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# Data Validation Training

Adult, Dislocated Worker, and Youth Programs

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**ARIZONA @WORK™**  
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# Topics

- Data validation overview
- State policy and procedures
- Common monitoring findings
- Document upload: Arizona Job Connection (AJC)

# Data Validation Overview

- Verifies the accuracy, validity, and reliability of data
- Identifies data anomalies
- Outlines required source documentation (checklist)
- Improves program performance accountability
- Distinct from eligibility determination
- State and local area responsibility



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# Data Validation Policy



# Data Validation State Policy

## ARIZONA DEPARTMENT OF ECONOMIC SECURITY



### WORKFORCE INNOVATION AND OPPORTUNITY ACT POLICY MANUAL

SUBJECT: Data Validation Policy

### CHAPTER 2 – SECTION 1500

#### **1500 BACKGROUND AND PURPOSE**

Data validation is a series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data. This policy is issued pursuant to the Department of Economic Security's (DES) responsibilities as the state grant recipient of Title I funds from the U.S. Department of Labor (DOL), to develop policies and procedures to ensure data submitted by service providers of the Local Workforce Development Boards (LWDBs) to DES are valid and reliable.

References: Section 116 of Workforce Innovation and Opportunity Act (WIOA) of 2014 ([P.L. 113-128](#)), 20 CFR [§ 683.220](#), 29 CFR [§ 97.42](#), Training and Employment Guidance Letters (TEGL) [39-11](#), [7-18](#), and [23-19](#).

#### **1501 RESPONSIBILITIES**



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# DES Responsibilities

- Develop and distribute data validation procedures and checklists
- Provide training on data validation procedures annually to LWDB and staff and service provider staff
- Conduct quarterly data validation
  - Data validation activities outlined and reflected in procedures

# Conducting Quarterly Data Validation

- Schedule desk reviews of randomly selected files or records
- Send notice to the LWDB staff two (2) days prior to the desk review with list of participants (active and those who have exited) selected for data validation
- Review data in selected files
- Issue a report of findings during the review
- Ensure the state data and reporting system is accurately capturing and processing the data entered by local workforce areas
- Ensure that all data reports are readily available to LWDBs to ensure the ability for ongoing validation of data entry

# Local Workforce Development Board Responsibilities

- Develop internal controls and procedures:
  - For data validity and reliability
  - To protect personally identifiable information and other sensitive information found on the source documents
- Ensure appropriate staff receive DES communications regarding data validation
- Ensure appropriate staff receive data validation training annually, incorporating data validation feedback
- Collect source documentation indicated on the Data Validation Checklist
- Ensure DES staff access to source documentation for all participants selected for data validation
- Correct data validation errors identified during the DES review within the timeframe indicated in the DES report



# Compliance and Corrective Action

Corrective action after failure to correct errors (2% per file):

- Training and technical assistance from DES to the LWDB and/or service provider staff to resolve the error(s)
- Data validation reviews of the LWDB and/or service provider by DES in addition to the regular data validation review
- After exhaustion of informal resolution, determination of Substantial Violation

# Substantial Violation

DES may implement the Substantial Violation, Sanctions, Decertification, and Reorganization Policy found in Section 1300 due to any of the following:

- Failure of a LWDB and/or service provider to respond to requests to provide source documentation to DES as required pursuant to this policy
- Failure of a LWDB and/or service provider to comply with corrective action required as a result of the DES data validation review
- Finding of DES of high error rates for two consecutive years
  - For the current year, the standard will be 5%. This will be reviewed at the end of the year and adjusted if needed

# Record Retention

DES, the LWDB, and the Service Provider must follow the federal record retention requirements found in 29 CFR § 97.42 and the state Record Retention Policy found in [Section 800](#) for all source documents.



