

Workforce Connections General Policies Data Recording and Management	Gen-050-07
Supersedes Policies ADW-030-04 and YTH-040-04	Revision No. 2 Effective 07-01-2020
Policy Approved By: WC Executive Director Policy Adopted on August 1, 2013	<i>J-P-P 7-1-2020</i>

Purpose

To provide policy guidance related to compliance requirements for the collection, storage, and dissemination of data for programs funded under Title I of the Workforce Innovation and Opportunity Act (WIOA).

Background

Consistent with 20 CFR §683.300, all states and other direct grant recipients must report financial, participant, and performance data in accordance with instructions issued by the Department of Labor (DOL) and the Employment and Training Administration (ETA). Workforce Connections (WC) is required to establish basic standard operating procedures for data collection and management to ensure the quality and integrity of the collected data over time. Federal law, OMB guidance, DOL and ETA require the protection of Personally Identifiable Information (PII) and any other sensitive information. Accurate and timely data entry is essential for the reliability and quality of reported WIOA Title I services, activities, and performance outcomes. This includes standards for data verification, data validation, and data security.

Policy

Workforce Connections has established that, for the purpose of Federal, State and local reporting requirements, all data related to WIOA registration and services/activities provided to eligible WIOA Title I program participants must be recorded in the State Management Information System (MIS) within eight (8) business days of the occurrence of such events and/or activities. WC requires timely written notification if required data entry cannot be accomplished within the required time frame. This policy applies to all WC's sub-recipients providing WIOA Title I services to adult, dislocated workers, youth and the One-Stop operator(s).

References

29 U.S.C. § 3245; Public Law (P.L.) 113-128 WIOA, Secs. 116, 185, 188, 189, and 503; 20 CFR Part 677, 20 CFR Part 683; TEGL 14-18; TEGL 19-16; TEGL 39-11; State Compliance Policy (SCP) 5.5

All information required by Federal, State, and local reporting requirements must be collected for each individual receiving service under a WIOA Title I funded program. The appropriateness of any service provided to an eligible program participant should be documented in the individual employment plan and should show a clear linkage between the provided service and potential improvement in the participant's employability or career objective goals.

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I. General Provisions for Data Collection Requirements

A. Data Verification

1. Data verification is a process that involves checking the accuracy of all, or a sample of, computerized records against the original paperwork or other source(s).
2. Consistent with ETA requirements, sub-recipients are required to maintain standardized individual records containing characteristics, activities and outcomes information for all program participants who receive services or benefits financially assisted by WIOA Title I programs.
3. Although the goal of data entry is to achieve 100 percent correct entries, it is rarely accomplished due to recording of typographical errors. Overall data verification process is the confirmation of the accuracy of all, or a sample of, typed/recorded entries by comparison with the original source(s) to identify and properly correct errors.

B. Data Validation

1. Data validation involves checking the reasonableness of all, or a sample of, data recorded or entered into an electronic database.
2. Facilitate the collection of effective, consistent, and complete information on a program participant in order to support the overall management, assessment, and continuous improvement of WIOA Title I programs.
3. Although data may be correctly transcribed from forms, it may not be accurate or logical because of recording errors. For example, entering a wrong date of birth raises concerns about the accuracy of such entries, regardless of whether or not they were properly transcribed from the paperwork or other sources.

C. Data Security

1. Data security involves ensuring only authorized staff has access to electronic databases and paper files containing sensitive program participants' information. It is imperative that personal information be protected at all times.
2. Providers of WIOA Title I services are encouraged to take aggressive measures to mitigate the risks associated with the collection, storage, and dissemination of sensitive data, including PII. Providers of WIOA Title I services shall ensure that any PII used during the performance of their sub-award has been obtained in compliance with applicable Federal, State and local regulations governing the confidentiality of information.
3. Employees and other personnel who will have access to sensitive, confidential, proprietary, and private data must be advised of the confidential nature of the information, the safeguards required to protect such information, and that there are civil and criminal sanctions for noncompliance with such safeguards that are contained in Federal and State laws.
4. Program participants' information can only be released to third party agencies or entities if the program participant has authorized such release, or the custodian of the records is presented with a valid court order requesting information pursuant to legal action.
5. Providers of WIOA Title I services must take the steps necessary to ensure the privacy of all PII obtained from program participants and/or other individuals and to protect such information from unauthorized disclosure. Providers of WIOA Title I services must maintain such PII in accordance with the ETA standards for information security described in TEGL 39-11.

