

BACKGROUND – Training and Employment Guidance Letter (TEGL) 23-19

Data validation is a series of internal controls or quality assurance techniques established to verify data accuracy, validity, and reliability. 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 each grant recipient. The purpose of the data validation procedures is to:

- Verify that the performance data reported by grant recipients 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.

REGULATIONS – TEGL 23-19 (Change 1 and 2), TEGL 7-18

The Workforce Innovation and Opportunity Act (WIOA) Core and Trade Adjustment Assistance (TAA) programs must use a data validation strategy per guidance from the U.S. Department of Labor (USDOL). However, these programs and the other non-core program grant recipients can decide the specific design, implementation, and periodic evaluation of that strategy, so long as those strategies or procedures adhere to this guidance.

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. As such, it is recommended that grant recipients incorporate their data validation procedures and methodology into their internal controls, data quality assurance process, and the 2 CFR 200.328-required monitoring policies and procedures.

WIOA core and TAA programs must develop data validation procedures that include:

- Written procedures for conducting data validation reviews that contain a description of the process for identifying and correcting errors or missing data, which may include electronic data checks;
- Regular data validation training for appropriate program staff (USDOL recommends at least annually);
- Monitoring protocols, consistent with 2 CFR 200.328, to ensure that program staff are following the written data validation policy and procedures and take appropriate corrective action if those procedures are not being followed;
- A regular data integrity review of program data (USDOL recommends quarterly) for errors, missing data, out-of-range variances in values reported, and other anomalies;
- Documentation that missing and erroneous data identified during the review process have been corrected;
- Documentation processes for maintaining records per the Federal records retention policy on results, which may include copies of worksheets on data elements or records reviewed, frozen quarterly wage records for wage record matching used for reporting outcomes, trends in common data accuracy issues, error rates, and corrective action efforts made after data validation reviews; and
- Regular assessments of the effectiveness of the data validation process (USDOL recommends at least annually) and revisions to that policy and process as needed.

PROCEDURES

Data validation consists of two functions: report and data element validation.

- Report validation checks the accuracy of the state calculations used to generate USDOL performance reports as submitted through the Workforce Integrated Performance System (WIPS).
- Data element validation checks the validity, accuracy and reliability of the data used by the state to perform the calculations.

Three Units will conduct Data Validation within the Department of Commerce and Economic Opportunity Office of Employment and Training (OET), the Performance and Reporting Unit, which includes Information Technology staff, the Monitoring Unit, and the Trade Adjustment Assistance team.

- **Performance and Reporting Unit:** The Performance and Reporting Unit will oversee all Title I and TAA validation. This will include all Participant Individual Record Layout (PIRL) elements noted in TEGLs 07-18 and 23-19, Change 2. For all programs, IT staff will cover the required wage-matching PIRL elements.
- **Monitoring Unit:** The Monitoring Unit will assist in the annual data validation process by being included in the pool of validators and offering their expertise in case management practices for policy and training revisions.
- **Trade Adjustment Assistance (TAA) Unit:** TAA will complete validation for its cases using the required validation elements noted in TEGL 23-19, Change 2.

PERFORMANCE AND REPORTING UNIT

Verification Process

Program Years (PY) have four quarterly periods for which data is produced and submitted via the WIPS to USDOL. Reports are prepared and submitted for the WIOA Title I Adult (1A), Dislocated Worker (1D), and Youth (1Y) programs.

The verification process ensures that the cumulative data reported via the case management system is reasonable, rational, logical, and acceptable. When an anomaly appears, the data is analyzed further to ensure that what was reported is factual.

In addition to the state internal review, the USDOL WIPS system has hundreds of data validation and scans built into uploading the reporting files that conduct automated system analysis of the data to ensure the integrity of the information reported. The quarterly reports must be submitted to USDOL within forty-five (45) days after the completion of the quarter.

The internal data verification process includes the following steps conducted by representatives of the Performance and Reporting Unit:

1. Programmer/analyst produces initial quarterly reports from the case management system and WIPS.
 - a. Data from both reports are uploaded to the Microsoft Excel spreadsheet for side-by-side comparison.
2. Programmer/analyst conducts an initial review of the information.
 - a. Verify data as appropriate for reports;
 - b. Compare data records; and

- c. Identify discrepancies or outliers in data.
3. Programmer/analyst reconciles or seeks reconciliation of any data that appears to have errors.
4. Programmer/analyst submits comparison data spreadsheets to Performance and Reporting Unit management and staff for review.
5. Management and staff review information in preparation for a meeting to discuss the data.
6. Management and staff meet to discuss any concerns with the data and identify potential reasons for errors.
 - a. Compiles participant records included in the data to identify potential errors;
 - b. Compares data to the case management system programming calculation/convention to ensure data is accurately being captured in the WIPS report; and
 - c. Compares the case management system and WIPS reports to acceptable allowance.
 - 1) DOL does not provide details of the numerator or denominator to reconcile differences as a test of reasonableness fully.
 - 2) There will be explainable differences due to the data extraction and reconciliation timing.
7. Management and staff meet with the programmer/analyst to collectively review the report and, as appropriate, deem it certifiable or make necessary changes.
 - a. Identified changes implemented as appropriate.
 - b. Programmer/analyst reproduces report, if necessary, following changes.
8. Programmer/analyst certifies the report in WIPS if deemed acceptable; otherwise, necessary changes are made, and the report is resubmitted in WIPS.
9. USDOL issues email certification confirmation.
10. Quarterly and Annual WIPS are published on the Performance & Transparency page of Illinois workNet®.
11. Annual WIPS reports are included in WIOA Annual Statewide Performance Report Narrative.

