

SOP 23-02 Change 1
Workforce Programs Data Validation
Standard Operating Procedures
Grow Southwest Indiana Region 11
Approval Date: 2-23-2024

Purpose

SOP 23-02 Change 1 establishes data validation requirements and procedures for DWD staff and local area responsibilities regarding the performance accountability indicators that apply to core programs including Adult, Dislocated Worker, and Youth programs, National Dislocated worker Grants (NDWG), Wagner-Peyser (WP), and partner programs of Jobs for Veterans State Grants (JVSG) and Trade Adjustment Assistance (TAA). The SOP provides accurate and reliable program information for reporting purposes and clarifies local area data entry requirements and data validation recommendations*.

Change 1 Summary

- Timelines for DWD’s annual data validation training and data validation effectiveness reviews are more detailed.
- The policy now specifies that DWD uses both active and exited cases when completing quarterly data validation reviews.
- The policy now includes the formula used to calculate errors.
- TEGL 23-19, Change 2, requires Office of Apprenticeship Grants (OA-managed) grant recipients to fully implement the data validation framework.
- OA-Managed grants have been added to DWD’s data validation process.
- Attachment II from TEGL 23-19 Change 2 has been added as Attachment B.
- The data processes outlined in DWD Policy 2023-05 Maintaining Data Integrity in Workforce Programs have also been included in this policy.

Rescission

DWD Policy 2022-08 *Workforce Programs Data Validation*

Region 11 SOP 23-02 *Workforce Programs Data Validation*

References

See Attachment A.

Content

Background

- WIOA focuses on serving individuals with barriers to employment and ensures that individuals with barriers to employment have increased access to quality services and opportunities for employment, education, training, and support.
- WIOA focuses on the alignment of workforce, education, and economics development systems.
- WIOA focuses on the continual improvement of access and delivery of WIOA services for eligible individuals to increase worker and employer prosperity.
- One key element to reach these goals is data validation processes.

- A series of internal controls, data validation will verify the accuracy and reliability of data. Source documentation for common data elements and written procedures help identify and correct data errors, improves data comparability across programs, and improves performance accountability.
- There are three separate functions of data validation:
 - Report validation (RV) checks the accuracy of state calculations that are used to generate the USDOL quarterly and annual performance reports submitted through the Workforce Integrated Performance System (WIPS).
 - Data Element validation (DEV) checks the accuracy, validity, and reliability of the data used to perform calculations for the key indicators of performance.
 - Quarterly Report Analysis (QRA) provides consistent aggregate view of Indiana's data and identifies areas where state data does not conform to USDOL Employment and Training Administration expectations.

Data Validation Requirements

- Common data elements and descriptions plus acceptable source documentation of the common data elements form the basis for what information is captured and what substantiation needs to be documented for data validation.

- Per DOL, data validation procedures must include:
 - Written procedures for conducting DV reviews that identify and correct data errors or missing data and may include electronic data checks.
 - Regular data validation training for appropriate program staff (DWD completes this each fall at the conclusion of the program year's data validation cycle).
 - Monitoring protocols consistent with 2 CFR 200.328, that ensure program staff are in compliance with data validation policy and procedures and take corrective action if found not in compliance.
 - Regular data integrity review of program data for errors, missing data, and other anomalies
 - Documentation that missing and erroneous data have been corrected.

- Processes for maintaining records per federal retention requirements including copies of worksheets on reviewed data elements, frozen quarterly wage records for wage record matching used for reporting outcomes, trends in common data issues, error rates, and corrective action efforts made post-review.
- Regular assessments of the effectiveness of data validation processes and policy revisions as needed, at least annually.

DWD Data Validation

DWD will conduct WIOA data validation for the state. DWD Performance Reporting and Data Integrity Team will develop and conduct training for DWD Validators. DWD will complete quarterly validation reviews or randomly selected participant files from the following workforce programs:

1. Adult, Dislocated Worker, Youth
2. National Dislocated Worker Grants
3. Wagner-Peyser
4. Jobs for Veterans State Grants
5. Trade Adjustment Assistance
6. Office of Apprenticeship Grants (OA-Managed)

DWD Methodology

A random sample based on the required sample size per program population (Table1) of participant files per program will be extracted from the data submitted in the Participant Individual Record Layout (PIRL).DWD will distribute the sample across four quarters and review records from each program.