6. Access to any PII must be restricted to only those employees of the provider of WIOA Title I services who need, in their official capacity, to perform duties in connection with the scope of work as addressed in their sub-award agreement.
7. Providers of WIOA Title I services must have their policies and procedures in place under which provider's employees and other personnel, before being granted access to PII, acknowledge 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 of PII.

D. A procedure for data collection and management to ensure the resulting electronic database is accurate includes, but is not limited to, the following:

1. Checking the accuracy of the computerized records against the original source (usually paper copies of records);
2. Conducting random calls to program participants or other sources to verify the accuracy of the information collected;
3. Ensuring case files containing program participants' information are secured in filing cabinets and access to such files is limited to authorized personnel only;
4. Evaluating data collection efforts by using trained staff to randomly observe interviews and other data collection methods;
5. Limiting access to program participants' information to authorized personnel who are trained in data security and validity and have acknowledged in writing the requirement to safeguard program participants' data; and
6. Performing logical tests of data (although data may be correctly transcribed from the original forms, it may not be accurate due to of misprints and other mistakes).

II. Data Requirements

- A.** The State MIS is designed to collect, process and report data on registered WIOA Title I program participants. The MIS establishes a standardized set of data elements, definitions, and specifications that can be used to describe the characteristics, activities, and outcomes of program participants served by WIOA Title I programs.
- B.** Service providers are responsible for the integrity and validity of recorded data, which is required to be complete and without error. It is essential to the integrity of program participants' data that services entered into the record reflect services actually provided to the program participant and that all activities involving a program participant are correctly, timely identified and accurately recorded in the program participant's MIS record.
- C.** It is the responsibility of the providers of WIOA Title I services to ensure that at least a monthly contact is made with the program participant to monitor progress towards the established goals and to maintain the highest level of participant services.

D. MIS Access Authorization

Workforce Connections will authorize employees of providers of WIOA Title I services to use MIS based on their job-related need to access and input data into the system. User rights will be assigned by Workforce Connections through individual user accounts. All new users must successfully complete MIS training prior to rights being assigned.

1. Successful completion of MIS training is required for staff with job duties that require program participant data recording.
2. All staff at the Nevada JobConnect centers must also successfully complete and sign the State of Nevada's Department of Employment, Training and Rehabilitation (DETR) individual access and confidentiality agreement.
3. Each user must have an e-mail account issued by the sub-recipient/employer. Hotmail, Yahoo and other accounts of this nature are not acceptable.
4. Current, in-program participants are not eligible for MIS user accounts.
5. The training request will be originated from management staff or designee.
6. All granted access users must sign the MIS User Agreement.

E. Confidentiality Standards

1. All information recorded in the MIS is confidential and unauthorized disclosure is prohibited.
2. All MIS users must comply with all applicable Federal, State and local privacy and confidentiality laws governing the confidentiality of the information.
3. For the purpose of collecting and using program participants' social security number, all service providers are mandated to ensure that social security numbers will be maintained in a secure and confidential manner [TEGL No. 5-08].
4. Access to the MIS is granted only by WC authorized representative. In the event a person with granted access to the MIS terminates employment with a service provider, it is the responsibility of the service providers' management to immediately notify WC of such change.
5. Workforce Connections reserves the right, without limitations, to monitor activities related to the use of the MIS without previous notice to the MIS users.
6. Access may be terminated at any time without previous notice. Any individual with granted access to the MIS is responsible for full cooperation in the event of a necessary investigation concerning wrongful use and/or misappropriation of information.
7. MIS user account request can be found at <http://nvworkforceconnections.org>