PY 2021 LOWCOUNTRY WORKFORCE INSTRUCTION NUMBER 17

TO: Lowcountry Workforce Innovation and Opportunity Act Contractors/Service Providers/Sub-recipients/One- Stops

FROM: MICHAEL V. BUTLER
Lowcountry Workforce Development Director

Subject: Performance Data Validation for DOL Workforce Programs

Issuance Date: March 23, 2022

Effective Date: July 1, 2021

Purpose: To provide data validation procedures for the Workforce Innovation and Opportunity Act (WIOA) 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
- State Instruction 20-09

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.
WIOA Adult/Dislocated Worker, Youth and National Dislocated Worker Grant (NDWG) Programs

Each Local Workforce Development Board (LWDB) must develop its own data integrity review policy that aligns with all federal and state laws, regulations, and guidance.

Policy:

Lowcountry Workforce Area Data Validation Policy and Procedures

All Programs

- Appropriate Lowcountry WIOA 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 programs. 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.

- Lowcountry Staff responsible for conducting the data validation review must complete quarterly reviews in October, January, April, and July on both active and exited records. Lowcountry Staff are responsible for validating the data for the previous quarter.

- In order to conduct the quarterly review Lowcountry Staff will utilize the form and sample the records provided by the State to the Lowcountry each quarter.

- Lowcountry Staff will review a minimum of 4 records each quarter.

- Lowcountry Staff will ensure different records are reviewed each quarter so that at the end of the year, when four quarters have been completed, a minimum of 16 records have completed reviews.

- Lowcountry Staff will provide a summary of data validation results at least annually to applicable workforce programs/contractors which may include technical assistance and corrective action plans, when needed;

- Lowcountry Staff will use the latest Participant Individual Record Layout (PIRL) document found at https://www.dol.gov/agencies/eta/performance/reporting#current-reporting-req for definitions/instructions, program specific requirements and source documentation needed to perform data validation on each data element.

- Lowcountry Staff will only validate those data elements reported by Lowcountry Adult/Dislocated Worker/Youth/NDWG staff. All other elements will be marked as “unable to be validated” in the Audit Outcome column and will not be considered as to if the element and record file passes or fails the data validation. There are a number of required data elements that are unable to be validated due to the confidentiality of the source documents, restricted access, or where the data or source was not Lowcountry Adult/Dislocated Worker/Youth/NDWG staff.
• This includes, but is not limited to programs administered by the Department of
Employment and Workforce (DEW) Wagner-Peyser (WP), Trade Adjustment Assistance
(TAA), Jobs for Veterans' State Grants (JVSG), and National Dislocated Worker Grants
(DWG), other local area staff or partners and participant self-reported data. Data
Elements not reported (data entry created) by Lowcountry Adult/Dislocated
Worker/Youth/NDWG staff may include, but is not limited to
  o 1600 - Employed in 1st Quarter After Exit Quarter
  o 1601 - Type of Employment Match 1st Quarter After Exit Quarter (WIOA)
  o 1602 - Employed in 2nd Quarter After Exit Quarter
  o 1603 - Type of Employment Match 2nd Quarter After Exit Quarter (WIOA)
  o 1604 - Employed in 3rd Quarter After Exit Quarter
  o 1605 - Type of Employment Match 3rd Quarter After Exit Quarter
  o 1606 - Employed in 4th Quarter After Exit Quarter
  o 1607 - Type of Employment Match 4th Quarter After Exit Quarter
  o 1614 - Industry Code of Employment 1st Quarter After Exit Quarter
  o 1615 - Industry Code of Employment 2nd Quarter After Exit Quarter
  o 1616 - Industry Code of Employment 3rd Quarter After Exit Quarter
  o 1617 - Industry Code of Employment 4th Quarter After Exit Quarter
  o 1618 - Retention with the same employer in the 2nd Quarter and the 4th
Quarter
  o 1700 - Wages 3rd Quarter Prior to Participation Quarter
  o 1701 - Wages 2nd Quarter Prior to Participation Quarter
  o 1702 - Wages 1st Quarter Prior to Participation Quarter
  o 1703 - Wages 1st Quarter After Exit Quarter
  o 1704 - Wages 2nd Quarter After Exit Quarter
  o 1705 - Wages 3rd Quarter After Exit Quarter
  o 1706 - Wages 4th Quarter After Exit Quarter
  o 2700 - Social Security Number

• Lowcountry Staff will provide their data validation documentation, when requested, to
the State Office of Internal Audit, at least annually.

• Lowcountry 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, may be found at:
State Office of Internal Audit
The State 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.

State Technical Services, Policies, and Reporting
State 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).

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.

Effectiveness of Data Validation
All programs will review data validation procedures annually for effectiveness. This policy and any related procedures will be revised, as needed. Lowcountry will evaluate the effectiveness of data validation procedures based on the results of the State Office of Internal Audit annual summary of data validation results and if any corrective action plan was assigned by the State to the Lowcountry. The Lowcountry policy will be deemed to be effective if there is no state corrective action plan implemented.

Staff Training
Lowcountry staff must provide training to local WIOA Title I Workforce Lowcountry Adult/Dislocated Worker/Youth/NDWG program staff on the importance of correct data entry as it relates to obtaining positive performance outcomes on an annual basis, at minimum. Lowcountry staff 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, Lowcountry 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 and/or correcting inaccurate data, if applicable.

Personally Identifiable Information and Record Retention
LWDB Staff, contractors, partners, one-stop operators, must maintain and store participant information in a manner that ensures confidentiality in accordance with 29 CFR 38.41 and State Instruction 16-11, Confidentiality of Equal Opportunity Records, including keeping all Personally Identifiable Information (PII) or legally sensitive information (e.g., information about divorce proceedings, custody battles, or criminal histories) in a separate locked file. PII and legally sensitive information must never be included in a case note.

As a general rule, the following records must be retained for three years from the submission of the Final Expenditure Report:

- Financial Records
- Supporting Documents
- Statistical Records
- Participant Files
- All other non-federal entity records pertinent to a federal award

However, exceptions to this rule may apply. Refer to 2 CFR § 200.334 for more guidance.

Note: Records related to Equal Opportunity (EO) complaints must be kept for three years following the complaint resolution, or if the complaint resolution is appealed to DOL, records must be retained for three years following the resolution of the appeal.

Exceptions to all policies may be approved by the Lowcountry Workforce Development Director

Action: Please ensure that all appropriate staff receive this policy and understand their responsibilities for performance data validation.

Inquiries: Questions may be directed to scampbell@lowcountrycog.org

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