SUBJECT:		
Statewide Data Element Validation Policy		

ATTACHMENTS: Attachment 1- PIRL Data Sampling Desk-Aid
Attachment 2- TAA and WP Specific Data Elements

This Issuance is Official Policy of the Missouri Office of Workforce Development	**THIS ISSUANCE DOES REQUIRE CREATION OR ALTERATION OF A CORRESPONDING LOCAL POLICY**	**THIS ISSUANCE AFFECTS:**
ISSUING AUTHORITY	**KEYWORDS:**	Missouri One-Stop Delivery System (MJCs/AJCs)
		WIOA Title I Local Areas/Local Boards/Local Plans
[signature]	Data Element, DEV, Performance, Validation, WIOA,	WIOA Title I Performance/Accountability
		WIOA Title I One-Stop Delivery/Service Providers
Mardy Leathers, Director Missouri Office of Workforce Development (OWD)		WIOA Fiscal/Administrative Procedures
		Trade Adjustment Assistance
		State of Missouri Workforce System Procedures
		FOR THE ATTENTION OF:
		OWD State Professional Staff
		One-Stop Fontline Staff
		Chief Elected Officials
		Local WDB Directors
		One-Stop Operators
		One-Stop Functional Leaders
		Service Providers
		Local Quality Assurance Monitors
		Local Trade Act Reps
		Local Trade Act Navigators

RESCISSIONS:

None.

REFERENCES:

20 CFR 677.240, "What are the requirements for data validation of State annual performance reports?"

U.S. Department of Labor, Employment and Training Administration, Training Employment and Guidance Letter (TEGL) 23-19, "Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs," June 18, 2020.

TEGL 7-18, "Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)," December 18, 2018.

OWD Issuance 12-2019, "Statewide Sub-State Monitoring Policy," December 6, 2019.

SUMMARY:

The purpose of this policy is to establish a data validation strategy for the WIOA Adult and Dislocated Worker, WIOA Youth, Wagner-Peyser (WP), and the Trade Adjustment Assistance (TAA) programs operated by the Office of Workforce Development (OWD). This policy will help ensure the accuracy of quarterly and annual performance reports, safeguards data integrity, and promotes the timely resolution of data anomalies and inaccuracies. This policy supersedes any previous guidance on this topic.

BACKGROUND:

Data validation is a series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data. The establishment of 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. To that end, the purposes of validation procedures are to[1]:

- *Verify that the performance data reported by grant recipients to 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.*

SUBSTANCE:

DEV Procedures

All Programs

- Staff responsible for conducting Data Element Validation (DEV) reviews must submit a system access request in order to receive access to the "PIRL data sampling" report located in the statewide electronic case management system.
- Staff responsible for conducting the DEV review must complete quarterly their reviews at the beginning of October, January, April and July on both active and exited records. Staff are responsible for validating the data for the quarter that just ended.
- Staff should follow the detailed desk-aid (Attachment 1) on how to access the PIRL data sampling report to randomly identify files to review. Depending on the size of each record set, the corresponding number of sample records shown below, at a minimum, must be examined. These guidelines are applicable for every review.[2] If the minimum number of sample records is not available, all available records must be reviewed.

Exited Record Set	Size Sample Size
1–200	69
201–300	78
301–400	84
401–500	87
501–1,000	96
1,001–2,000	100
2,001–10,000	105

- Staff will download the data element sheets generated by the statewide electronic case management system into Microsoft Excel and conduct their reviews directly in the workbook.
- Staff will mark each element as either a "pass" or a "fail". All failures must have corresponding comments describing why the element failed and the corrective action being taken to correct the data, if applicable.

---

[1] TEGL 23-19
[2] Sample size based on algorithmic tables for simple random sampling developed by The Research Advisors, Franklin, MA ©2006.

- Staff will use the latest PIRL document found at
  https://www.doleta.gov/performance/reporting/#current-reporting-req for definitions/instructions,
  program specific requirements and source documentation needed to perform data element validation on
  each data element.
- Staff will be expected to provide their DEV documentation, when requested, to the OWD Regulatory
  Compliance Unit at least annually.

WIOA Adult/Dislocated Worker and Youth Programs

- Each Workforce Development Board (WDB) is responsible for conducting quarterly DEV reviews to verify
  that the performance data elements reported by Missouri 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.
- Each WDB must use the source documentation requirements found in TEGL 23-19 Attachment II to
  validate the required elements identified in the attachments of OWD's Technical Assistance Guides
  (T.A.G.).

