OSWDI 02-2012

OKLAHOMA STRATEGIC WORKFORCE DUAL ISSUANCE 02-2012

DATE:	July 12, 2012	**PROGRAMS:**	WIA, W-P, TAA
TO:	WIA Board Staff Local Office Managers Workforce Services Management Veterans Services Division	**FROM:**	ODOC OESC

SUBJECT: **Final Data Validation, Program Eligibility and Document Uploader Requirements for Adult programs**

COMMENT PERIOD: This policy was open for a 30 day comment period on May 16, 2012. All comments received have been reviewed and the responses are included as Attachment F of this policy

PURPOSE: To provide staff policy and procedural guidance on requirements pertaining to eligibility/data element validation (DEV) and subsequent documentation requirements for the WIA Adult, Dislocated Worker (DLW), National Emergency Grants (NEG), Trade Adjustment Assistance (TAA) and Labor Exchange (LE) programs and activities.

REFERENCES:

a. Training and Employment Guidance Letter (TEGL) No 28-11 "Program Year 2011/Fiscal Year 2012 Performance Reporting and Data Validation Timelines."
b. Oklahoma Employment and Training Issuance (OETI) 25-2009 "Veterans Priority of Service."
c. Oklahoma Employment Security Commission (OESC), Workforce Integrated Programs Memorandum 7-2010 "Priority of Services for Veterans and Eligible Spouses."
d. TEGL No. 17-05 and TEGL 17-05, Change 2, "Common Measures Policy for the Employment and Administration's Performance Accountability System and Related Performance Issues."
e. TEGL No. 3-03 and subsequent changes 1-3, "Data Validation Policy for Employment and Training Programs."
f. USDOL WIA DRVS Handbook for DRVS 7.2, April 2009.
g. USDOL TAA Data Validation Handbook, December 2006.
h. USDOL LX Handbook, May 2009
i. Workforce Investment Act of 1998
j. 20 CFR Part 652 Workforce Investment Act; Final Rules

- **BACKGROUND**: The United States Department of Labor Employment and Training Administration (DOLETA) publishes annual guidance pertaining to report timelines

and data element validation, which includes allowable source documentation. The administrative burden of data element validation has been reduced in recent years insofar as aligning data validation documentation requirements with the level of service given. In addition, the DOLETA WIA Data Reporting and Validation System (DRVS) User Handbook (August 2009) allows documents to be scanned and uploaded to a State's management information and data reporting system which, in Oklahoma, is Oklahoma Service Link (OSL) Including scanned documentation in participant files for the verification of eligibility and/or the validation of specific data elements allows monitoring and data validation to be performed electronically and alleviate the unnecessary burden of maintaining paper case files.

MESSAGE: Continuing in the spirit of service integration and functional alignment, this Oklahoma Strategic Workforce Dual Issuance (*OSWDI)* is intended to clarify documentation procedures that minimize the effect of program silos and the burden of validation documentation on staff and customers, while remaining respectful of the need to ensure data integrity and report accurate information regarding the characteristics, activities and outcomes of the participants that are served. In alignment with President Obama's Green Initiative, this OSWDI requires that documents previously copied and kept in paper files now be electronically scanned and uploaded to OSL participant records.

Data Validation and Program Eligibility Requirements for Adult Programs

I. Level of Service and Eligibility / Data Validation Requirements

The level of service provided will dictate the data and source documentation requirements needed to comply with federal policy related to program eligibility and data element validation.

1. Participants receiving **Self-Service or Informational Activities/Services*** only – Additional eligibility and/or data element validation documentation *is not required.* Information entered by the participant through the OSL registration process is sufficient.

2. Participants receiving **Staff Assisted Core Services*** only – Oklahoma defines all staff assisted core services as services that require significant staff involvement. The OSL system, local staff verification and participant self-attestation of OSL information will be used to comply with documentation requirements for those participants receiving only staff-assisted core services. Information verifying eligibility and/or validating specific data elements must be documented in OSL as indicated in Attachment A of this policy.

3. Participants receiving **Intensive or Training Services*** must have the required documentation scanned and uploaded into OSL as indicated in Attachment A of this policy.

   *See OETI 01-2007, Attachment B, or the most current State policy to determine if a service is an Informational Service, Staff Assisted Core Service, or an Intensive or Training Service.

II. Methods of Documenting Required Data Elements for Eligibility and/or Data Validation

1. **Self-Attestation** may be referred to as a participant statement and occurs when a participant states his or her status for a particular data element, and then signs and dates a form acknowledging this status. DOLETA guidance states: "The form signature can be on paper or in the state management information system**,** with an online signature." Self-attestation can be utilized as a method for documentation prior to the delivery of a staff-assisted service that warrants co-enrollment into a WIA funded program. In Oklahoma, this means that data entered in OSL by the participant during the program enrollment process is thoroughly reviewed and then verified with the participant's virtual signature. *It is imperative that this information be correct prior to the participant's self-attestation.* Additional details pertaining to self-attestation include the following:

   - Staff reviews with participant all basic demographic characteristics recorded in the participant's demographic snapshot prior to the participant's co-enrollment into a WIA funded program. The participant then self-attests that the information reviewed prior to the program enrollment is true and correct by entering a "virtual signature." Staff may at that point proceed to the appropriate WIA program enrollment and the entry of the first staff- assisted service.

   - If it is determined that the demographic information obtained prior to the virtual signature and co-enrollment was not accurate, a request for a correction to the snapshot can be made to designated Local Workforce Investment Area (LWIB) administrative staff. If the snapshot is corrected, the participant is required to return to the office and virtually resign the demographic snapshot.

2. **Staff Verification** consists of staff reviewing documentation provided by the individual to determine the allow-ability of the source document (for eligibility or data validation purposes), to verify that the data has been correctly entered into OSL, and to support the process with detailed case notes. This method of documentation will be allowed for some staff assisted services and will be used to comply with requirements as indicated in Attachment A of this policy when :

   - Staff reviews the allowable source document to determine accuracy of the data item being verified and ensures the corresponding OSL entry matches the information on the allowable source document. Staff then records in OSL Client Notes or Program Notes, as indicated in Attachment A. The following information *must* be included:

     a. Specific data element being verified;

b. Specific source document used;
c. Date the verification occurred, if different than the data entry date; and
d. Pertinent data as presented on the source document (such as the driver's license number from a driver's license).

NOTE: It is required that the staff person verifying the "source" document and information in OSL be the one doing the entry of the Client Note or the Program Note.

3. **Scanned Documentation** uploaded to OSL is another method of documentation that will be required to verify some eligibility criteria and to verify certain data elements, as indicated in Attachment A of this policy, prior to the participant's receipt of any intensive or training services. Documentation requirements are met when the following procedures are followed:

   - Staff reviews and scans a copy of the appropriate source document used to verify the eligibility criteria or data element and attaches the scanned document to the proper OSL screens.

4. **Oklahoma Service Link** (OSL) may be used as a method of documentation for some eligibility criteria and certain data elements if detailed information is provided. For example, OSL may be used to verify the date of the first training service if all of the following information is included in the service entry: actual start date, O*NET-SOC, CIP, Training Agent ID and the name of the Training Provider.

5. **Telephone Verification** is yet another method of documenting eligibility criteria and/or the validity of certain data elements as indicated in Attachment A. The information obtained must be documented by completing the sample "Telephone Verification Form for Adult Programs" included as Attachment C or a similar board developed form. This form must be scanned and uploaded to the proper OSL screens once complete.

III. Types of Validation Rules

1. **Match** means that the document used to verify the information is exactly the same as the source document outlined in Attachment A and the information from the source document accurately matches what has been indicated or entered in OSL. For example, if the allowable source document is a birth certificate and date of birth is being verified, a corresponding case note must reflect that a birth certificate was used and the date on the birth certificate is exactly the same date that was entered as the date of birth in OSL. It should be noted that whenever a date is entered into OSL it must match exactly the date on the document used to verify the information.

2. **Support** means that the information contained in the documentation that was scanned and uploaded to the OSL case file, for instance, provides enough information to support the accuracy of the data in the participant's OSL record. For example, information in OSL that indicates a participant is homeless or the

status of their employment situation at the time of WIA program enrollment can be supported by a participant's virtual signature verifying that all demographic information provided at the time of enrollment was true and correct. Another example would be at the point of intensive service when a participant provides documentation indicating they are legal to work by presenting a United States Birth Certificate and a picture ID. These documents support their eligibility to work in the United States.

IV. Specific Program Eligibility/Data Element Validation Interpretations

1. **Selective Service Registration** – A male between the ages of 18-26 who cannot provide proof of Selective Service registration at the point of a staff-assisted service is not eligible for participation in the WIA Adult, DLW or NEG programs and must be referred to the Selective Service for registration. Staff assisted services may commence after the registration process has been completed. A male over the age of 26 who is not registered with the Selective Service is not eligible for participation in the WIA Adult, DLW or NEG programs and should not be co-enrolled until they have requested and received a Status Information Letter from the Selective Service. A copy of the Status Information Letter will then be reviewed by designated staff that will make the final determination regarding the participant's eligibility to receive services. Additional information is available at www.sss.gov.

