Title: Data Validation	**Related Forms:** No
Effective Date: 12/13/2019	**Revised Date:** 2/15/2025

Purpose:

The purpose of this policy is to establish guidelines for the implementation of data validation for Workforce Innovation and Opportunity Act (WIOA) program operation at the local level.

References:

- Workforce Innovation and opportunity Act (**WIOA**) of 2014, Section 116
- Training and Employment Guidance Letter (**TEGL**) 07-18 Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act
- Training and Employment Guidance Letter (**TEGL**) 23-19, Change 2 Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor Workforce Programs
- Virginia Workforce Letter **(VWL)**15-02 Attachment G Change 1: Self-certification and Telephone /Document Inspection Verification Requirements.
- Virginia Workforce Letter (**VWL**)21-01

BACKGROUND:

The United States Department of Labor, Employment and Training Administration (DOLETA) requires states to validate the accuracy of their annual performance report submissions to ensure decisions about WIOA services and funding are made based on program outcomes.   Data validation is a series of internal controls, or quality assurance techniques, established to verify the accuracy, validity, and reliability of data. The data validation process is intended to accomplish the following:

- Detect and identify specific issues with a state's reporting process;
- Ensure that critical performance data are reasonably accurate; and
- Provide tools that help analyze the causes of the performance successes and failures by displaying participant data organized by outcomes.

GUIDANCE:

Data validation consists of two separate functions, as required by federal regulations: ***Report Validation (RV)*** and ***Data Element Validation (DEV***). Because there are two basic sources of reporting error, validation requires two methods. First, although the data for each participant may be correct, the state's reporting software could calculate inaccurate performance outcomes. Second, if the software is correct, the data entered could be in error. RV review checks the accuracy the software accuracy in calculating the ETA 9090, ETA 9091 and the rolling four quarters report. (DEV) review verifies the data used by the software to perform the calculations.

RV Review

RV is used to validate the accuracy of the values reported in each item of the ETA 9173 report and the ETA 9169 report.

The WIOA Title I Administrator's Performance and Reporting team runs the Participant Record and Individual Layout (PIRL) report every quarter for local areas (WIOA Title I programs).

The information from the extracted file is checked against our state system to ensure the information contained in all federal extract files is accurate. Data is reviewed for errors, inconsistencies, missing data out-of-range values, and any anomalies. The local areas are informed of the results and required to address in a timely manner all findings and concerns that are identified. The reviews are done prior to the submission in the federal reporting system Workforce Integrated Performance System (WIPS).

DEV Review

Annual DEV review is conducted to evaluate the accuracy of the participant data used to generate the WIOA Annual report.

The WIOA Title I Performance and Reporting team completes the annual PIRL report at the end of each Program Year (PY) and generates a sample for the DEV review. For WIOA Title I programs, the sample is 15% of the total program exiters (or a minimum of 650 participants) for the program year identified for review. The sample drawn is based on the proportion of participants in each Local Workforce Development Area (LWDA), relative to the individual programs. A worksheet for each participant record selected as part of the sample is created from the PIRL file and contains all applicable data elements and documentation reported during the reporting period.

Data validation may be conducted during the annual on-site monitoring reviews or during separate on-site visits or desk reviews, as determined by the WIOA Title I Compliance Monitoring team. The review will validate the worksheets in comparison to the source documentation in the participant's file to ensure compliance with federal and state guidance. Data elements required for validation will be scored as either a pass or fail. Each data element that is required to be validated and that is supported by acceptable documentation is scored as a "pass". Conversely, any data element required to be validated that is not supported by acceptable documentation, or is inconsistent with other documentation, is scored as a "fail". Thus, data elements lacking properly labeled or unreadable source documents will be scored as "fail".

For most data elements, the validation guidelines in TEGL 23-19 provide multiple forms of acceptable source documentation. If multiple sources for the same data element are collected and the sources conflict, the most objective source, as determined by the WIOA Title I Compliance Monitoring Team, will be used to determine if the data element is valid and accurate. The source documentation types include:

- **Cross-Match**: A cross-match requires validators to find detailed supporting evidence for the data element in the participant's file. Documentation must be clear and legible. Some documentation may be source documents for more than one data element. The state's Telephone/Document Inspection form is an acceptable form of documentation, if the information recorded on the form is adequate to enable a monitor or auditor to trace back to the cognizant agency or the document used. Note: verification of eligibility through document inspection is appropriate when documents cannot or may not be machine-copied.

- **Self-Certification/Applicant statement**: Self-certification occurs when a participant states his or her status for a particular data element and then signs and dates the form acknowledging that it is true and correct. Self-certification may be used in limited circumstances and is not allowed as a verifiable source of documentation for program eligibility.

The key elements for self-attestation are: (a) the participant identifying his or her status for permitted elements; and (b) signing and dating a form attesting to this self-identification. The appropriate self-certification form for either eligibility or priority of service must be used as applicable.

- **Case notes:** Case notes refer to either paper or electronic statements by the case manager that identify, at a minimum, the data element and subject to be verified, the 3 date the information was obtained, the agency or third party providing or verifying the information, and the name and contact information of the person providing the information.

- **Electronic records**: Electronic records are participant records created, stored, or transferred in a form that only a computer can process and maintained in the state's management information system. Records can be numeric, graphic, or text.

Once completed, the validation worksheets will be reviewed, and the pass/fail ratios for each LWDA will be calculated. The Local Workforce Development Board (LWDB) Director and Grant Recipient will receive an initial report at the close of the review process in which a description of the documentation issues noted.

LWDBs will have 30 business days from the date of the initial report to review and submit a written response to the Director of WIOA Title I Administration and Compliance.

Data Validation Process Review and Training

The data validation process will be reviewed annually after completion to determine efficacy and whether changes are needed. Data validation training will be provided to appropriate program staff annually before starting data validation for the program year.