

## Data Validation Process and Procedures

### Conducting Data Validation Reviews

Data Validation will be conducted by four Units within the Division of Workforce Solutions (DWS): the Performance Unit, the Regional Analysts, the Trade Adjustment Assistance (TAA) team, and Information Technology (IT) staff:

- **Performance Unit:** The Performance unit will oversee all Title I and Title III validation. This will include all Participant Individual Record Layout (PIRL) elements noted in TEGs 07-18 and 23-19, Change 2.
- **Regional Analysts:** The Regional Analysts will assist in the annual data validation process by being included in the pool of validators and by offering their expertise in case management practices for policy and training revisions.
- **TAA:** TAA will complete validation for its cases using the required validation elements noted in TEG 23-19, Change 2.
- **IT Staff:** For all programs, IT staff will cover the required wage matching PIRL elements.
- Please see Attachment 2 for the exact breakdown of PIRL elements covered by each Unit.

### Sample Creation

Each Workforce Development Board (WDB) will have a sample of 6 cases covering each program: Title I – Adult, Title I – Dislocated Worker, Title I – Youth, and Title III – Wagner-Peyser. This will yield a typical case count of 24 cases per WDB per program year. However, in the rare instance that the total number of cases for a program being validated is less than 6, all cases for that program will be reviewed and the total case count for a particular WDB may fall below 24 for that program year.

Sample Size for Each Workforce Development Board		
WIOA Program		Sample Size
Title I	Adult	6
Title I	Dislocated Worker	6
Title I	Youth	6
Title III	Wagner-Peyser	6
Total Cases per Workforce Development Board		24

Management overseeing the Trade Adjustment Assistance (TAA) program will determine a sample size based on their program's total case count and provide this figure to the Performance Unit by December 1<sup>st</sup> each program year for a case sample to be generated.

### Timeframe

- **Performance Unit and Regional Analysts**
  - Data Validation by Performance staff and the Regional Analysts will be completed from the third quarter to the fourth quarter of each program year with all validation reviews to be concluded no later than May 31 of each program year to ensure sufficient time for corrective actions to be issued and completed. On December 1 (or

the first business day thereafter) of each program year, the Director of Performance will randomly assign all Local Area WDBs (or portions thereof based on case count) to a data validation assessor. As a result of the random assignment, Local Area WDBs are likely to be validated in a different order and by a different data validation assessor each program year.

- **TAA and IT Staff**

- Data Validation will be conducted within each program year from January 2 through May 31.

### **Validation Process and Worksheet Creation**

NCWorks Online (NCWorks), DWS' Case Management System, will be used to sample the pool of available active and exited cases for WIOA Title I – Adult, WIOA Title I – Dislocated Worker, WIOA Title I – Youth, WIOA Title III – Wagner-Peyser, and TAA. NCWorks will generate the necessary number of worksheets and will cover only the PIRL elements being validated by the respective Units of DWS as noted above (see Attachment 2 for the breakdown of elements covered by DWS Units).

Each worksheet will detail one case, with the corresponding PIRL element values, and included columns for the Reported Value, the Audit Outcome, the Document used for validation, and any Comments. Staff will evaluate each PIRL element value against the participant's file to see if case file documentation supports it and mark the reported value as either Pass, Fail, or Unable to Validate by choosing the corresponding value in the drop-down within the Audit Outcome column. Each PIRL element listed in Attachment 2 has a list of the supported documentation acceptable for that element. Only the documents listed as approved documentation for that PIRL element may be used in support. Any elements marked Fail or Unable to Validate must be accompanied by a supportive explanation in the Comments column, detailing why the value failed or was not able to be validated and suggesting possible corrective action.

At the conclusion of the validation process, an electronic copy of the Pass or Fail record sheets must be returned to the head of each respective Unit (noted below) responsible for completing the validation, to ensure proper records retention:

- Performance: Director of Performance
- TAA: Trade Unit Manager and Trade Adjustment Assistance Coordinator
- IT: Information Technology Director

### **Monitoring**

The Accountability Unit will integrate Data Validation into the Unit's annual oversight Guide and participant reviews. The Unit will document the results in the Local Area WDB Oversight Summary Report. Any documented deficiencies will be recorded with a date required for rectification consistent with the current monitoring correction timelines.

