

# Oklahoma Employment Security Commission



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## Oklahoma Employment and Training Issuance # 06-2006

**TO:** Chairpersons of Local Workforce Investment Boards  
Chief Local Elected Officials  
WIA Board Staff  
Director, Workforce Quality  
Director, Workforce Services  
Director, Veteran Services

**FROM:** Richard Gilbertson, Director  
Workforce Integrated Programs

**DATE:** July 3, 2006

**SUBJECT:** Program Eligibility and Data Element Validation Policy for Workforce Investment Act (WIA) Adult & Dislocated Worker Programs (DLW), Wagner-Peyser (WP), and Trade Adjustment Assistance (TAA) programs.

**PURPOSE:** To provide State of Oklahoma policy on eligibility criteria and subsequent document validation requirement procedures for WIA Adult Programs, WP, and TAA programs.

**REFERENCE:**

- a. Training and Guidance Letter (TEGL) No. 17-05, "Common Measures Policy for the Employment and Administration's Performance Accountability System and Related Performance Issues."
- b. USDOL/Employment and Training Administration (ETA) TEGL No. 3-03, and subsequent changes 1-3, "Data Validation Policy for Employment and Training Programs."
- c. USDOL Revised Draft WIA Validation Handbook, November 2004.
- d. Oklahoma Employment and Training Issuance (OETI) 04-2006, "State Guidance relevant to the Implementation of USDOL / ETA's Common Measures Policy."
- e. Oklahoma Employment and Training Issuance (OETI) 20-2001, Change 2, "Military Selective Service Registration."
- f. USDOL/Employment and Training Administration (ETA) TEGL No. 9-98, "Selective Service Registration."

**Note:** This issuance rescinds the Adult and Dislocated Worker (DLW) portions of Oklahoma Employment and Training Issuance (OETI) 20-2001, 20-2001 change 1, and OETI 10-2004.

**BACKGROUND:** OETI 04-2006, “State Guidance relevant to the Implementation of USDOL / ETA’s Common Measures Policy” presented revised guidance of common measures, provided additional guidance to clarify the point when performance participation commenced and terminated; modified the methodology for calculating the Adult Earnings measure; clarified when participants are counted and when they are excluded from performance, distinguished “self-service” and “informational” activities that are staff-assisted from other “staff-assisted services”; provided a list of Key Definitions of Services; and a list of Services with appropriate timeframe duration. This policy provides further guidance on integration of services covering data collection and verification requirements for Eligibility and back-up Data Element Validation.

**MESSAGE:** Continuing in the spirit of service integration and functional alignment, this OETI works to provide eligibility and associated data element validation procedures that minimizes the effect of program silos and the burden of validation documentation on staff and customers, while remaining respectful of the need to ensure integrity of these requirements.

## **ADULT PARTICIPANTS**

### **1. Level of Service and Eligibility / Data Validation Requirements**

The level of service provided will dictate the required data and source documentation needed to comply with program eligibility and data element validation requirements. For example:

- Self-Service or Informational Activities –Eligibility and/or Data Element Validation documentation *is not required*.
- Staff Assisted Services – Eligibility and/or Data Element Validation documentation *is required for all participants* regardless of program enrollment.

The term “staff assisted service” means a service having a “significant” level of staff involvement, as defined by USDOL/ETA in TEGL No. 17-05, and as stated in OETI 04-2006. Oklahoma has defined all “staff assisted services” as being considered “significant.” Minimum eligibility verification is required for all clients receiving any staff assisted service. Minimum eligibility verification for all programs consists of:

1. Date of birth
2. Selective Service registration
3. Eligible to work in the United States

## 2. Participation in Multiple Programs

Service integration under Oklahoma’s Common Measure Policy will result in a common customer pool. For example, all individuals 18 years of age and older who access self-help and/or informational activities are counted as participants in both the WP and WIA Adult programs. Similarly, if one of these individuals receives a staff assisted service, and is determined to be eligible for multiple programs, they will be included in the respective program’s performance pool and considered a performance participant.

