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ADWS Policy Number: WIOA I-B – 4.6 Effective Date: July 20, 2022

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## **Data Validation Policy and Procedures**

### **PURPOSE**

The purpose of this policy is to give guidance to State and Local WIOA title I-B staff regarding Data Validation.

### **REFERENCE**

WIOA § 116(d)(5)  
TEGL 23-19

### **BACKGROUND**

The Department of Labor (DOL) and the Department of Education (ED), referred to as the “Departments”, jointly published TEGL 7-18 on December 19, 2018. This document provided guidance for validating performance data submitted to DOL through the Participant Individual Record Layout (PIRL). TEGL 23-19, dated June 18, 2020, expands on the joint guidance in TEGL 7-18, providing specific Data Validation guidance for validating additional elements not addressed in TEGL 7-18. Elements from TEGL 7-18 are included in TEGL 23-19.

WIOA section 116(d)(5) requires states to establish procedures consistent with guidelines issued by the Departments to ensure that the data reported is valid and reliable. Data Validation helps ensure the accuracy of Quarterly and Annual performance reports, safeguards data integrity, and promotes the timely resolution of data anomalies and inaccuracies.

The purpose of Data Validation performed at the local level is to [TEGL 23-19]:

1. Verify that data reflected in participant records and reported to DOL are valid, accurate, reliable, and comparable across programs. Reporting of accurate data will improve performance accountability through the results of Data Validation efforts.
2. Identify errors, missing data, out-of-range values, and anomalies in the data and resolve issues that may cause inaccurate reporting.
3. Outline source documentation required for common data elements.
4. Improve program performance accountability through the results of Data Validation efforts.

The Departments identified acceptable source documentation necessary to validate the selected data elements. The elements were selected based on their importance to reporting accurate information and to ensure data consistency across core programs.

## **POLICY**

At a minimum, state staff will conduct data validation training for both state and local staff on an annual basis. Local Workforce Development Boards are also required to conduct training annually. The training will cover all related topics, common trends, and other issues detected during the data validation review process.

During annual monitoring, data validation requirements will be reviewed to ensure that the data validation policy has been implemented by local staff.

Training documents distributed by the state should be used for local staff training to increase understanding of Data Validation issues that were identified during the review. Through staff training it is anticipated that repeated occurrences will be prevented.

State monitoring protocols have been set to ensure that local program staff are following the written Data Validation procedures and to provide corrective action if the procedures are not being followed. During quarterly Arkansas JobLink (AJL) desk reviews on specific topics, issues will be reported by email to the local area, along with technical assistance and suggested corrective action. This data integrity review will include identifying errors, missing data, out-of-range variances in values reported, and other anomalies. During the full monitoring season, these issues will be reviewed.

Regular assessment of the effectiveness of the Data Validation process and revisions to this policy will be completed as needed. Edit checks in the Arkansas JobLink (AJL) system are based on PIRL specifications, which assist with the data validation effort in real-time. At the local level, a “pending” status is in effect in AJL as part of the process when initially enrolling new participants. After a supervisor reviews and verifies that all data and documentation are correct, the supervisor must either release the “pending” status or require the case manager to correct information.

On a quarterly schedule States upload participant data into the Workforce Integrated Performance System (WIPS), which controls correct data entry by the application of many edits. All errors identified must be corrected prior to certifying reports. If Local Area participant data is not correct, State data will not be correct. Data Validation is vital to educate Local Areas concerning the provision of correct information for participants.

The Department of Labor will conduct monitoring reviews of the State’s validation system to include policies and procedures, local and state staff training, corrective actions, retention policy, participant information, and source documentation.

## **PROCEDURES**

### **1. Process for Random Sample Selection of Participants**

America’s JobLink Alliance (AJLA) has developed a random sampling methodology that will provide a sufficient representation of records from each program, and for each of the required elements that may be specific to the respective program. This sampling method is available to states.

