



**OKLAHOMA WORKFORCE DEVELOPMENT ISSUANCE #02-2019, Change 2**

**TO:** Chief Local Elected Officials  
Workforce Development Board Chairs  
Workforce Development Board Staff

**FROM:** Don Morris, Executive Director

**DATE:** May 25, 2021

**SUBJECT:** Data Validation and Documentation Requirements

**PURPOSE:** The Oklahoma Office of Workforce Development (OOWD) as the Governor’s Workforce Innovation and Opportunity Act (WIOA) administrative entity, provides this issuance as guidance to the workforce system on the State of Oklahoma’s Data Validation and Source Documentation Requirements for the WIOA Title I Programs and the Wagner-Peyser Employment Services as amended by Title III.

**REFERENCES:**

- The Workforce Innovation and Opportunity Act (WIOA) of 2014 (Public Law (Pub. L. 113- 128)) Title I and III
- Federal Register/Vol. 81. No.161
- U.S. Department of Labor/Employment and Training Administration (TEGL) No. 7-18
- U.S. Department of Labor/Employment and Training Administration (TEGL) No. 18-16
- U.S. Department of Labor/Employment and Training Administration (TEGL) No. 19-16
- U.S. Department of Labor/Employment and Training Administration (TEGL) No. 21-16
- U.S. Department of Labor/Employment and Training Administration (TEGL) No. 22-15
- U.S. Department of Labor/Employment and Training Administration (TEGL) No. 23-19

**MESSAGE:**

This Oklahoma Workforce Development Issuance (OWDI) is intended to clarify procedures that support documenting eligibility, service provision, and outcomes while to ensure data integrity and report accurate information to the United States Department of Labor (USDOL). The revision updates the program elements for data validation information collection described in U.S. Department of Labor/Employment and Training Administration Training and Employment Guidance Letter (TEGL) No. 23-19, and changes the data validation review from an annual to a quarterly process.

**RESCISSIONS**

OWDI #02-2019, Change 1

**EXPIRATION DATE**

Continuing



## INSTRUCTIONS:

### General Eligibility

#### Wagner-Peyser

The Wagner-Peyser Act of 1933 established a nationwide system of public employment offices known as the Employment Service (ES). The Act was amended in 1998 and again in 2014 to become part of the Workforce Innovation and Opportunity Act and the One-Stop delivery system. The primary responsibilities of ES are to:

- Assist job seekers in finding employment and employers in filling jobs;
- Facilitate the match between job seekers and employers; and
- Meet the work test requirements of the State Unemployment Compensation system.

The types of ES services available include job search and placement assistance, recruitment services and special technical services for employers, reemployment services for unemployment insurance claimants, labor exchange services for workers who have received notice of permanent or impending layoff, referrals and financial aid application assistance for training and educational resources and programs, and the development and provision of labor market and occupational information.

ES services are available to any jobseeker, regardless of employment status; however, Veterans receive priority of service in accordance with Training and Employment Guidance Letter (TEGL) 10-09 and Veterans Program Letter (VPL) 07-09. Program participants may also include individuals with employment authorization documents who have been granted relief under the Deferred Action for Childhood Arrivals (DACA). In addition, any employer seeking workers is also eligible for ES services.

#### WIOA Title I Adult Programs

The WIOA Title I Adult Program is designed to provide quality employment and training services to assist eligible individuals in finding and qualifying for meaningful employment. Veterans and eligible spouses continue to receive priority of service for the WIOA Title I Adult Programs. To receive WIOA Title I Adult services, all individuals must meet the following eligibility criteria.

