17

Period of Participation: 06/03/16 – 10/20/16

Services Provided:  
 Initial Assessment: 06/03/16 – 06/03/16  
 Career Guidance: 06/03/16 – 06/03/16  
 Occupation Skills Training: 06/14/16 – 09/18/16  
 Workforce Preparation Assistance: 10/20/16 – 10/20/16

Decision: This request would be denied because it is over the allowable 20 days after the end of the applicable quarter timeframe. Quarter end 12/31/16 + 20 days = 01/20/17.

Example 2: Deleting a Participant Service:

Request: Request is to delete the Workforce Preparation Assistance service on 10/20/16

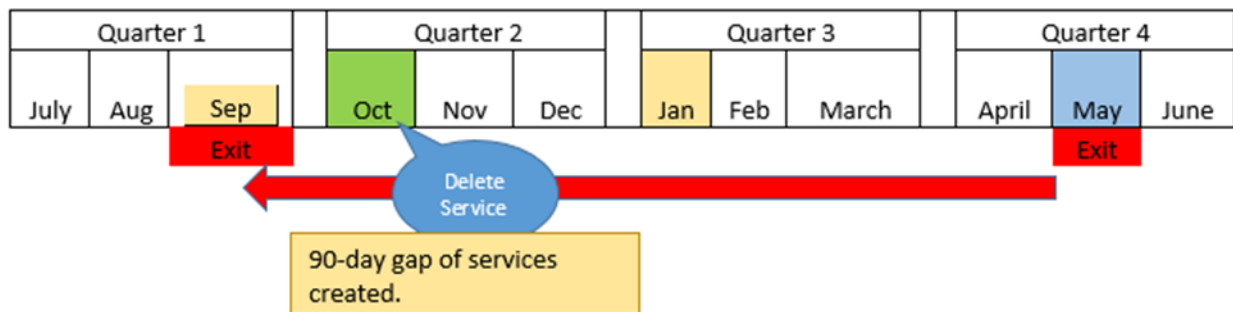
Requested Date: 05/30/17

Period of Participation: 06/03/16 – 05/27/17

Services Provided:  
 Initial Assessment: 06/03/16 – 06/03/16  
 Career Guidance: 06/03/16 – 06/03/16  
 Occupation Skills Training: 06/14/16 – 09/18/16  
 Workforce Preparation Assistance: 10/20/16 – 10/20/16  
 Career Guidance: 01/20/17 – 01/20/17  
 Work Experience: 02/03/17 – 04/21/17  
 Workforce Preparation Assistance: 05/27/17 – 05/27/17

Decision: This request would be denied because deleting this service would:

- Create a gap of more than 90 days between services;
- Move the exit date from 05/27/17 to 09/18/16 (a different quarter); and
- Would require a new period of participation that would begin on 01/20/17.



Example 3: Deleting a Participant Service:

Request: Request is to delete the Workforce Preparation Assistance service on 10/20/16

Requested Date: 01/09/17

Period of Participation: 06/03/16 – 10/20/16

Services Provided:

- Initial Assessment: 06/03/16 – 06/03/16
- Career Guidance: 06/03/16 – 06/03/16
- Occupation Skills Training: 06/14/16 – 09/18/16
- Workforce Preparation Assistance: 10/20/16 – 10/20/16

Decision: This request would be approved because:

- The request is within the allowable 20 days after the end of the applicable quarter timeframe;
- The deletion of the service does not change the exit quarter for the participant.
- Period of Participation will be 06/03/16 – 09/18/16.