TO: **All WIOA Core Programs and TAA Programs**

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SUBJECT: Joint Policy on Data Validation for Required Core Programs (Titles IB, II, III and IV- Vocational Rehabilitation Programs) of the Workforce Innovation and Opportunity Act and the Trade Act

DATE: January 17, 2020

Purpose

To provide guidance regarding Data Validation requirements for jointly required performance data submitted under the Workforce Innovation Opportunity Act (WIOA) and the Trade Adjustment Assistance (TAA) programs. The Idaho Department of Labor (IDOL) as the Governor's WIOA and Trade Act administrative entity, with the support of the Idaho Division of Vocational Rehabilitation, the Idaho Commission for the Blind and Visually Impaired and the Idaho Division of Career and Technical Education, provides this issuance as guidance to the workforce system on the State of Idaho's Data Validation and Source Documentation Requirements for the WIOA Title IB Programs, Title II Programs for Adult Education and Literacy, Wagner-Peyser Employment Services as amended by WIOA Title III (except for subclauses (IV) and (V)), WIOA Title IV Vocational Rehabilitation programs, National Dislocated Worker Grant (NDWG) Programs, the Trade Adjustment Assistance Programs.

Background

The State as a grantee receiving funding under U.S. Departments of Labor (DOL) and Education (ED) requires WIOA programs to maintain and report accurate and reliable program and financial information. Data validation requires the State to ascertain the validity, accuracy and reliability of report and participant record data submitted to the DOL and ED, as set forth in section 116 of WIOA.

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Data validation consists of two separate functions: report validation (RV) and data element validation (DEV). Report validation checks the accuracy of the state calculations used to generate the DOL and ED quarterly and annual performance reports as submitted through the Workforce Integrated Performance System (WIPS), the annual report as submitted through the National Reporting System for Adult Education (NRS), and the quarterly RSA-911 report as submitted through the Management Information System (MIS) to RSA. Data element validation checks the validity, accuracy and reliability of the data used by the state to perform the calculations.

DEV is an annual activity conducted by Idaho's WIOA core partner administrative staff. Selected samples of Participant Individual Record Layout (PIRL) data reported on the most current annual report submitted through WIPS and fiscal year Trade Act Participant Report (TAPR) are reviewed against source documentation in exiter records for compliance with federal definitions. The State also validates Wagner-Peyser records. See DEV Procedures, per core partner agency, for additional information.

Core partners also conduct annual case file reviews on a sample of open and closed cases to help ensure that source documentation requirements are being met. Training and Employment Guidance Letter (TEGL) 07-18 and RSA Technical Assistance Circular (TAC) 19-01 contains the most current Guidance for Validating Jointly Required Performance Data Submitted under WIOA, with source documentation requirements.

Policy:
It is the State's policy to ensure, to the maximum extent feasible, the accuracy of the data entered by WIOA Core partners, into federally-required management information systems. This policy and its correlating procedures shall establish and maintain a data validation system pursuant to DOL and ED requirements.

Requirement to Validate Data Elements
Recipients of WIOA Title IB, Title II, Title III, Title IV, NDWG and TAA funds are required to collect and report accurate information for each of these programs. DOL and ED recommends quarterly DEV to maintain and demonstrate system integrity, and identify and correct problems associated with reporting processes. Additionally, DOL and ED mandates annual assessment of the accuracy of submitted participant data as well as training on data validation elements and supporting documentation guidelines.

Alignment of DEV and Eligibility Documentation
Although DEV does not validate participant eligibility, it is the policy of the state to utilize DEV documentation requirements, as outlined in TEGL 7-18 or for Title IV programs, RSA-TAC-19-01 (for joint reporting measures) and "Guidelines: Supporting Documentation for Case Service Report (RSA-911)" (for Title IV – specific measures), as the foundation for WIOA program eligibility documentation for all eligibility components included under DEV requirements.

The alignment of these requirements will increase efficiencies and ensure DEV requirements are met (for eligibility components) at the time of participant enrollment. In this way, DEV documentation will fulfill certain eligibility documentation requirements.

IDOL's/IDVR's/ICBVI's/ICTE's annual Case File Reviews of program participants comprehensively address eligibility for their respective programs as a part of the broader case review, specifically looking for documentation to support eligibility determinations.

Definitions
Data Element Validation (DEV) – The federally mandated process by which the state annually assesses the accuracy of a sampling of reported participant data against source documents in program exiters' files for compliance with federal definitions (refer to TEGL 7-18, TAC 19-01 and "Guidelines: Supporting Documentation for Case Service Report (RSA-911)").