2. Notification of Local Area of Upcoming Review  
State staff will notify the Local Area two days prior to the beginning of the review period. Staff conducting validation will generally be those in the DWS monitoring unit, although validation may also be conducted by other ADWS employees.
3. 5% Pass/Fail Ratio  
For Local Areas to be considered as passing the Data Validation review, the Local Area programmatic pass/fail ratio must be below a 5% reporting error rate to be considered a passing report for the area. The rate will be figured for each program Adult, Dislocated Worker, Youth, and Dislocated Worker Grants. If the pass/fail ratio is above the 5% reporting error rate for any program, the Local Area must provide an action plan with proposed resolution in order to remedy the data validation error rates.
4. Review Documentation  
During the state-conducted validation process, reviewers will conduct reviews of sampled participant records against source documentation to ensure compliance with federal definitions and to assess the accuracy of participant data records. DOL-specified source documentation for data elements will be reviewed in the AJL Uploader, Case Notes and posted wage information. Programs included in the review are Adult, Dislocated Worker, Youth and Dislocated Worker Grants. Reviewers will identify inaccurate documentation issues. The “Participant Data Element Document Worksheet” will be used by reviewers as they desire to record information pertaining to the review.
5. Selection of Specified Data Elements  
Not all PIRL elements are subject to validation. The State reviewers will use DOL-selected specific data elements, which are selected for validation based on three factors:
  - a) Feasibility – Data elements can be validated only when it is practical and efficient to locate and examine supporting evidence within the State records. Therefore, such items as race, ethnicity, and gender will not be validated because these data elements are self-reported by participants.
  - b) Risk – The process for validating data elements is based partly on the likelihood that the data element may be inaccurate. Data elements involving human judgment are more prone to error than data elements that do not involve human judgment. For example, determination of employment based on supplemental sources is more likely to be in error than determination of employment from wage bank records.
  - c) Importance – Data elements are selected for validation based primarily on their importance to the integrity of the Annual report.
6. Data Validation Policy is not Standalone  
Information in this policy and the Data Validation Checklist are not intended to be standalone sources for WIOA information. In some instances, knowledge beyond the information in the policy and/or checklist is required. There are many instances where familiarity of the law, regulations, policy manual, issuances, TEGs, etc. must be taken into consideration. Examples of this include, but not limited to: (a) knowledge of the definition of a credential is important to determine if an acceptable credential has been obtained, (b) knowledge of the local policy is needed to identify a youth who needs additional assistance, and (c) an understanding of the Measurable Skill Gains guidance is necessary to determine if the participant achieved a particular skills gain.

As stated in TEGl 23-19, Attachment II, Columns for Data Element number, Data Element Name, and Data Element Definitions/Instructions are not to be cited as the latest PIRL data elements. When seeking current reporting requirements, please visit:

<https://www.doleta.gov/performance/reporting/#current-reporting-req>

7. Source Documentation

State Reviewers will match source documentation uploaded by local areas against information entered in AJL to identify documentation that does not accurately support participant information in AJL.

Documentation supporting data elements in the Data Validation Checklist is to be acquired by Local Area staff. All elements pertaining to a particular participant (Adult, Dislocated Worker, Youth, Dislocated Worker Grants) are to be documented by the source documentation listed in the Data Validation Checklist. Only one category of source documentation is required for each data element. Documentation other than that which is listed on the Data Validation Checklist is not allowable.

Documentation for data elements from any source, except those designated as “electronic” or “case notes” must be uploaded into AJL within three days of receipt of the documentation. It is best to upload the documentation as soon as it is obtained. Case notes must be entered into AJL within three days of the time the information is obtained. However, it is best to enter the information as soon as it is received.

Most source documents must be uploaded into AJL through the “Uploaded Documentation” section, commonly referred to as the “Document Uploader”, or entered in Case Notes, as appropriate. Documentation must be identified with the PIRL element number given on the Data Validation Checklist, whether the documentation is uploaded into the Document Uploader or provided as a Case Note. Case Notes are not required to be uploaded, but when Case Notes are combined with other documentation, Local Area staff are to enter Case Notes into the Note section of the Uploader and then upload the documentation for the particular PIRL element. Documentation is not uploaded by Case Managers for electronic data.

The name of the documentation that is selected in the Uploader must be the same as the corresponding document name that is listed on the Data Validation Checklist for the particular element. The PIRL element selected in the Uploader must have the appropriate PIRL number attached to it. Often, one documentation type can be uploaded for more than one PIRL element. However, each PIRL element must be individually selected.