   Veterans and part-time National Guard or Reservists born after December 31, 1959, will satisfy the Selective Service requirement by presenting their DD Form 214 showing dates of military service, or a current military ID card if still on active duty or a member of the National Guard or Reserves. If a male leaves the military before turning 26, he must register with the Selective Service. If a male has passed the age of 26 and has not registered with the selective service, but can provide proof of military service in the form of a DD-214 or current military ID they meet the requirements of Selective Service registration

2. **Veteran Status and Priority of Service** – There is a discrepancy between the source documents allowable to verify veteran status under DOLETA's WIA Data Element Validation policy, and the source documents necessary for participation in the Veteran's Employment and Training Services (VETS) program. This significantly hinders service integration under Workforce Center functional alignment. Specifically, the VETS program eligibility allows self-attestation of veteran status with no additional source documentation to support the claim; whereas a veteran that receives intensive or training services under WIA Title I programs must provide either a DD-214, a letter from the Veterans Administration or cross-match with veteran data. To maintain compliance with WIA Title I Data Element Validation and provide veterans with the intensive and training service for which they are eligible with priority, proof of Veteran Status will be required only at the point that intensive and training services are provided. Staff should not deny provision of an intensive service to a veteran who does not have a document verifying veteran status at the time the service is provided. The service must be given and a program note entered indicating that intensive service was provided in keeping with the Veterans Priority of Service policy and that the documentation will be obtained when the veteran returns for additional service.

3. **Priority of Servic*e* for Low Income Individuals** – Section 1 34(d)(4)(E) of WIA stipulates that if a LWIB makes a determination that WIA Adult funds are limited, priority for intensive and training services should be given to recipients of public assistance and other low-income individuals. LWIB's 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 this priority of service determination based on limited funds, 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 by the LWIB, for participants in the WIA Adult Program

4. **Participant Characteristics: Needs and Barriers** – OSL will be used as the data source for participant self-attestation or staff verification (as previously described) pertaining to all demographic characteristics, income status and needs and barriers for individuals receiving ***only staff-assisted core services***. All demographic screens must be reviewed with the individual prior to the receipt of the first staff assisted service. Any characteristics that apply to the individual must be correctly and accurately entered into OSL prior to self-attestation and the entry of a program enrollment (consistent with Section II.1). Specific program eligibility and data validation requirements for core services will be documented in Universal Case notes as reflected in Attachment A.

   NOTE: Individuals that receive intensive and training services must have paper or scanned documentation ***only*** for the characteristics, income status and needs and barriers used to establish eligibility to receive those services. Any characteristics not used to establish eligibility will be verified using OSL self-attestation as the method of documentation.

2. **Disability Status** – Even though OSL inquires about an individual's disability status, additional documentation/validation is not required. Customers are asked to *voluntarily respond* to a question about their disability status to comply with Equal Employment Opportunity programmatic eligibility requirements. If an individual declines to provide information pertaining to a disability it is important the disability question in OSL is set to N/A, not NO.

3. **OSL Pending Enrollment Queue -** Oklahoma Service Link generates potential program eligibilities based on demographic information entered by the participant during self-registration and expanded eligibilities based on additional characteristics entered in to OSL by staff during the intake process. The OSL potential eligibility determination and the ability to enroll a client into one of these programs remain viable for 45 days. At the end of 45 days, the client is considered ineligible and cannot be enrolled. In order to re-determine eligibility, the demographic characteristics must be reviewed once again and updated to ensure any changes in the client's status are taken into consideration.

   When a client is enrolled in a program other than WIA Adult or LE, that enrollment enters into a pending queue for supervisor approval prior to the enrollment becoming finalized. The supervisor should verify the client's eligibility including

uploaded documentation, self-attestation and OSL notes. The supervisor must either approve or deny the enrollment request. When denying the enrollment the supervisor must make a note as to why the enrollment has been denied. The enrollment approval/denial process must take place within 45 days of the enrollment request or the request will be denied by State administrators and eligibility will need to be re-determined.

V. OSL Document Uploader for Paperless Case Management

OSL has been programmed with the ability to store scanned eligibility, data validation and outcome documentation and attach those documents to the virtual case file of a client receiving intensive or training services. It is the intent of this policy to move all documentation normally kept in a paper case file to the client's virtual case file in Oklahoma Service Link. This will be a process. As we venture into the world of virtual case management staff will find more and more uses for the document uploader. Attachment A (Documentation Guide) and Attachment B (OSL Document Upload Desk Aid) will be updated as the need arises without requiring new policy issuance. The updates will be indicated by a date change to the policy and a comment

Any information documented directly in OSL does not need to be printed out and uploaded. OSL is considered to be the source of the documentation.

RECISSIONS: OWDI 01-2011

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

ATTACHMENTS:

Attachment A - Program Eligibility & Data Validation Documentation Guide
Attachment B - OSL Desk Aid
Attachment C - List of Acceptable Documents to Verify Eligibility to Work
Attachment D - Telephone Verification Form - SAMPLE
Attachment E - IEP Client Involvement Statement-SAMPLE
Attachment F – Responses to Comments

INQUIRIES: If you have any questions pertaining to this issuance, please contact
Robyn Coman at (405) 815-5322 robyn_coman@okcommerce.gov for WIA Programs
Jon Eller at (405) 557-7149 jon.eller@oesc.state.ok.us for Labor Exchange Programs
Sandy Slaven at (405) 557-7274 sandy.slaven@oesc.state.ok.us for Trade Adjustment Act.

Adult Program Eligibility/Data Validation Documentation Guide
LE, WIA Adult and Dislocated Worker, NEG and TAA

Attachment A

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Date of Birth	**WIA Adult and Dislocated Worker (DLW)** Prior to co-enrollment and 1st staff-assisted service	The applicant must be age 18 or older at the time of participation in WIA Adult and or DLW programs.	**<u>Core Service Requirement</u>** Verification of Date of Birth (DOB) is required using an acceptable source document to determine age. When verified, staff must: 1. Record and/or verify the "DOB" in the OSL Universal Demographics screen; and 2. Record in OSL Universal Client Notes: • Eligibility Criteria being verified (e.g., DOB); • Date the verification occurred (only if different than data input date); • Source document used with unique information from the document noted; **And** • DOB listed on the document Staff must also verify that the DOB listed on the source document matches the DOB entered in the universal demographics screen **<u>Intensive and Training Service Requirement</u>** The acceptable source document must be scanned and uploaded as a new document as a Universal Documentation Item with the acceptable source document chosen from the dropdown and Eligibility and Validation both selected as the document type. *Note: Some documents may be source documents for more than one data element and need only to be uploaded one time provided all data elements it verifies are indicated prior to the upload.	***MATCH*** **<u>Core Service Requirement</u>** • Universal Client Note* verification of source document from the list below *Case note must include some uniquely identifiable information from the source document used. **<u>Intensive and Training Service Requirement</u>** • Baptismal Record • Birth Certificate • DD-214 (Report of Transfer or Discharge Paper) • Driver's License • Federal, State, or Local Government ID card • Hospital Record of Birth • Passport • Public Assistance/Social Service Records • School Records or School ID • Work Permit • Cross-match with Department of Vital Statistics • Tribal Records • Court Records

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Selective Service Registration	**WIA Adult / DLW and National Emergency Grant (NEG)** Males only Prior to co-enrollment and 1st staff assisted service *Participants over the age of 26 that have not registered for Selective Service are not eligible for WIA services until the Status Information Letter has been completed and designated staff has made a determination of eligibility.	Section 189(h) of WIA requires that a determination of military Selective Service (SS) registration status be made prior to enrollment in WIA Adult / DLW funded programs. Although SS registration must be verified, there is no SS registration requirement for participation in Labor Exchange (LE) All males who are at least 18 years of age and born after December 31, 1959, and who are not in the armed service on active duty, must be registered with the SS. Males 18 -26 years of age that cannot provide proof of Selective Service registration at the point of the 1st staff-assisted service must be referred to the Selective Service for registration. *WIA funded services may not be provided until the individual is registered (services may continue to be provided under LE).* If a male leaves the military before turning 26, he must register with the Selective Service. If a male has passed the age of 26 and has not registered with the selective service, but can provide proof of military service in the form of a DD-214 or current military ID they meet the requirements of selective service registration	**Core Service Requirement** Verification of Selective Service is required using an acceptable source document to determine Selective Service registration. When verified, staff must: 1. Record and/or verify the "SS" in the OSL Universal Demographics screen; and 2. Record in OSL Universal Client Notes: • Eligibility Criteria being verified (e.g., SS); • Date the verification occurred (only if different than data input date); • Source document used with unique information from the document noted. **Intensive and Training Service Requirement** Add a new document to the "Uploaded Documentation Section" of participant's "Case Details" page. Choose the appropriate acceptable source document from the drop down list and choose **"Universal"** as the item type. Choose the type of documentation as **"Eligibility**" and select the data elements that this document upload verifies and upload the document. *Note: Some documents may be source documents for more than one data element and need only be uploaded one time provided the data elements it verifies are indicated prior to the upload.	***SUPPORT*** **Core Service Requirement** • Universal Client Note* verification of source document from the list below *Case note must include some uniquely identifiable information from the source document used. **Intensive and Training Service Requirement** • Selective Service Status Information Letter • Selective Service Registration Card • Selective Service Registration Record (Form 3A) • Selective Service Verification Form • Stamped Post Office Receipt of Registration • US Selective Service Verification (Internet) www.sss.gov The following documents may be used **only if** the participant is past the age of 26 and has not registered with the selective service • DD-214 • Current Military ID

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Eligible to Work in the United States	**WIA Adult, DLW and NEG** Prior to co-enrollment and 1st staff assisted service	The participant must be eligible to work in the United States at the time of participation.	**Core Service Requirement** Participant self-attestation to verify eligible to work status is required prior to co-enrollment into WIA Adult, DLW or NEG programs. Staff reviews eligible to work information with the participant in the demographic snapshot. The participant then self-attests that the status is true and correct by entering their virtual signature on the demographic snapshot. **Intensive and Training Service Requirement** Add a new document to the "Uploaded Documentation Section" of participant's "Case Details" page. Choose the appropriate acceptable source document from the drop down list and choose **"Universal"** as the item type. Choose the type of documentation as **"Eligibility"** and select the data elements or programs that this document upload verifies and upload the document. *Note: Some documents may be source documents for more than one data element and need only be uploaded one time provided the data elements it verifies are indicated prior to the upload.	***MATCH*** **Core Service Requirement** • Self-Attestation by virtual signature **Intensive and Training Service Requirement** • United States Birth Certificate • Native American Tribal Documentation • US Passport • Verification document that satisfies List A of Attachment B • Verification document(s) that satisfy List B **and** C of Attachment B • Naturalization Certificate *NOTE: Documents that have expiration dates must be reviewed at each subsequent enrollment and uploaded as necessary to reflect most current documentation.

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Employment Status at Participation	**WIA Adult, DLW and NEG** Prior to co-enrollment and 1st staff assisted service	Employment Status at Participation can be one of three options: • Employed; • Employed, but received notice of termination or transitioning service member; or • Not Employed. **Employed:** an individual currently working as a paid employee or who works in his or her own business or profession or on his or her own farm, is one who is not working, but has a job or business from which he or she was temporarily absent because of illness, bad weather, vacation, labor-management dispute, or personal reasons, whether or not paid by the employer for time-off, and whether or not seeking another job. **Employed, but Received Notice of Termination of Employment or Military Separation:** an individual who, although employed, either has received notice of termination or the employer has issued a Worker Adjustment Retraining Notification (WARN) or other notice that the facility or enterprise will close, or is a transitioning service member within 12 months of retirement or 24 months of separation. **Not Employed**: an individual who does not meet one of the above conditions.	**Core Service Requirement** Participant self-attestation to verify employment status at registration is required prior to co-enrollment into WIA Adult, DLW or NEG programs. Staff reviews the employment status with the participant in the demographic snapshot. The participant then self-attests that the status is true and correct by entering their virtual signature on the demographic snapshot. **Intensive and Training Service Requirement** Staff must enter a Detailed Program Note verifying that the employment status at registration was reviewed and verified with the participant prior to the receipt of an intensive or training service. Example WIA Program Note: Employment Status at Registration: Date Verified: 05/12/2011 Status: Employed Client states that he is currently working at John's Well Service as a technician.	***SUPPORT*** **Core Service Requirement** • Self-Attestation by virtual signature **Intensive and Training Service Requirement** • Detailed WIA Program Note documenting employment status at program enrollment

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Homeless Individual	**WIA Adult** Prior to co-enrollment and 1st staff assisted service	101 (25)(D) An individual who qualifies as a homeless individual, as defined in subsections (A) AND (C) of the Stewart B. McKinney Homeless Assistance Act. A person who lacks a fixed, regular, adequate night time residence. This includes any individual who has a primary night time residence that is a publicly or privately operated shelter for temporary accommodation; an institution providing temporary residence for individuals intended to be institutionalized; or a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings. This definition does not include an individual imprisoned or detained under an Act of Congress or State law. An individual who may be sleeping in a temporary accommodation while away from home should not, as a result of that alone, be recorded as homeless.	Participant self-attestation to verify homeless status at registration is required prior to co-enrollment into the WIA Adult program. Staff reviews the homeless status with the participant in the Demographic Snapshot. The participant then self-attests that the status is true and correct by entering their virtual signature on the demographic snapshot prior to proceeding to the program enrollment.	***SUPPORT*** • Self-Attestation by virtual signature
Offender	**WIA Adult** Prior to co-enrollment and 1st staff assisted service	If the individual is a person who either is or has been subject to any stage of the criminal justice process for committing a status offense or delinquent act, or requires assistance in overcoming barriers to employment resulting from a record of arrest or conviction for committing delinquent acts, such as crimes against persons, crimes against property, status offenses, or other crimes	Participant self-attestation to verify offender status at registration is required prior to co-enrollment into the WIA Adult program. Staff reviews the offender status with the participant in the demographic snapshot. The participant then self-attests that the status is true and correct by entering their virtual signature on the demographic snapshot prior to proceeding to the program enrollment.	***SUPPORT*** • Self-Attestation by virtual signature

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Eligible Veteran Status	**WIA Adult, DLW, NEG and Trade Adjustment Assistance (TAA)** Prior to co-enrollment and 1st staff assisted service	The individual is a person who served in the active U.S. military, naval, or air service for a period of less than or equal to 180 days, and who was discharged or released from such service under conditions other than dishonorable. **Or** The individual served on active duty for a period of more than 180 days and was discharged or released with other than a dishonorable discharge; or was discharged or released because of a service connected disability; or as a member of a reserve component under an order to active duty pursuant to section 167 (a), (d), or, (g), 673 (a) of Title 10, U.S.C., served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge. **Or** The individual is a person who is (a) the spouse of any person who died on active duty or of a service connected disability, (b) the spouse of any member of the Armed Forces serving on active duty who at the time of application for assistance under this part, is listed, pursuant to 38 U.S.C 101 and the regulations issued there under, by the Secretary concerned, in one or more of the following categories and has been so listed for more than 90 days: (i) missing in action; (ii) captured in the line of duty by a hostile force; (iii) forcibly detained or interned in the line of duty by a foreign government or power; or (c) The spouse of any person who has a total disability permanent in nature resulting from a service-connected disability or the spouse of a veteran who died while a disability so evaluated was in existence.	**Core Service Requirement** Participant self-attestation to verify Eligible Veterans Status is required prior to co-enrollment into WIA Adult, DLW, NEG or TAA programs. Staff reviews the veteran's status with the participant in the demographic snapshot. The participant then self-attests that the status is true and correct by entering their virtual signature on the demographic snapshot prior to proceeding to the program enrollment. **Intensive and Training Service Requirement** Add a new document to the "Uploaded Documentation Section" of participant's "Case Details" page. Choose the appropriate acceptable source document from the drop down list and choose "**Universal**" as the item type. Choose the type of Documentation as "**Validatio**n" and select the data elements that this document upload verifies and upload the document. *Note: Some documents may be source documents for more than one data element and need only be uploaded one time provided the data elements it verifies are indicated prior to the upload.	***SUPPORT*** **Core Service Requirement** • Self-Attestation by virtual signature **Intensive and Training Service Requirement**** • DD-214 • Letter from the Veterans Administration • Cross-Match with Veterans Data **If a source document is not available at the time an intensive service is provided a program note must be entered indicating that the service was provided in keeping with the Veterans Priority of Service Policy and that the documentation will be obtained when the veteran returns for additional service

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Date of Actual Qualifying Dislocation	**WIA DLW and NEG** Prior to Program Enrollment	The date of separation or dislocation from employment. This date is the last date of employment at the dislocation job.	Participant self-attestation to verify the last day worked as the Date of Qualifying Separation required prior to enrollment in WIA DLW and NEG. Staff reviews the date of separation with the participant in the lay-off details of the demographic snapshot. The participant then self-attests that the Date of Qualifying Separation is true and correct by entering their virtual signature on the demographic snapshot prior to proceeding to the program enrollment.	***MATCH*** • Self-Attestation by virtual signature
Dislocated Worker (DLW) (Category 1)	**WIA DLW** Prior to DLW Program Enrollment	**Category 1: Recently Dislocated** The individual has been terminated or laid off, or has received a notice of termination or layoff from employment; **And** The individual is eligible for, or has exhausted entitlement to, unemployment compensation; or has been employed for a duration sufficient to demonstrate attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that was not covered under a State unemployment compensation law; **And** The individual is unlikely to return to a previous industry or occupation	Add a new document to the "Uploaded Documentation Section" of participant's "Case Details" page. Choose the appropriate acceptable source document from the drop down list and choose **"Enrollment"** as the item type. Choose the type of Documentation as **"Eligibility"** and select the data elements or programs that this document upload verifies and upload the document. It is important to keep in mind that some categories of DLW will require more than one document to verify eligibility. *Note: Some documents may be source documents for more than one data element and need only be uploaded one time provided the data elements it verifies are indicated prior to the upload.	***SUPPORT*** (3 documents required, 1 from each criteria) **Criteria 1:** • Notice of Layoff, • TAA Certification, • Documented telephone verification with employer using telephone verification form **Criteria 2:** • Current unemployment insurance verification • Current RES/ REA enrollment **Criteria 3:** • Current Statewide/Local Labor Market Information that indicates lack of industry/occupation availability, • Doctor statement indicating applicant's inability to return to previous industry/occupation due to physical limitations. • Current RES/ REA enrollment

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Dislocated Worker (DLW) (Category 2)	**WIA DLW** Prior to DLW Program Enrollment	**Category 2: Plant Closure / Substantial Layoff** Individual has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility, or enterprise; or the individual is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or for purposes of eligibility to receive services other than training services, intensive services, or supportive services, is employed at a facility at which the employer has made a general announcement that such facility will close.	Add a new document to the "Uploaded Documentation Section" of participant's "Case Details" page. Choose the appropriate acceptable source document from the drop down list and choose **"Enrollment"** as the item type. Choose the type of Documentation as **"Eligibility"** and select the data elements or programs that this document upload verifies and upload the document. It is important to keep in mind that some categories of DLW will require more than one document to verify eligibility. *Note: Some documents may be source documents for more than one data element and need only be uploaded one time provided the data elements it verifies are indicated prior to the upload.	***SUPPORT*** (1 document required) • Written Employer Statement • Notice of Layoff • Media Announcement with employment verification • TAA Certification • Documented telephone verification with employer using telephone verification form • WARN Notices listing affected employees

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Dislocated Worker (DLW) (Category 3)	**WIA DLW** Prior to DLW Program Enrollment	**Category 3: Formerly Self Employed** The individual was self-employed (including employment as a farmer, a rancher, or a fisherman); and is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters.	Add a new document to the "Uploaded Documentation Section" of participant's "Case Details" page. Choose the appropriate acceptable source document from the drop down list and choose **"Enrollment"** as the item type. Choose the type of Documentation as **"Eligibility"** and select the data elements or programs that this document upload verifies and upload the document. It is important to keep in mind that some categories of DLW will require more than one document to verify eligibility. *Note: Some documents may be source documents for more than one data element and need only be uploaded one time provided the data elements it verifies are indicated prior to the upload.	***SUPPORT*** (2 documents required, 1 from each criteria) **Criteria 1:** • Bankruptcy documents listing both name of the business and the applicant's name • Business License • Most Recent Tax Return (Schedule SE) • Articles of incorporation for the business listing the applicant as a principal **Criteria 2:** • Documentation showing disaster caused business closure • Documentation showing poor economic conditions in the community or surrounding area caused business closure

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Displaced Homemaker	**WIA DLW** Prior to DLW Program Enrollment	To be eligible as a WIA Displaced Homemaker under this Category, the participant must meet **both** of the criteria below: The term "displaced homemaker" means an individual who has been providing unpaid services to family members in the home, **And** Has been dependent on the income of another family member but is no longer supported by that income; and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.	Add a new document to the "Uploaded Documentation Section" of participant's "Case Details" page. Choose the appropriate acceptable source document from the drop down list and choose **"Enrollment**" as the item type. Choose the type of Documentation as "**Eligibility"** and select the data elements or programs that this document upload verifies and upload the document. *Note: Some documents may be source documents for more than one data element and need only be uploaded one time provided the data elements it verifies are indicated prior to the upload.	***SUPPORT*** (2 documents required, 1 from each criteria) **Criteria 1:** • Divorce Papers • Court Records • Bank Records • Spouse's Layoff Notice • Spouse's Death Record **AND** **Criteria 2:** • Documented telephone verification with employer using telephone verification form • Current unemployment insurance verification • Pay stubs • Public Assistance Records
NEG Project Number	**NEG** Prior to NEG Enrollment	The Project I.D. Number (NEG enrollment number) where the participant receives services financially assisted under a National Emergency Grant. (For example Oklahoma projects would be numbered in the following format; OK12, OK13, etc.)	Select the appropriate NEG enrollment number from the dropdown box Universal Demographic Dislocated Worker screens when the participant is to receive services financially assisted under a National Emergency Grant	***MATCH*** • The NEG enrollment number must correctly reflect the NEG Project ID number assigned by the U.S. DOL NEG Grant Officer.

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Date of Most Recent Qualifying Separation	**TAA** Prior to TAA Program Enrollment	The most recent date of separation from trade-impacted company that qualifies the participant to receive benefits and/or services under the Trade Act.	Staff verification of the date of most recent qualifying separation (i.e., last day worked) using an acceptable source document. **And** Add a new document to the "Uploaded Documentation Section" of participant's "Case Details" page. Choose the appropriate acceptable source document from the drop down list and choose **"Enrollment"** as the item type. Choose the type of Documentation as **"Eligibility"** and select the data elements or programs that this document upload verifies and upload the document.	***MATCH*** • Lay-Off List • Rapid Response List • Notice of Termination • Letter from Employer • UI Separating Employer Inquiry • OESC Form 856
TAA Petition Number	**TAA**	The petition number of the certification which applies to the individual's worker group. If there is more than one petition number, record the petition number of the program from which the training will be paid.	Staff verification of TAA Petition Number at participation using an acceptable source document. When verified, staff must: 1. Record and/or verify "Plant Closure or Major Layoff" in the OSL Universal Demographic Dislocated Worker screen; and 2. Complete the Layoff Details screen including the TAA petition number found on one of the acceptable source documents.	***MATCH*** • Determination of Eligibility Form • DOLETA Website Verification www.doleta.gov/tradeact • Worker Group Certification • TAA eligibility form issued by State Office or other states

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
TAA Application Date	**TAA**	The date of which the individual first applied for Trade Act services/benefits under the applicable certification.	Staff must enter the date from an acceptable source document verifying the date the participant first applied for TAA services in the Application Date field when adding the TAA enrollment. **And** Add a new document to the "Uploaded Documentation Section" of participant's "Case Details" page. Choose the appropriate acceptable source document from the drop down list and choose **"Enrollment"** as the item type. Choose the type of Documentation as **"Eligibility"** and select the data elements or programs that this document upload verifies and upload the document.	***MATCH*** • OESC Form 856
Date Received First Basic Trade Readjustment Payment Allowance (TRA)	**TAA**	The first date upon which the participant received basic TRA payment.	Verification will be done at the State Level using UI screens. Local staff verification is not required.	***SUPPORT*** • Cross Match with UI Claims Records (G-Link)

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Waiver from Training Requirement	**TAA**	A participant may have the requirement to be enrolled in training waived if it is determined that it is not feasible or appropriate for the worker due to one of the following reasons: 1. Recall – The participant has been notified that they will be recalled from the firm from which the separation occurred. 2. Marketable Skills – The participant possesses marketable skills for suitable employment and there is a reasonable expectation of employment at equivalent wages in the foreseeable future. 3. Retirement – The participant is within 2 years of meeting all requirements for entitlement to either Social Security Benefits or a private pension sponsored by an employer or labor union. 4. Health - The participant is unable to participate in training due to the health of the worker, except that shall not exempt a participant from requirements to be able, available and to actively seek work under Federal or State unemployment compensation laws. 5. Enrollment Unavailable – The first available enrollment date for the approved training of the worker is within 60 days after the date of determination or, if later there are extenuating circumstances for the delay in enrollment 6. Training Not Available – Approved training is not reasonably available to the worker from either governmental agencies or private sources.	Detailed waiver information must be recorded in OSL on the Service and Training Plan by selecting the reason for the waiver indicated using the dropdown box and with the entry of a detailed Program Note. Note: Waivers from training are entered by state office staff only.	***SUPPORT*** • Service and Training Plan **AND** • Detailed Program Note

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Self-Sufficiency Local Boards must establish eligibility verification criteria and acceptable source document.	**WIA Adult/DLW** Participants employed at enrollment only. Prior to 1st intensive service	WIA requires a determination of self-sufficiency as a condition for providing intensive services to individuals *employed at the time of enrollment* as an eligibility requirement. Local boards must set criteria for determining whether employment leads to self-sufficiency. [Reference: Title 20 CFR Section 663.230]	The "Low Income Monetary Determination" in the demographic snapshot must be completed. The acceptable source document supporting Self-Sufficiency is scanned and uploaded to appropriate program by choosing **"Enrollment"** as the item type. Choose the type of Documentation as **"Eligibility"** and select the data elements or programs that this document upload verifies and upload the document. The acceptable Board-defined source document verifying determination of self-sufficiency must be scanned and uploaded to the appropriate program enrollment by choosing **"Enrollment"** as the item type. Choose the type of Documentation as **"Eligibility"** and select the data elements or programs that this document upload verifies and upload the document.	***SUPPORT*** **Core Service Requirement** • None **Intensive Service Requirement** • Self-Sufficiency Documentation as required by LWIB policy

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
EEO Statement	**WIA Adult/ DLW/ TAA/ NEG**	It is against the law for this recipient of federal financial assistance to discriminate on the following basis: • Against any individual in the United States, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief and; • Against any beneficiary of programs financially assisted under Title I of the Workforce Investment Act of 1998 (WIA), on the basis of the beneficiary's Citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his or her participation in any WIA Title I-financially assisted program or activity. The recipient must not discriminate in any of the following areas: • Deciding who will be admitted, or have access, to any WIA Title I-financially assisted program or activity; • Providing opportunities in, or treating any person with regard to, such a program or activity; or • Making employment decisions in the administration of, or in connection with, such a program or activity.	The receipt of the EEO information must be verified in Oklahoma Service Link prior to a program enrollment.	***SUPPORT*** • Verification of Oklahoma Service Link EEO/Grievance Statement on Enrollment Details Screen

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Grievance Acknowledgment	**WIA Adult/ DLW/ TAA/ NEG**	Each local area, State and direct recipient of funds under Title 1 of WIA except for Job Corps, must establish and maintain a procedure for grievances and complaints and make reasonable efforts to assure that the information be understood by affected individuals, including youth and those who are limited-English speaking individuals.	The receipt of the EEO/Grievance information must be verified in Oklahoma Service Link prior to a program enrollment. The acceptable Board-defined source document notifying the participant of grievance procedures in accordance with LWIB policy must be scanned and uploaded to the appropriate program enrollment by choosing **"Enrollment"** as the item type. Choose the type of Documentation as **"Eligibility"** and select the data elements or programs that this document upload verifies and upload the document.	***SUPPORT*** • Verification of Oklahoma Service Link EEO/Grievance Statement on Enrollment Details Screen **OR** • Local WIB developed Form
Release of Confidential Information	**WIA Adult/ DLW/ TAA/ NEG**	Required to allow agencies, LWIB staff and service providers to share client information across program	**Core and Intensive Service Requirement** Participant self-attestation to the release of confidential information is done at the time of account creation **Training Service Requirement** The acceptable Board-defined source document verifying that the participant agrees to the release of confidential information must be scanned and uploaded to the appropriate program enrollment by choosing **"Enrollment"** as the item type. Choose the type of Documentation as **"Support"** and select the data elements or programs that this document upload verifies and upload the document.	***SUPPORT*** • Local WIB developed Form

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Low Income/Family Size **Only if Local Area has established a "priority of service" policy** If the local board determines **funds for the WIA Adult program are limited**, then *intensive and/or training services* must be prioritized for current recipients of public assistance and other low-income individuals. **Note:** The LWIB can differentiate between determining priority of service at the intensive or training service level.	**Adult** Prior to 1st intensive or training service	"Low Income Individual" An individual who— (A) receives, or is a member of a family that receives, cash payments under a Federal, State, or local income-based public assistance program; (B) received an income, or is a member of a family that received a total family income, for the 6-month period prior to application for the program involved (exclusive of UI compensation, child support payments, payments described in subparagraph (A) , and old-age and survivors insurance benefits received under section 202 of the SS Act that, in relation to family size, does not exceed the higher of— (i) the poverty line, for an equivalent period; or (ii) 70 percent of the lower living standard income level, for an equivalent period; (C) Is a member of a household that receives (or has been determined within the 6-month period prior to application for the program involved to be eligible to receive) food stamps pursuant to the Food Stamp Act of 1977; (D) Qualifies as a homeless individual, as defined in subsections (a) and (c) of section 103 of the Stewart B. McKinney Homeless Assistance Act; (E) Is a foster child on behalf of whom State or local government payments are made; or In cases permitted by regulations promulgated by the Secretary of Labor, is an individual with a disability whose own income meets the requirements of a program described in subparagraph (A) or (B), but who is a member of a family whose income does not meet such requirements. "Family" Two or more persons related by blood, marriage or decree of court, who are living in a single residence, ***and*** are included in one or more of the following categories. (A) A husband, wife, and dependent children (B) A parent or guardian and dependent children (C) A husband and wife	**Core Service Requirement** Participant self-attestation to verify Low Income Status and Family size is required prior to co-enrollment into WIA Adult. Staff reviews the Low Income Status with the participant in the demographic screen and enters the total Family Size in the household. The participant then self-attests that the income status and family size is true and correct by entering their virtual signature on the demographic snapshot prior to proceeding to the program enrollment. The low income monetary determination does not need to be completed for core service only. ***Intensive and/or Training Service Requirement** If the LWIB has established policy that priority of service for low income is effective at the intensive or training service level, the "Low Income Monetary Determination" in the demographic snapshot must be completed. The acceptable source document supporting Low Income is scanned and uploaded to appropriate program by choosing **"Enrollment"** as the item type. Choose the type of Documentation as **"Eligibility"** and select the data elements or programs that this document upload verifies and upload the document.	***SUPPORT*** **Core Service** • Self-Attestation by virtual signature **Intensive/Training Service Requirement** Participant self attests to Family Size prior to enrollment by entering their virtual signature in the demographic information. **AND** Supporting document(s) from list below to establish the family income. • Alimony Agreement, • Award Letter from Veterans Administration • Bank Statements • Compensation Award Letter • Employer Statement • Family or Business Financial records • Pay stubs • Pension Statement • Quarterly Estimated Tax for Self-Employed Persons • Current Unemployment Insurance Verification • Social Security Disability Insurance (SSDI) • Social Security Benefits (SSI) * Required only when "priority of service" for low income individuals has been established. *Must be in compliance with LWIB policy.

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Temporary Assistance to Needy Families (TANF) Note: This is used solely to determine a characteristic of a participant and is NOT meant to be part of a low income determination	**WIA Adult / DLW** 1st Staff Assisted Service	*An individual who is listed on the welfare grant or has received cash assistance or other support services from the TANF agency in the last six months prior to participation in the program *This definition is for data validation of a characteristic and does not meet the requirement for low income. TANF used for low income eligibility must be current.	**Core Service Requirement** Participant self-attestation to TANF Status required prior to co-enrollment into WIA Adult and/or DLW. Staff reviews the TANF Status with the participant in the demographic snapshot. The participant then self-attests that the status is true and correct by entering their virtual signature on the demographic snapshot prior to proceeding to the program enrollment. **Intensive and/or Training Service Requirement** The acceptable source document supporting TANF Status is scanned and uploaded to appropriate program enrollment by choosing **"Enrollment"** as the item type. Choose the type of Documentation as **"Eligibility"** and select the data elements or programs that this document upload verifies and upload the document.	***SUPPORT*** **Core Service Requirement** • Self-Attestation by virtual signature **Intensive and Training Service Requirement** Supporting Document(s) from list below • TW-3 • TANF Public Assistance Records

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method Documentation Requirements**	**Acceptable Source Document**
Other Public Assistance/ General Assistance Note: This is used solely to determine a characteristic of a participant and is NOT meant to be part of a low income determination	**WIA Adult / DLW** 1st Staff Assisted Service	*Participant that is receiving or has received in the six months prior to participation, cash assistance or other support services from one of the following: • General Assistance (GA) (State/local government); • Refugee Cash Assistance (RCA); • Supplemental Security Income (SSI-SSA Title XVI); or • Food Stamp Assistance. *This definition is for data validation of a characteristic and does not meet the requirement for low income. Other Public Assistance when used for low income eligibility must be current	**Core Service Requirement** Participant self-attestation to Other Public Assistance/General Assistance is required prior to co-enrollment into WIA Adult and/or DLW. Staff reviews the Other Public Assistance/General Assistance Status with the participant in the demographic snapshot. The participant then self-attests that the status is true and correct by entering their virtual signature on the demographic snapshot prior to proceeding to the program enrollment. **Intensive and/or Training Service Requirement** An acceptable source document supporting Other Public Assistance/General Assistance Status is scanned and uploaded to appropriate program enrollment by choosing **"Enrollment"** as the item type. Choose the type of documentation as **"Eligibility"** and select the data elements or programs that this document upload verifies and upload the document.	***SUPPORT*** **Core Service Requirement** • Self-Attestation by virtual signature **Intensive and Training Service Requirement** Supporting Document(s) from list below • Copy of Public Assistance Check • State issued Medical Card • Refugee Assistance Records • Copy of Authorization to Receive Public Cash Assistance • Telephone Verification Form/ Public Assistance • TANF Public Assistance Records

Program Participation and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method and OSL Documentation Required**	**Acceptable Source Document**
Date of Program Enrollment / First Staff Assisted Core Service	**WIA Adult, DLW, NEG and TAA**	The date of program enrollment must be the same as the date that the participant began receiving any staff assisted core services in a physical location funded by the program following the determination of eligibility.	The Program Enrollment Date must be recorded on the OSL Enrollment screen at the time of the first staff assisted service. Staff must ensure that the program enrollment date recorded in OSL reflects the actual date the first staff assisted service was provided and recorded in OSL Service and Training Plan or Quick Service. No further documentation outside of OSL is required.	***MATCH*** • OSL Service & Training Plan • OSL Quick Service • OSL Enrollment Screen
Date of Exit	**WIA Adult, DLW, LE, NEG and TAA**	The date on which the last service funded by the program or a partner program is received by the participant. Once a participant has not received any services funded by the program or a partner program for 90 consecutive calendar days and has no gap in service and is not scheduled for future services, the date of exit is applied retroactively to the last day on which the individual received a service funded by the program or a partner program. *Self Service will prevent a participant from exiting all programs.	Staff must accurately record and keep updated in OSL all services received or scheduled and the end date(s) associated with all services. When the individual's OSL record indicates that no service funded by any program (LE, WIA, NEG,TAA,)was recorded or scheduled for a period of greater than 90 days and there is no gap in services recorded, OSL will automatically exit the individual from all common enrollment programs recording the date of last service received as the common exit date of all programs.	***MATCH*** • OSL Service & Training Plan • OSL Quick Service Screen • OSL Program Details Screen
Other Reasons for Exit	**WIA Adult, DLW and NEG**	Participant is unable to continue receiving any program service due to any of the following: • Institutionalized; residing in • Health/medical; • Deceased; • Family Care; • Reservists called to active duty that chooses not to return to WIA; or • Retirement All of the above circumstances will exclude the participant from performance calculations with the exception of retirement. Individuals who exit because of retirement are included in performance calculations.	Staff must record in OSL Exit Questions Screen the Other Reason for Exit when participant is not expected to return to the program in 90 days or less. Staff must record detailed backup information in OSL Program Notes.	***SUPPORT*** • OSL Exit Questions and detailed Program Note

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method and OSL Documentation Required**	**Acceptable Source Document**
Date of First Intensive Service	**WIA Adult and DLW**	The date the participant began receiving intensive services.	Staff must ensure that the actual start date of the first intensive service is accurately recorded in OSL to reflect the actual date the service was provided. OSL recognizes an intensive service based on the program service type associated with the particular service recorded. Recording the service and the actual start date of the service in the OSL Service and Training Plan or OSL Quick Service is all that is needed for Data Element Validation. No further documentation is required to verify date of first intensive service.	***MATCH*** • OSL Service & Training Plan • OSL Quick Service • OSL Enrollment Screen
Date of Entered Training and Date Completed or Withdrew From Training	**WIA Adult, DLW, NEG and TAA**	The date the participant began receiving training services and the date the participant completed or withdrew from training services.	Staff must ensure that the actual start and end date of the training service is accurately recorded in OSL Service and Training Plan. OSL recognizes a training service based on the program service type associated with the particular service recorded. Any training service entry in OSL must provide the training provider and the specific type of training to be provided, and status of the training service as well as the actual start and end dates of the training.	***MATCH*** • OSL Service and Training Plan