### **Data Integrity**

On a quarterly basis, the Department of Labor (DOL) will provide DWS with feedback on its submitted performance reports to aid in data integrity efforts and support data accuracy. The analysis will include, but is not limited to, a review of the data submitted, anomalies and outliers, and other potential data quality issues, which may indicate reporting inaccuracies. The DWS will make use of these feedback reports to conduct quarterly data integrity reviews to identify data errors, missing data, out-of-range variances in values reported, and other anomalies.

### **Correcting Missing or Erroneous Data**

Each Unit will provide a summary to the Local Area WDBs outlining areas that Failed or were marked Unable to Validate during the data validation process. All Data Validation related reports, desk reviews, or annual reviews will provide required corrective actions with an indicated due date based on the process needed for correction. Local Area WDBs must take appropriate actions to correct missing or erroneous data found during Data Validation. Such actions may include:

- working with the Local Area WDB's superuser and potentially the Local Area WDB's assigned Regional Analyst to make data corrections;
- providing additional training or technical assistance to staff to address data errors; and
- collecting missing documentation to provide necessary verification.

Failure to comply with identified corrective actions by the identified completion date may cause:

- One year after the initial identification:
  - Mandatory on-site facilitated training by DWS staff on the required reporting for data elements.
- Two years of high or repeated error rates:
  - Issue of a monitoring "Finding"; and
  - Formal notification to the Local Area WDB Chair and Chief Local Elected Officer (CLEO) of failure to comply.

### **Records Retention**

All Data Validation records and documentation will be maintained in accordance with Federal records retention requirements, as given in 2 CFR 200.333:

*Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient.*

This would include:

- copies of worksheets on data elements or records reviewed;
- frozen quarterly wage records for wage record matching used for reporting outcomes;
- trends in common data accuracy issues and error rates; and
- corrective action efforts made after data validation reviews.

Each respective Unit will retain the records associated with its portion of the Data Validation process with retention overseen by the Unit leaders noted below:

- Performance: Director of Performance
- TAA: Trade Unit Manager and Trade Adjustment Assistance Coordinator
- IT: Information Technology Director

### **Process Assessment**

The Director of Performance and the Accountability Manager will meet during the first quarter of each program year to assess the effectiveness of current Data Validation procedures and determine

whether revisions to the policy and process are necessary. Any updates or changes will be released as a formal update to this Operational Guidance (OG).

### **Training**

During the second quarter of each program year, Data Validation staff will review, and receive training on the Data Validation process to ensure uniform application of all policies and procedures. In addition, DWS will provide annual Data Validation training for local office staff. Beyond the annual training provided by DWS, Local Area WDBs are expected to provide additional staff training, on at least an annual basis, on the importance of accurate data entry and allowable source documentation as given in WIOA and Wagner-Peyser Employment Act Participant Eligibility.

### **Local Area WDB/Local Area**

Each Local Area WDB is required to conduct Data Validation at least once annually for the Title I – Adult, Title I – Dislocated Worker, Title I – Youth, and Title III – Wagner-Peyser programs as a part of its ongoing monitoring efforts. Attachment 2 to this OG, is a modified version of Attachment II of TEGL 23-19 Change 2, which is the complete list of PIRL elements that need to be validated. (Note that the WIOA and Wagner-Peyser Employment Act Participant Eligibility Reference Guide provided as Operational Guidance by the DWS has been updated to be in agreement with TEGL 23-19 Change 2, Attachment II.) Local Area WDBs should be aware that the Youth and Wagner-Peyser programs may have different elements required compared to the Adult and Dislocated Worker programs and attention should be paid to ensure each program is validated according to its respective list of required elements.