## 3. Documentation and Data Validation

The Oklahoma Service Link (OSL) system and local staff verification will be used to comply with eligibility documentation and data validation. This will allow most eligibility and validation documentation to be maintained electronically in OSL, thereby replacing the need to keep paper records (filed copies in a folder or cabinet) of original source documentation for performance participants receiving only core and intensive services. If the Local Workforce Investment Board decides that priority of service is determined only at the time training services are provided then paper files and paper documentation will required only at the point that the participant is receiving training services or has entered into work experience.

- a. Data in OSL and State management information systems such as the State Unemployment Insurance (UI) system and UI wage record system, and linkages to those systems may be used to comply with some validation requirements.
- b. Local staff verification will be used to comply with validation requirements, where staff:
  1. Review appropriate source documents to determine the data item being validated.
  2. Record or verify the data item in the designated OSL data field(s) associated with the data element being validated, and make sure the OSL data entry matches the source documentation.
  3. Record in OSL Universal or Program Notes as indicated:
    - Specific data element being validated;
    - Specific source document used;
    - Date the verification occurred; and
    - Pertinent data as presented on the source document.

NOTE: It is required that the individual verifying the “source” document must be the one doing the data validation input.

## 4. Specific Data Element Validation Interpretations

- ***Disability Status*** – The State will not require disability status to be validated for adult programs. The adult programs ask customers to voluntarily respond to a question about their disability status to comply with Equal Employment programmatic eligibility requirements.

- ***Veteran Status*** – There is a discrepancy between the allowed source documents to validate veteran status under USDOL/ETA’s WIA Data Element Validation policy, and eligibility requirements for participation in the VETS program, which significantly hinders service integration under Workforce Center functional alignment. Specifically, the VETS program eligibility allows self-identification of veteran status (with no data validation), whereas WIA Data Element Validation requires: 1) Cross match with veteran data; or 2) DD-214. As such, the State (consistent with VETS eligibility) will allow self-identification to validate veteran status.

## 5. Program Eligibility Interpretations

- ***Selective Service Registration*** – A male between the age of 18-26 who can not provide proof of selective service registration at the point of a staff-assisted service are not eligible for participation in the WIA Adult program and must be referred to the Selective Service for registration. Note, services may continue to be provided to the individual as a participant of the WP program.

All males who are at least 18 years old and born after December 31, 1959, and who are not in the Armed Services on active duty, must be registered with Selective Service. All males over the age of 26 that were required to register and did not, must obtain a Status Information Letter (SIL) from the Selective Service System. The applicant will submit the SIL, any applicable evidence and a written explanation of why he failed to register. Designated staff shall evaluate the evidence presented by the applicant and determine whether the failure to register with Selective Service is consistent with the amendment to Public Law 99-661, Section 1366. (Refer to TEGl 8-89 for specific information).

- ***Priority of Service*** – Section 134(d)(4)(E) of WIA stipulates that if a local board makes a determination that WIA Adult funds are limited, then priority for intensive and training services should be given to recipients of public assistance and other low-income individuals. Local boards will establish whether or not this priority is in effect and whether it applies to intensive and training services, or only to training services. If a local area has made a priority of service determination, then data element validation for “low income” must occur at the point of the first staff assisted intensive and/or training service, depending on the priority established, for participants in the WIA Adult program.

**RECISSIONS:** This issuance rescinds the Adult and Dislocated Worker (DLW) portions of Oklahoma Employment and Training Issuance (OETI) 20-2001, 20-2001 change 1, and OETI 10-2004.

**ACTION REQUIRED:** Workforce Investment Board Staff are requested to widely distribute copies of this issuance to staff and partners within the Workforce Investment Area for a July 1, 2006 implementation. This is official state policy, and should be kept in your permanent policy issuance file.

**INQUIRIES:** If you have any questions pertaining to this issuance, please contact either Robyn Coman at (405) 557-5318, [robyn.coman@oesc.state.ok.us](mailto:robyn.coman@oesc.state.ok.us); or Tami Decker at (405) 962-7595, [tdecker@oesc.state.ok.us](mailto:tdecker@oesc.state.ok.us).

**Attachment A:** “Adult Program – Eligibility & Data Validation Guideline” addresses eligibility requirements and criteria for determining a participant’s eligibility to participate in the WIA (Adult and DLW), TAA and VETS programs and required data validation sources. This attachment includes references to OSL screens (where appropriate) to help staff identify the location of the data fields being referenced.