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method and OSL Documentation Required**	**Acceptable Source Document**
Type of Training Service	**WIA Adult, DLW, NEG and TAA**	Training services may be made available to employed and unemployed adults and dislocated workers who have met the eligibility requirement for intensive service, have received at least on intensive service and have been determined to be unable to obtain or retain employment through such services. Training services may include: • On-the-Job training • Skill Up-grading and Retraining • Entrepreneurial Training • Adult Basic Education (ABE) or English as a Second Language (ESL) in Combination with Training • Customized Training • Other Occupational Skills Training	Staff must ensure that the actual start date of the Training Service is accurately recorded in the OSL. Any training service entry in OSL Service and Training Plan must record the name of the training provider (where the training is taking place) and the specific type of training to be provided as well as the actual start and end dates of the training.	***SUPPORT*** • OSL Service and Training Plan • Regular program notes pertaining to the participants progress in training.
Gap in Service	**WIA Adult/ DLW/ NEG/ TAA**	A participant should not be considered as exited if there is a gap in service of greater than 90 days due to one of the following circumstances: • Delay before the beginning of training; • Health/medical condition or providing care for a family member with a health/medical condition • Temporary move from the area that prevents the individual from participating in services, including National Guard or other related military service The gap must be related to one of the three circumstances identified above and last no more than 180 consecutive calendar days from the date of the most recent service. An additional gap of up to 180 days may be granted to resolve the issues that prevent the participant from completing program services that lead to employment.	To enter a "Gap in Service" 1. A program service that is greater than 90 days in the future must be scheduled in the service and training plan. 2. The gap itself must be entered in the "Schedule a Service Gap" link in the participant's program enrollment with a detailed reason for the gap entered in the program notes.	***SUPPORT*** • Enter Scheduled Service in Service and Training Plan • Schedule Gap in Program Enrollment • Enter Detailed Program Note

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method and OSL Documentation Required**	**Acceptable Source Document**
Individual Employment Plan Development (IEP)	**WIA Adult and DLW**	The individual employment plan is an ongoing strategy jointly developed by the participant and the case manager that identifies the participant's employment goals, the appropriate achievement objectives, and the appropriate combination of services for the participant to achieve the employment goals. (CFR 663.245)	*Staff must ensure that the OSL employment plan is completed in coordination with the participant and based on current state and/or LWIB policy* Staff must ensure that all source documents used in the development of the IEP are scanned and uploaded to the appropriate program enrollment by choosing **"Enrollment"** as the item type. Choose the type of documentation as **"Eligibility"** and select the data elements or programs that this document verifies and scan and upload the document.	***SUPPORT*** • LWIB developed IEP Client Involvement Statement • Comprehensive Assessment Documentation • Services provided in support of the IEP must be documented in the OSL Service and Training Plan with a correlating detailed program note
Individual Training Account (ITA) Documentation	**WIA Adult and DLW**	Individual Training Account (ITA) was established.	Staff must record the training service associated with the ITA in the OSL Service and Training Plan including the name of the training provider, the ONET code pertaining to the training and all other required fields in addition to recording OSL Detailed Program Notes pertaining to the date an ITA was established. Staff must ensure that ITA documentation required by current state/ LWIB policy is scanned and uploaded to the appropriate enrollment. The acceptable source document supporting the ITA is scanned and uploaded to appropriate program by choosing **"Enrollment"** as the item type. Choose the type of Documentation as Support and select the data elements or programs that this document upload verifies and upload the document.	***Support Documentation Must include each of the following documents*** • COTF • Acceptance Letter to Training or other Proof of Enrollment • ITA Agreement/ Contract with participant • Other LWIB Defined Documents • ITA Contract Modification (if applicable) Services provided in support of the ITA must be documented in the OSL Service and Training Plan with a correlating detailed program note

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method and OSL Documentation Required**	**Acceptable Source Document**
Training Voucher	**WIA Adult, DLW and NEG**	Training related cost maybe made in a variety of ways through financial institutions vouchers, or other appropriate methods. Payments may also be made incrementally; through payment of a portion of the costs at different points in the training course.	Staff must ensure that the cost of training documentation required by current state/ LWIB policy is scanned and uploaded to the appropriate enrollment The acceptable source documents supporting the cost of training is scanned and uploaded to appropriate program by choosing **"Enrollment"** as the item type. Choose the type of Documentation as Support and select the data elements or programs that this document upload verifies and upload the document.	***Support Documentation Must include each of the following documents*** • COTF • Training Voucher **AND** • All local board required documentation to support Training Voucher including the ITA Account Balance form* *Any discrepancy between the Training Voucher and Invoice must be documented in the note section of the uploaded document.
Supportive Services	**WIA Adult, DLW and NEG**	Supportive services for adults and dislocated workers are defined at WIA sections 101(46) and 134(e)(2) and (3). They include services such as transportation, child care, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under WIA title I when they are unable to obtain supportive services through other programs.	Staff must ensure that the Supportive Service documentation required by current state/ LWIB policy is scanned and uploaded to the appropriate enrollment The acceptable source documents supporting the Supportive Service is scanned and uploaded to appropriate program by choosing **"Enrollment"** as the item type. Choose the type of Documentation as Support and select the data elements or programs that this document upload verifies and upload the document	***Support Documentation Must include each of the following documents if applicable*** • Supportive Service Request / Voucher • Verification that No Other Sources Are Available **AND** • All local board required documentation required for Supportive Service

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method and OSL Documentation Required**	**Acceptable Source Document**
Needs Related Payments	**WIA Adult and DLW**	WIA Section 134 (e)(3) provided the LWIA's the authority to make policy and administrative provisions to tailor services to meet the needs of the local community. Needs Related Payments may be provided to eligible Adults and Dislocated Workers to allow them to participate in training when other funds are not available or have been exhausted. Needs Related Payments are not entitlements and must be show to be necessary to the success of the participant's training plan, and beyond the ability of the participant to pay.	Staff must ensure that the Needs Related Payment documentation required by current state/ LWIB policy is scanned and uploaded to the appropriate enrollment The acceptable source documents supporting the Need Related Payments is scanned and uploaded to appropriate program by choosing **"Enrollment"** as the item type. Choose the type of Documentation as Support and select the data elements or programs that this document upload verifies and upload the document	***Required Documentation*** • NRP, Voucher, purchase order, invoice, receipts • NRP, Tracking Document • NRP,UI screen showing benefit exhaustion or ineligibility • NRP, Verification of training enrollment, participation, grades or completion • NRP determination form signed by customer and staff • NRP Weekly verification of income and training • NRP WIB required documentation
Work Experience	**WIA Adult and DLW**	Work Experience (Section 663.200 (b)) is a planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience may be paid or unpaid, as appropriate. A work experience workplace may be in the private for profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists.	Staff must ensure that the Work Experience documentation required by current state/ LWIB policy is scanned and uploaded to the appropriate enrollment. The acceptable source documents supporting the Work Experience is scanned and uploaded to appropriate program by choosing **"Enrollment"** as the item type. Choose the type of Documentation as Support and select the data elements or programs that this document upload verifies and upload the document	***Support Documentation*** ***Must include each of the following documents*** • Work Site Agreement • Trainee Plan • I-9 and W-4 forms • Time Sheets • Work Experience Orientation • Supervisor Orientation • Copies Proof of Payment to Participant

General Eligibility and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method and OSL Documentation Required**	**Acceptable Source Document**
On the Job Training (OJT)	**WIA Adult and DLW**	Training by an employer that is provided to a paid participant while engaged in productive work in a job that: (A) Provides knowledge or skills essential to the full and adequate performance of the job; (B) Provides reimbursement to the employer of up to 50 percent of the wage rate of the participant, for the extraordinary costs of providing the training and additional supervision related to the training; and (C) Is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate.	Staff must ensure that the On Job Training documentation required by current state/ LWIB policy is scanned and uploaded to the appropriate enrollment The acceptable source documents supporting the OJT is scanned and uploaded to appropriate program by choosing **"Enrollment"** as the item type. Choose the type of Documentation as Support and select the data elements or programs that this document upload verifies and upload the document	***Required Documentation*** ***Locally Developed Forms not limited to but to include the following:*** • Pre-Award Review Form • OJT Contract including Skills Gap Analysis • Employer/Employee Orientation Documentation • Proof of Workers Compensation Insurance • Any Modifications to the training contract • Training Time Documentation • Training Payment Invoices • Proof of Payment of Wages • Monthly Evaluation • Monitoring Reports • Documentation of completion or verification of participant's failure to complete training.

