



Workforce System Directive

WIOA Data Management and Integrity

Effective Date of Policy: 7/23/2026

Rescissions: WSD 01-2026

Policy Number: WSD #01-2026, Change 1

Approved By: Trae Rahill, Chief Executive Officer

Approved by Governor's Council for Workforce and Economic Development:

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:

- [The Workforce Innovation and Opportunity Act](#) of 2014 (Public Law 113-128);
- [20 CFR Part 680](#)
- [20 CFR 683.220](#)
- [29 CFR 38.43](#)
- [TEGL No. 11-11, Change 2](#)
- [TEGL No. 23-19, Change 3](#)
- [TEGL No. 10-23, Change 1](#)
- [TEGL No. 10-23, Change 3](#)
- [TEGL 26-16, Change 1](#)
- [TEGL 07-18, Change 1](#)
- [TEGL 39-11](#)
- [TEN 08-21](#)
- [WSD 51-2024 Selective Service Registration](#)

STEVENS AMENDMENT: Oklahoma Works programs and services are administered by the Oklahoma Employment Security Commission under the Workforce Innovation and Opportunity Act and are 100% funded by the United States Department of Labor Employment and Training Administration (USDOL/ETA) through awards totaling \$17,639,410.

PURPOSE:

This policy establishes a unified framework for data validation, data integrity, and the protection of personally identifiable information (PII) across Oklahoma's workforce system. It provides guidance to ensure that data entered into the State's case management system is

accurate, complete, timely, and supported by appropriate documentation, in alignment with federal reporting requirements and applicable regulations.

In addition, this policy defines expectations for the secure collection, use, storage, and sharing of participant information, while reinforcing shared responsibility among workforce system partners for maintaining data quality and confidentiality. The intent is to support reliable performance reporting, protect sensitive information, and ensure that data can be effectively used to deliver coordinated, compliant, and high-quality services to jobseekers and employers.

BACKGROUND: The revision updates the data elements and required documentation as described in TEGL 10-23, Change 3; TEGL 23-19, Change 3; TEGL 26-16, Change 1; and TEGL 07-18, Change 1.

POLICY AND PROCEDURES:

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.

This policy provides guidance on data validation for DOL programs for the following WIOA core programs and non-core programs supported by OESC.

- Wagner-Peyser
- WIOA Adult
- WIOA Dislocated Workers
- WIOA Youth
- Jobs for Veterans' State Grants (JVSG)

In addition, the data validation requirements in this policy also apply to the Monitor Advocate System. The Monitor Advocate System protects the standard of services provided to migrant and seasonal farmworkers (MSFW) under the Wagner-Peyser Act Employment Service program. Therefore, as part of a WIOA core program, all the requirements that apply to the Wagner-Peyser Act Employment Service for data validation will apply to the Monitor Advocate System.

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.

The common data elements and source documentation are indicated in **Attachment II, Source Documentation DOL-only Data Element Validation**. Local areas are 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 Source Documentation:** Source documentation uploaded to the virtual case management system must be clear, legible copies 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. 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.
- **Detailed Case Notes:** Either paper or electronic statements made by the case manager that identify, at a minimum, a participant's status for a specific data element, the date on which the information was obtained, and the name of the case manager who obtained the information. Case notes should be entered at the time the activity is provided and no later than seven calendar days and must be detailed, accurately support the coordinating service entries, and reflect a comprehensive picture of jobseeker activities and staff interactions concerning the jobseeker.
- **Cross-match:** A cross-match requires areas to identify detailed evidence that confirms the data element in a secondary database. The cross-match must also confirm supporting information such as dates of participant and services rendered. Data sharing agreements must be in place as appropriate. Results must be available to state and federal auditors, upon request.
 - **Cross-match Documentation Template:** Where cross-match with an authoritative secondary database is used as source documentation for a data element for which self-attestation is not an acceptable form of documentation, staff must document the cross-match as a case note using the designated template. The template must include at minimum:
 - Data Element Being Validated (e.g., Date of Birth)
 - Authoritative Secondary Database Used for Cross-Match (e.g., UI Claimant Database)
 - System or Platform Through Which Cross-Match Was Conducted (DocuShare, Laserfiche, etc.)
 - Record Type or Information Verified (e.g., Date of Birth confirmed via uploaded Driver's License from UI Claimant record)
 - Date of Verification by Case Manager
 - Name of Case Manager Conducting Verification

The completed template must be uploaded into the participant's case file as source documentation and must be available to state and federal auditors upon request. Data sharing agreements must be in place prior to conducting cross-matches with secondary databases.