Table 1

Data Validation: Required Sample Size			
Program Population Size	Confidence level %	Confidence Interval (margin of error)	Required Sample Size
1-99	95	15	30
100-199	95	15	35
200-299	95	15	37
300-499	95	15	39
500-699	95	15	40
700-999	95	15	41
1000-4999	95	15	42
5000+	95	15	43

Source: ETA/USDOL 2021 Summer conversation Series: Data Validation Summit, July 14, 2021

DWD's case management system will create audit sheets for each participant in the sample and participant records will be compared to the list of acceptable source documentation. See SOP 21-08 for Adult and Dislocated Eligibility data validation documents and SOP 17-05 Change 1 for Youth Eligibility data validation documents. A data element review spreadsheet for the Adult, Dislocated Worker, Youth, NDWGs, WP, JVSG, and TAA programs has been developed from TEGL 23-19, Change 2 for this process. DWD Validators will utilize the system generated audit sheets to document required program data elements as pass/fail.

Wage and earnings information will be validated utilizing UI wage records, State Wage Interchange System (SWIS), federal wages (when available), Supplemental Data reported according to TEGL26-16, or other administrative sources. All validators viewing SWIS wages are required to sign the SWIS confidentiality agreement before beginning validation of the wage data.

DWD Data Validation: Local Area Responsibilities and Failed Records

- In support of the data validation process, local area staff enter the participant record data into DWD's case management system on the day they are provided or within three (3) working days of the service of the service date.
- Each program year, DWD will request a local workforce development area (LWDA or local area) representative to be identified by each local area as the primary contact for DWD Validators. Region 11 has identified the Performance Monitoring Specialist as the primary contact for data validation.
- When errors, missing data, anomalies or out-of-range values are identified, the DWD Validators will contact the designated local area representative (Performance Monitoring Specialist) to discuss the procedure for making a correction or to better document why the value may be accurate.
- DWD Validators will review 100% of the failed records with the local area representative (Performance Monitoring Specialist).
- Errors are calculated using the following equation:

$$\frac{\text{FAIL +UNABLE TO VALIDATE}}{\text{Number of Elements Present}}$$

DWD Annual Process Analysis, Monitoring, and Continuous Improvement

- DWD will conduct an annual assessment of data validation efforts to determine what is working well and what, if any, changes are needed to the data validation strategy and state policy.
- Monitoring protocols will assess the consistent application of the data element requirements contained in TEGL 23-19, Change 1 and ensure the accuracy of entered data.
- DWD will share the following with the local areas:
 - Identified trends
 - Identified strengths
 - Opportunities for improvement

- Issues
- Necessary solutions for identified issues
- The annual assessment will evaluate the effectiveness of DWD’s data validation efforts.

DWD Document Storage and Record Retention

- All staff must access, maintain, and store participant information in a manner that ensures confidentiality in accordance with 29 CFR 200.334 and is consistent with DWD policy and agency system access agreements.
- 2 CFR 200.334 states that “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 (3) year 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.”
- Documentation pertaining to DWD’s data validation efforts will be stored electronically on a secured drive. All documentation will be stored in accordance with the federal records retention requirements.

Action

The processes in this policy are to be implemented as directed by DWD management for state-level data validation.

Region 11 will address and case note system changes related to errors, missing data, anomalies, out-of-range values, and will implement DWD identified continuous improvement solutions.

Region 11 will ensure timely data entry in DWD’s case management system. Services are to be entered on the day they are provided or within three (3) working days of the service date.

Region 11 will:

- Conduct annual monitoring of data entered into the case management system
- Conduct quarterly monitoring of data when required
- Conduct other random additional data monitoring at points of contact that may include but are not limited to enrollment, additional funding requests, financial award analysis data for training, credential data, and job placement.

The contents of this policy will be subject to routine DWD monitoring.

Attachments

Attachment A – References

Attachment B TEFL 23-19, Change 2 Revised Attachment II- *Source Documentation for WIOA Core/Non-Core Programs*

Effective Date

Immediately

Ending Date

Upon rescission

Attachment A References

WIOA Sec.2 and 116

Trade Act of 1974 Sec. 239(j)(3)

2 CFR 200.328

2 CFR 200.334

20 CFR 618.100

29 CFR 38.41

TEGL 7-18 Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)

TEFL 23-19 Change 1 and Change 2 Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (USDOL) Workforce Programs

TEGL-26-16 Guidance on the Use of Supplemental Wage Information to Implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act (WIOA)

DWD Policy 2023-05 Maintaining Data Integrity in Workforce Programs

Attachment B
TEGL 23-19 Change 2 Revised Attachment II – Source Documentation for
WIOA Core/Non-Core Programs

Attachment II is available upon request.