Outcomes and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method and OSL Documentation Required**	**Acceptable Source Document**
Type of Recognized Educational or Occupational Certificate or Diploma, Degree Attained or Licensure	**WIA Adult and DLW who received training services**	Type of Recognized Educational, Occupational, Certificate, Diploma, or Degree Attained such as: • High School Diploma/GED • AA or AS Diploma/Degree • BA or BS Diploma/Degree • Occupational Skills Licensure • Occupational Skills Certificate or Credential • Other Recognized Educational or Occupational Skill Certificate/Credential	Staff must record in OSL Outcomes screen when a participant receives any type of Recognized Educational/Occupational/Certificate/Diploma /Degree or licensure. This may occur during program participation or up to the third quarter after the client exits. **And** A detailed Program Note is entered citing type of attainment and date attained. **Or** The acceptable source document supporting the attainment is scanned and uploaded to appropriate program by choosing "Enrollment" as the item type. Choose the type of Documentation as Validation and select the data elements or programs that this document upload verifies and upload the document.	***SUPPORT*** • OSL Program Outcomes **AND** • Detailed Program Note **OR** • Certificate • Diploma • Transcript • Licensure
Entered Training-Related Employment Upon Exit	**WIA Adult and DLW who received training services**	If a participant has received any training service the results of the training service must be recorded in the Exit Detail screen of the WIA Program Details at the time of program exit. .	Staff must record in the OSL Exit Questions the O*NET code of the employment obtained and whether or not the employment was related to the training service(s) the participant received. Staff should utilize the "WIA Recently Exited" report included in the OSL management reports to identify participants that must have the exit questions recorded.	***SUPPORT*** • OSL Program Exit Questions

Outcomes and Data Validation Documentation Requirements				
Eligibility/ Validation Criteria	**Program**	**Eligibility/Validation Requirements**	**Validation Method and OSL Documentation Required**	**Acceptable Source Document**
Employed in 1st, 2nd, and 3rd Quarters after exit	**WIA Adult, DLW, NEG, TAA and LE**	Local action required when supplemental data is the only source for a positive employment outcome.	OSL automatically captures/records information from the quarterly UI Wage Record System, Wage Record Interchange System, and the Federal Employment Data Exchange System (FEDES), and validation is conducted administratively by OESC. For participants whose employment outcomes are only reported from supplemental data, staff must record Supplemental Wage data in OSL Program Details Wage screen.	***MATCH*** • OSL WIA Program Details Wage Link • UI Quarterly Wage Record System • Wage Record Interchange System • FEDES
Source of Supplemental Wage Data	**WIA Adult, DLW, NEG, TAA and LE**	When supplemental data is the only source for a positive employment outcome.	Staff must record supplemental wage data in OSL Wage screen after participant exits. In addition, an OSL Universal Case note must be recorded indicating the supplemental source of data used to verify employment, the name of the employer, the date hired, the wage rate and number of hours of work per week.	***SUPPORT*** • OSL WIA Wage Screen **AND** • OSL Program Note

Oklahoma Service Link Document Upload Desk Aid

Attachment B

Eligibility/Validation Criteria	Document Being Uploaded	Document Type
Date of Birth	Driver's License, Birth Certificate, DD 214, Passport (See additional options Attachment A).	Choose the appropriate acceptable source document from the drop down list: Universal Eligibility **&** Validation
Selective Service Registration	DD 214, Current Military ID, Selective Service Registration Card, Internet Selective Service Verification (See additional options Attachment A).	Universal Eligibility
Eligible to Work in the United States	U.S. Birth Certificate, U.S. Passport, Verification document that satisfies List A OR List B and C. (Attachment B).	Universal Eligibility
Eligible Veteran Status	DD-214, Letter from the Veterans Administration, Cross-Match with Veterans Data.	Universal Validation
DLW	Notice of Layoff, TAA Certification, Telephone Verification, Most Recent Tax Return (Schedule SE), Bankruptcy Documents	Enrollment Eligibility
Displaced Homemaker	Divorce Papers, Court Records, Spouses Lay-off Notice AND Telephone Verification with Employer, Current UI Verification, Pay Stubs, Public Assistance Records	Enrollment Eligibility
TAA Lay-off Date, Petition Number, Application Date	Lay –off list, Notice of Termination, OESC Form 856, Determination of Eligibility Form (See detailed options Attachment A)	Enrollment Eligibility
Self-Sufficiency	Self-Sufficiency Documentation as required by LWIB policy.	Enrollment Eligibility
Grievance	Local WIB developed form.	Enrollment Supporting
Release of Confidential Information	Local WIB developed form.	Enrollment Supporting
Low Income	See Acceptable Source Documents Attachment A	Enrollment Eligibility
TANF, SNAP (Food Stamps)	TW-3. TANF Public Assistance Record, Public Assistance Verification/Telephone (See additional options Attachment A).	Enrollment Eligibility

Eligibility/Validation Criteria	Document Being Uploaded	Document Type
Other Public Assistance/General Assistance	Copy of Public Assistance Check, State issued Medical Card, Refugee Assistance Records, Copy of Authorization to Receive Public Cash assistance, Telephone Verification Form/Public Assistance, TANF Public Assistance Records	Enrollment Eligibility
IEP (Individual Employment Plan)	Client Involvement Statement, Comprehensive Assessment Documentation.	Enrollment Eligibility
ITA (Individual Training Account)	Proof of PELL Grant application, COTF, Acceptance Letter to Training or other Proof of Enrollment, ITA Agreement, Other LWIB, Defined Documents, ITA Contract Modifications (if applicable).	Enrollment Support
Training Voucher	COTF, Training Voucher, and all LWIB required documentation including the ITA Account Balance form. (Any discrepancy between the Training Voucher and Invoice must be documented in the note section of the uploaded document.	Enrollment Support
Supportive Services	Supportive Service Request/Voucher, Verification that No Other Sources Are Available, All LWIB required documentation	Enrollment Support
Needs Related Payments	Voucher, purchase order, invoice, receipts, Tracking Document, UI screen showing benefit exhaustion or ineligibility, Verification of training enrollment, participation, grades or completion, Needs related payment determination form, Weekly verification of income and training, Any additional LWIB required documentation.	Enrollment Support
Work Experience	Work Site Agreement, Trainee Plan, I09 and W-4 forms, Time Sheets, Work Experience Orientation, Supervisor Orientation, and Copies Proof of Payment.	Enrollment Support

Eligibility/Validation Criteria	Document Being Uploaded	Document Type
On The Job Training (OJT)	Pre-Award Review Form, OJT Contract including Skills Gap Analysis, Employer/Employee Orientation Documentation, Proof of Workers Compensation Insurance, Any Modifications to the Training Contract, Training Time Documentation, Training Payment Invoices, Proof of Payment of Wages, Monthly Evaluation, Monitoring Reports, Documentation of completion or verification of participant's failure to complete training.	Enrollment Support
Recognized Educational or Occupational Certificate or Diploma or Degree or Licensure Attained	Detailed Program Note, Certificate, Diploma, Degree/Transcript or Licensure.	Enrollment Validation

Attachment C

List of Acceptable Documents to Verify Eligibility to Work

LIST A: Documents That Establish Both Identity and Employment Authorization

1. U.S. Passport or Passport Card
2. Permanent Resident Card or Alien Registration Receipt Card (Form I-551)
3. Foreign passport that contains a temporary I-551 stamp or temporary I-551 printed notation on a machine-readable immigrant visa (MRIV)
4. Employment Authorization Document (Card) that contains a photograph (Form I-766)
5. In the case of a nonimmigrant alien authorized to work for a specific employer incident to status, a foreign passport with Form I-94 or Form I-94A bearing the same name as the passport and containing an endorsement of the alien's nonimmigrant status, as long as the period of endorsement has not yet expired and the proposed employment is not in conflict with any restrictions or limitations identified on the form
6. Passport from the Federated States of Micronesia (FSM) or the Republic of the Marshall Islands (RMI) with Form I-94 or Form I-94A indicating nonimmigrant admission under the Compact of Free Association Between the United States and the FSM or RMI

OR

LIST B: Documents That Establish Identity

For individuals 18 years of age or older:

1. Driver's license or ID card issued by a state or outlying possession of the United States, provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address
2. ID card issued by federal, state, or local government agencies or entities, provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address
3. School ID card with a photograph
4. Voter's registration card
5. U.S. military card or draft record
6. Military dependent's ID card
7. U.S. Coast Guard Merchant Mariner Card
8. Native American tribal document
9. Driver's license issued by a Canadian government authority

For persons under age 18 who are unable to present a document listed above:

10. School record or report card
11. Clinic, doctor, or hospital record
12. Day-care or nursery school record

AND

LIST C: Documents That Establish Employment Authorization

1. U.S. Social Security account number card other than one that specifies on the face that the issuance of the card does not authorize employment in the United States.
   NOTE: A copy (such as a metal or plastic reproduction) is not acceptable.
2. Certification of Birth Abroad issued by the U.S. Department of State (Form FS-545)
3. Certification of Report of Birth issued by the U.S. Department of State (Form DS-1350)
4. Original or certified copy of a birth certificate issued by a state, county, municipal authority, or outlying possession of the United States bearing an official seal
5. Native American tribal document
6. U.S. Citizen Identification Card (Form I-197)
7. Identification Card for Use of Resident Citizen in the United States (Form I-179)
8. Employment authorization document issued by Department of Homeland Security

SAMPLE WIA Telephone Verification Form for Adult Programs

IDENTIFYING INFORMATION

Applicant's Name: _____
Last First MI

Participant ID: _____ **Program of Enrollment:** _____

NOTE: In addition to eligibility items, this form may be used to document other information. Be sure to clearly identify the information being verified. A copy of this form must be scanned and uploaded to the appropriate OSL enrollment.

TELEPHONE VERIFICATION

Information to be Verified: **Date Verified:**

_____ _____

Entity Providing Verification: _____

Contact Name: _____ **Phone Number:** _____

Comments: _____

_____

_____

_____

_____

_____

_____

_____

CERTIFICATION

I attest that the information recorded by me on this form was obtained through telephone contact on the above date. As indicated by the agent, all information was obtained from data previously determined and recorded in the applicant's records at the agency providing the eligibility verification.

