



## Workforce and Talent Development Board Policy

Subject: Data Validation Framework

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New Policy  Revised Policy

### Overview

The Workforce Innovation and Opportunity Act (WIOA) Section 116(d)(5) directs States to establish procedures to ensure the data contained in the State's Annual Performance Report(s) is valid and reliable. These procedures are broadly referred to as "data validation."

This requirement is reiterated in 20 CFR 677.240(a): "States must establish procedures, consistent with guidelines issued by the Secretary of Labor or the Secretary of Education, to ensure that they submit complete annual performance reports that contain information that is valid and reliable, as required by WIOA sec. 116(d)(5)."

As part of these guidelines, the US Department of Labor (DOL) issued Training and Employment Guidance Letter (TEGL) 07-18, *Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)*, which provides information to States and grantees of DOL and the US Department of Education (ED) on the performance accountability system requirements set forth in section 116 of WIOA. Specifically, this guidance provides information about the guidelines States must use in developing procedures for ensuring the data submitted are valid and reliable.

TEGL 7-18 describes a Joint Data Validation Framework that applies to programs administered by DOL and ED and includes, "While States must utilize a data validation strategy, the specific design, implementation, and periodic evaluation of that strategy is left to the discretion of the State so long as those strategies or procedures are consistent with these guidelines."

US DOL continues to update data validation guidance and has curated subject specific web page which all DOL WIOA grantees should review regularly and prior to conducting data validation for program participant files.

### Policy Statement

The Higher Education Coordinating Commission's (HECC) Office of Workforce Investments (OWI) and the Oregon Employment (OED) have developed a Data Validation Framework for the WIOA Core programs they administer and the Trade Adjustment Assistance program. This data validation policy consists of

- Oregon's Data Validation Framework
- A link to DOL website resources, including a list of allowable source documents (see References and Resources).

This policy and its attachments apply to all WIOA Core programs administered by HECC OWI and OED, the Trade Adjustment Assistance program, the Jobs for Veterans State Grants (JSVG), and National Dislocated Worker Grants (DWGs). These programs must also adhere to their respective programs' presiding federal guidance for the program year data being validated.

These programs and the other WIOA Core and non-core program grant recipients have the discretion to develop additional policies, guidance, or other documents that pertain to the specific design, implementation, and periodic evaluation of that strategy, so long as those strategies or procedures adhere to all relevant federal and State guidance.

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## **Oregon’s PIRL Data Validation Framework For WIOA Title I Dislocated Worker, Adult, and Youth, WIOA Title III Wagner-Peyser, Jobs for Veterans State Grants (JVSG), and the Trade Adjustment Assistance (TAA) Programs**

### **Contents**

<a href="#">Oregon’s PIRL Data Validation Policy</a> .....	2
<a href="#">Data Validation Frequency</a> .....	2
<a href="#">Sample Methodology</a> .....	3
<a href="#">Error Identification and Tracking</a> .....	3
<a href="#">Feedback and Error Correction</a> .....	3
<a href="#">Training and Technical Assistance Identification and Provision</a> .....	4
<a href="#">Data Validation Follow-up Activities</a> .....	4
<a href="#">DV Procedural Documentation by Program Area</a> .....	5
<a href="#">Overview of Office of Workforce Investments (OWI) Processes</a> .....	5
<a href="#">Wagner-Peyser and JVSG DV Procedures</a> .....	6
<a href="#">TAA DV Procedures</a> .....	6
<a href="#">Required Data Validation Elements and Source Docs</a> .....	6

### **Oregon’s PIRL Data Validation Policy**

This policy covers the following federal programs: WIOA Title I Dislocated Worker, Adult, and Youth, WIOA Title III Wagner-Peyser, Jobs for Veterans State Grants (JVSG), National Dislocated Worker Grants (NDWGs), and the Trade Adjustment Assistance for Workers program.

The State agencies/entities that are responsible for the programs addressed in this framework perform data validation (DV) on their respective programs to ensure reporting accuracy and reliability, system integrity, and outcome improvement. The State will conduct DV for the applicable programs annually, follow-up on DV results, and provide technical assistance and/or corrective actions, as applicable. The State’s DV efforts will be certified in the Annual Statewide Performance Narrative Report.

The State will review source documents against the management information systems (MIS) and/or other systems of record, and the Participant Individual Record Layout (PIRL) in accordance with guidance provided by the US Department of Labor. The State will also conduct technical reviews of the PIRL to ensure data reporting procedures are valid and reliable.

The sample selected for review will include records of participants at various stages of their involvement with applicable programs.

### **Data Validation Frequency**

The State will conduct DV annually, typically in the 3<sup>rd</sup> calendar quarter and will conduct follow-up and provide technical assistance, as needed or requested. Individual programs governed by this framework may have

differing, program-specific start and end dates for data validation activities. The State's data validation methodology will be addressed and certified in the WIOA Annual Statewide Performance Report Narrative.

It is expected the State will conduct Data Validation in late August to September of each year.

### Sample Methodology

To select the sample size, performance staff collaborate with their IT division to randomly select from active and exited records in the PIRL the appropriate sample size for each program.

- Each year the State will review the sample size, taking into account previous years' DV results, potential data concerns and other relevant factors. Sample sizes are detailed in the **DV Procedural Documentation by Program Area section**, below.
- The universe of records sampled will be all participants for the previous ten quarters and will include both active and exited participants.
- All required data elements (per program) will be reviewed for each record sampled.
- Additional details are in each agency's processes towards the end of this document.

### Error Identification and Tracking

- Each program will create and maintain a data validation checklist/tool for use by the individuals conducting DV.
- State DV staff will use the checklist/tool described above to verify:
  - That allowable source documentation exists\*; and, where applicable, that the data in the participant record and the source documentation match.
- If/as errors are discovered, State DV staff will record relevant information on the checklist/tool.
  - \*Note: A lack of allowable source documentation will result in an automatic error for the corresponding data element, and may result in additional follow-up, technical assistance, or other corrective action.
- The State will use documentation to track errors. Errors shall be recorded by data element, per program, per local area and/or AJC as appropriate.

The computational method for calculating error rates will be determined by:

- Dividing the number of errors (per element) by the number of files reviewed which contain that element, expressed as a percentage.
  - Example:
    - 200 participant files reviewed for "Date of Birth"; with 5 errors found;
    - $5/200 = 0.025$ , or 2.5%
  - This process will be repeated for each data element.
- Each program will use the previous year's DV results to determine error threshold rate(s) for the upcoming year.
  - Error threshold rate(s) may fluctuate depending upon the *cause* of the error (e.g., a local AJC will not be held responsible if a State system/process is the cause of the error).
  - In all cases, the actual error rate, and any actual or presumed reasons/causes for errors will be documented when errors exceed the error threshold rate.

### Feedback and Error Correction

State DV staff will require local staff correct errors within 90 days of being notified of the error.

### **Training and Technical Assistance Identification and Provision**

DV training will be provided for appropriate program staff annually.

Additionally, the feedback process will include engagement of program and local staff to ensure that they are advised of data elements and types of source documentation that had higher trends in errors, or other general data quality concerns identified, including:

- Technical assistance will be provided annually, as needed or requested, or both, typically within 90 days of the completion of State-level DV activities.
- Targeted or system-wide staff training will be considered after DV error rates or results are analyzed.

### **Data Validation Follow-up Activities**

DV results are used to ensure the accuracy of local and state reports. Error rates and trends analysis will inform policy revisions and future sampling approaches.

If error correction is required and/or data or source documents are missing, State data validation staff will notify program coordinators (or providers, as appropriate) upon the completion of a program's data validation and source documentation review.

Individual programs governed by this framework will request follow-up documentation from their program coordinators detailing how DV processes have been corrected and will set timelines for provider responses – typically within 90 days of notifying the coordinator as described in the previous paragraph.

Should a DV error rate or trend be identified, the State will provide assistance to program providers and AJC staff to implement system and/or policy changes to improve data quality.

All records and related documentation pertaining to DV will be compiled and maintained according to federal record retention requirements and be accessible to federal reviewers (2 CFR 200.334).

Records may include:

- Copies of worksheets on data elements and files/records reviewed
- Frozen quarterly wage records for wage record matching used for reporting outcomes
- Frozen/retained screen shots and documents displaying pre-correction data
- Trends in common data accuracy issues
- Error rate calculations
- Corrective action efforts made after data validation reviews
- Manner in which results are memorialized and records retained
- Document process for the correction of missing and erroneous data identified

In the event corrective action is required, those actions and expected outcomes will be tracked and monitored, in addition to any "typical" follow-up during DV activities (identifying promising practices, etc.).