Personally Identifiable Information and Record Retention
All records must be maintained in compliance with federal requirements for personally identifiable information and the local area's procedures. See Idaho Department of Labor's Technical Assistance Guide (TAG) and IDVR's and ICBVI's Security & PII Awareness Acknowledgement for additional information.

Records are to be maintained per WIOA core partner agency policy requirements, based upon participant program exit date and award period end date. Record retention period may be extended if audit has not been completed.

Applicability
The following programs are subject to the Data Validation policy and procedures:

> WIOA Title IB Adult, Dislocated Worker, Youth
> WIOA Title II Adult Education and Literacy

WIOA Title III Wagner-Peyser Employment Services
WIOA Title IV Vocational Rehabilitation
National Dislocated Worker Grants
Trade Act Trade Adjustment Assistance

Procedures

The Workforce Administration Division of IDOL holds primary responsibility for executing WIOA Title I and III, Trade Act TAA and NDWG data validation procedures. DEV procedures include:

- Description of DEV Process
  - IdahoWorks – AJLA sampling
  - Quarterly data edit-checking prior to federal report submission
  - Quarterly desktop monitoring
    - Correcting errors or missing data and verification of corrections
  - Annual assessment of effectiveness of data validation process
- Annual data validation training requirements

The State Coordinator of Adult Education and GED Administrator holds primary responsibility for executing data validation procedures for Adult Education and Literacy under WIOA Title II programs. Their DEV procedures include:

- Quarterly desk audits
- Annual training with OCTAE's National Reporting System
- Bi-annual project director meetings which include data validation training and review

The IDVR and ICBVI staff are primarily responsible for validating data for the Title IV programs. Their DEV procedures include:

- Quarterly SQL querying of AWARE and ORION management information systems to report and verify anomalies or correct known errors in case management data.
- Verify data quarterly against RSA tables and Alliance open source edit checker.
- Submit data to RSA.
- Annual case file review
- Annual data validation training

Refer to Data Validation DEV Procedures, by agency, for detailed information.

Action Required

This guidance should be shared with all program supervisory, career planning and case management staff and instructors responsible for the maintenance of customer records for programs identified in section above titled **Applicability**.

References and Links

- The Workforce Innovation and Opportunity Act (WIOA) of 2014 (Public Law (Pub. L. 113- 128))

- WIOA Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions, 81 Fed. Reg. 55791 (Aug. 19, 2016)

- WIOA Joint Performance Accountability Information and Reporting System, OMB Control Number 1205-0526

- U.S. Department of Labor/Employment and Training Administration Training and Employment Guidance Letter (TEGL) No. 7-18

- 20 CFR 676-678, 34 CFR 361, 34 CFR 463 (WIOA Joint Final Rules – OCTAE, RSA, ETA)

- U.S. Department of Labor/Employment and Training Administration Training and Employment Guidance Letter (TEGL) No. 19-16 (Service Delivery for Adult and Dislocated Worker Programs under WIOA Title I and ES Program, as amended by WIOA Title III, Under the WIOA Final Rule)

- U.S. Department of Labor/Employment and Training Administration Training and Employment Guidance Letter (TEGL) No. 21-16 (Guidance and Planning Information for WIOA Title I Youth Formula Funds)

- 2 CFR 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards)

- http://www.ed.gov/AEFLA

- http://www2.ed.gov/about/offices/list/osers/rsa/wioa-reauthorization.html

- http://www.doleta.gov/wioa

- http://www.doleta.gov/performance

- WIOA Technical Assistance Guide:
  https://www.labor.idaho.gov/dnn/Portals/0/WIOA/Tags/wioa-technical-assistance-guide.pdf?v=111

- Agency-specific (IDOL, ICTE, IDVR, ICBVI) Data Validation - DEV Procedures

- https://www2.ed.gov/policy/speced/guid/rsa/subregulatory/tac-19-01.pdf   [fix fonts]

- https://www2.ed.gov/rschstat/eval/rehab/supporting-documentation-for-case-service-report.pdf

- Idaho Division of Vocational Rehabilitation, Security and PII Awareness Policy

- Idaho Commission for the Blind and Visually Impaired, Security and PII Awareness Policy

- IDOL Security and Awareness Training Policy No. AT-1

Questions

For general questions regarding this guidance, contact Gail Richardson, Business Analyst, Workforce Programs, Administrative Services Division, IDOL at Gail.Richardson@labor.idaho.gov.