_____ _____
Authorized Staff Signature Date

SAMPLE INDIVIDUAL EMPLOYMENT PLAN CLIENT INVOLVEMENT STATEMENT

CLIENT INVOLVEMENT STATEMENT

- In consulting with my Case Manager, I have determined that the employment goal and services strategy stated in the IEP developed and dated _____is my choice and is consist with my assessment results.
- I also understand that this is a general plan of services and training and it is neither entitlement nor a contract between the program and the customer at this time.
- I understand that I am responsible for my actions.
- I understand that my goal for completing this plan is to become self-sufficient.

_____ _____

PARTICIPANT'S SIGNATURE DATE

NAME: _____ OSL PID: _____

CASE MANAGER: _____ OFFICE: _____

COMMENTS:_____

_____

_____

_____

_____

_____

_____

RESPONSES TO COMMENTS

DATE: July 11, 2012

SUBJECT: On May 16, 2012, OSWDI 02-2012 Data Validation, Program Eligibility and Document Uploader Requirements for Adult Programs policy, was sent out to WIA Board Staff, Local Office Manager, Workforce Services Management and the Veterans Service Division and published on the Oklahoma Department of Commerce and Oklahoma Employment Security Commission's websites. A 30 day comment period commenced. The workgroup who developed the policy has reviewed comments and the responses have been provided below.

1. It appears that this policy is being issued jointly by "ODOC" and "OESC." It is not clear that this is office state policy and has the explicit approval of either Mr. Lopez or Mr. McPherson. Are we to assume that the policy has been reviewed and approved by directors of both agencies?

Response – Secretary Lopez and Mr. McPherson employ staff to ensure that the programs operated by ODOC and OESC are compliant with federal directives. All issuances are developed by a workgroup of subject matter experts and reviewed by a joint committee comprised of administrative staff representing ODOC and OESC.

2. This policy is intended to clarify documentation procedures that minimize the burden of validation documentation on staff and customers. To have a truly minimal impact on staff and customer the policy should adopt the minimum data validation required by the U.S. Department of Labor as described in the DRVS Handbook for DRVS 7.2, April 2009. An example is the requirement for documenting Displaced Homemaker and Dislocated Worker.

Response – State guidance can be more restrictive than federal guidance just as local WIB guidance can be more restrictive than State guidance. The Uniform Administrative Requirements, Code of Federal Regulations, 29 CFR Part 97.40 states in part that grantees are responsible for managing the day-to-day operations of grant and sub-grant supported activities to assure compliance with applicable Federal requirements. The eligibility requirements for the Dislocated Worker program and Displaced Homemaker program have been taken directly from Title 1, Section 101 (9)(A -D) and Section 101 (10)(A-B).

3. The DRVS Handbook offers s simple list of source documents for low income including "applicant statement." The OSWDI on the other hand, eliminates "applicant statement" as a source document and adds a required form "Low Income/ Family Size form which does not appear anywhere in federal guidance. This additional record-keeping requirement places a direct burden on program participants and in some cases may be a deterrent to program participation.

Response – The DRVS Handbook is intended to validate data elements only, not to verify eligibility for a participant to receive program services. Applicants may self-attest with a virtual signature which is considered to be the "applicant statement" to low income status at the core service level. Documenting low income status occurs only if a LWIB has determined funds are limited and then depending on LWIB self-sufficiency policy. The form referenced in the comment is no longer a part of the OSWDI. Oklahoma Service Link has been programmed to automatically determine self sufficiency based on LWIB policy and applicant income.

4. The purpose of the issuance is described as follows: "To provide staff with specific guidelines and policy on eligibility/data element validation (DEV) and subsequent documentation requirements for the WIA Adult, Dislocated Worker (DLW), National Emergency Grants (NEG), Trade Adjustment Assistance (TAA) and Labor Exchange (LE) programs and activities." The policy goes on to say "Scanned documentation is required to verify some eligibility/data element validation criteria as, as indicated in Attachment A of this policy, prior to the participant's receipt of any intensive or training services. Taken together, these statements suggest that ODOC is implementing and/or interpreting the eligibility requirements for these programs. In effect, the issuance is defining who is eligible for WIA services-core, intensive and training.

Response – The eligibility/validation requirements cited in attachment A of this policy have been taken directly from federal policy, state policy or the Workforce Investment Act of 1998 and 20 CFR part 652 Workforce Investment Act; Final Rules. The Act and the Final Rule have been added as references for this policy. The joint ODOC/OESC policy has been issued under the authority of 29 CFR Subtitle A, 97.40 which grants the state authority to assure sub grantee compliance with Federal requirements.

5. If ODOC chooses to impose additional eligibility requirements on the customers of our Workforce Oklahoma system, then the state's Administrative Procedures Act describes how this can be done through ODOC's normal rule-making process. An issuance like OSWDI #02-2012, even if it calls itself an "official state policy" is not enforceable, according to the APA.

Response – The authority to designate eligibility requirements comes from the Workforce Investment Act and therefore does not require the Oklahoma Department of Labor to go through the State of Oklahoma's rule making process.

6. There are several validation requirements in OSWDI 02-2012 which seem to be un-related to any requirement of the U.S. Department of Labor. Attachment A of the OSWDI describes General Eligibility and Data Validation Documentation Requirements for a Dislocated Worker. A list of acceptable source documents is given:
   - Notice of Layoff
   - TAA Certification
   - Documented telephone verification with employer using a telephone verification form
   - Current unemployment insurance verification
   - Current REA/REA enrollment
   - Current Statewide/Local Labor Market information that indicated lack of industry/occupation availability
   - Doctor statement indicating applicant's inability to return to previous industry/occupation due to physical limitation
   - Current RES/REA enrollment

But, I can't find any guidance from DOLETA that supports this list. This list seems to be invented by ODOC.

Response –
20 CFR Part 652, 661.120 (b) States should establish policies, interpretations, guidelines and definitions to implement provision of title 1 of WIA to the extent that such policies, interpretations, guidelines and definitions are not inconsistent with the Act and the regulations

issued under the Act, as well as Federal statutes and regulations governing One-Stop partner programs.

The policy has been reviewed and approved by Region 4 Department of Labor program and data validation staff.

7. It is apparent the ODOC is using DOLETA's Data Validation framework and is, in fact, expanding it to define documentation requirement for program eligibility. This comment goes on to state that the requirements of this policy are inappropriate not supported neither by DOLETA's guidance nor by Oklahoma's Administrative Procedures. The commenter then suggests that this policy be broken down into three policy statements.

Response – This policy has combined documentation for both data validation and program eligibility into one policy to simplify procedures for both field staff and oversight organizations. This is not new; this policy is a revision of a previous policy that combined data validation and program eligibility documentation and only includes additional documentation instructions.

8. If ODOC wishes to add any requirements for documentation of participant eligibility (beyond those defined in the Act, the Regulations and official DOLETA guidance), then the state's APA process should be used.

Response - 20 CFR Part 652, 661.120 (b) States should establish policies, interpretations, guidelines and definitions to implement provision of title 1 of WIA to the extent that such policies, interpretations, guidelines and definitions are not inconsistent with the Act and the regulations issued under the Act, as well as Federal statutes and regulations governing One-Stop partner programs.

The policy has been reviewed and approved by Region 4 Department of Labor program and data validation staff.

9. Don't forget that the Local Workforce Investment Boards have the capability (and the authority) to establish policies, interpretations, guidelines and definitions related to documentation of participant eligibility. The commenter goes on to state that the LWIB's have more administrative flexibility to establish program guideline. See the WIA Regs at Sec. 661.120.

Response - The commenter is correct, in part. 661.120(a) Local areas should establish policies, interpretations, guidelines and definitions to implement provisions of title 1 of WIA to the extent that such policies, interpretations, guidelines and ***definitions are not inconsistent with the Act, Federal statutes and regulations governing One-Stop partner programs, and with State policies.***

10. The commenter stated that their board director would proceed to establish a policy of eligibility for dislocated workers and review and possibly expand policy on Priority of Service.

Response - 661.120(a) *Local areas should establish policies, interpretations, guidelines and definitions* to implement provisions of title 1 of WIA *to the extent that such policies, interpretations, guidelines and definitions* ***are not inconsistent*** *with the Act, Federal statutes and regulations governing One-Stop partner programs, and* ***with State policies.***

11. Several comments were received regarding the policy change simplifying the documentation required to support Dislocated Worker Status. Each of the comments requested that the eligibility for Dislocated Worker be broken down into categories as outlined in previous policies.

Response – The Dislocated Worker documentation requirements have been changed and broken down into three categories as defined in Section 101(9) (A) through (C) of the Workforce Investment Act.

12. Several comments were received questioning the requirement to use Attachment D, Telephone Verification Form and Attachment E, IEP Client Involvement Statement.

Response – The requirement to use these specific forms has been removed but the forms have been retained as samples. Locals may development their own Telephone Verification Form and IEP Client Involvement Statement.

13. Does the "Grievance/EEP" refer to the requirement EEO notice that we give to participants? Does it also refer to the notice we provide regarding our grievance procedures. Will we need to upload both forms or only the one for the EEO notice? Will we be required to upload documentation for every core participant?

Response – The requirement have been broken down and separated. The participant receipt of EEO information must be verified in Oklahoma Service Link prior to program enrollment and need not be uploaded. Oklahoma Service Link will be considered the source document for the EEO Statement. The requirement to maintain a copy of the grievance procedures should be done in accordance with LWIB developed policy and uploaded to the appropriate OSL screens as indicated in attachment A.