

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 Accountability Unit, the Trade Adjustment Assistance (TAA) team, and Information Technology (IT) staff:

- **Performance Unit and Accountability Unit:** For Title I and Title III validation, validation items will be split between the Performance and Accountability Units, with the DWS Participant Individual Record Layout (PIRL) elements coinciding with the distinctions between the required elements of TEGLs 07-18 and 23-19.
 - **Performance:** The Performance Unit will cover all PIRL elements noted in TEGL 07-18.
 - **Accountability:** The Accountability Unit will cover the remaining required WIOA Title I and Title III elements noted in TEGL 23-19 that are not otherwise covered under TEGL 07-18.
- **TAA:** TAA will complete validation for its cases using the required validation elements noted in TEGL 23-19.
- **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

On October 1 (or first business day thereafter) of each program year, the Director of Performance will determine the necessary sample sizes to sufficiently cover each program: Title I – Adult, Title I – Dislocated Worker, Title I – Youth, Title III – Wagner-Peyser, and Trade Adjustment Assistance (TAA). To ensure sufficient representation, every Local Area Workforce Development Board’s (WDB) year-end participant count for each program from the prior program year will be used to generate a sample size. The sample size will be based on a 95% Confidence Level and a 20% Confidence Interval. The sample size chart below provides the appropriate sample sizes based on the corresponding participant counts for each program. In the rare instance that the total number of cases for a program being validated are less than the calculated sample size, all cases will be reviewed.

Prior Year-end Participant Count	Confidence Level	Confidence Interval	Resulting Sample Size
1-99	95	20	20
100-199	95	20	22
200-299	95	20	23
300-399	95	20	23
400-499	95	20	23

Prior Year-end Participant Count	Confidence Level	Confidence Interval	Resulting Sample Size
500-599	95	20	24
600-699	95	20	24
700-799	95	20	24
800-899	95	20	24
900-999	95	20	24
1000-1999	95	20	24
2000-4999	95	20	24
5000-9999	95	20	24
10000-14999	95	20	24
15000-19999	95	20	24
20000+	95	20	24

Timeframe

- **Performance Unit**

- Data Validation by Performance staff will be completed from the second 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 October 1 (or first business day thereafter) of each program year, the Director of Performance will randomly assign all 23 Local Area WDBs to a validation quarter (Q2, Q3, Q4) of the current program year. This will determine the order in which Local Area WDBs are validated each program year and will change year to year.

- **All Other Units**

- Data Validation will be conducted within each program year from October 1 through February 1.

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 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 and what corrective action must be undertaken to correct the issue.

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) that is completing the validation, to ensure proper records retention:

- Performance: Director of Performance
- Accountability: Accountability Manager
- TAA: Trade Unit Manager and State 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.

The Accountability Unit will also conduct quarterly desk reviews. DWS will provide official results of the random reviews to the Local Area WDBs throughout the year. The Local Area WDBs will receive feedback on the outcomes of the reviews and that feedback will indicate required corrective actions. The Accountability Unit will determine the required completion date for corrections based on the process needed for correction.

Data Integrity

On a quarterly basis, Department of Labor (USDOL) 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. 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 or 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
- Accountability: Accountability Manager
- TAA: Trade Unit Manager and State Trade Adjustment Assistance Coordinator
- IT: Information Technology Director

Process Assessment

The Director of Performance and 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 first 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, 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, 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.

Rescinded