

10.30 Data Validation

Data validation is a series of internal controls or quality assurances techniques established to verify the accuracy, validity, and reliability of data. This policy is established to provide program staff guidelines to ensure that all program data are consistent and accurately reflect the individual data elements and the performance outcomes of WIOA core programs, National Dislocated Worker Grants, and the Apprenticeship State Expansion Grant. As such, the DOL Workforce Investment Agency, as the administering entity of WIOA Title I Programs, Apprenticeship Program Grants, and the National Dislocated Worker Grants are required to:

- Verify that the performance data reported by the State is 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.

Record Sampling Methodology

As part of the overall data integrity assurances, all participant records of the programs will be examined periodically during program participation, training services, exit, and follow-up for data entry review and quality assurance. Quarterly performance reports will be reviewed each quarter for accuracy.

For data element validation, which verifies data and compares data reported to source documentation, data validation will be conducted quarterly. These reviews will occur after the quarter ends.

When data validation is conducted, 50% of all active participants and exit records will be sampled for that program year. This will achieve at least a 95% confidence level in the sampling methodology.

Data Validation and Integrity Review

Assigned program staff will conduct periodic reviews of all participant records for quality assurance on the accuracy, validity, and reliability of the required Data Element Validation (DEV) of enrolled and exited individuals as well as the performance outcomes required data elements identified in the chart. Attachment A – Procedural Guidance Data Validation outlines the processes for program to conduct the review.

On a quarterly basis, the Performance Specialist at USDOL provides CNMI DOL Workforce Investment Agency feedback reports to assist in regular data integrity and quality assurance in addition to data validation. The analysis will include, but is not limited to, a review of the data submitted, anomalies and outliers, and other potential data quality issues, which may indicate reporting inaccuracies. DOL Workforce Investment Agency will use these feedback reports to conduct quarterly data integrity reviews of program data errors, missing data, out-of-range variances in values reported, and other anomalies.

Annual training on source documentation and data validation requirements will be provided to all staff.

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 within 30 days. These corrective actions may include, but not limited to:

- Submitting detailed Change Requests to correct inaccurate data to the immediate supervisor;
- Retain copies of the pre-correction data element and documents;
- Working with the vendor of the management information system or MIS to resolve data errors;
- Providing additional training or technical assistance to workforce staff responsible for the erroneous data entry, if applicable;
- Collecting missing documentation to ensure accuracy of elements, if applicable.

A pass/error ration below a 5% reporting error rate is considered a pass for each data element. If the ratio is above 5% reporting error rate, DOL Workforce Investment Agency will have 60 days to conduct research, analyze case files, review policy and/or procedures, provide feedback to staff on the data elements with high error rate trends, and develop training plans to address the inaccurate data elements to resolve ongoing issues.

DOL WIA Procedural Guidance on Data Validation

The Procedural Guidance on Data Validation outlines the processes for program staff to conduct Data Validation and Integrity Review, Correcting Missing or Erroneous Data, and Records Retention.

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DOL WIA Procedural Guidance on Data Validation

Required Individual and Performance Data Element Validation

The data element source documentation table or Exhibit 1 – Data Validation Checklist lists the data elements that are required to validate. The table displays the Participant Individual Record Layout or PIRL data element numbers, name, acceptable or required source documentation to validate each data element, and the applicable grant program the data element is required.

Source Documentation

For most data elements, the validation guidelines provide multiple forms of acceptable source documentation. If multiple sources for the same data element and the sources conflict, the most objective source should be used to determine if the data element is valid and accurate. In all elements where Self-Attestation is allowed, Self-Attestation shall be the last resort for source documentation. All source documentation shall be frozen or retained in copies in the data validation records at all times.

These source documentation types include:

1. **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 (SSN) 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. Data sharing agreements must be in place as appropriate.
2. **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. 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 management information system, with an electronic signature. Self-Attestation shall be used as a last resort for source documentation.
3. **Case Notes:** 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, and (c) the case manager who obtained the information.
4. **Electronic Records:** Electronic records are participant records created, stored, or transferred in a form that only a computer can process and maintained in the State's management information system. Records can be numeric, graphic, or text. They can also include magnetic storage media as tapes or disks.

Records Retention

Per the Federal records retention guidelines (2 CFR 200.333) data element validation or DEV documentation must be maintained as follows:

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. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. The only exceptions are the following:

(a) If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

(b) When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.

(c) Records for real property and equipment acquired with Federal funds must be retained for 3 years after final disposition.

(d) When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the 3-year retention requirement is not applicable to the non-Federal entity.

(e) Records for program income transactions after the period of performance. In some cases recipients must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the non-Federal entity's fiscal year in which the program income is earned.

(f) Indirect cost rate proposals and cost allocations plans. This paragraph applies to the following types of documents and their supporting records: indirect cost rate computations or proposals, cost allocation plans, and any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).

(1) If submitted for negotiation. If the proposal, plan, or other computation is required to be submitted to the Federal government (or to the pass-through entity) to form the basis for negotiation of the rate, then the 3-year retention period for its supporting records starts from the date of such submission.

(2) If not submitted for negotiation. If the proposal, plan, or other computation is not required to be submitted to the Federal government (or to the pass-through entity) for negotiation purposes, then the 3-year retention period for the proposal, plan, or computation and its supporting records starts from the end of the fiscal year (or other accounting period) covered by the proposal, plan, or other computation.