**Workforce System Directive**

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

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**Effective Date of Policy:** 1/13/25       **Policy Number:** WSD 58-2024, Change 1
**Rescissions:** WSD 58-2024                 **Approved By:** Trae Rahill, Chief Executive Officer
**Policy History:**
**Approved by Governor's Council for Workforce and Economic Development:** 1/19/2024
**Change 1:** Align federal expectation with new case management system, N/A

**STAKEHOLDERS:**
- Chief Local Elected Officials
- Workforce Development Board Chairs
- Workforce Development Board Staff
- Designated Fiscal Agent Staff
- Oklahoma Career Tech
- Oklahoma Rehabilitation Services
- Wagner Peyser

**REFERENCES**
- Workforce Innovation and Opportunity Act
- 20 CFR 683.220
- 20 CFR 38.43
- TEGL 39-11
- EN 08-21

**PURPOSE:** The Oklahoma Employment Security Commission (OESC), as the Governor's chosen Workforce Innovation and Opportunity Act (WIOA) administrative entity, provides this issuance as guidance for implementation of procedures for the oversight, monitoring, and the review of jobseeker data entered into the State case management system. Such procedures ensure the timely, complete, and accurate entry of jobseeker data.

**MESSAGE:**
Data entered in the State's case management system must accurately reflect the services provided to jobseekers for the State and Local areas to evaluate, 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 is

supported with appropriate documentation.

Changes that impact federal reporting requirements including performance and data validation are managed through the OESC Zendesk.

All workforce system staff with access to the case management system 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. In the event that staff with access to the case management system have been dismissed for any reason, the OESC Zendesk must be notified immediately.

**Instructions**:
***General Guidelines for Data Integrity and Personally Identifiable Information (PII)***

*Demographics:*
Demographic information must be complete and accurate at the time of program 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 into the case management system or support the data with verifiable information according to the requirement in the source documentation policy.

*Enrollment Service Entry:*
Enrollment 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. Follow-up services must be services that benefit the jobseeker, and the service must be clearly documented in the individual enrollment plan or individual service strategy.

*Case notes:*
Case management activities should be documented as case notes. Case notes should be entered at the time the activity is provided and no later than seven calendar days. Case notes must be detailed, accurately support the coordinating service entries, and reflect a comprehensive picture of jobseeker activities and staff interactions concerning the jobseeker. 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.

*Jobseeker contact:*

All Jobseeker contact should be entered in the activity component in the case management system. Activity components include log a call, task, event, and email and these should be documented at the time that the activity occurs and no later than seven calendar days of any instance. Activity comments must be detailed, accurately support the activity, and reflect a comprehensive picture of jobseeker interactions concerning the jobseeker.

*Confidential 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 the State case management system and the notation of accommodation in a case note, without attachment to the disability, may be made within the jobseeker's file.

**Data Edit Request**
A Data Edit Request, including the ability to add, modify or delete jobseeker 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 a Data Edit Request is based on the Federal WIOA performance reporting schedule:
- 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.
- 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.

| 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 to determine whether a request will be approved before submission to the OESC Zendesk. Questions that may guide the determination may include:
- Is the change fully justified in the request?
- Are the changes documented and supported throughout the jobseeker'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?

Request that will be denied by OESC will include request 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 an Enrollment Service:**
Request: Request is to delete the Workforce Preparation Assistance service on 10/20/20
Requested Date: 5/30/21
Period of Participation: 6/03/20 – 10/20/20

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

Decision: This request would be denied because it is over the allowable 20 days after the end of the applicable quarter timeframe.  The quarter ends 12/31/20 + 20 days = 1/20/2021.

