Workforce System Directive

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

Effective Date of Policy: 1/19/24 **Policy Number:** WSD 58-2024
Rescissions: OWDI 02-2022 **Approved By:** Trae Rahill, Chief Executive Officer
Approved by Governor's Council for Workforce and Economic Development: 01/19/2024

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](#)
- WSD 12-2024
- WSD 80-2024
- WSD 06-2024

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 to the local workforce development boards for implementation of procedures for the oversight, monitoring, and the review of participant data entered in the case management system titled, OKJobMatch. Such procedures ensure the timely, complete, and accurate entry of participant data.

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 is 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, 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.

Instructions:

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

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 service. Follow-up services must be services that benefit the exited and the service must be clearly documented in the service and training plan note. *Attempted contact with the participant or contact made for the collection of*

documentation or performance measures are not acceptable follow-up services and should be documented as detailed case notes, and in addition a case note is not to serve as a follow-up service. However, there are various types of follow-up services for examples; counseling regarding the workplace; additional career planning and counseling; contact with the participant's employer; including assistance with work-related issues that may arise; peer support groups; information about additional Partner or Referral educational opportunities; and labor market information. Please view the following policies for more information regarding Follow-Up Services: Adult and Dislocated Worker Programs WSD 80-2024; WIOA Title I Youth Program Guidance WSD 12-2024, and WIOA Case Management and Common Exit WSD 06-2024

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 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.

Measurable Skills Gains:

The Measurable Skills Gain data edit requests in the Zendesk Helpdesk in OKJobMatch is subject to the Data Integrity policy of no more than up to 20 days after the end of the applicable quarter. This does not apply to prior quarters because it is past the timeframe in this policy.

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 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 by the Local Workforce Development Board and/or Service Provider to determine whether 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 10/20/20

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. Quarter end 12/31/20 + 20 days = 1/20/2021.

Example 2: Deleting a Participant Service:

Request: Request is to delete the Workforce Preparation Assistance service on 10/20/20
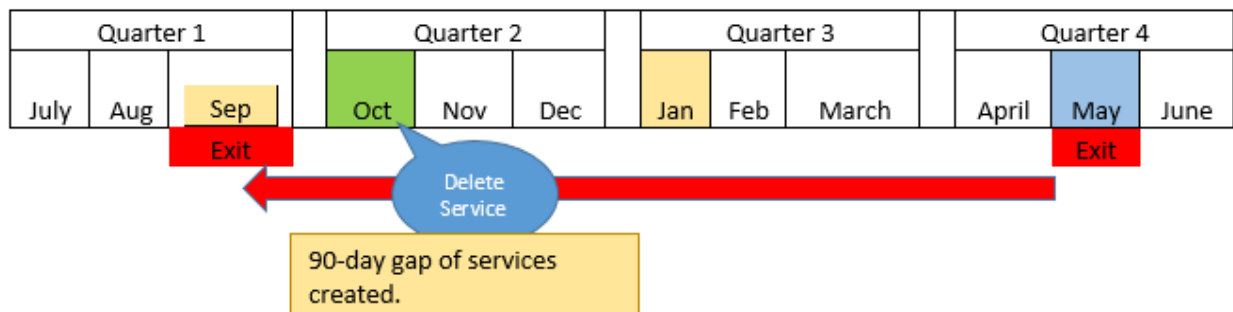
Requested Date: 5/30/2021.

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 a Participant 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 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.

Data Edit Requests for Title I and Title II Programs

- Title I data edit requests are sent to OESC.
- OESC **will not** receive Title III data edit requests at Zendesk.
- Title III data edit requests are sent to OESC.
- The local area will continue to send all Title III data edit requests to OESC at their email address.
  - o OESC has requested for all their data edit requests to be sent directly at: **Oklahoma Employment Security Commission (OESC) helpdesk at RES-techsyssup@oesc.state.ok.us.**

Title I- Zendesk Helpdesk Procedures

1. *Zendesk helpdesk ticket requests* (aka) *database edit requests, OKJM account requests, and information requests* are entered through OESC's Zendesk ticketing system at: https://OESC.zendesk.com/hc/en-us . All ticket requests are entered, assigned, counted, and tracked through this system. When local areas submit a ticket request, OESC assigns it to a helpdesk administrator.

