

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION WIOA
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ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 23-19

TO: STATE AND LOCAL STAKEHOLDERS IN THE WORKFORCE
INNOVATION AND OPPORTUNITY ACT
STATE WORKFORCE AGENCIES
STATE WORKFORCE ADMINISTRATORS
STATE WORKFORCE LIAISONS
H-1B JOB TRAINING PROGRAM GRANT RECIPIENTS
INDIAN AND NATIVE AMERICAN PROGRAM (INAP) GRANT RECIPIENTS
JOB CORPS CONTRACTORS
JOBS FOR VETERANS STATE GRANTS (JVSG) GRANT RECIPIENTS
STATE MONITOR ADVOCATES
NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANT RECIPIENTS
NATIONAL DISLOCATED WORKER GRANT RECIPIENTS (DWG)
REGISTERED APPRENTICESHIP PROGRAMS
REENTRY EMPLOYMENT OPPORTUNITIES (REO) GRANT RECIPIENTS
SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP) GRANT RECIPIENTS
TRADE ADJUSTMENT ASSISTANCE (TAA) LEADS
YOUTHBUILD GRANT RECIPIENTS

FROM: JOHN PALLASCH /s/
Assistant Secretary

SUBJECT: Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs

- Purpose.** This guidance provides information to grant recipients of the U.S. Department of Labor workforce programs, including states, and provides guidelines for grant recipients to use in developing procedures for ensuring the data submitted for performance reporting are valid and reliable.
- Action Requested.** Grant recipients should distribute this information to the appropriate staff.

RESCISSIONS TEGL 22-15	EXPIRATION DATE Continuing
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3. **Summary and Background.**

A. **Summary.** This guidance is specific to grant recipients of DOL workforce programs and aligns with and expands on the DOL/Department of Education Joint Guidance in Training and Employment Guidance Letter (TEGL) 7-18 *Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)*. This guidance provides specific data validation guidance for the WIOA core programs and other DOL-funded programs not addressed in TEGL 7-18.

B. **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 for both DOL-only and jointly-required performance data are to:

- 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.

This issuance provides additional DOL-specific guidance on data validation for DOL programs, including those that are not WIOA core programs (referred to in this guidance as “non-core programs”), as well as additional DOL-specific guidance on the DOL-administered WIOA core programs. Non-core programs include programs authorized by WIOA, as well as programs authorized by other Federal legislation. Collectively, the non-core programs include:

- Indian and Native American (INA) Program, under WIOA section 166;
- Job Corps, under WIOA sections 141-162;
- National Farmworker Jobs Program (NFJP), under WIOA section 167;
- YouthBuild, under WIOA section 171;
- Reentry Employment Opportunities (REO), authorized under WIOA section 169;
- National Dislocated Worker Grants (DWG), under WIOA section 170;
- H-1B Job Training Programs (grants awarded July 1, 2016, and later), authorized under section 414(c) of the American Competitiveness and Workforce Improvement Act of 1998 (29 U.S.C. 3224a);
- Senior Community Service Employment Program (SCSEP), authorized under title V of The Older Americans Act of 1965 (42 U.S.C. 3056 et seq.);
- Trade Adjustment Assistance (TAA), authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.);

- Apprenticeship Program Grants administered by the Office of Apprenticeship; and
- Jobs for Veterans State Grants (JVSG), authorized under 38 U.S.C. chapter 41.

In addition, the data validation requirements in this guidance also apply to the Monitor Advocate System. The Monitor Advocate System protects the standard of services provided to migrant and seasonal farmworkers (MSFWs) under the Wagner-Peyser Act Employment Service program. Therefore, as part of a WIOA Core Program, all of the requirements that apply to the Wagner-Peyser Act Employment Service for data validation will apply to the Monitor Advocate System.

DOL, jointly with the Department of Education, issued TEGL 7-18, *Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)*, which elaborated on the data validation guidelines for performance accountability required under WIOA section 116(d)(5). This DOL-only data validation guidance fits within the framework established in TEGL 7-18 and provides DOL grant recipients with additional details on the framework for data validation. Grant recipients must develop data validation policies and procedures consistent with the instructions in this guidance.