- **Electronic Records** which may include:
 - Participant Source Documents: participant source documents maintained in the management information system (MIS).
 - Participant Service Record: Participant information generated and maintained by the State regarding the specific services received by a participant. The information may be generated and maintained through the State MIS.
- **Self-Attestation:** Written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. DOL broadly interprets what is considered an electronic/digital signature. Electronic signatures or submission from the participant such as an email, text, or unique online survey response is considered an electronic signature or verification; it must be participant generated and traceable to the participant. The documentation of the self-attestation must be uploaded in, not captured by the State MIS. Other forms of source documentation should be used when possible.

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 the State's case management system 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 will be utilized to randomly select participants for the data validation process. To meet the 90% confidence interval for each Title I program, a total of 271 participants will be drawn, 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 based on the participant exit date. The start and exit dates will be within the program year being validated. The participants will be validated based on the proportion of participants in each local workforce area relative to the individual programs.

A worksheet for each participant 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 area 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 Validation Unit outlining any concerns or questions regarding the report.

Data Validation Training: Consistent with the DOL recommendation that data validation be part of annual monitoring efforts, a summary will be presented with the State's annual monitoring detailing the most 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.

Source Documentation and Demographics

It is both useful and necessary to properly establish eligibility and capture key information and characteristics of individuals to understand their needs and the potential programs or benefits for which they may be eligible, as well as for program and performance management purposes. Processes for gathering information must be done as efficiently as possible to administer important services timely. At times, eligibility for a participant can be based on a single known characteristic.

During intake, you should limit collection of documentation only to those items required for eligibility rather than trying to collect all the documentation necessary for data validation purposes. Local procedures should include opportunities to request documentation after intake

and initial service provision. Federal guidance directs states to rely on self-attestation, or self-reported supplemental wage data information from participants through post-exit follow-up, for eligibility determination and data validation only when all efforts to collect other allowable source documentation have been exhausted. Even so, self-attestation remains a sufficient and viable means for both eligibility determination and data validation where applicable, particularly among certain populations whose life circumstance may preclude immediate access to certain documents.

There may be times when certain documentation is not necessary. Local areas can play a crucial role in helping individuals obtain the required documents by paying fees to obtain such documents as an allowable supportive service, except for individuals not yet authorized to work.

Demographic information must be complete and accurate at the time of program eligibility to ensure appropriate eligibility determination and subsequent reporting.

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.

Work Authorization: Participation in WIOA Title I and Wagner-Peyser Act programs is available to citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, parolees, and other immigrants authorized by the Attorney General to work in the United States, per WIOA Section 188. Staff must verify that a participant falls within one of these categories to ensure participant eligibility.

Participant-level services are those services beyond self-services or information-only services. Some participant-level services in Oklahoma do require valid source documentation of the participant's work authorizations. The requirements are driven by and often mirror work authorization requirements of employers. Work authorization must be documented using the **"Documents to Verify Eligibility to Work" form in Attachment I.**

Certain services may be provided without documentation of work authorization. This allows timely access to services for individuals who may not have immediate access to required documents due to circumstances such as disaster, homelessness, recent incarceration, transition from foster care, relocation, or similar barriers.

Local areas are not required to verify the specific circumstance preventing documentation. A copy of work authorization documentation is not required for these services. Case managers must document in a case note the reason documentation was not required and the service provided.

When serving participants whose work authorization has not been verified, local areas must

develop an Individual Employment Plan (IEP) or Individual Service Strategy (ISS) that outlines a sequence of services designed to support skill development, remove barriers, and prepare the participant for employment.

