

WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) TITLE I-B DATA VALIDATION PROCEDURES

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.

Beginning each Program Year (July 1) a Data Validation will be conducted on ARIZONA@WORK Local Workforce Development Boards (LWDB's). Program Validators will review WIOA Title I-B Policy and Procedure Manual Section 1500, Training and Employment Guidance Letter (TEGL) 7-18 (*joint guidance*), TEGL 23-19 (*WIOA Workforce Programs*), and uploaded files into the Arizona Job Connection (AJC) System July 1 through June 30 for the identified program year, sampling quarterly.

I. PREPARING FOR THE REVIEW

Desk Review

1. An email notification of intended monitoring dates will be sent to the LWDB.
2. An email notification will be sent two (2) days prior to desk review to provide the Director of the LWDB the sampled list for data validation.

II. SAMPLE PULLS FROM DERS WORKFORCE IT

DERS Workforce IT will provide random sample based on Active Program Participants and Exiters

DERS Workforce IT– Generate participant reports for each WIOA Title I-B program funding stream to identify and select active and exited participant files:

- Adult and Dislocated Worker
- In-School / Out-of-School Youth

III. REVIEW OF PROGRAM DATA VALIDATION

Review Files, Case Management Notes in AJC, Source Documentation & Complete Worksheet

Data validation is a series of internal controls or quality assurance established to verify the accuracy, validity, and reliability of data.

- Verify that the performance data reported by grant recipients to the U.S. 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;
- Outline source documentation required for common data elements; and
- Improve program performance accountability through the results of data validation efforts.

Therefore, documents uploaded into the AJC System after participants have been identified or documents in AJC that do not match will be marked as a "Fail". The document will be accepted as missing data. Validators are required to use the requirements in effect on the date when they do the validation. This will enable grantees to see where there needs to be changes in practice or additional training in order to comply with the current regulations and/or policies.

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IV. COMPLETING THE DATA VALIDATION MONITORING REPORT

Compiling of Data Review

The monitoring report may include the following:

1. Program errors
2. Missing Program Data
3. Out of range variances and other anomalies
4. Documentation missing and erroneous data identified during the review process
5. The error rates by local area and Program

Data Validation Monitoring Report

The monitoring worksheet will be completed by the Validator and a summary report will be issued to LWDB.

The Quality Assurance Integrity Administration (QAIA) supervisor will review the summary report within ten (10) business days. If approved, the report is returned to the validator to issue the final report to the LWDB, copying the following:

cc: QAIA Audit Manager
QAIA Audit Supervisor
LWDB Director and Chair

LWDB is provided twenty (20) business days from the date of issuance of the monitoring report to respond and upload documents in AJC to address program errors, missing data, out of range variances and other anomalies, missing source documentation and error rates by local area to complete case file for compliance.

Non-Compliance

If the LWDB does not respond within twenty (20) business days with corrected program errors, missing data, out of range variances and other anomalies and source documentation a 2nd letter is sent requesting a response within ten (10) business days. If no corrections are made, and a repeat finding is discovered during the following year, the LWDA will be reported to the Finance & Business Operations Administration (FBOA) for possible implementation of Substantial Violation, Sanctions, Decertification and Reorganization found in Policy Section 1300. A letter will be issued to the LWDB for failure to respond to the monitoring report as Non-Compliant for identified program year.

V. RECORDS

Monitoring Report Tracking

1. All Data Validation Monitoring Reports (Data Validation Worksheet, Summary of report, source documentation and participant files request) will be saved in the LWDB's respective shared folders labeled Data Validation with PY with QAIA office.
2. The assigned Validator will be responsible for tracking and storing the data of respective LWDB's monitoring report.
3. The QAIA Audit Supervisor will track the status of each review internally to ensure that the process meets required deadlines for the audit.

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Federal Record Retention

1. All Monitoring Review materials will be saved in the LWDB's respective shared folders labeled Data Validation with PY with QAIA office.
2. A Data Validation Log is created and inserted in the respective participant file with the dates of actions completed.
3. All records pertaining to the monitoring review must be maintained pursuant to 29 CFR 97.42 and must be available for review by DOL, Audit Management Services, and the Auditor General's Office for federal oversight of the State's monitoring responsibilities for Arizona's LWDBs. *(Note: All records shall be maintained for a period of three (3) years).*

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TABLE I.1
TIMING OF ACTIVE PARTICIPANTS ENROLLED IN
WIOA TITLE I-B PROGRAMS

If Active Assignment Date is between	Record could be in Program Monitoring Sample for PY	Which is Monitored during Calendar Year
7/1/2019 and 6/30/2020	2020	2021
7/1/2020 and 6/30/2021	2021	2022
7/1/2021 and 6/30/2022	2022	2023

TABLE I.2
TIMING OF PERFORMANCE DATA VALIDATION

If Exit Date is between	Record could be in Performance Sample for PY	Which is Validated during PY
4/1/2021 and 3/31/2022	2020	2021
4/1/2022 and 3/31/2023	2021	2022
4/1/2023 and 3/31/2023	2022	2023

TABLE I.3
WIOA PERIODS FOR REPORTING COHORTS

Program Year 2020 (PY20) Annual Report	
<i>Report Due Date</i>	<i>October 1, 2021</i>
Employment Rate Second Quarter After Exit	7/01/19 to 6/30/20
Employment Rate Fourth Quarter After Exit	1/01/19 to 12/31/19
Median Earnings Second Quarter After Exit	7/01/19 to 6/30/20
Credential Attainment Rate	1/01/19 to 12/31/19
Measurable Skill Gains	7/01/20 to 6/30/21

Program Year 2021 (PY21) Annual Report	
<i>Report Due Date</i>	<i>October 1, 2022</i>
Employment Rate Second Quarter After Exit	7/01/20 to 6/30/21
Employment Rate Fourth Quarter After Exit	1/01/20 to 12/31/20
Median Earnings Second Quarter After Exit	7/01/20 to 6/30/21
Credential Attainment Rate	1/01/20 to 12/31/20
Measurable Skill Gains	7/01/21 to 6/30/22