



Title: Data Validation	Related Forms: No
Effective Date: 12/13/2019	Revised Date: 10/26/2020

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 Investment Act of 1998 (WIA)
- Workforce Innovation and Opportunity Act (WIOA)
- TEGL 3-03
- TEGL 9-07
- TEGL 06-14, Attachment A
- VWL #14-09 Timely Data Entry
- TEGL 39-11 Guidance on the Handling and Protection of Personally Identifiable Information
- VWL #20-06 WIOA Participant Activity Code Definitions, Projected Durations & Use Projection Limitations
- VWL #20-07 Change 1 Virginia Workforce Connection System of Record & Electronic Case Files

Policy:

The Piedmont Workforce Development Board must ensure to the maximum extent feasible the accuracy of the data entered into the system of record, the Virginia Workforce Connection (VAWC). The PWDB, and its' contractors, as applicable, will comply with state and federal reviews of local records as required. The data validation initiative covers both the accuracy of aggregate reports submitted to ETA on program activity and performance outcomes and the accuracy of individual data elements.

Procedure:

This process assesses the accuracy of data records. Data element validation is performed by reviewing samples of participant records against source documentation to ensure compliance with federal definitions.

Not all data elements are subject to validation. Data elements are selected for validation based on three factors:

1. **Feasibility** – Data elements can be validated only when it is practical and efficient to locate and examine supporting evidence within the records. Therefore, such items as race, ethnicity, and gender will not be validated because these data elements are self-reported by participants, and it is not efficient to locate the participant to document these characteristics. It is also not practical to validate for data entry errors.

2. **Risk** – The process for validating data elements is based partly on the likelihood that the data element may be inaccurate. Data elements involving human judgment are more prone to error than data elements that do not involve human judgment. For example, determination of employment based on supplemental sources is more likely to be in error than determination of employment from wage records.

2. **Importance** – Data elements are selected for validation based primarily on their importance to the integrity of the ETA 9091 report (Annual Report).

The ETA standardized software generates a sample of the participant records and data elements the State or grantee will validate. Data element validation samples are selected from a sample of offices within the State, rather than from every office.

Two sampling techniques are used:

- **Clustering** – The software selects the sample of exiters from a relatively small number of locations within the State where source documentation is stored. This approach reduces the burden that on-site validation imposes on the State by limiting the number of locations to visit.
- **Stratification** – Cases that have a higher potential for error that will affect performance (positive employment or education outcomes) and more data elements to be validated are sampled in greater proportion than cases with a reduced chance of error (negative employment or education outcomes) and fewer elements to validate.

Once the State has validated the sampled records, the software weights the results of the validation to correct for over- and under-sampling resulting from the clustering and stratification.

The data element validation includes assembling worksheets arrange visits to local offices. If appropriate, state staff should conduct the validation onsite except for data stored at the state level, i.e., wage record information. States have the flexibility to determine the most efficient source to use to validate the information when more than one source is specified. State staff shall notify local staff well in advance of when the onsite validation, if any, will occur to ensure local staff is available to assist in the validation. State staff shall also inform local staff which records will be sampled.

To ensure integrity and authority of the data validation process, Virginia completes the data validation process through the Virginia Community College System (VCCS). The state monitor who is assigned to the local office is responsible for conducting the review of participant records, and the submittal of the annual data validation report to ETA. Participant records will be reviewed in both paper and electronic format. The PWDB may provide assistance to the VCCS in completing data validation, upon request.

Accuracy Standards

States and grantees will be held accountable for meeting acceptable levels and will be required to address any issues concerning data accuracy. States and grantees that fail to meet accuracy standards will receive technical assistance from ETA and will develop and implement a corrective action plan. Data that do not meet accuracy standards will not be acceptable for measuring performance and may keep the State or grantee from being eligible for incentives that are awarded based on performance data.

Upon completion of data validation, the results will be shared with the local area. In incidents where acceptable levels are not met, technical assistance may be provided. Depending on the degree of deficiency, the State may require a corrective action plan from the local area.

Data Elements and Source Documentation

The elements required for data element validation focus on eligibility, performance, and services. See the following link for a list providing federal guidance regarding what types of source documentation are acceptable to validate key data elements related to WIA/WIOA program eligibility, services and outcomes:
<http://wdr.doleta.gov/directives/attach/TEGL/TEGL-6-14-Attachment-A-Acc.pdf>.

Only one of the documents listed for each element is required for validation. However, if multiple sources are collected for the same data element and the sources conflict, the most reliable source should be used to determine if the element passes or fails. For example, for School Status at Participation copies of records from an educational institution are a more reliable source than participant self-attestation. Special attention must be paid to the following general definitions for certain types of source documentation:

- **Cross-Match:** A cross-match requires validators to find detailed supporting evidence for the data element.
- **VaWC:** Unless otherwise noted, VaWC refers to specific, detailed information that is stored in the State's information system that supports an element. An indicator, such as a checkmark on a computer screen, is not acceptable source documentation in and of itself. For example, VaWC is an acceptable source documentation for date of first training service. To be an acceptable source to validate the date of first training service, in addition to the date of first training, VaWC should have information about the type of training and the organization that provided the training. This detailed information makes valid source documentation and makes it unnecessary for such states to validate this data element in local offices.
- **Self-Attestation:** Self-attestation occurs when a participant states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status. The key elements for self-attestation are:
 - the participant identifying his or her status for permitted elements and
 - signing and dating a form attesting to this self-identification.
- **Case Notes:** Case notes refer to either paper or electronic statements by the case manager that identifies, at a minimum, the following:
 - a participant's status for a specific data element,
 - the date on which the information was obtained, and
 - the case manager who obtained the information.