



CENTRAL OKLAHOMA WORKFORCE INNOVATION BOARD

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

***Pursuant to WSD# 58-2024 Change I: "Oklahoma Data Integrity and Secure
Stewardship of Personally Identifiable Information (PII)"***

Approved and Published: September 2022, Updated May 2025

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The Central Oklahoma Workforce Innovation Board (COWIB) is the policy and guidance board for the Workforce Oklahoma system in Central Oklahoma. We are business leaders with a goal to establish a highly skilled, productive workforce in our 9-county area.

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COWIB Data Integrity & Secure Stewardship of PII Policy

PURPOSE

To implement local procedures for the oversight, monitoring, and review of participant data entered into the state 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 COWIB's service provider(s) using the State case management system, including:

- One-Stop Operator;
- WIOA Title I-B Adult and Dislocated Worker program service provider; and
- WIOA Title I-B Youth Program service provider.

AUTHORITY

The authority for this policy derives from Section 116 of the Workforce Innovation and Opportunity Act (WIOA) and from WSD# 58-2024 Change I "Oklahoma Data Integrity and Secure Stewardship of Personally Identifiable Information (PII)" policy, 20 CFR 683.220, 20 CFR 38.43 and Training and Employment Guidance Letter (TEGL) No. 39-11. (Rescissions: WSD# 58-2024 CHANGE I).

BACKGROUND

WIOA Sec. 116(d)(1) describes how the U.S. Secretary of Labor, in conjunction with the U.S. Secretary of Education, "...shall develop a template for performance reports that shall be used by States, local boards, and eligible providers of training services under section 122 to report on outcomes achieved by the core programs."

WIOA Sec. 116(d)(5) goes on to say:

- (5) DATA VALIDATION. — In preparing the State reports described in this subsection, each State shall establish procedures, consistent with guidelines issued by the Secretary, in conjunction with the Secretary of Education, to ensure the information contained in the reports is valid and reliable.

To ensure the validity and reliability of data reported by the State of Oklahoma, the Oklahoma Employment Security Commission issued WSD# 58-2024 Change I "Oklahoma Data Integrity and Secure Stewardship of Personally Identifiable Information (PII)," on January 13, 2025. WSD# 58-2024 Change I includes requirements and guidelines to be used by local service providers in order to assure that performance reports on WIOA Title I-B programs are "*accurate, complete, and up-to-date...*"

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 state case management system. It is a secure, online case management and program performance system operated by the Oklahoma Employment Security Commission (OESC).

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The state case management system is designed to allow WIOA program staff to record data about individual program participants – including data related to individual eligibility, services provided, and program outcomes.

WSD# 58-2024 Change I describes procedures that must be followed when there is a need to add, modify or delete participant data after initial data entry.

LOCAL POLICY

The Central Oklahoma Workforce Innovation Board recognizes that data entered into the State’s case management system 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.

A. GENERAL GUIDELINES

A.1 DEMOGRAPHICS

It shall be COWIB’s policy that our WIOA Title I-B service provider(s) in Central Oklahoma shall properly enter all participant demographic information into the State case management system according to instructions established by OESC. Participant demographic information must be complete and accurate at the time of participant eligibility determination to ensure appropriate program enrollment and subsequent reporting.

A.2 DATA ELEMENTS AND SOURCE DOCUMENTATION

In order to properly validate an applicant’s eligibility for program participation, COWIB’s WIOA Title I-B service provider(s) shall collect and upload appropriate documentation into the state case management system according to guidance established by OESC.

As required by WSD# 58-2024 Change I:

“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.”

A.3 SERVICE ENTRY

Pursuant to WSD# 58-2024 Change I, COWIB’s WIOA Title I-B service provider(s) will assure that participant 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 exiter and the service

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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. A case note is not to serve as a follow-up service, there are various types of Follow-Up services: 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; labor market information; and follow-up. Please view policies for more information regarding Follow- Up Services: Adult/DLW, Youth, WIOA Case Management and Common Exit.

A.4 CASE NOTES

Pursuant to WSD# 58-2024 Change I, COWIB's WIOA Title I-B service provider(s) will assure that 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.

As stated in WSD# 58-2024 Change I:

"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."

As interpreted by COWIB, the term "Case Note" is equivalent to these additional terms that are also used in the State case management online system:

- "Client Note"
- "Program Note"
- "Enrollment Note"
- "Needs and Barriers Note"

A.5 JOB SEEKER 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.

A.5 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

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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.

B. DATA EDIT REQUEST

A 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 a Data Edit Request is based on the Federal WIOA performance reporting schedule:

- Program Year: A program year runs July 1st to June 30th 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

B.1 PROCESSES:

The request must first be analyzed by the COWIB 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?

Request that will be denied by COWIB and/or Service Provider 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.

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Examples:

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: 5/30/21

Period of Participation: 06/03/20 – 5/27/21

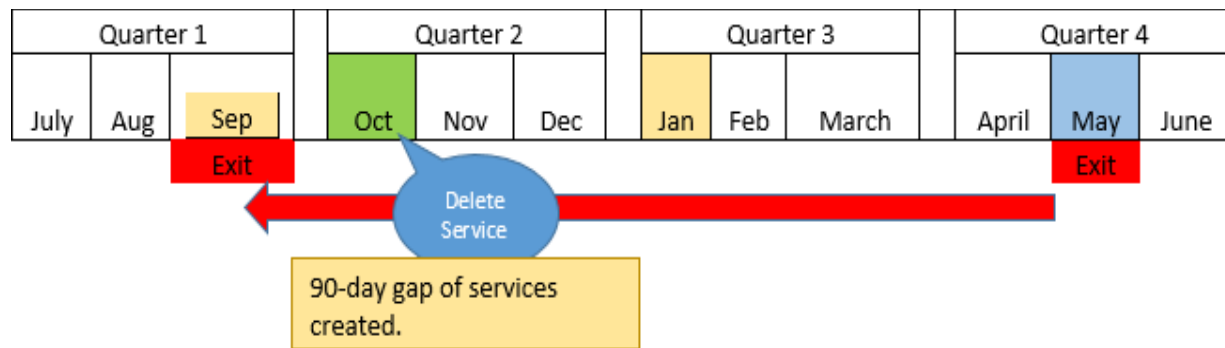
Services Provided:

- 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.

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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 State case management 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.

B.2 TITLE I – ZENDESK HELPDESK PROCEDURES

1. **Zendesk helpdesk ticket requests**—such as database edit requests, system 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.
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.

C. SECURE STEWARDSHIP OF PERSONALLY IDENTIFIABLE INFORMATION (PII)

Before being granted access to State case management, 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.

C.1 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.

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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), 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.

ADDENDA / REVISIONS

The COWIB Chief Executive Officer is authorized to issue additional instructions, guidance, approvals, and/or forms to further implement the requirements of policy, without making substantive change to the policy, except in situations when a new or updated state and federal guidance is issued.