- 18 years of age or older
- Authorized to work in U.S.
- Selective Service Registration

#### \*Priority Populations groups for WIOA Adult Program

- Low-income individuals
- Individuals with disabilities
- Homeless individuals
- Native Americans, Alaska Natives, and Native Hawaiians
- Older individuals (age 55 and older)

- Ex-offenders
- Individuals who are English language learners
- Individuals who have low levels of literacy
- Individuals facing substantial cultural barriers
- Eligible migrant and seasonal farmworkers
- Individuals within two years of exhausting lifetime TANF eligibility
- Single parents (including single pregnant women)
- Long-term unemployed individuals (unemployed for 27 or more consecutive weeks); and
- Displaced homemakers

#### WIOA Title I Dislocated Workers Programs

The WIOA Title I Dislocated Workers Program is designed to provide quality employment and training services to assist eligible individuals in finding and qualifying for meaningful employment. For the WIOA Dislocated Worker program, the only priority of service is the veteran's priority of service. A veteran must meet each program's eligibility criteria to receive services under the respective employment and training program.

To receive WIOA Title I Dislocated Worker services, individuals must meet the following eligibility criteria.

- Authorized to work in U.S.;
- Meet Military Selective Service registration, if applicable; and
- Meet one of the following;
  - Recently Dislocated
  - Plant Closure or Substantial Layoff
  - Loss of Self-Employment Income
  - Displaced Homemaker
  - Military Spouse (Loss of employment or Displaced)

#### WIOA Title I Youth Program

The WIOA Title I Youth program is designed to assist youth with one or more barriers to employment prepare for post-secondary education and employment opportunities, attain educational and/or skills training credentials, and secure employment with career and promotional opportunities.

To receive WIOA Title I Youth services, individuals must meet the following eligibility criteria.

##### In-School Youth:

- Attending school
- 14-21 years of age
- Low Income
- At least one of the following must apply:
  - Basic Skills Deficient

- An English Language Learner
- An offender
- A homeless youth or runaway youth
- In foster care or has aged out of foster care
- Pregnant or parenting
- Individual with a disability
- An individual who requires additional assistance to complete an educational program or to secure or hold employment (\*Not more than 5% of the newly enrolled ISY in a given program year may be eligible based on this criterion.)

Out-of-School Youth:

- 16-24 years of age
- Not attending any school
- At least one of the following must apply:
  - Individual with a disability
  - School dropout
  - Within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter
  - A recipient of a secondary school diploma or its recognized equivalent who is low income and either an English language learner or basic skills deficient
  - An offender
  - A homeless youth or a runaway youth
  - In foster care or has aged out of foster care
  - Pregnant or parenting
  - An individual who is low income and “needs additional assistance” to enter or complete an educational program or to secure or hold employment.

5% Exception:

WIOA allows a low-income exception where 5% of youth may be participants who ordinarily would be required to be low-income for eligibility purposes and meet all other eligibility criteria for WIOA youth except the low-income criteria. A program must calculate the 5% based on the percent of newly enrolled youth in the local area’s WIOA youth program in a given program year who would ordinarily be required to meet the low-income criteria.

Trade Adjustment Act (TAA)

TAA offers a variety of benefits and services to support workers in their search for reemployment. This includes Trade Readjustment Allowances, training, assistance with healthcare premium costs, Reemployment Trade Adjustment Assistance, job search, and relocation allowances. A group of workers may be eligible for TAA if their jobs are lost or threatened due to trade-related circumstances as determined by a USDOL investigation.

In order for workers to obtain TAA or Reemployment Trade Adjustment Assistance (RTAA) services and benefits, an employer of a group of workers, a group of three or more workers, a Union, or another authorized individual must first file a petition with the U.S. Department of Labor (USDOL) and the state trade coordinator or dislocated worker unit to request a certification of group eligibility for workers adversely affected by foreign trade. Once the group certification is issued, each worker in the group must then individually apply for services and benefits through their local Oklahoma Works (one-stop) Center. A OESC case manager will issue a determination of the workers' individual eligibility for TAA benefits.

The following eligibility requirements apply to the TAA program:

- An approved TAA certification; and
- Other criteria as determined by the types of benefits and services.

#### National Farmworkers Job Program (NFJP)

The National Farmworker Jobs Program (NFJP) is the Department of Labor-administered workforce investment program for [eligible MSFWs](#) established by [WIOA](#) sec. 167 as a required partner of the [one-stop delivery system](#) and includes both [career services](#) and training grants, and housing grants.