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# Data Validation Procedures

# How is State-level data validation conducted?

- A desk review will be conducted for the Nineteen Tribal Nations (NTNs) and Local Workforce Development Areas (LWDAs).
- Audits are conducted Quarterly and includes Active and Exited Cases for:
  - Adult and Dislocated Worker
  - Youths In and Out of School
- Program Validators will utilize resources that include:
  - WIOA Title I-B Policy and procedure manual
  - TEGs 7-18 (joint guidance) and 23-19 (workforce programs)
  - Source documentation in AJC only

***All source documentation for the participants must be uploaded in Arizona Job Connection System (AJC) for QAIA to review, except disability documentation. Disability documentation will be sent via secure email to QAIA.***



# Who conducts data validation?

Quality Assurance and Integrity Administration (QAIA) Team:

- Stacey Anderson QAIA Audit Manager
- Crystal Moody QAIA Audit Supervisor
- Ronald Delgado QAIA Auditor / Program Validator
- Jessica Miner QAIA Auditor / Program Validator
- Troy Hawthorne QAIA Auditor / Program Validator
- Austin Iwamoto QAIA Auditor / Program Validator

# What is included in a data validation report?

The data validation monitoring report may include:

- Program errors
- Missing program data
- Out of range variances and other anomalies
- Documentation missing and erroneous data identified during the review process

# Data Elements with Frequent Findings

- **DE603 Supplemental Nutrition Assistance Program**

Required for programs: Adult and Dislocated Worker, if the participant has received individualized career or training services

- If the participant is receiving assistance through the Supplemental Nutrition Assistance Program (SNAP) and received individual career or training services, the appropriate source documentation would need to be collected to verify this element.

- **DE802 Low Income Status at Program Entry**

Required for programs: Adult, Dislocated Worker, and Youth

- The appropriate source documentation would need to be collected to verify this element if the participant, at program entry, is a person who:
  - receives or is a member of a family that receives or has received in the past 6 months prior to application SNAP, TANF, SSI, State or local income-based public assistance;
  - is in a family with a total family income that does not exceed the higher of the poverty line or 70% of the LLSIL;
  - receives free or reduced lunch;
  - is a foster child whom state or local government payments are made;
  - is a participant with a disability whose own income is at the poverty line but who is a member of a family whose income does not meet this requirement;
  - is a homeless participant, or
  - is a youth living in a high poverty area.

- **DE1302 Date Entered Training #1**

- This element validates the date on which the participant's first training service actually began.

- **DE1307 Training Completed**

- Did the participant complete the approved training?

- **DE1308 Date Completed or Withdrew from Training**

- The date when the participant completed training or withdrew permanently from the most recent training.

**Note:** The above elements are required for the Adult, Dislocated Worker, and Youth programs.

The appropriate source documentation would need to be collected to verify these elements.



# Reasons for Failed Data Elements

- Lacking acceptable source documentation; failure to collect and upload to participant AJC record
- Case notes fail to address the status for a specific data element & the date on which the information was obtained
- Failure to address discrepancies or conflicting information



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# Uploading Documents to Arizona Job Connection (AJC)