8. Electronic Records

Certain source documentation is identified in the Data Validation Checklist as “Electronic Records.” For documentation designated as such, there will be nothing for Case Managers to upload. Most of the electronic record designations are crossed out on the Checklist and are not able to be used because of the lack of electronic records available in Arkansas for these elements. (See the definition of “electronic records” below.)

9. Electronic Wage File

Case Managers do not upload wage information unless it is documentation for supplemental information that does not go through a state's electronic wage system. Such information must include the total amount earned in the quarter, and not merely the rate of pay.

State Reviewers will review electronically transferred Arkansas Unemployment Insurance (UI) and State Wage Interchange System (SWIS) wages posted to participant records in AJL. State Reviewers will receive a file of UI wages and SWIS wages for wage record matching. The appropriate quarters of wages posted to participant records in AJL will be matched against the file.

Electronic documentation found to be incorrect will fail validation. Understandably, the Local Area has no control over electronic documentation, such as incorrect wage transfers, but data validation not only points out problems directly the result of Local Area documentation, but also problems with wage transfers that must be corrected.

10. Participant Data Element Documentation Worksheet

Local Area staff are required to use the "Participant Data Element Documentation Worksheet" to keep up with documentation requirements. One worksheet is used per participant, and documentation must be entered into the Worksheet as it is obtained and uploaded into AJL. This method provides an easy means to view the elements that have been documented and those that are remaining. This will help to decrease the possibility of documentation not being collected and uploaded. Enter the name of the documentation that was used, write notes that are helpful to staff, and write "n/a" for all elements that do not apply to the participant.

11. Data Validation Checklist

The Data Validation Checklist, developed by DWS, is to be used by Local Area staff and State Reviewers as a guide to the PIRL elements to document. It contains element names and numbers, a description of the element and additional information. The first column specifies the program for which the data element is for. As an example: "Programs: A/D/Y/DWG" signifies that the data element is for Adults, Dislocated Workers, Youth, and Dislocated Worker Grants. The last column lists source documentation for each element. Case Managers must select one type of documentation for each element. Only documentation listed in this column can be used. Most of the information on the Checklist is from TEGL 23-19.

12. How do you determine which elements to use for a particular participant?

Documentation of all PIRL elements is not required for each participant. Document whichever elements apply to the participant. For example:

- a) If the participant does not have a disability, then do not document #202
- b) If the participant is not a veteran, then do not document #301
- c) If the participant is not on SNAP, then do not document #603
- d) If the participant did not receive training, then do not document #1300; #1302; #1303; #1306; #1307; #1308

Always keep in mind what it is that is being documented. Be sure that the document verifies the information that is being documented. For example:

PIRL #1332 is to document that the participant was in postsecondary education during participation. The documentation must contain two things 1) something that indicates the participant was in postsecondary education, and 2) that the participant was in postsecondary education during the time of participation.

13. Quarterly State Review

The State will usually conduct Data Validation on a quarterly basis. Establishing quarterly data reviews is a best practice for identifying and correcting errors before they continue to be repeated. Data Validation improves performance reporting and ensures that the data properly reflects the program participants, services, and outcomes. Reviews will be completed prior to the submission to DOL of the program year Annual report, which is due October 1<sup>st</sup>.

14. Missing Documentation

When documentation is missing, the Local Area will have an opportunity to provide such documentation. If it cannot be provided, then the element will fail validation. Failure to correct the documentation may become a monitoring finding, especially if a pattern is discovered.

15. Other AJL Information Review

During the review, various fields not directly related to the elements to be validated may be reviewed for accuracy. Deficiencies found and corrective action will be communicated to the Local Area by email during the time of the review and included in the final Data Validation report.

16. Data Elements “Pass” or “Fail” Validation

Reviewers will score each Data Element as either “pass” or “fail” validation. A Data Element fails validation if correct documentation is not available or if corresponding information in AJL does not match information on the documentation, such as a date. Documentation must be present in the Uploader, Case Notes or by Electronic Records, whichever is appropriate for a particular element.

The Local Areas will be notified and allowed to make corrections and/or add documentation if possible, during the review period. Corrections must be completed during the time of the review. Responses by Local Areas regarding corrections will be considered by the reviewer, and if Local Area corrections are not sufficient, the Local Area will be requested to make adjustments. There will be flexibility at the discretion of the reviewer for extenuating circumstances regarding the time period for corrections. If corrections are made and accepted by the reviewer, then elements will pass validation.