The following definitions apply to programs under this part:

Allowances means direct payments made to participants during their enrollment to enable them to participate in the career services described in WIOA sec. 134(c)(2)(A)(xii) or training services as appropriate.

Dependent means an individual who:

(1) Was claimed as a dependent on the eligible MSFW's Federal income tax return for the previous year; or

(2) Is the spouse of the eligible MSFW; or

(3) If not claimed as a dependent for Federal income tax purposes, is able to establish:

(i) A relationship as the eligible MSFW's;

(A) Child, grandchild, great grandchild, including legally adopted children;

(B) Stepchild;

(C) Brother, sister, half-brother, half-sister, stepbrother, or stepsister;

(D) Parent, grandparent, or other direct ancestor but not foster parent;

(E) Foster child;

(F) Stepfather or stepmother;

(G) Uncle or aunt;

(H) Niece or nephew;

(I) Father-in-law, mother-in-law, son-in-law; or

(J) Daughter-in-law, brother-in-law, or sister-in-law; and

(ii) The receipt of over half of his/her total support from the eligible MSFW's family during the eligibility determination period.

Eligibility determination period means any consecutive 12-month period within the 24-month period immediately preceding the date of application for the MSFW program by the applicant MSFW.

Eligible migrant farmworker means an eligible seasonal farmworker as defined in WIOA sec. 167(i)(3) whose agricultural labor requires travel to a job site such that the farmworker is unable to return to a permanent place of residence within the same day; and dependents of the migrant farmworker, as described in WIOA sec. 167(i)(2).

Eligible migrant and seasonal farmworker means an eligible migrant farmworker or an eligible seasonal farmworker, also referred to in this regulation as an "eligible MSFW," as defined in WIOA sec. 167(i).

Eligible MSFW youth means an eligible MSFW aged 14-24 who is individually eligible or is a dependent of an eligible MSFW. The term eligible MSFW youth is a subset of the term eligible MSFW defined in this section.

Eligible seasonal farmworker means a low-income individual who for 12 consecutive months out of the 24 months prior to application for the program involved, has been primarily employed in agricultural or fish farming labor that is characterized by chronic unemployment or underemployment; and faces multiple barriers to economic self-sufficiency; and dependents of the seasonal farmworker as described in WIOA sec. 167(i)(3).

Emergency assistance is a form of "related assistance" and means assistance provided by grantees that addresses immediate needs of eligible MSFWs and their dependents. An applicant's self-certification is accepted as sufficient documentation of eligibility for emergency assistance.

Family, for the purpose of reporting housing assistance grantee indicators of performance as described in in § 685.400, means the eligible MSFW(s) and all the individuals identified under the definition of dependent in this section who are living together in one physical residence.

Farmwork means work while employed in the occupations described in § 651.10 of this chapter.

Grantee means an entity to which the Department directly awards a WIOA grant to carry out programs to serve eligible MSFWs in a service area, with funds made available under WIOA sec. 167 or 127(a)(1).

Housing assistance means housing services which contribute to safe and sanitary temporary and permanent housing constructed, supplied, or maintained with NFJP funding.

Lower living standard income level means the income level as defined in WIOA sec. 3(36)(B).

Low-income individual means an individual as defined in WIOA sec. 3(36)(A).

Refer to Training and Employment Guidance Letter (TEGL) 18-16 and state program policy to provide definitions and clarification for the NFJP eligibility criteria.

#### **Pending List:**

Oklahoma's virtual case management system OKJobMatch generates enrollments and potential program eligibilities based on demographic information entered by the participant during self-registration and front-line staff during the intake process. Dislocated Worker and Youth enrollments are placed in a pending queue that require supervisory approval/denial once entered into OKJobMatch. Enrollments, source documentation, and eligibility determinations are valid for 30 days to allow the supervisor time to review information and to approve/deny the pending request. Enrollments must be approved/denied by a supervisor after verifying the client's eligibility including uploaded documentation, self-attestation and program notes, before there is any expenditure of funds. At the end of the 30 days if the enrollment is still in the pending queue it is considered ineligible and will require a new enrollment, new source documentation collection, and a new eligibility determination.