# Data Validation Checklist

Exhibit 1500b \_\_\_\_\_

## WIOA TITLE I-B Adult/Dislocated Worker/Youth Programs

### DATA VALIDATION CHECKLIST

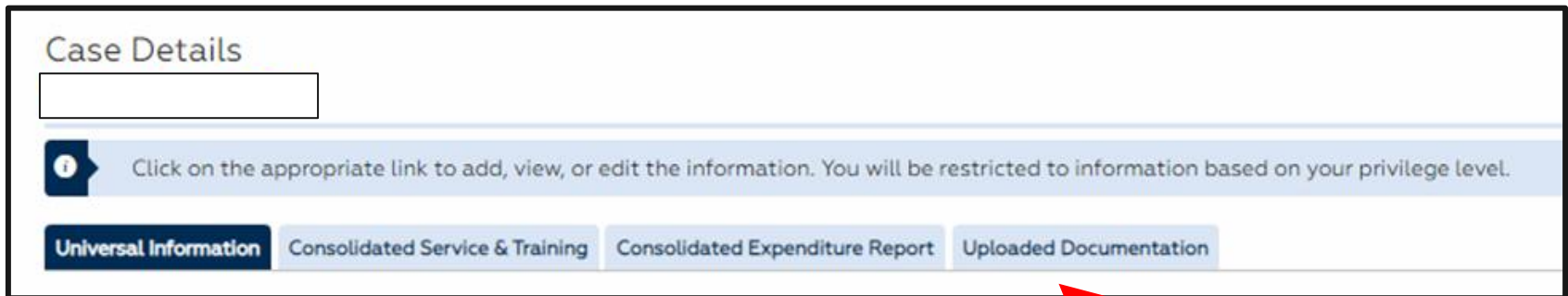
CRITERIA	ACCEPTABLE VERIFICATION AND DOCUMENTATION <u>Only one document from this column per data validation criterion is required, unless otherwise stated.</u> Source Documentation is from TEGL <u>23-19</u>	ADULT	DW	YOUTH
<p>★ <i>Do Not upload documents into the system of record if the full Social Security Number (SSN) is listed - Case manager, enter a note as visually verified. Case managers may upload documents containing a partial (last 4 digits) of the SSN.</i></p> <p>★ <i>Any Personal Identifiable Information (PII) must be stored properly and handled with extreme care!</i></p> <p>★ <i>If self-attestation is listed as one of the acceptable methods of verification, case managers should not be using it as the main resort but use it when it is most appropriate for the participant under the current circumstances.</i></p>				
<p><b>DATE OF BIRTH (Element 200)</b></p> <p><input type="checkbox"/> Documentation <b><u>MUST</u></b> be uploaded in the system of record</p> <p><input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Baptismal record (if date of birth is shown)</p> <p><input type="checkbox"/> Birth certificate</p> <p><input type="checkbox"/> DD-214</p> <p><input type="checkbox"/> Report of transfer or discharge paper</p> <p><input type="checkbox"/> Federal, State or local identification card (i.e., driver license, identification, tribal records that shows birthdate)</p> <p><input type="checkbox"/> Passport (showing date of birth)</p> <p><input type="checkbox"/> Hospital record of birth</p> <p><input type="checkbox"/> Public assistance/Social service records (if name and DOB is shown)</p> <p><input type="checkbox"/> School records or school ID cards (if name and DOB is shown)</p> <p><input type="checkbox"/> Work permit that shows birthdate</p> <p><input type="checkbox"/> Family bible that shows birthdate</p>	X	X	X



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# Adding a New Document

On the Case Details (Universal) page, select the **Uploaded Documentation** tab:



## Select Add New Document:

UPLOADED DOCUMENTATION

Universal Information Consolidated Service & Training Consolidated Expenditure Report **Uploaded Documentation**


No documents listed.

**Add New Document** Return to Case Details



# Selecting File to Upload

**NEW DOCUMENT**

 Please Select File

The following file types are accepted: PDF, JPC, or PNG. The file may be no larger than 10 MB.