**Example 2: Deleting an Enrollment Service:**
Request: Request is to delete the Workforce Preparation Assistance service on 10/20/20
Requested Date: 5/30/2021.
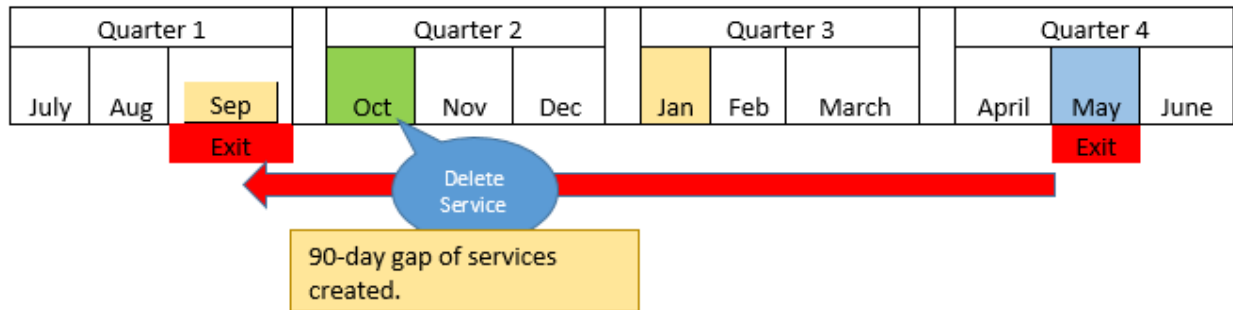Period of Participation:  06/03/20 – 5/27/21

Services Provided:
- Initial Assessment: 06/03/20 -06/03/20
- Career Guidance: 06/03/20 – 06/03/20
- Occupation Skills Training: 06/14/20 – 09/18/20
- Workforce Preparation Assistance 10/20/20 – 10/20/20
- Career Guidance: 01/20/21 – 01/20/21
- Work Experience: 02/03/21 – 4/21/21

- Workforce Preparation Assistance: 5/27/21 – 5/27/21

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 5/27/21 to 9/18/20 (*a different quarter*); and
- would require a new period of participation that would begin on 1/20/21.



**Example 3: Deleting an Enrollment Service:**
Request: Request is to delete the Workforce Preparation Assistance service on 10/20/20
Requested Date: 1/09/21
Period of Participation: 6/03/20 – 10/20/20

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

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 6/03/20 – 09/18/20.

**Required Timeline:**
A complete and accurate request ticket must be submitted to the OESC Zendesk at the time the error was identified and no later than 20 days after the end of the applicable quarter and follow all policy guidelines.

**Zendesk Procedures**
1. *Zendesk ticket requests*—such as database edit requests, system account requests, and information requests—are submitted through OESC's Zendesk ticketing system at: https://oesc.zendesk.com/hc/en-us. All ticket requests are logged, assigned, tracked, and counted within this system.

2.  ***Normal Zendesk business hours*** *are* Monday through Friday, 7:00 AM-4:00 PM. Tickets submitted after 4:00 PM will be completed the next day or within 24-48 hours after OESC has received the submission*.*

3.  ***Zendesk Ticket Procedures:***
    *   Zendesk ticket requests are submitted via the web at: https://oesc.zendesk.com/hc/en-us
    *   Zendesk ticket requests are reviewed in the order received.
    *   If screenshots are required, please ensure they are uploaded in the attachment section.
    *   Select *Create a Ticket* based upon the need of request and complete the form in as much detail as possible.
    *   OESC Zendesk staff will communicate through the email provided in the ticket.
    *   Once the requested ticket response is completed, the Zendesk staff will provide confirmation of the completion.

**Data Integrity and Personally Identifiable Information (PII) 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:** This Workforce System Directive (WSD) is to become a part of your permanent records and be made available to appropriate staff and sub-recipients. Title I Local Boards must develop policies that provide guidance to include processes for approval and denial of data edit requests to ensure the requirements of this policy are met.

**ATTACHMENTS:**
None

**INQUIRIES:** If you have any questions or concerns regarding issuance, please email WorkforceServices.Inquiry@oesc.ok.gov.