For the most up-to-date guidance on PIRL elements and their definitions, please refer to USDOL’s website: <https://www.dol.gov/agencies/eta/performance/reporting>. All records must be retained as outlined in the Records Retention section of this policy. This would include retention of a list of validated records, Pass or Fail worksheets, and documentation associated with any corrective actions taken.

### **Self-Attestation in WIOA Title I Programs**

In the three WIOA Title I Programs (Adult, Dislocated Worker, and Youth) there are a number of PIRL elements for which self-attestation is an allowable form of data validation documentation. Please refer to Attachment 2 for the complete list of PIRL elements for which self-attestation can be used. When using self-attestation for WIOA Title I documentation, there are three key considerations:

1. Self-Attestation should be used when an item is unverifiable, or it is unreasonably difficult to obtain other acceptable documentation. All other acceptable forms of documentation for a given PIRL element should be utilized first since self-attestation is not the primary method of gathering documentation to verify data elements. The lack of source documentation beyond self-attestation should not delay or prevent enrollment and the receipt of services.
2. Self-Attestation always refers to signed documentation. If the participant has not signed the supporting documentation, the documentation is not sufficient and will fail data validation.
3. If self-attestation is used, the scanned supporting documentation must directly relate to the PIRL element the scanned document is being used to support. For example, if self-attestation is being used as documentation for PIRL 802 – Low Income Status at Program Entry, then the uploaded supporting document must include an entry specifying the participant’s income. In this example, if the scanned document did not indicate the participant’s income, the documentation would not be sufficient and would fail data validation.

In addition to the considerations above, please be aware of the specific self-attestation usage limitations for PIRL Elements 200 – Date of Birth and 301 – Eligible Veteran Status for WIOA Title I programs. For both elements, self-attestation may only be used for Homeless Individuals or Runway Youth. Please refer to Attachment 2 for a full listing of the PIRL elements for which self-attestation can be used and any limitations on usage.

### **Self-Attestation in WIOA Title III – Wagner-Peyser**

In the WIOA Title III – Wagner-Peyser, there are a number of PIRL elements for which self-attestation is an allowable form of data validation documentation. Please refer to Attachment 2 for the complete list of PIRL elements for which self-attestation can be used. When using self-attestation for WIOA Title III documentation, there are two key considerations:

1. Self-Attestation always refers to signed documentation. If the participant has not signed the supporting documentation, the documentation is not sufficient and will fail data validation. For WIOA Title III, signed documentation often takes the form of a signed application. Please note, detailed in the section below, the requirement for every participant’s WIOA Title III application to now be signed beginning on July 1, 2023.
2. If self-attestation is used, the scanned supporting documentation must directly relate to the PIRL element the scanned document is being used to support. For example, if self-attestation is being used as documentation for PIRL 802 – Low Income Status at Program Entry, then the uploaded supporting document must include an entry specifying the participant’s income. In this example, if the scanned document did not indicate the participant’s income, the documentation would not be sufficient and would fail data validation.

### **Veterans Status and DD-214s**

A special note regarding veterans receiving services. A DD-214 is not necessary for a veteran to be registered or begin receiving services under either the WIOA Title I (Adult, Dislocated Worker) or WIOA Title III (Wagner-Peyser) programs. A DD-214 (or alternative documentation as indicated in Attachment 2) only becomes necessary for WIOA Title I participants when services rise above basic career services.

### **Signed Applications and Disability Status**

Beginning July 1, 2023 (start of PY 2023), there are two new requirements for how WDBs must handle WIOA Title I/Title III applications:

1. Each WDB must ensure that every Title I/Title III application is signed, either electronically or physically, and retained as a saved document within the participant’s electronic case files in NCWorks. WDBs are encouraged to use electronic signature capabilities as it makes for an easier process regardless of whether the participant is physically in the local office or not.
2. Each application must include the Disability Information section as a standard component of a signed Title I/Title III application. Including the Disability Information section of both applications facilitates validators’ ability to track the necessary disability PIRL elements for WIOA Title I/Title III programs.

A separate Operational Guidance, OG 03-2023, has been published that specifically addresses the signed application requirements for WIOA Title I and Title III programs.