In cases where a participant does not disclose, is uncertain of, or has a pending work authorization status, local areas must clearly communicate which services can be provided without documentation and which services require verified work authorization. Staff must also inform participants that employers will require valid work authorization documentation prior to employment.

Selective Service Registration: Local areas must continue to follow requirements related to Selective Service registration and documentation of such as a prerequisite for eligibility for all programs. **For details on these requirements, see WSD 51-2024, *Selective Service Registration*.**

Personal Identifiable Information (PII) and Other Confidential Information

Personal Identifiable Information: 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.

Social Security Numbers:

Disclosure of a Social Security Number (SSN) is voluntary and is not required for eligibility determination. Services must not be denied if an individual chooses not to provide an SSN, and local policies may not require SSN disclosure as a condition of receiving services.

The Oklahoma Employment Security Commission requests SSNs under the authority of the Workforce Innovation and Opportunity Act (Public Law 113-128) and applicable federal regulations governing performance accountability and reporting. If provided, the SSN will be used to support wage record matching, performance reporting, program evaluation, and data integrity.

When requesting an SSN, local areas must provide a written disclosure notice to the participant at the time of collection. The notice must clearly explain:

- That disclosure of the SSN is voluntary
- The authority for requesting the SSN
- The purpose for which the SSN will be used
- How the information will be used and protected
- The participant's right to decline disclosure without denial of services

The SSN disclosure notice established in this policy must be provided through intake forms, electronic systems, or other written methods. Staff must document in the case file that the disclosure notice was provided.

A SSN may be requested at any point during participation if needed to support employment or performance reporting activities; however, service delivery must not be conditioned upon the provision of an SSN or SSN card.

SSNs are classified as protected personally identifiable information and must be collected, stored, transmitted, and accessed in accordance with all applicable federal and state confidentiality and data security requirements. Access must be limited to authorized personnel with a business need to know.

Other 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.

Program Specific Requirements

WIOA Title I (Adult, Dislocated Worker, and Youth) programs must use the appropriate WIOA Title I Eligibility Forms in **Attachment I, Adult and Dislocated Worker or Youth**, to document and verify program eligibility. Acceptable source documentation for each eligibility element must align with this policy.

WIOA Title III (Wagner-Peyser) 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](#).

In accordance with TEGL 23-19, Change 3, source documentation may be required to validate eligibility for certain Wagner-Peyser services. Required documentation elements are identified with an 'X' in **Attachment II: Source Documentation DOL-only Data Element Validation**.

Individuals with valid employment authorization, including those granted relief under Deferred Action for Childhood Arrivals (DACA), may receive services as appropriate. Employers seeking workers are also eligible to receive Wagner-Peyser services.

The Trade Adjustment Assistance (TAA) program entered phased termination on July 1, 2022, and no longer accepts new applicants. Oklahoma continues to serve participants enrolled prior to that date through program closeout.

The Jobs for Veterans State Grants (JVSG) program provides formula-funded services to eligible veterans and eligible persons with significant barriers to employment, as well as employer services to support the hiring of veterans.

In accordance with TEGL 23-19, Change 3, source documentation may be required to validate eligibility for certain JVSG services. Required elements are identified with an "X" in **Attachment II: Source Documentation DOL-only Data Element Validation**.

The National Farmworker Jobs Program (NFJP) provides career and training services to migrant and seasonal farmworkers and their dependents to support employment stabilization or transition into new industries. The program operates in coordination with the Monitor Advocate System to support equitable access to workforce services.

In accordance with TEGL 23-19, Change 3, source documentation may be required to validate eligibility for certain NFJP services. Required elements are identified with an "X" in **Attachment II: Source Documentation DOL-only Data Element Validation**.

Enrollment Service Entry, Jobseeker Contact, and Date Edit Request Procedures

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.

Jobseeker Contact: All jobseeker contacts should be entered in the activity component in the case management system. Activity components include logging 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.

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.

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. If staff with access to the case management system have been dismissed for any reason, the OESC Zendesk must be notified immediately.

To support data integrity, local areas should maintain separation between staff responsible for data entry and those responsible for initiating or approving data edit requests, consistent with federal guidance set forth in TEGl 23-19, Change 3.