4. DOL Data Validation Requirements.

A. Requirements for WIOA Core Programs and Non-Core Programs.

WIOA Core Programs and the TAA program: WIOA establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of states and local areas in achieving positive outcomes for individuals served by the workforce development system's six core programs. WIOA core programs, as well as the TAA program (Sec. 239(j)(3) of Trade Act of 1974), are required to follow the data validation framework outlined in section B as well as any program specific guidance outlined in Attachment I.

Other Non-Core Programs: Other non-core programs are required to follow the program-specific guidance related to data validation discussed in Attachment I. To meet the objectives of accurate, valid, and reliable program data, these non-core programs are highly encouraged to also implement the data validation framework outlined below.

- B. Data Validation Framework.** The WIOA Core programs and the TAA program must use a data validation strategy. However, these programs and the other non-core program grant recipients have the discretion to 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 programs and the TAA program 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 (DOL 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 (DOL 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 (DOL recommends at least annually) and revisions to that policy and process as needed.

On a quarterly basis, DOL will be providing grant recipients with feedback regarding their performance 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. Grant recipients are encouraged to incorporate the DOL's analysis into their data validation processes.

For the WIOA Core programs, the information in the State's annual report must be validated before it is submitted to DOL. However, DOL recommends that all grant recipients engage in data validation activities on a quarterly basis to ensure their data is accurate. Establishing quarterly data reviews is a best practice for identifying and correcting errors to improve performance reporting and ensuring the data properly reflects the program participants, services, and outcomes.

- C. **Data Validation Parameters.** Policies and procedures developed by the WIOA Core programs, as well as the TAA program, must include regular data element validation through program monitoring on the specific data elements required in TEGL 7-18, and Attachment II of this TEGL. DOL selected the elements in Attachment II based on their

importance to reporting accurate performance outcomes and to ensure data consistency across the programs mentioned above in section 3B.

DOL will not be providing a specific statistical validation sampling methodology, or specific data validation software. However, grant recipients are encouraged to incorporate a comprehensive random sampling methodology and procedure for the source documentation review of participant files into their data validation processes. Grant recipients using a random sampling methodology should provide a sufficient representation of records from each program, and for each of the required elements that may be specific to the respective program.¹

D. Source Documentation. In Attachment II of this guidance, programs mentioned above in section 3B identify acceptable source documentation necessary to validate these selected data elements. Grant recipients may:

- (1) maintain supporting source documentation for program-specific data elements not included in this guidance;
- (2) conduct source document validation on additional data elements; and/or
- (3) require additional source documentation in their procedures.

DOL recommends that grant recipients identify similar data elements that are required for validation, such as for eligibility documentation, and use those requirements as a basis for developing source documentation requirements for any additional elements beyond the requirements set forth in Attachment II.

E. Reporting Requirements. Grant recipients must describe their data integrity measures, data validation methodology, policies, and procedures as required by their individual program guidance in Attachment I. Grant recipients should contact their appropriate regional or program offices for technical assistance.

F. Monitoring. DOL's monitoring of these requirements will be conducted by the appropriate regional or program office. During these reviews, grant recipients can expect Federal staff to conduct monitoring activities that include, but are not limited to:

- (1) checking for data validation policies, processes, and procedures;
- (2) verifying staff are being trained, and if any corrective action is needed or implemented;
- (3) reviewing files and source documentation;
- (4) reviewing data validation results maintained per Federal records retention policy; and
- (5) analyzing data integrity reports generated by DOL. Reviews may result in findings or requirements for corrective action.

¹ Grant recipients may use publicly available calculators and tools for determining sample size based on total records.

5. **Inquiries.** Please direct inquiries to the appropriate regional or program office.

6. **References.** Please see Attachment III.

7. **Attachment(s).**

- Attachment I – Program Specific Instructions
- Attachment II – Source Documentation for WIOA Core/Non-Core Programs
- Attachment III – References