



Oklahoma Office of Workforce Development  
900 N. Portland Ave.  
Oklahoma City, OK 73107

## OKLAHOMA WORKFORCE DEVELOPMENT ISSUANCE #08-2017, CHANGE 2

**TO:** Workforce Development Board Chairs  
Workforce Development Board Staff  
Workforce Development Fiscal Agents

**FROM:** Dr. Erin E. Risley-Baird, Executive Director

**DATE:** June 14, 2018

**SUBJECT:** Oklahoma Data Integrity and Secure Stewardship of Personally Identifiable Information (PII)

**PURPOSE:** 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 OKJobMatch. Such procedures ensure the timely, complete, and accurate entry of participant data.

### 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

**MESSAGE:** Data entered in the State's case management system (OKJobMatch) 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.

All workforce system staff with access to OKJobMatch who will have access to sensitive,

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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. In the event that staff, with access to OKJobMatch, have been dismissed for any reason, the appropriate State agency must be notified immediately.

**General Guidelines:**

**Demographics:**

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

**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.

**Service Entry:**

Services should be entered at the time the services are provided, and no later than seven 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.

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.

**Case notes:**

Case 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 must be entered no later than seven calendar days of either instance. Case notes 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 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. Confidential information regarding medical conditions or disabilities must be handled, stored, used, and disclosed in compliance with 29 CFR 38.41(b)(3). No notation other than the self-disclosure of disability information within the demographic section of OKJobMatch and the notation of an

accommodation in a case note, without attachment to the disability, may be made within the participant’s file. Case management activities should be documented as case notes.

**Data Edit Request**

An OKJobMatch 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. This allows Local areas a reasonable amount of time to identify errors and request corrections, and a reasonable amount of time for 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 OKJobMatch Data Edit Request is based on the Federal WIOA performance reporting schedule:

- Program Year: A program year runs July 1<sup>st</sup> to June 30<sup>st</sup> 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.
- Quarterly Performance Reports: Federal WIOA quarterly performance reports are due approximately 45 days after the end of each quarter, September 30<sup>th</sup>, December 31<sup>st</sup>, March 31<sup>st</sup>, and June 30<sup>th</sup>.

Quarter 1			Quarter 2			Quarter 3			Quarter 4		
July	Aug	Sep	Oct	Nov	Dec	Jan	Feb	March	April	May	June

**Processes:**

The request must first be analyzed by the Local Workforce Development Board and/or Service Provider to determine whether or not a request will be approved before submission to the appropriate state agency. Questions that may guide local procedures 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?

Local procedures must include processes for the denial of requests, including requests that must be denied by the LWDBs and State are those that:

- 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.

**Examples:**

Quarter 1			Quarter 2			Quarter 3			Quarter 4		
July	Aug	Sep	Oct	Nov	Dec	Jan	Feb	March	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:** 5/30/17

**Period of Participation:** 6/03/16 – 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 = 1/20/17.

**Example 2: Deleting a Participant Service:**

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

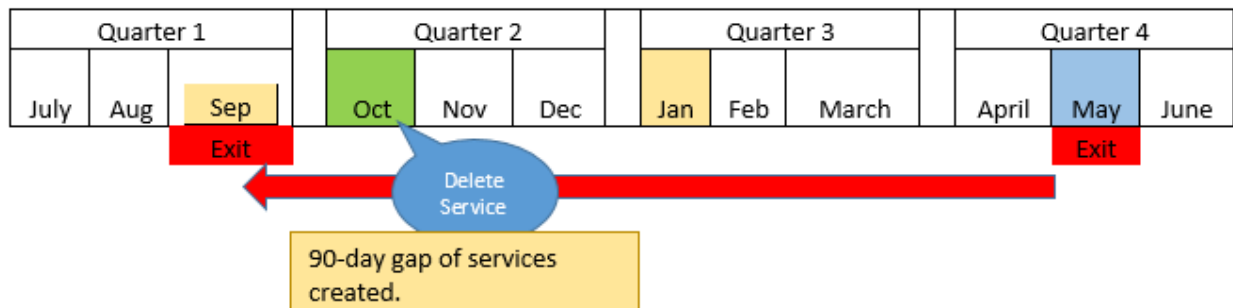
**Requested Date:** 5/30/17

**Period of Participation:** 06/03/16 – 5/27/17

**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 – 4/21/17  
 Workforce Preparation Assistance: 5/27/17 – 5/27/17

**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 5/27/17 to 9/18/16 (a different quarter); and
- would require a new period of participation that would begin on 1/20/17.



