

Data Validation Resource

Adult, Dislocated Worker, and Youth Programs

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Overview

Data validation is a series of internal controls or quality assurance techniques that verifies the accuracy, validity, and reliability of data. Its purposes are to verify that performance data reported 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; improve performance accountability; and outline source documentation required.

Source: [Training and Employment Guidance Letter \(TEGL\) 23-19, Change 1](#)

Source Documentation Categories

Case notes - paper or electronic statements by the case manager that identify the participant's status for a specific data element, the date on which the information was obtained, and the name of the case manager who obtained the information.

Cross-match - detailed evidence that confirms the data element in a secondary database. When using cross-match, programs –

- Must also confirm supporting information (dates, services rendered);

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- Should have data sharing agreement in place, as appropriate; and
- May need to enter case notes in the system of record, Arizona Job Connection (AJC), to document the confirmation of the data element.

Electronic records - information generated or maintained in AJC or other official record keeping system and may include –

- Participant source documents; and
- Participant service record.

Self-attestation - a written or electronic/digital declaration of information for a particular data element, signed and dated by the participant.

Note:

- Source documents other than self-attestation are preferred *when practical*.
- Self-attestation is an important option for populations with barriers to obtaining eligibility and reporting documents.
- An email, text, or unique online survey response that is participant-generated and traceable to the participant may be accepted as an electronic signature or verification.

Survey - may refer to a signed¹ post-exit questionnaire sent to participants to gather performance-related information, such as whether the individual is employed, whether the employment is related to training received, earnings, etc.

State Data Validation Process

Frequency	Quarterly data validation of participant case files
Case Files Reviewed	<ul style="list-style-type: none"> ● Pulled from the Participant Individual Record Layout (PIRL) file – contains 2.5 years/10 quarters of reportable individual, participant, and exiter data ● Participant cases randomly selected from the file ● Sample size based on staff

¹ WorkforceGPS WIOA Performance Summer Conversation Series
<https://performancereporting.workforcegps.org/announcements/2021/06/09/14/30/WIOA-Performance-Summer-Conversation-Series>

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	capacity
Monitoring Report to Local Areas	<ul style="list-style-type: none"> ● Includes any failed data validation elements ● Findings and observations ● List of missing program data or source documentation ● Individual case record accuracy rate and the total accuracy rate for each program
Substantial Violations	<ul style="list-style-type: none"> ● Local area’s failure to respond to requests to provide source documentation ● Failure to comply with corrective actions resulting from the review ● High error rates for two consecutive years <ul style="list-style-type: none"> ○ High error rate – 2% or more per participant case file ○ Local area corrections do not change the error rate, unless the failed element was cited in error.

Questions and Answers

Source Documentation and Protecting PII

1. How should personally identifiable information (PII) in source documentation be appropriately handled and uploaded in AJC?

Source documentation with **protected PII** must be redacted, while ensuring that information necessary for eligibility determination, service provision, or data validation remains visible. For instance:

- If an individual presents and staff opts to make a copy of a social security (SS) card that confirms an individual’s authorization to work, staff must obscure or black out the first five digits of the SS number before uploading a copy to AJC.

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- If uploading documentation with an individual's SS number, and the number is not the element being verified (e.g., uploading public assistance documentation to validate receipt of public assistance), the social security number – and other protected PII – must be obscured.

For additional information on handling PII, including protected PII, refer to [TEGL 39-11](#).

2. Is an individual's date of birth considered protected PII?

Yes, according to [TEGL 39-11](#), date of birth is considered protected PII.

Eligibility Determination and Data Validation

3. Should staff verify applicant information and collect source documentation during eligibility determination?

Yes, staff should verify applicant information and collect appropriate source documentation during eligibility determination and system registration.

4. What are acceptable documents for verifying an individual's SS number?

SS number is *not required* to be validated under the Adult, Dislocated Worker, or Youth program, nor is it required for eligibility determination in the Title I core programs.

However, because the SS number is used for unemployment insurance wage match – *if provided* – the number should be verified and entered correctly in AJC.

5. Should staff collect documentation of low-income status during eligibility determination, even when it is not an eligibility criterion?

Yes, the recommended practice would be to *initiate the collection* of documentation that validates low-income status if it is identified during eligibility determination and registration in AJC that the individual is low-income – even when low-income status is not an eligibility determinant.

Note: self-attestation may be used to validate low-income status.

6. Should staff collect documentation of low-income status during eligibility determination, even when it is prior to an adult or dislocated worker receiving individualized career or training services?

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While low-income status for an adult or dislocated worker is required to be validated only if the participant has received individualized career or training services ([TEGL 23-19, Change 2, Attachment II](#)), the recommended practice would be to *initiate the collection* of documentation that validates low-income status if it is identified during eligibility determination and registration in AJC that the individual is low-income.