Regular assessments of the effectiveness of the DV process will be conducted annually, typically in the 3<sup>rd</sup> calendar quarter, and will employ revisions to the policy and process, as needed, including:

- Method(s) for staff to assess the effectiveness of the DV process

- Frequency for how often this assessment occurs
- An assessment of the use of self-attestation as a form of source documentation
- An assessment of data collection accuracy through supplemental information gathering processes

Assessments results may be used to design staff training and/or technical assistance sessions with a focus on potential process and data integrity improvements. Additionally, technical assistance may be requested at any time by State or local staff.

Results of the assessments may also be incorporated into subsequent years' pre-DV guidance and/or training materials.

### **DV Procedural Documentation by Program Area**

Procedures for performing DV for each program is documented in 3 separate sections, Title I, Wagner-Peyser & JVSG, and TAA due to MIS and procedural differences.

Note: Since all ETA programs that are part of this data validation framework use the same source document list/requirements, if a participant is co-enrolled in more than one of the applicable programs, any program may accept the data validation results of another program's DV procedure, as long as all Program Specific Parameters also apply.

### **Overview of Office of Workforce Investments (OWI) Processes**

1. The Office of Workforce Investments (OWI) is responsible for Data Validation related to WIOA title I programs, including National Dislocated Worker Grants.
2. OWI integrates Data Validation (DV) for WIOA title I programs during the course of annual on-site monitoring.
3. OWI staff will notify all local workforce development boards (LWDBs) before beginning each cycle of DV.
4. If any National Dislocated Worker Grants are/were in effect during the period covered by DV, OWI will incorporate those participant records into its DV calendar.
5. Sample methodology and size: OWI will use participant records randomly gleaned from WIPS/PIRL submissions and cross-reference them with participant names to create individual program-specific worksheets.
  - a. OWI will typically select 10 customer records per program, per local area, for the WIOA T-I Adult, Dislocated Worker, and Youth programs (10 records x 3 programs x 9 local WDBs = 270 records). Additionally, if OWI administered any National DWGs during the Program Year for which data is being validated, OWI will typically select 10 DWG customer records for review and data validation.
6. Correcting errors and obtaining missing data or source documents will align with **Data Validation Follow-up Activities** (above).
7. Any discrepancies or inconsistencies will be identified and resolved during the annual monitoring process.
8. A summary of data validation efforts will be included in each local area's final monitoring report.
9. OWI will create a summary report of statewide Title I programs DV results to be used for the WIOA Annual Statewide Performance Report Narrative and/or distribution to relevant parties (State WDB, etc.).

### **Wagner-Peyser and JVSG DV Procedures**

1. OED Data Validation staff will conduct DV of WP and JVSG records as outlined in the State DV Policy & Framework and will follow the processes outlined under the "Overview of Office of Workforce Investments (OWI) Processes" with the following exceptions:
  - a. Exclude item 5 and instead use sample sizes:
    - i. Wagner-Peyser will randomly select 25 records
    - ii. JVSG will randomly select 10 records

### **TAA DV Procedures**

1. OED Data Validation staff will conduct DV of TAA records as outlined in the State DV Policy & Framework and will follow the processes outlined under the "Overview of Office of Workforce Investments (OWI) Processes" with the following exceptions:
  - b. Exclude item 5 and instead use sample sizes:
    - i. TAA will randomly select 25 records

### **Required Data Validation Elements and Source Docs**

Required data validation elements and their corresponding source documents (by program) can be found at: <https://www.dol.gov/agencies/eta/performance/reporting/data-validation>

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### **Effective Date**

Upon publication.

### **Required Action**

All entities to which this policy applies must review this policy and related links and may develop additional, program-specific guidance, as necessary.

### **Contact**

Questions are to be referred to [hecc.wtdbpolicy@hecc.oregon.gov](mailto:hecc.wtdbpolicy@hecc.oregon.gov).

### **Attachments**

None.

### **References and Resources**

- WIOA Sec. 116(d)(5) Data Validation
- 20 CFR § 677.240 What are the requirements for data validation of State annual performance reports?: <https://www.ecfr.gov/current/title-20/chapter-V/part-677/subpart-F/section-677.240>
- U.S. Department of Labor Employment and Training Administration Data Validation Website: <https://www.dol.gov/agencies/eta/performance/reporting/data-validation>