Some elements will fail validation even if corrected because incorrect information has already been submitted on the PIRL. An example is an incorrect date. Reviewers will use the “Participant Data Element Documentation Worksheet” to record information regarding each data element and mark “P”, “F” or “n/a” in the Pass/Fail column. All findings will be included in the final report even if they are corrected.

Examples for an element to fail validation, including elements that will fail even if corrected include, but are not limited to:

- a) Generally, all incorrectly reported elements reported on the PIRL will fail validation. An element will not usually fail validation due to incorrect or missing documentation unless correct documentation is not provided.

- b) An incorrect date that has been submitted on the PIRL will fail, even though it is corrected.
- c) Corrections made after the review has been completed will fail.
- d) Fail will occur if an incorrect document is selected in the AJL Uploader, or if an element is selected in the AJL Uploader that does not have a PIRL number. If the Local Area corrects these, then the element will pass.
- e) Data Elements fail validation if the information related to the element has been entered incorrectly into AJL. For example: Element #1806 Date Attained EFL. The DATE of attainment is what is being validated, not the fact that the EFL was attained. If the date entered in AJL was 6/1/2020 and the correct date entered on the documentation was 6/2/2020, then 1806 fails validation. It is obvious that a typo has occurred, but the date on the documentation must match the date entered in AJL. The date entered in AJL is reported to DOL on the quarterly PIRL, so the state will report an incorrect date. The Local Area should correct AJL, but 1806 will fail validation even if it is corrected.
- f) Only source documentation listed on the “Data Validation Checklist” is acceptable (this is the same documentation as in the TEG). Documentation other than what is listed will fail validation if not corrected.
- g) Case notes will fail validation if not sufficient to document the element. The element will pass if these case notes are corrected.
- h) If the youth 2<sup>nd</sup> quarter and/or 4<sup>th</sup> quarter placement information is not entered or is entered incorrectly, these elements will fail even if corrected. They are reported on the PIRL.
- i) An MSG marked “attained” but was “not attained” will fail because it is reported on the PIRL.
- j) An incorrect credential/date entered in AJL Outcomes will fail. It is reported on the PIRL.
- k) If a record was held open and caused the exit date to be incorrect, then the exit date will fail.
- l) Missing documentation will cause an element to fail. For example, if documentation is not available for supplemental wages, then the element will fail. Likewise, if documentation is not available for an attained MSG, then the element will fail.
- m) If the date of participation is incorrect, it will fail. It is a PIRL date.
- n) An electronic wage will fail validation if it is found to be incorrect. It is recognized that the Local Area has no control over electronic wage transfers, but the function of Data Validation is to identify all problems.
- o) If a document is such poor quality that it cannot be read, the element will fail validation unless another upload is successful.
- p) If a date to be validated cannot be read, it will fail unless another upload is successful. It is not acceptable to hand write the date on the document.

#### 17. Reporting during the review

Emails will be sent during the review process, with a separate email per participant. These emails will list all findings pertaining to the participant. These emails will describe how to correct findings. All findings must be corrected, if possible, during the validation review. Findings corrected after the review will not correct a finding for the final report. This process is similar to previous years when the documentation could be corrected during the time the reviewer was in the local office, but not after the reviewer had left the office.

#### 18. Final Report

At the conclusion of the review, a final report will be emailed to the Local Area containing information from the review. This report will contain the following information:

- a) Participant name, program, Participant ID number.

- b) A description of all findings whether corrected or not.
- c) Correspondence from the communication of the findings during the review.
- d) Indicate “pass” or “fail” validation.
- e) Include participants in the report that had no findings, including their program and AJL ID number.

19. Record Retention

All records associated with the data validation review will be stored for a period of three years from the date of the final report.

The state will be responsible for retaining information used at the state level, such as Participant Data Element Documentation Worksheets, email correspondence, the Data Validation report, training documents, and any other information pertinent to Data Validation. The state will store the UI wage files, SWIS wage files and PIRL files on the S Drive.

The Local Area will be responsible for retaining Participant Data Element Documentation Worksheets, email correspondence, the Data Validation report, training documents, and any other information pertinent to Data Validation.