**Document Name** (required)

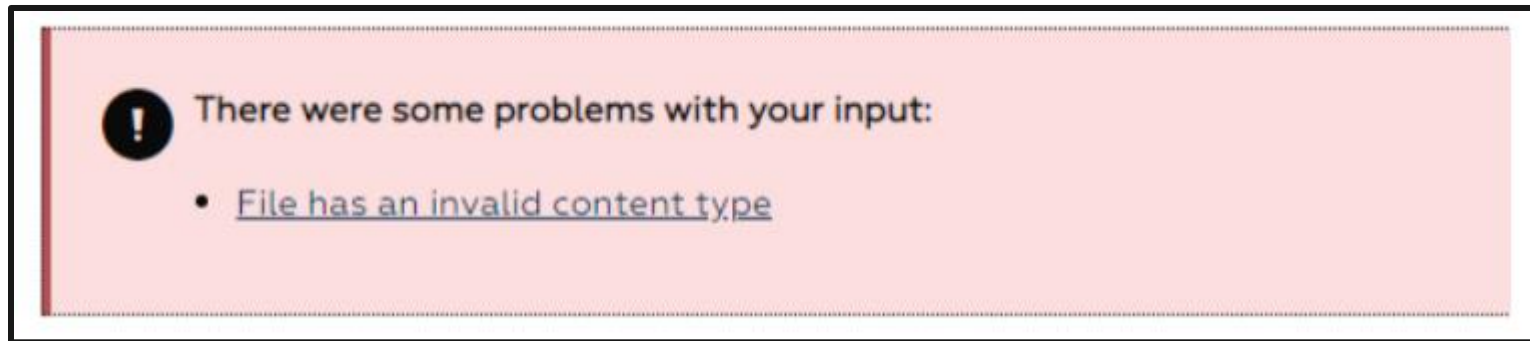
**File Description**

(2500 character maximum)

**Document Item** (required)

# Accepted File Types

- Document must be in **PDF, JPG, or PNG** format
- Must be **10 MB or less**
- If file type or size is not acceptable:



# Document Name and File Description

**NEW DOCUMENT**

Select File to Upload Birth Certificate.docx

The following file types are accepted: PDF, JPG, or PNG. The file may be no larger than 10 MB.

Document Name (required)  
Birth Certificate

File Description  
This is a Birth Certificate for

Award Letter from Veterans Administration  
Bank Statements  
Baptismal Record  
Birth Certificate  
Certificates

Save Cancel

# Document Scope and Type

**Select File to Upload** Birth Certificate.pdf

The following file types are accepted: PDF, JPG, or PNG. The file may be no larger than 10 MB.  
can't be blank.

**Document Name** (required)

**File Description**  
to show DOB  
  
(2500 character maximum)

**Document Item** (required)

**Item Scope** (required)  
 Universal  
 Enrollment

**Document Type** (required)  
 Eligibility  
 Identity Verification  
 Validation

**Enrollment(s)**  
 Job Service: April 02, 2012 (Closed)  
 Job Service: January 03, 2013 (Closed)  
 Job Service: August 08, 2013 (Closed)  
 Job Service: August 27, 2014 (Closed)  
 Job Service: July 07, 2015 (Closed)  
 Job Service: November 18, 2015 (Closed)  
 Adult: February 10, 2016 (Closed)

**Enrollment: Adult: February 10, 2016 (Closed)**

**Data Elements to be Verified**

# Viewing Uploaded Documents

**UPLOADED DOCUMENTATION**

[Universal Information](#) [Consolidated Service & Training](#) [Consolidated Expenditure Report](#) **Uploaded Documentation**

Sortable table sorted by Date, descending

Actions	Document Name	Type	Validates	Uploaded By	Date
<a href="#">Edit</a>	<a href="#">Birth Cert</a> Birth Certificate	Enrollment	<ul style="list-style-type: none"><li>Adult: February 10, 2016 (Closed)<ul style="list-style-type: none"><li>Date of Birth DE(200)</li></ul></li></ul>	Marilyn Nicols	Jan 06, 2022

[Add New Document](#) [Return to Case Details](#)



# Resources

- Training and Employment Guidance Letter No. 39-11
- Training and Employment Guidance Letter No. 7-18
- Training and Employment Guidance Letter No. 23-19
- Best Practices: Data Validation of Required Performance Data for WIOA Title I and III Grantees
- Data Validation Policy
- Data Validation Procedures
- Data Validation Checklist

# Contacts

- State-level reviews/data validation: [QAWIOA@azdes.gov](mailto:QAWIOA@azdes.gov)
- Title I policy questions: [titleipolicy@azdes.gov](mailto:titleipolicy@azdes.gov)
- AJC system-related questions: [ea-wioa@azdes.gov](mailto:ea-wioa@azdes.gov)
- Programmatic and operational support/technical assistance: [wioaprogram@azdes.gov](mailto:wioaprogram@azdes.gov)

Survey Link: <https://www.surveymonkey.com/r/VQY5237>



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