

SOUTHERN WORKFORCE BOARD



DATA INTEGRITY AND SECURE STEWARDSHIP OF PERSONALLY IDENTIFIABLE INFORMATION (PII) POLICY

SWB – #130

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**OKLAHOMA
WORKS**

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SWB is an Equal Opportunity Employer/Program and Activities. Auxiliary aids and services are available upon request to individuals with disabilities.

BABEL NOTICE (29 C.F.R. § 38.9(g) (3)): This document contains vital information. If English is not your preferred language, contact One Stop Operator, ososouthern@gmail.com, 1414 E. Wade Watts Ave. McAlester, Ok. 74501 (580)634-1853 TTD/TTY: 711 or 800-722-0353 to obtain translation and/or interpretation services for the content of this document

PURPOSE: To implement local procedures for the oversight, monitoring, and review of participant data entered into OKJobMatch online case management system. This policy and procedure are designed to ensure the timely, complete, and accurate entry of participant data. The requirements herein are applicable to the service provider(s) using the OKJobMatch system.

REFERENCES: The authority for this policy derives from Section 116 of the Workforce Innovation and Opportunity Act (WIOA) and from OWDI #08-2017, Change 2, “Oklahoma Data Integrity” and Secure Stewardship of Personally Identifiable Information (PII) Policy.

To facilitate the collection of data and the preparation of the reports that are specified by the U.S. Department of Labor, Oklahoma uses the OKJobMatch system. It is a secure, online case management and program performance system operated jointly by the Oklahoma Office of Workforce Development (OOWD) and the Oklahoma Employment Security Commission (OESC).

- The Workforce Innovation and Opportunity Act (WIOA)
- 20 CFR 683.220
- 20 CFR 38.43
- Training and Employment Guidance Letter (TEGL) No. 39-11

LOCAL POLICY/MESSAGE:

The Southern Workforce Board (SWB) recognizes that data entered into 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.

A. General Guidelines

(1) Demographics

It shall be SWB policy that service provider(s) shall properly enter all participant demographic information into the OKJobMatch system according to instructions established by OOWD and OESC. Participant demographic information must be complete and accurate at the time of participant eligibility determination to ensure appropriate program enrollment and subsequent reporting.

(2) Data Elements and Source Documentation

In order to properly validate an applicant’s eligibility for program participation, the service provider(s) shall collect and upload appropriate documentation into the OKJobMatch system according to guidance established by OOWD and OESC. 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.

(3) 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.

(4) Case Notes/Program Note

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.

B. Data Edit Requests -- Procedure

(1) Timeline

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

(2) Local Procedure for Initial Review and Approval of Data Edit Requests

Before a Data Edit Request may be submitted to OOWD or OESC the request must be analyzed by the SWB and/or Service Provider to determine whether or not a request will be approved before submission.

SWB’s policy shall require a two-level analysis of any Data Edit Request before the request is submitted to the appropriate state agency.

(a) The first-level analysis shall be conducted by the service provider. The first-level analysis shall include an examination of the request, based on these questions:

- *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?”*

(b) The second-level analysis shall be conducted by the Executive Director or his/her designee. The second-level analysis will result in the rejection of any Data Edit Requests 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.*

(c) Submission of the Data Request. After the completion of the first- and second-level analyses – if the service provider and staff agree that the Data Edit Request is proper and

allowable according to OWDI #08-2017, Change 2, – then the Data Edit Request may be submitted to the appropriate state agency.

(d) Use of the Data Edit Request Form. The Data Edit Request will be submitted using the Data Edit Request Form specified in OWDI #08-2017, Change 2. A copy of the 2-page form is attached to this document. A Word version of the form may be downloaded from the Oklahoma Works website, here ...

<https://oklahomaworks.gov/docs/2017/08/OWDI-08-2017-Attachment-OKJobMatch-Data-Edit-Request.docx>

(3) The Responsible Person(s)/Entity Designated for Making Requests to the State

By these procedures, A complete and accurate OKJobMatch Data Edit Request will be submitted to OOWD within 20 days after the end of the applicable quarter and follow all State and Local policy guidelines. SWB will permit a Date Edit Request to be submitted by either:

- (a) SWB staff, or
- (b) The SWB’s One-Stop Operator, Area Manager, WIOA Project Director, or his/her designee.

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.

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

(4) Notification to OOWD When Changes Are Made to Local Procedures

In accordance with OWDI #08-2017, Change 2, SWB will provide a timely notification to OOWD in the event that any changes are made to these procedures or to the responsible person(s)/entity designated for making requests to the State, post local review.

Secure Stewardship of Personally Identifiable Information (PII)

Before being granted access to OKJobMatch, SWB Board staff, Service Provider, 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. Attachment II is the Confidentiality agreement form that is to be submitted to OOWD when requesting access to OKJobMatch.

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.

ATTACHMENTS:

Attachment I: OKJobMatch Data Edit Request

Attachment II: OKJobMatch Confidentiality Agreement

OKJobMatch Data Edit Request Form

A Word version of the form may be downloaded from the Oklahoma Works website, here ...

<https://oklahomaworks.gov/docs/2017/08/OWDI-08-2017-Attachment-OKJobMatch-Data-Edit-Request.docx>

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: _____

Southern Workforce Board, Inc.: _____



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