INSTRUCTION LETTER

INSTRUCTION NUMBER: WIOA Local Instruction 20-04

TO: To Upstate WB Staff and All Contractors

SUBJECT: Performance Data Validation for DOL Workforce Programs

DATE
ISSUED: May 27, 2021

DATE
EFFECTIVE: Immediately

DATE
EXPIRES: Indefinitely

PURPOSE: To provide data validation procedures for the Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser (WP), Trade Adjustment Assistance (TAA), Jobs for Veterans' State Grants (JVSG), and National Dislocated Worker Grants (DWG) programs administered by the Department of Employment and Workforce (DEW).

REFERENCES:
- Workforce Innovation and Opportunity Act, Public Law 113-128, § 116
- 2 CFR §§ 200.328, 200.334
- Training and Employment Guidance Letters (TEGLs) 39-11, 7-18, 23-19
- State Instruction 08-05

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

POLICY:

Data Validation Procedures and Responsibilities

<u>All Programs</u>
- Appropriate WIOA, TAA, WP, JVSG, and DWG staff are responsible for conducting quarterly data validation reviews to verify that the performance data elements reported by South Carolina are valid, accurate, reliable, and comparable across program. The review is to identify anomalies in the data or missing data, to resolve issues that may cause inaccurate reporting, and to improve program performance accountability through the results of data validation efforts.
- Local Board Monitoring Staff will be responsible for conducting the data validation quarterly reviews in October, January, April, and July on both active and exited records. Staff are responsible for validating the data for the previous quarter.
- Staff will use the latest Participant Individual Report Layout (PIRL) document found at https://www.dol.gov/agencies/eta/performance/reporting#current-reporting-reg for definitions/instructions, program specific requirements and source documentation needed to perform data validation on each data element.
- Staff will be expected to provide their data validation documentation, when requested, to the Office of Internal Audit, at least annually.
- Staff must use the source documentation requirements found in TEGL 23-19, Attachment II, Source Documentation for WIOA Core/Non-Core Programs DOL-only Data Element Validation, to validate required program elements. TEGL 23-19, Attachment II, is attached to this policy and may also be found at https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=9155.

<u>WIOA Adult/Dislocated Worker and Youth Programs</u>
Each Local Workforce Development Board (LWDB) must develop its own integrity review policy that aligns with all federal and state laws, regulations, and guidance.

<u>Office of Internal Audit</u>
The Office of Internal Audit is responsible for assisting program staff in data validation review by performing the following tasks:

- Providing annual data validation by conducting a file review of data elements against source documentation;
- Implementing a sampling methodology of participant files for data validation review;

- Providing a summary of data validation results to applicable workforce programs to include technical assistance, when needed; and
- Receiving and following up on corrective action plans from applicable workforce programs to address noted deficiencies.

Technical Services, Policies and Reporting

Technical Services, Policies, and Reporting is responsible for assisting program staff in data validation review by performing the following tasks:

- Addressing edit checks on quarterly and annual performance data;
- Submitting performance data into the Workforce Integrated Performance System (WIPS); and
- Providing technical assistance related to data validation tools available to programs in South Carolina Works Online Services (SCWOS).

Effectiveness of Data Validation

All programs will review data validation procedures annually for effectiveness. This policy and other related procedures will be revised, as needed.

Staff Training

The SCWOS Coordinator is expected to provide training to local WIOA program staff on the importance of correct data entry as it relates to obtaining positive performance outcomes on an annual basis, at minimum. Additionally, each LWDB must provide training to workforce staff on the allowable source documentation requirements contained in TEGL 23-19, Attachment II, and any other relevant state policies.

State-level program staff, Area Directors, and Regional Managers are expected to provide training to WP, JVSG, and TAA staff on the importance of correct data entry as it relates to obtaining positive performance outcomes on an annual basis at minimum, and must provide training to workforce staff on the allowable source documentation requirements contained in TEGL 23-19, Attachment II, and any other relevant state policies.

Correcting Missing or Erroneous Data

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

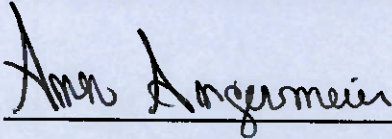- Submitting detailed change requests to correct inaccurate data;

- Working with Technical Services, Policies, and Reporting to resolve out-of-range variances and/or large quantities of data anomalies;
- Providing additional training or technical assistance to workforce staff responsible for the erroneous data entry, if applicable;
- Collecting missing documentation to verify required data elements, if applicable.

Personally, Identifiable Information and Record Retention

Staff must maintain and store participant information in a manner that ensures confidentiality in accordance with 29 CF 38.41 and State Instruction 16-11, Local Instruction Letter 13-02, Confidentiality of Equal Opportunity Records, including keeping all Personally Identifiable Information (PII) or legally sensitive information in a separate locked file. See Local Instruction Letter 13-01 for file storage requirements.

ACTION: You are responsible for ensuring that all appropriate staff receive this policy and understand their responsibilities for performance data validation.

INQUIRIES: Questions may be directed to Dana Wood wood@upstateworkforceboard.org.

Ann Angermeier, Director

Source: State Instruction 20-09.