MONITORING UNIT

The Office of Employment and Training's monitoring team conducts data validation as a part of its annual monitoring visits for the WIOA and TAA program grants.

State monitoring protocols have been set to ensure that local program staff follow the written data validation procedures and to provide corrective action if they do not.

Schedule for Validation

The data validation task will be directly integrated into each grantee's annual on-site review. The program year monitoring schedule will be provided to the local areas during the annual monitoring and data validation kick-off training conducted by OET monitoring staff.

Documentation Review

The following steps are conducted when the monitoring team is reviewing the selected participant files for data validation compliance:

1. Review and answer all applicable monitoring questions related to the participant file to verify that the data reported by the local area is accurate and reliable.
2. Ensure that the local area has uploaded all supporting documentation supporting the answers to the monitoring questions. Monitors review hard copies from the participant file, and data entered in the case management system for accuracy.

3. Review data for common inconsistencies and/or systemic data validation errors based on TEGL 23-19 source documentation requirements, Change 2 Attachment II.
 - a. If the source documentation does not match that data element in the case management system, the file is marked as a data validation “Fail,” and the participant file is flagged as a finding.
 - b. Monitors will review 100% of the failed records with the local area representatives.
 - c. The local areas will be allowed to make corrections and/or add documentation, if possible, during the review period. Depending on the number of issues and complexity of the failed reporting element, the monitoring report will note the issue as a finding or area of concern.
4. Preliminary observations are discussed at the exit conference, and findings regarding data validation compliance are noted in the “Results” letter sent to the local area.
 - a. The letter notes Corrective Action steps, management recommendations, areas of concern, and/or a referral for technical assistance.
5. The Lead Monitor will compile all findings into an internal validation report form for a final review.
6. The Fiscal/Programmatic Monitoring Manager will review the validation report and all supporting documentation during the final review of any observations noted during the monitoring event. Upon completing the report, the Monitoring Manager will sign and date the form.
7. The internal validation report is uploaded and saved in the Department’s Grantee Monitoring System (GMS) monitoring system.

TRADE ADJUSTMENT ASSISTANCE (TAA) UNIT

Verification Process

Program Years (PY) have four quarterly periods for which data is produced and submitted via the WIPS to USDOL. Reports are prepared and submitted for the Trade Adjustment Assistance (TAA) programs.

The verification process ensures that the cumulative data reported via the case management system is reasonable, rational, logical, and acceptable. When an anomaly appears, the data is analyzed further to ensure that what was reported is factual.

In addition to the state internal review, the USDOL WIPS system has hundreds of data validation and scans built into uploading the reporting files that conduct automated system analysis of the data to ensure the integrity of the information reported. The Quarterly reports must be submitted to USDOL within forty-five (45) days after completion of the quarter.

The internal data verification process includes the following steps conducted by representatives of the Trade Adjustment Assistance Unit:

1. Programmer/analyst produces initial quarterly reports from the case management system and WIPS.
 - a. Data from both reports are uploaded to the Microsoft Excel spreadsheet for side-by-side comparison.

2. Programmer/analyst conducts an initial review of the information.
 - a. Verify data as appropriate for reports;
 - b. Compare data records; and
 - c. Identify discrepancies or outliers in data.
3. Programmer/analyst reconciles or seeks reconciliation of any data that appears to have errors.
4. Programmer/analyst submits comparison data spreadsheets to TAA staff for review.
5. TAA staff reviews quarterly report data from the case management system and WIPS.
6. TAA staff runs the quarterly PIRL data through the USDOL TAA Data Integrity (TAADI) Self-Check.
7. TAA staff discusses any concerns with the data and identifies potential reasons for errors.
 - a. Compile participant records included in the data to identify potential errors;
 - b. Compare data to the case management system programming calculation/convention to ensure data is accurately being captured in the WIPS report; and
 - c. Compares the case management system and WIPS reports to acceptable allowance.
 - 1) DOL does not provide details of the numerator or denominator to reconcile differences as a test of reasonableness fully.
 - 2) There will be explainable differences due to the data extraction and reconciliation timing.
8. TAA staff meets with the Programmer/analyst to collectively review the report and, as appropriate, deem it certifiable or make necessary changes.
 - a. Identified changes implemented as appropriate.
 - b. Analyst reproduces report, if necessary, following changes.
9. Programmer/analyst certifies the report in WIPS if deemed acceptable; otherwise, necessary changes are made, and the report is resubmitted in WIPS.
10. TAA staff reviews the USDOL-issued TAADI results and responds if needed.