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

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 10/20/25

Requested Date: 5/30/26

Period of Participation: 6/03/25 – 10/20/25

Services Provided:

- Initial Assessment: 06/03/25 -06/03/25
- Career Guidance: 06/03/25 – 06/03/25
- Occupation Skills Training: 06/14/25 – 09/18/25
- Workforce Preparation Assistance 10/20/25 – 10/20/25

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 12/31/25 + 20 days = 1/20/2026.

Example 2: Deleting an Enrollment Service:

Request: Request is to delete the Workforce Preparation Assistance service on 10/20/20

Requested Date: 5/30/2026.

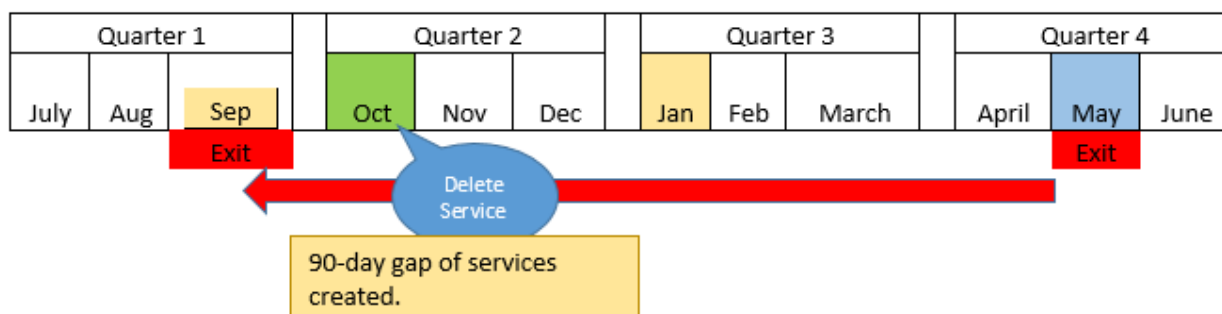
Period of Participation: 06/03/25 – 5/27/26

Services Provided:

- Initial Assessment: 06/03/25 -06/03/25
- Career Guidance: 06/03/25 – 06/03/25
- Occupation Skills Training: 06/14/25 – 09/18/25
- Workforce Preparation Assistance 10/20/25 – 10/20/25
- Career Guidance: 01/20/26 – 01/20/26
- Work Experience: 02/03/26 – 4/21/26
- Workforce Preparation Assistance: 5/27/26 – 5/27/26

Decision: This request would be denied because deleting this service would:

- create a gap of more than 90 days between services, which qualifies as a participant exit under [20 CFR 677.150\(c\)\(1\)\(i\)](#)
- move the exit date from 5/27/26 to 9/18/25 (*a different quarter*); and
- would require a new period of participation that would begin on 1/20/26.



Example 3: Deleting an Enrollment Service:

Request: Request is to delete the Workforce Preparation Assistance service on 10/20/25

Requested Date: 1/09/26

Period of Participation: 6/03/25 – 10/20/25

Services Provided:

- Initial Assessment: 06/03/25 -06/03/25
- Career Guidance: 06/03/25 – 06/03/25
- Occupation Skills Training: 06/14/25 – 09/18/25
- Workforce Preparation Assistance 10/20/25 – 10/20/25

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 6/03/25 – 09/18/25.

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. All submitted and completed Data Edit Request tickets, including documentation and justification, must be retained in accordance with the Federal records retention requirements set forth in [2 CFR 200.334](#).
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.

EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT All Recipients, and Sub-recipients must comply with WIOA’s Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex, 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: Workforce Service Directive (WSD) is to become a part of your permanent records and be made available to appropriate staff and sub-recipients.

INQUIRIES: For any questions or concerns related to this issuance, please begin by submitting a [Technical Assistance Request](#). If additional clarification is needed after your request has been reviewed, you may email WorkforceServices.Inquiry@oesc.ok.gov.

ATTACHMENTS:

Attachment I: WIOA Required Forms & Documentation Index

WSD 01-2026, Attachment II: DOL-only Data Element Validation (Excel)