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*, if submitted to AJLA for repair depending upon a case-by-case basis.***

3. ***Helpdesk Ticket Procedures:***

   - **Helpdesk ticket requests are submitted via the web at: https://OESC.zendesk.com/hc/en-us**

   - **Zendesk will no longer use an email address, it will include a direct website.**

   - **The data edit forms have been eliminated and an online form for each data edit has been included.**

   - **Helpdesk ticket requests are performed in the order received in Zendesk by date and if received the same day, then it is completed by the timestamp.**

   - **If screenshots are required, please ensure it is uploaded in the attachment section.**

   - **Please complete the ticket request form in as much detail as possible. This will eliminate several emails and phone calls to understand your local area's needs.**

   - **Zendesk is to be utilized for the following: Case management-related questions are submitted via the information request online form in Zendesk; OKJM staff account needs are sent via an online form in Zendesk, and all Participant data edit requests each have an online form in the Zendesk.**

   - **Youth questions will be directly emailed to the youth program officer; Adult/DLW questions will be directly emailed to the Adult/DLW program officer; Questions related to the Eligible Training Provider (ETP) registry will be emailed to the State ETP administrator; Performance questions will be directly emailed to the performance program officer, EEO questions will be directly emailed to the EEO program officer, and so forth.**

4. ***Helpdesk Ticket Process:***

   - **Select *Create a Ticket*- The local area submits a ticket request via the respective Zendesk ticket form (i.e.- If a demographic snapshot request is needed, please select- Demographic Snapshot- and the demographic topic to correct- i.e.- Employment Status- List the information that is incorrect and the information that is correct). Once completed, please select submit to allow Zendesk to process your ticket request.**

   - **OESC will reply and inform the local area the ticket request was received.**

   - **OESC will complete the ticket request in the order it was received.**

   - **Once the requested ticket response is completed, OESC will inform the local area with a confirmation of the completion.**

5. ***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.

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.

ATTACHMENTS:

Attachment I: OKJobMatch Confidentiality Agreement
Attachment II: Zendesk Helpdesk Ticket Request Instructions

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

Oklahoma Employment Security Commission

OKJobMatch Confidentiality Agreement

Staff First Name_____

Staff Last Name_____

Staff Role _____

Staff OKJM User ID _____

Local Workforce Development Area _____

Offices_____

I, _____ (*First and last name*), understand the prescribed work for _____ (*Local Workforce Development Area*), will include handling confidential personal identifiable information that pertains to Workforce Innovation and Opportunity Act (*WIOA*) participant information which is not limited to the participant's social security numbers in the Oklahoma case management system, OKJobMatch.

I understand that my employer_____ (*Local Workforce Development Area*), 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 federal and state mandates.

I understand that various federal and state laws prohibit the unauthorized usage or disclosure of personally identifiable information obtained from WIOA participants.

I agree to follow, and I am bound by these terms and conditions regarding the 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.

Employee Signature: _____

Date: _____

OESC (Zendesk) Helpdesk- Ticket Request Instructions

Ticket Request Instruction:

- Please ensure **all requests** are sent to the State's (OESC) helpdesk at: https://OESC.zendesk.com/hc/en-us

- Please bookmark this website as this is the State's redesigned Helpdesk.

1- OESC Helpdesk Screen

OESC (Zendesk) Helpdesk Instructions:

1. **Do Not Sign-in:**

   - You will not need to sign-in

   - The sign-in is *reserved for the State's Oklahoma Employment Security Commission Staff Members.*

2. **Select Create a Ticket:**

   - You will be redirected to a screen that reads: "**Submit a Ticket**."
   - Next, there is an instruction under the Submit a request that reads as: "*Please choose a request type below."*
   - Select the drop-down menu to the right (*it is a small drop-down arrow*)

- You will select the ticket request type, which requires assistance from the State (*i.e., Password Reset=Password Reset*)
- After you have selected the correct ticket request type, you are redirected to a website page that reads, "*Submit a Request*"> Under Submit a request, you will notice the request type was entered from your previous selection.
- <u>Instant Troubleshooting Tip</u>--{**Make a Mistake?**} You may press the **"Back button"** to return to the Submit a Request (*Please Choose a Request Type Below*) Screen.
- **Complete the Submit a Request Type form with the following Information:** [*Helpful Hint- The * asterisk indicates an area is required for a ticket submission.*] **Enter the following:**
  - Work Email Address
  - **Subject of the Ticket** (*i.e., Johnson Password Reset*).

<u>Select Create a Ticket:</u>

- **Description**- Enter as much detailed information to assist the State in completing your request- The more information that you include reduces the redundancy of the State contacting you to complete your request.

- **Date**- The date you are submitting your request (*i.e., The same day) Select* your *workforce development area* from the drop-down menu.

- Enter your **first name.**

- Enter your **last name.**

- Enter your **work telephone number** for OESC to contact you regarding the ticket request (*i.e., if it is sent to a 3rd-party vendor which is AJLA, we will contact you by phone if AJLA has any questions regarding your ticket*). Please **do not include any punctuation** including dashes or a slash mark.

- Select the **Type of case management need that you have** (*i.e., Password Reset Type has a drop-down menu that is for Participants or Staff.*)

- **Complete the remaining areas of the ticket.**

- **Use the attachment area to attach documents related to your ticket request that will assist OESC in completing your request in a timely manner.**

- Select **submit** after you have checked your ticket request.

- Please submit **one ticket request** per **PID** *or* **per staff member.**