#### **Eligibility Source Documentation**

Eligibility Source documentation is indicated in appendix A for each eligibility criteria/data element. Title I Programs must utilize the WIOA Title I Eligibility Forms (Attachment F & O) to designate which eligibility criteria used to determine program eligibility. This document will determine the eligibility criteria/data element source documentation from Appendix A that will be required for eligibility data validation. This does not imply, however, that local areas need not collect supporting documentation for elements not used to verify eligibility.

Local Workforce Development Boards (LWDBs) must identify the assessments to be used to determine eligibility, and ensure eligibility determination procedures are consistent with the programmatic state policies.

Each Title I Participant will be required to have the following documents uploaded:

- The applicable program eligibility form (Attachment F or Attachment O)
- The three general eligibility criteria documentation, and
- The designated eligibility criteria/data element source documentation from appendix A notated for eligibility determination from the applicable program eligibility form. It is required to obtain and upload at least one source document for each applicable program eligibility element utilized in determining program eligibility. Some data elements may require more than one source document, noted by an “**AND**” in the Acceptable Source Document column.

### **Data Validation**

Data validation is a series of internal controls established to verify the accuracy, validity, and reliability of data. Data validation helps ensure the accuracy of the annual statewide performance reports, safeguards data integrity, and promotes the timely resolution of data anomalies and inaccuracies as required by 2 CFR 200.328. This joint data validation ensures that all programs are consistent and accurately reflect the performance of each core program. All participants across the core programs must validate the common data elements according to this guidance. The common data elements and source documentation is indicated in Appendix B. It is required to obtain and upload at least one source document for each data element listed for each participant in a WIOA core program.

Source documentation types include:

**Uploaded Documentation:** Documentation must be clear and legible copies that are uploaded into OKJobMatch under the Uploaded Documentation section of the Client’s Case Details Page. Some documentation may be source documents for more than one data element and need only to be uploaded one time provided all data elements are indicated prior to the upload.

Upload documentation according to the guidelines below:

- Documentation Item Type:
  - Universal: Documentation use to determine eligibility.
  - Enrollment: Documentation used to validate or support data elements, career services, training, performance measures, or other documents required by state and/or local policy.
- Type of Documentation: multiple types of documentation can be chosen
  - Eligibility: if documentation was used to determine eligibility
  - Validation: if documentation was used to validate data/information entered into OKJobMatch
  - Supporting: if documentation is used to support a service and training entry or case/program note entered into OKJobMatch.



- Follow-up: documentation to support follow-up services
- Employment Planning: documentation used to support employment planning

**Detailed Case/Program Notes:** Statements by the case manager entered in the virtual case management system that identify at a minimum, the specific data element, the status of the data element, information relevant to the data element, the date on which the information was obtained, and the case manager who obtained the information.

If a case manager is obtaining information verifying any data element for validation by phone, the detailed case/program note must include data element, subject to be verified, date verified, the agency or third party relationship providing verification, contact name, phone number, detailed comments from the contact, and the case manager who obtained the information.

**Virtual Signature (Self-Attestation):** The individual provides his/her status or information for a particular data element and then signs and dates the form acknowledging that it is true and correct. The self-attestation is completed as a virtual signature in OKJobMatch with the individual's unique username and password being used as the signature.

Eligibility determination requires that all individuals self-attest by virtual signature in the applicable enrollment demographic snapshot before services are provided. Staff must review the enrollment intake questions with the participant and the participant must then verify that the status is true and correct by entering their virtual signature (self-attest) in the applicable program demographics snapshot prior to receiving program eligibility approval. This method may be used in limited circumstances to document low income for participants when income is not verifiable for the prior 6 months of the enrollment date or obtaining the acceptable source documentation will cause undue hardship for the individual (i.e. natural disasters, domestic violence, etc.).