**Example 3: Deleting a Participant Service:**

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

**Requested Date:** 1/09/17

Period of Participation: 6/03/16 – 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 6/03/16 – 09/18/16.

**Timeline:** A complete and accurate OKJobMatch Data Edit Request must be submitted to the appropriate State Agency within 20 days after the end of the applicable quarter and follow all State and Local policy guidelines.

A Title I program data edit request must be submitted to the Oklahoma Office of Workforce Development (OOWD) help desk at [support@oowd.zendesk.com](mailto:support@oowd.zendesk.com).

A Title III program data edit request must be submitted to the Oklahoma Employment Security Commission (OESC) helpdesk at [RES-techsysup@oesc.state.ok.us](mailto:RES-techsysup@oesc.state.ok.us).

### **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**

**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.

**Sensitive Information** – 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.

**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.

1. 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.

2. 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.

**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.

**ACTION REQUIRED:** LWDBs must have procedures in place for initial review and approval of Data Edit Requests before submission to the State. OOWD must be notified of those procedures and the responsible person(s)/entity designated for making requests to the State, post local review within 90 days of this issuance or data edit request submissions will not be processed. If changes to the procedures or responsible person(s)/entity are made, please provide timely notification to OOWD.

LWDBs must have a written procedure in place that provide safeguards to protect personally identifiable information. All current staff with access to OKJobMatch must sign a confidentiality agreement 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 the LWDB.

This Oklahoma Workforce Development Issuance (OWDI) is to become a part of your permanent records and made available to appropriate staff and sub-recipients.

**INQUIRIES:** If you have any questions about this issuance, please contact policy and program staff in the Oklahoma Office of Workforce Development. Contact information can be found at <http://www.oklahomaworks.gov/about/>.

**ATTACHMENTS:**

Attachment I: OKJobMatch Data Edit Request

Attachment II: OKJobMatch Confidentiality Agreement

# OKJobMatch Data Edit Request

**Participant Name:** Click or tap here to enter text. **Participant ID:** Click or tap here to enter text.

**Participant Enrollment:** Adult  Dislocated Worker  Youth   
Job Service  TAA  RESEA  ERI  Other

**Enrollment Date:** Click or tap here to enter text. **Exit Date:** Click or tap here to enter text.

## OKJobMatch Change Request:

Demographic Snapshot  Services & Training  Uploaded Documentation  Other

Click or tap here to enter text.

## Description and Reason for Request:

Click or tap here to enter text.

## 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: Click or tap to enter a date. Description of Documentation: Click or tap here to enter text.
Documentation Type: Program Notes <input type="checkbox"/> Uploaded Documentation <input type="checkbox"/> Other <input type="checkbox"/> Date entered into OKJobMatch: Click or tap to enter a date. Description of Documentation: Click or tap here to enter text.
Documentation Type: Program Notes <input type="checkbox"/> Uploaded Documentation <input type="checkbox"/> Other <input type="checkbox"/> Date entered into OKJobMatch: Click or tap to enter a date. Description of Documentation: Click or tap here to enter text.
Documentation Type: Program Notes <input type="checkbox"/> Uploaded Documentation <input type="checkbox"/> Other <input type="checkbox"/> Date entered into OKJobMatch: Click or tap to enter a date. Description of Documentation: Click or tap here to enter text.



## OKJobMatch Data Edit Request

**Comments:**

Click or tap here to enter text.

**Requesting Office:** Click or tap here to enter text.

**Requested by:** Click or tap here to enter text.

**Date:** Click or tap to enter a date.

**Request Reviewed by:** Click or tap here to enter text.

**Date:** Click or tap to enter a date.

For Title I request submit request to: [support@oowd.zendesk.com](mailto:support@oowd.zendesk.com)

For Title III request submit request to: [RES-techsysup@oesc.state.ok.us](mailto:RES-techsysup@oesc.state.ok.us)

### Oklahoma State Agency Use Only

**Request Received by:** Click or tap here to enter text.

**Date Received:** Click or tap to enter a date.

**Request Reviewed by:** Click or tap here to enter text.

**Decision:**

Click or tap here to enter text.

OOWD is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities

## 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: \_\_\_\_\_



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