**Data Validation and Program Note Policy**

The Tulsa Area Workforce Development Board (TAWDB) provides guidance and establishes the policy regarding all WIOA funded programs.

**I. Data Validation and Source Documentation:**

A. Data validation is a series of internal controls established to verify the accuracy, validity, and reliability of data. Data validation helps ensure the accuracy of the annual statewide performance reports, safeguards data integrity, and promotes the timely resolution of data anomalies and inaccuracies as required by 2 CFR 200.328. This joint data validation ensures that all programs are consistent and accurately reflect the performance of each core program. All participants across the core programs must validate the common data elements according to this guidance.

B. It is required to obtain and upload at least one source document for each data element listed for each participant in a WIOA core program.

**II. Program Note:**

A. Statements by the case manager entered in the virtual case management system that identify at a minimum, the specific data element, the status of the data element, information relevant to the data element, the date on which the information was obtained, and the case manager who obtained the information. If a case manager is obtaining information verifying any data element for validation by phone, the detailed case/program note must include data element, subject to be verified, date verified, the agency or third party relationship providing verification, contact name, phone number, detailed comments from the contact, and the case manager who obtained the information.

B. All program notes must be timely and entered into the state and local area data management systems within five (5) working days.

**III. Guidance:** The Tulsa Area Workforce Development Board will follow the guidelines as established in state policy OOWD #02-2019, entitled Oklahoma Data Validation and Source Documentation Requirements dated May 1, 2019.

**IV. Follow-Up Services Contact, and Case Management:**

1. Adult, Dislocated Worker, and Youth participants who have not exited the program must receive contact at a minimum of every 30 days to check-in with service provider staff to ensure the following:
   1. Participants have the resources they need to continue along their IEP and that supportive services, needs-related payments, and incentives, referrals, and other resources within and outside the workforce system are discussed, documented, and made available.
   2. Staff are aware of any changes that may need to be made for the participants IEP, services, changes to priority of service status, and other information needed for effective and holistic case management.
   3. Provide participants the opportunity to give feedback to career navigators on their experiences within our programs, training providers, resource referrals, and other components of the workforce system that can be used to provide real-time strategy implementation for the TAWDB and the service provider.
   4. Exceptions shall be approved by the Executive Director or designee.
2. Follow-up and communication between staff and participants
3. Follow-up will be documented within 48 hours of when contact was attempted or conducted. Attempted or obtained contact must also be documented to include the different contact methods utilized by staff and what information was provided to the participant. This includes attempts by participants or by a designee.
4. Participants must be contacted using multiple communication forms to include phone numbers, e-mail, other communication methods provided by the participant to include contact via letter to a mailing address should other contact attempts fall short of reaching the participant within 5 days
5. Program Notes and documentation related to services will be entered at the time services are provided and no later than 5 business days after service delivery.

1. When a change of a participant’s direct point(s) of contact within their program(s) occur:
   1. Participants will be notified of the changes related to their new point(s) of contact via U.S. mail in addition to all other communication forms. Staff are to follow-up more closely with individuals with who transition between assigned staff. All notifications will include a direct point of contact for participants to contact regarding their participation in their program.
   2. A process shall be implemented by the service provider that ensures timely follow-up and contact and/or attempts are tracked, managed, reportable, and monitored by the service provider to ensure clients do not experience gaps in services, follow-up, and case management provision.

**V. Action:**

The Executive Director is responsible for compliance of this policy. The Executive Director is responsible for annual review and revisions if needed. Any exceptions to this policy statement will require prior written approval from the chair of the Tulsa Area Workforce Development Board.

This policy will be effective immediately upon approval of the TAWDB membership.

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Chair, Tulsa Area Workforce Development Board / Date