TAA

- Trade Navigators are responsible for conducting quarterly DEV reviews for their respective areas to verify
  that the performance data elements reported by Missouri 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.
- Trade Navigators must use the source documentation requirements found in TEGL 23-19 Attachment II to
  validate the required elements identified on Attachment 2 of this Issuance.

WP

- OWD's WP Program Coordinator is responsible for conducting quarterly DEV reviews on WP data in
  order to verify that the performance data elements reported by Missouri 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.
- The OWD WP Coordinator must use the source documentation requirements found in TEGL 23-19
  Attachment II to validate the required data elements identified on Attachment 2 of this Issuance.

<div align="center">

DEV Training

</div>

Each WDB is expected to provide training to workforce staff on the importance of correct data entry as it
relates to obtaining positive performance outcomes on an annual basis, at minimum. Additionally, each
WDB must provide training to workforce staff on the allowable source documentation requirements

contained within OWD's WIOA Adult/Dislocated Worker TAG[3], WIOA Youth TAG[4], and Attachment II[5] of TEGL 23-19.

OWD Supervisors and Regional Managers are expected to provide training to frontline workforce staff on the importance of correct data entry as it relates to obtaining positive performance outcomes.

OWD will provide DEV training to all staff responsible for monitoring data entry and performance on an annual basis, at a minimum. These trainings may occur via regular monthly Office of Performance & Strategy / Workforce Data unit meetings, annual monitoring summits, virtual technical assistance sessions, or other appropriate training methods as recommended by OWD.

Data Integrity

On a quarterly basis, DOL will provide OWD with performance feedback reports to aid in data integrity efforts and support data accuracy. 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.[6] Office of Performance & Strategy / Workforce Data unit 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.

On an annual basis, OWD's Regulatory Compliance Unit will review the DEV reviews conducted by each responsible entity to determine the effectiveness of this policy and the procedures identified within. If inefficiencies are discovered, the policy and procedures will be updated accordingly.

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. These corrective actions may include, but is not limited to:

- Submitting detailed Change Requests to correct inaccurate data;
- Working with the Office of Performance & Strategy / Workforce Data unit to resolve out-of-range variances and/or large quantity 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, if applicable.

Record Retention

DEV documentation must be maintained per the Federal records retention guidelines[7].

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.

---

[3] OWD Issuance 04-2020
[4] OWD Issuance 05-2020
[5] TEGL 23-19 Attachment II
[6] TEGL 23-19
[7] 2 CFR 200.333

- Each WDB must retain copies of worksheets on data elements and/or records reviewed during the data validation review process, and any corrective actions taken such as submitted Change Requests or technical assistance.
- OWD's TAA and WP Coordinators must retain copies of workbooks, worksheets on data elements and/or records reviewed during the data validation review process, and any corrective actions taken such as submitted Change Requests or technical assistance.
- Office of Performance & Strategy / Workforce Data unit must maintain frozen quarterly wage records for wage record matching used for reporting outcomes, trends in common data accuracy issues, and error rates.
- OWD Regulatory Compliance Unit must retain documentation of annual DEV effectiveness reviews and any corrective action efforts made after data validation review process.

ROLES, RESPONSIBILITES, and REQUIRED ACTIONS:

- Each WDB must revise their local sub-state monitoring policy[8] **and** internal controls to include the quarterly data element validation monitoring procedures outlined in this policy.
- Each WDB must designate and identify at least one staff to perform validation procedures on a quarterly basis. This information must be included in the updated sub-state monitoring policy.
- Each WDB has 90 days to revise their policy and to submit a required Plan modification.
- TAA Navigators must validate TAA data on a quarterly basis.
- OWD's WP Coordinator must validate WP data on a quarterly basis.

TIMELINE:

Specially Identified Workforce System Staff – Implementation of these rules…..…**Immediate and Continuous**

INQUIRIES:

Please direct all questions or comments regarding this Issuance document to dwdpolicy@dhewd.mo.gov. All active Issuances are available at jobs.mo.gov/dwdissuances. Expired/rescinded Issuances are available on request.

For information about Missouri Office of Workforce Development services, contact a Missouri Job Center near you.
Locations and additional information are available at jobs.mo.gov or 1-(888)-728-JOBS (5627).

Missouri Department of Higher Education and Workforce Development is an equal opportunity employer/program.
Auxiliary aids and services are available upon request to individuals with disabilities.
Missouri Relay Services at 711.

---

[8] 2 CFR 200.328