

Performance Measures Related Data Validation Guidance
August 2019

Associated Data Validation Materials

Data Validation Checklist

Participant Data Element Documentation

Document Uploader Presentation

The Department of Labor (DOL) and the Department of Education (ED), referred to as the “Departments”, jointly published TEGL 7-18 December 19, 2018 containing guidance for validating performance data submitted to DOL through the Participant Individual Record Layout (PIRL).

WIOA section 116(d)(5) requires states to establish procedures, consistent with guidelines issued by the Departments to ensure that the data reported is valid and reliable.

The guidance in this memo is to provide instructions to Local Area WIOA staff regarding the process of data validation. Currently the Departments have issued only the data elements that relate to performance measures. At a later date the Departments will publish information for validating other data elements.

The purpose of Data Validation is to:

- Verify that the performance data reported to the Departments are valid, accurate, reliable, and comparable across programs.
- Identify errors, missing data, out-of-range values and anomalies in the data and resolve issues that may cause inaccurate reporting.
- Outline source documentation required for common data elements.
- Improve program performance accountability through the results of data validation efforts.

The Departments identified acceptable source documentation that is adequate to validate the performance data elements. The elements were selected based on their importance to reporting accurate performance outcomes and to ensure data consistency across core programs.

All source documents must be uploaded into AJL through the “Uploaded Documentation” section commonly referred to as the “Document Uploader” located on the Case Details page in AJL. Attached is a demonstration of the Document Uploader.

The attached “Data Validation Checklist” developed by the Division of Workforce Services (DWS) contains data elements to be validated, a description of the element and allowable source documentation for each data element.

The Data Validation process will not be retroactive. Local Boards must begin uploading documentation into the Document Uploader in AJL for participants who have a Date of Participation of September 1, 2019.

Annually the state will conduct data validation training for state reviewers during staff development sessions. Training for appropriate WIOA Local Board staff will be conducted on an annual basis, generally after a review. The state will conduct regular assessments of the effectiveness of the data validation process and adjustments will be made as needed.

Validation Process:

1. Allowable documentation supporting data elements is to be acquired by Local Board staff, as described in the Data Validation Checklist, beginning with participants who have a Date of Participation of September 1, 2019.
2. Source documentation will be stored using electronic means which is Arkansas JobLink (AJL).
3. Documentation for all data elements, not designated as “electronic,” that is provided to the case manager by the participant should be uploaded into AJL at the time it is received and then returned to the participant. Documentation received from a school or employer should be uploaded within 3 days of the receipt. It is not necessary to return documentation to the school or employer. It is not necessary to keep documentation in the participant folder. Case notes must be entered in AJL as soon as the information is obtained or at least within 3 days. It will not be necessary to store paper documentation in the participant folder.
4. Only one source document listed on the “Data Validation Checklist” is required for each data element.
5. Certain source documentation will be identified as “Electronic Records.” For documentation designated as such, there will not be paper copies for case managers to collect and upload. Information entered in AJL will serve as documentation and will be available in AJL to be reviewed by a validator.
6. During the state validation process, DWS staff will conduct reviews of data elements against source documentation. Validating all records for participants who are new as of September 1, 2019 will ensure a good start and correct problems identified in the beginning. Later there will be a scheduled time for the state data validation review which may be quarterly. During the review, the attached “Participant Data Element Document Worksheet” will be used to record information from the review. Local Area staff should also use this form to keep up with documentation for each participant.

If incorrect documentation is found in the AJL Uploader, or there is missing documentation, or if documentation is not readable, the Local Board will be notified and asked to upload

correct documentation. The incorrect documentation will be deleted. Errors concerning electronic documentation will also be brought to the attention of local area staff for correction. All errors, missing documentation, and documentation not readable will be recorded by the state for historical purposes and retained for DOL to review when they monitor our data validation program. Copies of incorrect documentation must be kept with the "Participant Data Element Documentation Worksheet." State validation records will be kept for three years from the date that Data Validation is completed. Documents uploaded into AJL will be retained for a period of more than three years.

7. All errors will "fail" validation even when corrected. It is necessary to correct errors if possible so that we have correct information in AJL for historical purposes. If an error cannot be corrected, then it will remain as incorrect.
8. Corrective action in the form of technical assistance and/or a correction action plan may be required if procedures are not followed, or there is a high number of failed elements during a state review.
9. There will not be a sampling methodology at this time because all files will be reviewed during the startup period. At a later date AJLA will develop a sampling methodology which will be programmed into AJL.
10. Each data element on the worksheet will be scored as "pass" or "fail".
11. Documentation other than that which is listed on the Data Validation Checklist is not allowable.
12. For Local Areas to be considered as passing the Data Validation review there must be an error rate of 5% or less per program (Adult, Dislocated Worker, Youth, Dislocated Worker Grants). However, at the initial start of Data Validation, September 1, 2019, the error rate will not be in effect because only new participants will be validated which will be a gradual number of participants increasing over a period of time. The state will keep track of new participants to be reviewed by using Report 8 in AJL.
13. Reports of the review will be distributed to each Local Board containing results of the state data validation review. These reports and any other pertinent information will be utilized as training materials to be discussed with the Local Board. Local areas should use these reports for informational purposes and for staff training.
14. The Local Board will have two weeks from the date of the report to respond with concerns, questions or comments. If the number of errors described on the report seems excessive, the Local Board will be asked to provide an action plan to remedy the number of errors for the future.