1. **Can the upload screen have a reminder list of 'don't upload full Social Security Number (SSN)' etc.?**

   This may be possible through the Change Request process. A Regional Director is assigned to each Local Workforce Development Area (LWDA). The Regional Director is responsible for submitting Change Requests. Staff should contact the Regional Director to submit a Change Request.

2. **What is identity verification under document type when uploading a document in Arizona Job Connection (AJC)? When would you use this type of document when uploading?**

   You don't need to use Identity Verification. We are in the process of removing that as a selection. If you notice it, please send an email to the ea-wioa@azdes.gov email and we will remove the selection.

3. **Who will the monitoring report be provided to?**

   They will be provided to the LWDBs Directors who are responsible for ensuring that their service providers and appropriate staff receive all communications from the Department of Economic Security (DES).

4. **Do we redact all but the last 4 digits of a social security number (SSN)?**

   There may be instances where an SSN is needed to ensure staff are working with or looking up at the correct participant. In those instances, you must redact up until the last four digits in the SSN. If the SSN is not required for the task at hand, redact the entire number.

5. **How far do we have to go back to black out or redact SSN already uploaded to AJC?**

   We won't tell you a specific time on how far back you need to go back to redact SSN. However, moving forward, SSN must be either fully redacted or redacted until the last four digits, if the last four digits are required for the task at hand.

   As a reminder, all LWDB staff and service providers are responsible to safeguard and maintain the confidentiality of SSN and other personally identifiable information (PII). For the definition of PII, please refer to 2 CFR § 200.1.

6. **How do you delete or remove a document?**

Staff with the regional director role with the privilege to delete documents would access the document and select delete. If more information is needed, please send an email to the ea-wioa@azdes.gov.

7. **At the direction of our LWDB we do not upload documents to AJC because of security concerns. Per the DV training, documents must be uploaded to the AJC system for DV purposes. If we don't have a document uploaded in AJC for validation, will this be a finding?**

The AJC system will be used for data validation; therefore, documents must be uploaded to the system. The only time documentation will be accepted via secure email is when the document has disability information. Those documents must be stored separately.

In addition, there have been multiple security measures added to AJC to ensure the security of the information in AJC. LWDBs, service providers and staff are responsible for safeguarding PII and are liable if the PII is compromised.

8. **What about the emergency Dislocated Worker (DW) policy? How will this impact Data Validation? What program years will be validated?**

The emergency policy will not impact data validation. Service provider staff must enter a case note in the AJC system to reflect that dislocated worker eligibility was determined based on one of the four categories, and specifically note if eligibility was based on COVID-19. If the note indicates it was COVID related, it will be accepted. Data validation will start with Program Year 2019, and all program years to follow, unless instructed otherwise by Department of Labor (DOL).

9. **Our area has not uploaded documents in the past. At this time is PY20/FY20 the only documents that need to be uploaded?**

Documentation is required as far back as 1/1/2018 to cover PY2019 and PY2020.

10. **It was noted that all documents from January 1, 2019 must be uploaded. I want to verify that the date I heard is correct and if so, do we need to upload January 2019 exits?**

Data validation will start with Program Year 2019, and all program years to follow, unless instructed otherwise by Department of Labor (DOL). Documentation is required as far back as 1/1/2018 to cover PY2019 and PY2020.

11. **Are we to go back as of PY19 -7/1/19 to 6/30/20? Or PY 20- 7/1/20 to 6/30/21?**

Data validation will start with Program Year 2019, and all program years to follow, unless instructed otherwise by Department of Labor (DOL). Documentation is required as far back as 1/1/2018 to cover PY2019 and PY2020.

12. **Why the change from annual to quarterly data validation?**

The annual programmatic monitoring is separate from the quarterly data validation. DOL requires data validation to be conducted annually to ensure the accuracy and integrity of data in the annual report. DES has opted to conduct data validation quarterly, however, to allow for the timely identification and correction of errors before the annual report is submitted to DOL.

13. **Is there a deadline to have all these uploaded?**

The documents for PY19 should already be in the file. All documents should be uploaded/in file as soon as possible. LWDB staff will receive a list of those participants selected for data validation. At a minimum, documents for those participants should be uploaded.

14. **Can I get a copy of the presentation?**

Please follow up with your LWDB Director, as it was attached to the calendar invite. DES will also send out the presentation to the LWDB again.

15. **Are we still required to properly store the source document in a secured place (i.e., locked file cabinet) as stated per TEGL 39-11 since SSN is considered PII?**

Yes. However, for data validation purposes, you should only collect a document with PII if it is necessary to validate a data element with that document. The SSN does not need to be validated. There is no item on the data validation checklist which requires a full SSN for validation. However, if for some reason the participant provides a document containing a SSN, the LWDB must have internal controls and policies in place that provide safeguards to protect PII (e.g. redacting the SSN on the document to be uploaded) and other sensitive information (20 CFR § 683.220(a)).

It should be noted that while SSN is not required for data validation, staff should be validating it as the SSN is used to determine median earnings. We recommend that staff add to the case note that the number was reviewed and verified, which will eliminate the need to maintain a hard copy document, which must be stored in a secured location.

16. **How will the State verify the information pertaining to data validation if it's stored in a secure place and not uploaded?**

If documentation is redacted or removed from the Electronic Case File (ECF), please document these actions in case notes to ensure effective monitoring practices.

17. **Regarding this response on page 16 of the Data Validation comment register, "Data Validation must be done in compliance with TEGL 7-18 and 23-19 which may not coincide with program monitoring." Can you provide a paragraph and page number where coordination of data validation with annual monitoring is prohibited?**

We acknowledge that TEGLs 7-18 and 23-19 neither prohibit nor require the integration of data validation and programmatic monitoring. Both guidance letters, however, allow States to develop, implement, and evaluate their own data validation strategy, as long as it is consistent with the guidance. The feasibility of integrating quarterly data validation and annual programmatic monitoring may be part of the evaluation of our data validation strategy. Currently, the data validation and the programmatic monitoring are separate activities.

18. **Do local areas need to keep paper files once the documents are uploaded?**

    LWDBs are not required to keep hard copies once uploaded.

19. **Can performance activity notes be uploaded as a PDF document?**

    There is NOT a place to upload specifically performance activity notes in AJC. If it is about a service, a comment must be added under that service (which is then added to the program notes section).

    Please note that AJC has an option for staff to enter a case note into the AJC system, so it is not necessary to upload a case note as a PDF.

20. **Clients often meet eligibility through documented disabilities, do disability documents need to be uploaded?**

    No, documents with health information, including disability information do not have to be uploaded to AJC. For data validation purposes, documents with disability information may be sent via secure email to the monitor. As a reminder, any document with PII, including health information must be safeguarded and stored appropriately.