

ADMINISTRATIVE ENTITY STATE POLICY –

WIOAP # 04-21

Effective Date: August 27, 2021

TO: All WIOA Subrecipients

From: Danilo Cabrera, Bureau Chief *Danilo Cabrera*

Subject: Idaho Department of Labor Data Validation Policy

Purpose:

Data validation is a series of internal controls or quality assurance techniques to verify the accuracy, validity, and reliability of data. Data validation framework requires a consistent review across programs to ensure that all data consistently and accurately reflect the performance of each grant recipient. Data validation procedures:

- Verify that the performance data reported by grant recipients to the United States Department of Labor (USDOL) are valid, accurate, reliable, and comparable across programs;
- Outline source documentation required for common data elements; and
- Improve program performance accountability through the results of data validation efforts.
- Discover and expeditiously resolve any irregularities or issues that may cause inaccurate reporting.
- Identify and implement front-line staff training needs or clarification of statewide technical guidance.

References:

- [TEGL 7-18](#) - Joint guidance for common data elements in Titles I – IV of WIOA
- [TEGL 23-19](#) - DOL-only guidance for required ETA program-specific data elements
- [TEGL 5-18](#) - DV policy summary in the state annual narrative formula report
- [TEGL 26-16](#) - Collecting and documenting supplemental information

Background

The State as a grantee receiving funding under the US Department of Labor requires WIOA programs to maintain and report accurate and reliable program and financial information. Data validation requires that the State ascertain the validity, accuracy, and reliability of report and participant record data submitted to DOL, as outlined in section 116 of WIOA.

Policy

It is the state policy to ensure, to the maximum extent feasible, the accuracy of the data entered into the Idaho Department of Labor case management system, IdahoWorks, for state performance reporting. The programs administered by IDOL and which are included in this Data Validation policy include:

- WIOA Title I-b (Adult, Dislocated Worker, Youth)
- National Dislocated Worker Grants (DWG)
- WIOA Title III (Wagner Peyser-Employment Services)
- JVSG (Jobs for Veterans State Grant)
- TAA (Trade Adjustment Assistance)

The Idaho Department of Labor's Workforce Administration Division holds primary responsibility for executing the data validation procedures for the above listed programs.

Participant Data Sources

All participant records are contained in the IdahoWorks MIS system which was developed and is maintained by America's Job Link Alliance (AJLA). Upon enrollment into any of the programs listed above, the system automatically takes a snapshot of the participant's demographic information, which is then used for federal reporting and data validation purposes.

Source documents for participant records are stored electronically in the IDOL SharePoint environment or the IdahoWorks MIS system. NOTE: Effective in PY20-21, IDOL is in the process of transitioning document storage for WIOA Title I and III records from the SharePoint site to IdahoWorks.

Allowable source documentation is that as listed in the WIOA Source Documentation column found in Attachment II of TEGl 23-19. This list of source documents is also included in the DV Source Documentation spreadsheet as well as in the individual spreadsheets used to record data validation results.

Since all participant records and associated source documentation are stored electronically, Data Validation will be conducted virtually.

Participant Sample Creation

Sampling is conducted by determining the proportionate number of enrollments per program to the total number of enrollments in each program state-wide. Participant samples are created using a PostgreSQL process developed with AJLA and the AJLA consortium states, which is then used on the IdahoWorks database to select both open and exited participants from the following funding streams: Adult, Dislocated Worker, Youth, Wagner Peyser (including JVSG), and TAA. The sample records will not include 'reportable individuals' enrollments. The code: *order by random()* is included in the PostgreSQL query to randomly select participant records from the results.

- For data validation purposes, any grant/funding stream with 250 participants or less during the PY will have a randomized participant sample size of a maximum of 10 percent of its enrollments.

Each year the time spent validating each record will be recorded; future sample sizes will be based in part upon the time needed to verify records and staff availability.

Frequency

Beginning in PY21, participant record samples will be generated after the end of each quarter of the program year allowing for both exiters as well as active participant records from the current program year to be used. Staff will then conduct validation quarterly throughout the year.

Data Validation for the Title I and Title III records will be completed before the submission of the WIOA Annual reports due on Oct 1st of each year.

Recording Validation Results

Excel spreadsheets are used to track the data validation results for the sampled participant records. One Excel file for each enrollment type (Title I: Adult, DW, Youth, Title III: Wagner Peyser, NDWG, JVSG, TAA) and a separate tab within the file for each sampled record is created. Each tab contains the corresponding PIRL elements for that program enrollment, the data validation audit outcome, the documentation source type used for validation, and any reviewer comments.

For each data validation record, all required data elements for the associated program enrollment are reviewed. Based on TEGL 23-19, the count of data elements for each enrollment type is:

- Adult: 100 elements
- Dislocated Worker: 101
- Youth: 66
- National Dislocated Worker Grant: 101
- Wagner Peyser: 58
- JVSG: 69
- TAA: 29

Scoring Validation Results

A pass, fail, or not applicable scoring value is assigned to each data element and tallied for the participant record. An error rate is calculated based on the total number of data elements, minus non-applicable elements, with a percentage based on the passing ratio. Example, 100 data elements minus 25 marked as n/a, and 70 marked as ‘pass’, and 5 marked as ‘fail’ = $70/(100-25)$ = 93% pass rate.

A passing threshold of 90% will be established for PY20 and then evaluated on an annual basis.

Error Correction:

If any missing or erroneous data is discovered through the validation process, validation staff will take appropriate actions to correct it. These corrective actions may include, but is not limited to:

- Providing a copy of the incorrect data to case management staff for them to correct.
(Note: case management staff cannot update demographics snapshot information but will update the live demographic record)
- Collecting missing documentation to verify required data elements;
- Providing additional training or technical assistance to workforce staff responsible for the erroneous data entry, if applicable;

Upon notification from validation staff, Case Management staff will have 30 days to submit corrections or obtain the missing data or source documentation for the reported failed data element.

Training

Training will be provided to workforce staff annually to showcase the results from the previous year's validation results, emphasize the importance of correct data entry, and review the allowable source documentation requirements.

Each program year during the quarter following submission of the Annual Report, Data Validation staff will review and receive training on the Data Validation process to ensure uniform application of all policies and procedures.

Process Assessment

The Workforce Administration Division will meet during the second quarter of each program year to assess the effectiveness of the 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 Data Validation Policy.

Records Retention

All Data Validation records will be retained electronically, 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 includes:

- Copies of the Excel Worksheets used to record data element outcomes and notes;
- IdahoWorks demographic snapshot information;

- Screenshots of 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.