### **Data Validation Review**

The U.S. Department of Labor, Employment and Training Administration, requires states to validate the accuracy of their annual performance report submissions to ensure decisions about WIOA policy and funding are made based on a true picture of program outcomes. Quarterly data element validation reviews shall be conducted to ensure the data elements in participant records are accurate in order to maintain system integrity, ensure completeness of data, and to identify and correct specific issues associated within the reporting process and to ensure the accuracy of data entered into OKJobMatch and subsequently submitted to USDOL-ETA. The effectiveness of the data validation process will be assessed annually and revisions will be made as needed.

Quarterly Data Validation Procedure:

- Local Area staff collect documentation supporting data elements on an ongoing basis. This data collection becomes the foundation for the data validation performed.
- Data from the Participant Individual Record Layout (PIRL) file provided for the annual performance report will be utilized to randomly select participants for the data validation process. In order to meet the 90% confidence interval for each Title I program, a total of 271 participant identification

numbers (PID) will be drawn from each of the programmatic PIRL files annually, or approximately 68 participants to be validated per quarter. Of the 271 participants, half of them will be drawn based on the participant start date and half of based on the participant exit date. The start and exit dates will be within the program year being validated. A minimum of 271 participants will be validated based on the proportion of participants in each local workforce area relative to the individual programs.

- A worksheet for each PID will be created from the PIRL file that contains all applicable data elements and documentation reported during the reporting period, to be validated.
- The State Data Validation Unit will validate the worksheets against the source documentation in the participant's file to ensure compliance with federal and state guidance. Screenshots of the case management system that indicate when and where the error occurred will enhance transparency of the state's validation procedures.
- The State Data Validation Unit will score each random element for random clients as either a pass or fail for validation that applies to each participant. Each data element that is required to be validated and that is supported or matched by acceptable documentation is scored as a "pass". Conversely, any data element required to be validated that is *not* supported by acceptable documentation, or is inconsistent with other documentation (particularly the PIRL data received from information input into the Outcomes in the state's management information system) is scored as a "fail". Data elements lacking properly labeled or unreadable source documents will be scored as "fail", even if the documentation is in the file.
- Once completed, the elements failed will be reviewed. At the beginning of each quarter the local areas will receive a report of errors that were identified for the sample of audited participants. The local area will have 30 days from the date of the initial report to review and submit a written response to the OOWD outlining any concerns or questions regarding the report.

### **Data Validation Training**

Consistent with the DOL recommendation that data validation to be part of annual monitoring efforts will be presented with the State's annual monitoring report a summary detailing the most commonly encountered errors throughout the program year from the data validation sample. The results of the report will be the focus of the Annual Data Validation Training which will focus on the most common data entry errors, ensure local areas understand the process for data validation, and provide technical assistance on how to successfully collect the information that is required by the reporting elements identified by DOL.

**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:** 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 [Staff in the Oklahoma Office of Workforce Development](#). Contact information can be found at <http://www.oklahomaworks.gov/about/>.

**ATTACHMENTS:**

- Attachment A: Income Eligibility Form
- Attachment B: Client Involvement Statement
- Attachment C: Individual Training Account Agreement Form
- Attachment D: Individual training Voucher Form
- Attachment E: Coordination of Training Funds
- Attachment F: Youth Eligibility Form
- Attachment G: Youth Support Form
- Attachment H: School Dropout Status Form
- Attachment I: Youth Training Provider Procurement Form
- Attachment J: Documents to Verify Eligibility to Work
- Attachment K: Applicant Statement
- Attachment L: WIOA Participant Supplemental Wage Quarterly Exit Data Collection Form
- Attachment M: Supplemental Wage Self-Employment Verification Form
- Attachment N: Wage Conversion Chart
- Attachment O: Adult and Dislocated Worker Eligibility Form