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(SN 29)

WIOA BULLETIN NO. 29-19

DATE: May 9, 2019

TO: Local Workforce Development Boards

SUBJECT: WIOA Data Validation Policies and Procedures

PURPOSE

The purpose of this bulletin is to issue policies and procedures for WIOA data validation.

BACKGROUND

The U.S. Department of Labor (USDOL), Employment and Training Administration (ETA), requires States to conduct annual validation of data submissions for federally-funded employment and training programs, including the Workforce Innovation and Opportunity Act (WIOA) programs.

Data validation is a series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data. Establishing a data validation framework will ensure that all program data are consistent and accurately reflect the performance of each core program.

While Counties have been responsible for ensuring that data entered into HireNet Hawaii are accurate and valid, USDOL recommended that the State issue policy to clarify data validation requirements and ensure consistency among the local areas.

POLICY

Counties are responsible to ensure the following:

1. Data entry into HireNet is **accurate** and **timely**;
2. Acceptable source documents in **hard copy** are retained in each participant's folder to substantiate every data element required to be validated. For data validation purposes, HireNet data, such as Individual Employment Plan showing enrollment dates and WIOA activities, are not appropriate source documents. Instead, hard copies of these forms shall be retained in each participant file for data validation.

3. **The source document used to support each required element is acceptable for that element, as listed and described in “Source Documentation for WIOA Core Programs” Attachment 1.**
4. If multiple sources are listed for the same data element and the sources conflict, the most reliable source is used to determine if the element passes or fails. For example, for Education Status at Participation, copies of records from an educational institution are a more reliable source than participant self-attestation.
5. If using any of the following source documents, it must fully comply with the requirements set forth below:
 - a. **Cross-Match:**

A cross-match requires validators to find detailed supporting evidence for the data element in a database. An indicator or presence of a Social Security Number (SSN) in an administrative non-WIOA database, i.e., a database not maintained by a WIOA core program such as data from the State’s Department of Motor Vehicles, is not sufficient evidence for a cross-match. State validators must also confirm supporting information such as dates of participation and services rendered.
 - b. **Self-Attestation:**

Self-attestation (also referred to as a participant statement) occurs when a participant states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status. The key elements of self-attestation are: (a) the participant identifying his or her status for permitted elements, and (b) signing and dating a form attesting to this self-identification. The form and signature can be on paper or in the State management information system, with an electronic signature.
 - c. **Case Notes:**

Case notes refer to either paper or electronic statements by the case manager that identify, at a minimum, the following: (a) a participant’s status for a specific data element, (b) the date on which the information was obtained, and (c) the case manager who obtained the information.
 - d. **Electronic Records:**

Electronic records are participant records created, stored or transferred in a form that only a computer can process and maintained in the State’s management information system. Records can be numeric, graphic, or text. They can also include magnetic storage media such as tapes or disks.
6. Staff members are encouraged to familiarize themselves with the Data Elements and Source Documentation Requirement Guide (Attachment 1). It is the County’s responsibility to ensure that all staff members are trained with the process and to periodically hold validation briefings for staff members, especially after new employees are hired.
7. Each County and WIOA Provider is encouraged to conduct periodic pre-validation reviews of a sample of files in their possession throughout each program year. The purpose of this review is to ensure that each staff is properly maintaining files according to established procedure.

PROCEDURES

1. **Uniform Filing of Participant Records** – Counties shall ensure each program operator files their participant records in a consistent manner throughout their local area. A standardized filing system would expedite the data validation review and facilitate coordination and continuity of service delivery within programs on each County.
2. Counties shall use labels as described below to clearly identify source documents and the data elements validated by the documents:
 - a. Print templates of label codes and data validation elements found in Enclosure No. 2 on yellow self-adhesive labels.
 - b. Apply these self-adhesive labels at the bottom right corner of **each source document**. If there are multiple labels for a particular source document, apply labels next to each other at the bottom without covering important information.
 - c. **On each source document, highlight each data element** being validated in **yellow**.
 - d. If a source document validates more than one element, handwrite in ink the applicable label code next to each element. Label codes consist of codes for program, category and number as follows:

Program

 - A = Adult
 - DW = