



**NORTH CAROLINA DEPARTMENT OF COMMERCE  
DIVISION OF WORKFORCE SOLUTIONS**

**DWS Operational Guidance Number: OG 16-2021, Change 4**

**Date: March 04, 2025**

**Subject: Defining Data Validation Process and Procedures**

**From:**

Handwritten signature of Andrea L. DeSantis in cursive script.

**Andrea L. DeSantis  
Assistant Secretary for Workforce**

**Purpose:**

To define the data validation guidance and procedures to be used for Workforce Innovation and Opportunity Act (WIOA) Title I Adult, WIOA Title I Dislocated Worker (DW), WIOA Title I Youth, WIOA Title III Wagner-Peyser (WP), and Trade Adjustment Assistance (TAA) programs.

This Operational Guidance updates the language in Attachment 1 to advise Local Area Workforce Development Boards (WDBs) that board-level data validation has been changed and is not a requirement, instead it is now encouraged to be conducted at least annually. This Operational Guidance incorporates the inclusion of several new Wagner-Peyser data validation elements, highlights minor changes to some existing elements of Attachment 2 (Participant Individual Record Layout (PIRL) Elements), such as changes in the wording of the allowed documentation to remain consistent with TEGL 23-19, Change 2.

This Operational Guidance rescinds OG 16-2021, Change 3 and the procedures herein supersede all previous policies, procedures, and guidelines regarding Defining Data Validation Process and Procedures.

**Background:**

Under WIOA Section 116(d)(5) and the further guidance of Training and Employment Guidance Letter (TEGL) 23-19, Change 2 and TEGL 07-18, states are required to develop a data validation strategy that helps ensure the accuracy of the annual statewide performance reports, safeguards data integrity, and promotes the timely resolution of data anomalies and inaccuracies.

Data Validation is a series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data. The establishment of a shared data validation framework that requires a consistent approach across programs ensures that all program data consistently and accurately reflect the performance of each grant recipient. To that end, the purposes of validation procedures for performance data are to:

- verify that the performance data reported by grant recipients to the Department of Labor (DOL) are valid, accurate, reliable, and comparable across programs;
- identify anomalies in the data and resolve issues that may cause inaccurate reporting;
- outline source documentation required for common data elements; and
- improve program performance accountability through the results of data validation efforts.

**Action:** The WDBs should be aware that data validation will be undertaken by Division of Workforce Solutions (DWS) staff as described in this Operational Guidance. In addition, all Local Area WDBs are encouraged to annually conduct their data validation for all Title I and Title III programs. Attachment 1 outlines the Data Validation Process and Procedures and Attachment 2 provides a complete list of all Participant Individual Record Layout (PIRL) Elements to be validated.

**Effective Date:** Immediately

**Expiration:** Indefinite

**Contact:** DWS Director of Performance

**Attachments:**

1. Data Validation Process and Procedures
2. Participant Individual Record Layout (PIRL) Elements

Rescinded