WIOA Joint Data Validation Policy and Procedures

Updated: August 15, 2024

This policy applies to the following programs: Title I Adult, Title I Dislocated Worker, Title I Youth, National Dislocated Worker Grants, Title III Wagner-Peyser, Jobs for Veterans State Grants (JVSG), and Trade Adjustment Assistance (TAA)

The WIOA programs under Title I, Title III, National Dislocated Worker Grants, Jobs for Veterans State Grants (JVSG), and Trade Adjustment Assistance (TAA) conduct data validation reviews each program year prior to certification of annual reports. The program's data validation activities are addressed between monitoring and file reviews. Program areas follow the requirements in the Department of Labor's (DOL) TEGL 23-19, Guidance for Validating Required Performance Data Submitted by Grant Recipients Change 1 and Change 2 when conducting a review. In addition to the guidance provided here, each program area may develop policies to meet data validation requirements specific to their program. Programs may specify requirements for items such as the required data elements for validation, allowable source documentation, documentation collection, and the process for data and documentation storage and retrieval (see program-specific policies).

Error rates will be determined from data validation reviews. Error rates are calculated as the percentage of records reviewed that had a data documentation/data completeness or data accuracy error. The threshold for error rates is 10%. If a data documentation/completeness or data accuracy error rate is greater than or equal to 10%, it is considered not met and technical assistance/training will be required. Error rates are calculated by data element per the following:

a) Local: A local area must have less than a 10% error rate for a single data element across programs. If the error rate exceeds 10%, specific local technical assistance will be required.

b) Overall: Statewide, across all programs, a single data element must have less than a 10% error rate. If error rate exceeds 10%, statewide training will be required.

Data validation results and records reviewed will be retained for at least 3 years to follow the federal records retention policy and the Maintenance and Retention of Records policy. All files submitted for federal reporting will be preserved and saved in a secure location.

Staff Assigned for Data Validation Responsibilities

- Provide overall guidance, training, and technical assistance for data validation standards and data documentation requirements to local areas.

- Perform data validation reviews at least annually.

- Identify errors and communicate with staff and local areas for resolution.

- Maintain records per state and federal records retention policies.

- Provide technical assistance and training to local areas that do not meet error rate requirements.
- Annually review the results of data validation review efforts and the effectiveness of the process and revise as needed.

Data Entry Management and Staff Responsibilities

- Develop internal controls to ensure data reported is valid, reliable, and aligns with data documentation.
- Provide training to staff on the importance of correct data entry and allowable data documentation on an annual basis, at a minimum.
- Regular data element review of program data for errors, missing data, and other anomalies, including missing documentation.
- Ensure appropriate staff receive statewide data validation and data documentation training annually.
- Maintain records per state and federal records retention policies.
- Ensure that state monitoring staff have access to data documents for review upon notification.
- Communicate in a timely manner with program and federal reporting staff regarding identified errors.
- Attend mandatory TA and training if there is a failure to meet error rate.

Federal Reporting Staff Responsibilities

- Conduct ongoing reviews of data accuracy within data systems (e.g., ASSET). Federal reporting staff work closely with information technology and product development staff to review potential issues with the collection and reporting of data.
- Provide trainings for program staff on how to conduct data validation reviews.
- Calculate error rates and notify program staff of any concerns or discrepancies.
- Provide trainings along with program staff to local areas and staff on data validation and documentation when overall error rate thresholds are met.
- Organize and manage data validation procedures listed below.

Procedures

1. When collecting data, the policy and responsibilities listed above are followed.

2. Random samples of Data Elements are pulled from either BI or preliminary PIRL files for review.

    a. Sample sizes are determined based on the population size (participants served & exited) and appropriate confidence levels (greater than or equal to 90%) and margins of error (less than or equal to 8%). The samples include current and exited PINs.

    b. Samples are listed by PIN and are distributed among the required data elements for validation. The PINs are reviewed in the case management system (ASSET) for appropriate data documentation, data accuracy, and data completeness.

3. Any corrections to identified data and documentation errors must be completed by September 10, before the annual program year reports are due for submission to the USDOL.

4. An annual review is a cumulative of reviews completed throughout the program year. PINs selected for reviews are part of the program year cohorts. The cumulative of the reviews becomes the final review file used to calculate error rates.

5. Error rates will be calculated as described above.

Definitions

- **Data Validation and Quality Review (DVQR):** The federally mandated process by which the state annually assesses the accuracy of prescribed data elements in randomly sampled participant files against data documentation in program files for compliance with federal definitions.

- **Data Validation:** A series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data.

- **Data Quality:** A measure of the condition of data based on factors such as accuracy, completeness, consistency, reliability and whether it's up to date.

- **Data Accuracy:** Refers to the correctness and reliability of data. Accurate data correctly represents the real-world scenario or event it is supposed to depict. It's free from errors, especially those that occur due to incorrect data entry or faulty processes.

- **Data Completeness:** Refers to whether all necessary data and documentation is present/included in the appropriate areas of the Management Information System (MIS) (e.g., ASSET).

- **Data Documentation:** The required documentation to attest that the data provided is complete and accurate. This could be provided by a reportable individual, a participant, an institution, an agency, or could be automated with other data sources.

- **Self-Attestation:** Self-attestation occurs when participants (applicants) state their status for a particular data element, such as pregnant or parenting youth, and then sign and date acknowledgement forms. Self-attestation can be in the form of a signed and dated document that is in either paper or electronic formats, or an email or text message directly from the participant confirming their attestation.

References

- [Federal records retention](#)

- [Title I Data Validation Policy](#)

- Training and Employment Guidance Letter (TEGL) 5-18 – WIOA Annual Statewide Performance Report Narrative

- Training and Employment Guidance Letter (TEGL) 07-18 – Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)

- Training and Employment Guidance Letter (TEGL) 10-16 Change 1 – Performance Accountability Guidance for WIOA Title I, Title II, Title III, and Title IV Core Programs

- Training and Employment Guidance Letter (TEGL) 14-18 – Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by USDOL

- Training and Employment Guidance Letter (TEGL) 23-19 Change 1 & 2– Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs.

- Training and Employment Notice (TEN) 14-02 – Data Validation Initiative

- [WIOA Section 116](#)