Participant information entered in AJL and documents uploaded into AJL will be retained for a period of three years.

This storage time period does not invalidate any other requirement to store records for a longer period of time.

**STATE REVIEW INSTRUCTIONS**

1. Reviews will be held quarterly. The time period for each quarterly review will be determined by DWS.
2. The specific date of the review will be determined by the reviewer. Two days prior to that date the reviewer will send an email to the local area to notify them of the start date and anticipated end date of the review.
3. Reviewers will receive a list of participants to review, a UI wage file, a SWIS wage file, and a PIRL file. Participants will represent the Adult, Dislocated Worker, Youth and Dislocated Worker Grants programs.
  - a) The wage files are to be used to match wages on the participant record.
  - b) The PIRL file is to match data elements from AJL to the appropriate PIRL column. This is to verify that information from AJL was posted correctly on the PIRL.
4. Staff will review participant records in accordance with validation instructions.
5. For each participant that has a finding(s), the finding(s) must be described in an email to the local area including a description of the finding, a picture from AJL if feasible and suggested corrective action. The email should not be sent until the validation is completed for the participant. Include all findings in the same email for a single participant. Instruct the local area to respond on the same email where the findings have been described. The reviewer will determine whether the correction made by the Local Area is adequate. Using this single participant email method eliminates confusion and provides a permanent record.



6. To detect problems that are not related to data validation, reviewers will notice other fields on the participant record looking for any issues that may be present. Those issues should be included in the data validation email.
7. When the Local Area review is completed, all findings, whether corrected or not corrected, must be described in the final report. Corrective actions will not be allowed in the final report because they should have been completed during the time of the review.
8. Participant Data Element Documentation Worksheet. The Worksheet can be used by the reviewer as they deem useful for them. Below is the suggested use intended for the form:
  - a) Column: Data Element PIRL # State Staff – PIRL & Wage Validation – Write in the PIRL data for each element.
  - b) Column: Source Documentation in AJL Document Uploader – For each element that is validated enter the documentation that the Local Area used. If the documentation was incorrect and they had to enter another document, then include that document also.
  - c) Column: Notes – if the documentation was not sufficient or failed, add a note to describe what was wrong. If the local area made a correction, enter what they did to correct. Enter any other notes that seem pertinent to the data validation effort.
  - d) Column: Pass/Fail – record whether the validation failed or passed by entering a “P” or “F”.

## **DEFINITIONS**

### **1. Case Notes (do not have to be uploaded)**

Case notes refer to either paper or electronic statements by the case manager that identify, at a minimum, the following:

- (a) a participant’s status for a specific data element,
- (b) the date on which the information was obtained, (this is the “Reference Date” on the note in AJL. Case Manager must enter this date which represents the date the information was obtained), and
- (c) the case manager who obtained the information (when a Case Note is entered in AJL, the name of the individual entering the note will automatically be entered on the note and will be considered the signature. If the person entering the note was not the person who obtained the information, then include the name of the person who obtained the information in the note. For some elements the person obtaining the information will have to sign the note (for example, #1813 – 4).

### **2. Case Notes Description**

This is a field on the Case Notes in AJL. When Case Managers are documenting an element using Case Notes, the Description field in AJL must contain the name of the PIRL element being validated or the PIRL number. There will not be enough space to type the element names if a Case Note is documenting more than one element. In that case, enter the PIRL number of each element described in the Case Note. Some participant records have 20-30 case notes. It is extremely time consuming to read all notes looking for the one that validates an element. It can also be difficult to determine which case note was written to validate a particular element. By identifying the element in the Description, the reviewer can quickly recognize the exact Case Note entered that was used to document a particular element.

If the Case Manager did not correctly enter the Description, it is not considered a “failed” documentation. If the reviewer cannot locate a Case Note, then the Local Area will be requested to identify the correct Case Note. The Local Area will be reminded to use the Description in the future.

An element will “fail” validation if the Case Note is not present or is considered to be inaccurate/incomplete. For example: Case Notes can validate the health/medical “Other Reason for Exit” #923. If the Case Note does not verify that the health/medical reason is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program, then the note is not complete and will fail validation unless it is corrected during the review period. Case Notes do not have to be printed and uploaded.

3. Cross-Match

A cross-match requires validators to find detailed supporting evidence for the data element in a database. An indicator or presence of a Social Security Number in an administrative non-WIOA database, i.e., a database not maintained by a WIOA core program such as data from the State’s Department of Motor Vehicles, is not sufficient evidence for a cross-match. State validators must also confirm supporting information such as dates of participation and services rendered. States must have data sharing agreements in place as appropriate.

4. Electronic Records

Electronic records are participant records created, stored, or transferred in a form that only a computer can process and are maintained in the State’s management information system. Records can be numeric, graphic, or text. They can also include magnetic storage media such as tapes or disks.

5. File Documentation with Case Notes:

This is a two-part documentation:

- a) File Documentation consists of a document related to the element being validated but is not sufficient documentation on its own. For example: “Date Enrolled in Post Exit Education ....” #1406. The date is what is being validated. The Case Manager may have a document that shows the participant was in post exit education, but the date is not on it.
- b) Using Case Notes the case manager can verify the date. When case notes are used in conjunction with File Documentation, then the notes must be written into the Uploader text box and the File Documentation uploaded.

6. Follow-up Survey

Information obtained from the participant.

7. Match / Support

To match, the data on the worksheet must be the same as the data on the source documentation. For example, dates must match. If the participant’s date of birth recorded in AJL is February 2, 1976, then the source documentation must also have February 2, 1976, as the birth date.

To support the data entered in AJL, the source documentation must provide evidence that the data entered in AJL is correct. This instruction is used when information must be interpreted or processed before it can be used to assess the accuracy of the data on the participant's records. For example,

source documentation is used to support youth who need additional assistance because validators must interpret policy and determine if the documentation supports that policy.

#### 8. Self-Attestation

Self-attestation (also referred to as a participant statement) occurs when a participant states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status. It is recommended that the most reliable source of documentation be selected, which may not be self-attestation.

The key elements for self-attestation are:

- a) the participant identifying his or her status for permitted elements, and
- b) signing and dating a form attesting to this self-identification. The form and signature can be on paper or in the State management information system, with an electronic signature.

A WIOA application can be used as self-attestation documentation. If the application is several pages, only the applicable page must be uploaded, or the entire application can be uploaded – it is the Case Manager’s choice.

Examples of self-attestation using an application:

- Pregnant or Parenting Youth #701 - The participant identifies his or her status by indicating on the application
- Youth Who Needs Additional Assistance #702 - The application must have a space to identify the barrier
- Long-Term Unemployed at Program Entry #402 - Application must have a space to identify weeks unemployed
- School Status at Program Entry #409 - There is more than one type of school status to identify
- Dislocation Date #410 - Must have space to write the date

#### 9. Wages

There are three types of Wages to be validated: Arkansas UI, SWIS (out-of-state UI wages), and Supplemental Wages (wages entered in AJL by Case Managers). Arkansas UI wages are validated from a spreadsheet of UI wages obtained from system UI updates. It might happen that some wages will have to be reviewed in IWAGE. SWIS wages will be validated from a spreadsheet of SWIS updates. Supplemental wages will be validated from Case Manager documentation.

#### 10. Enrollment Record

A copy of an Enrollment Record can be used as source documentation for several elements. An enrollment record is a document that signifies the participant has enrolled in school. PIRL #1332 Participated in Postsecondary Education During Program Participation can be documented by an Enrollment Record. An Enrollment Record does not include other types of school records, or a transcript/report card because they are listed as separate types of documentation for #1332.

#### 11. Certificate of Attendance/Completion/Training

A Certificate of Attendance, Certificate of Training or Certificate of Completion are not industry-recognized credentials. These certificates are issued to recognize that the participant has completed a specific number of training hours. The CNA license is the credential and a CDL license is a credential.

These certificates indicating class time cannot be used as documentation for the Credential performance measure or the Measurable Skill Gains (MSG).

Arkansas two-year colleges award Certificates of Proficiency, Technical Certificates, and Associate Degrees. In most circumstances these credentials awarded by two-year colleges for CNA can be used for the Credential performance measure and the MSG. Information regarding credentials may be found in TEGl 15-10 dated December 15, 2010, TEN 25-19 dated June 8, 2020, TEGl 10-16 dated August 23, 2017, and TEGl 14-18 dated March 25, 2019.