Note: self-attestation may be used to validate low-income status.

Validating Specific Data Elements

7. For data element 603 – Supplemental Nutrition Assistance Program (SNAP) (benefits recipient) – should source documentation be uploaded to AJC only when the participant is receiving individualized career or training services?

While data element 603 is required to be validated only if the adult or dislocated worker has received individualized career or training services ([TEGL 23-19, Change 2, Attachment II](#)), the recommended practice would be to *initiate the collection* of documentation that validates receipt of SNAP benefits if it is identified during eligibility determination and registration in AJC that the individual is receiving SNAP benefits.

8. May staff use a “food stamp benefit history” screen printout to validate data element 603?

Yes, documentation of receipt of SNAP benefits is acceptable source documentation. Staff must ensure that any source documentation with protected PII is redacted before uploading to AJC.

9. For data element 604 – other public assistance recipient – should staff only validate this element when the individual is receiving General Assistance or Refugee Cash Assistance?

Yes, data element 604 must be validated when the adult or dislocated worker is receiving or has received in the last six months prior to participation –

- Refugee cash assistance (RCA); or
- State or local government general assistance.

[RCA](#) is a needs-based cash benefit for refugees and other eligible beneficiaries. State “general assistance” was an interim cash benefit made available to eligible individuals pending the receipt of federal disability benefits ([A.A.C. R6-17-101](#)).

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Per [TEGL 23-19, Change 2, Attachment II](#), the following are acceptable source documentation for data element 604:

- Copy of authorization to receive cash public assistance
- Copy of public assistance check
- Medical card showing cash grant status
- Public assistance eligibility verification
- Cross-match

10. For data element 702 – youth who needs additional assistance – how does DES validate this element when each local area has its distinct definition as noted in the local plan?

Reviewers refer to the local area definition and determine whether supporting documentation is present in AJC.

11. For data element 801 – ex-offender status at program entry – case notes and self-attestation are both acceptable source documentation. Which would be the preferred method to validate this data element?

Staff should verify information using methods or documents that best ensure the integrity and accuracy of the information, while being mindful that document collection does not *unnecessarily or unreasonably* delay services.

12. Should data element 802 – low-income at program entry – be validated for a youth who is homeless?

Yes, data elements 800 and 802 are validated for a youth experiencing homelessness.

Data element 800 (homeless participant, homeless children and youths, or runaway youth at program entry) is validated if the youth is homeless at program entry.

In addition, because a homeless youth meets the definition of low-income individual per section 3(36) of WIOA, data element 802 (low income status at program entry), is also validated for a youth who is homeless – and therefore low-income – at program entry.

13. Can self-attestation or case notes be used to validate that an individual is homeless at program entry?

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Yes, to validate that an individual is homeless at program entry, case notes or self-attestation may be used. [TEGL 23-19, Change 2, Attachment II](#), lists the following acceptable source documentation for this characteristic:

- Intake application or enrollment form
- Written statement or referral transmittal from a shelter or social service agency
- Needs assessment
- Case notes
- Individual service strategy
- A letter from caseworker or support provider
- Self-attestation

14. For data element 1308 – date completed or withdrew from training – may staff use either an email or a verbal discussion with the training provider as a type of source documentation?

Staff must ensure that at least one of the source documentation identified in [TEGL 23-19, Change 2, Attachment II](#), is uploaded or entered in AJC to validate the date the participant completed or withdrew from training. The acceptable source documentation are:

- Cross-match
- Vendor training records
- Attendance sheets or records
- Case notes
- Electronic record

As noted above, staff may enter case notes in AJC indicating that staff received an email or had a verbal discussion with the vendor regarding the date the participant completed training or permanently withdrew from the training.

15. Does data element 1813 – date completed, during program participation, an education or training program leading to a recognized postsecondary credential or employment – have to be validated for an adult or dislocated worker in on-the-job training (OJT)?

Yes, the date of completion must be validated for an adult or dislocated worker in OJT. [TEGL 23-19, Change 2, Attachment II](#), lists the acceptable source documentation for this data element, including:

- Signed file documentation with information obtained from education or training provider
- Case notes

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- Self-attestation

16. What is data element 2004 on the PIRL?

Data element 2004 pertains to the receipt of services through a Disaster Recovery Dislocated Worker Grant, such as the Quality Jobs, Equity, Strategy, and Training or QUEST grant.

Resources

For additional information, please refer to the following:

- [**TEGL 23-19, Change 1**](#)
- [**TEGL 23-19, Change 2**](#)
- [**Data Validation Policy**](#)
- [**Data Validation Procedures**](#)
- [**Data Validation Questions and Answers**](#)
- [**Data Validation Checklist \(pending updates\)**](#)

Note: This resource document does not supersede but is intended to supplement and align with State policy and federal guidance. For questions or comments, please email wioaprogram@azdes.gov.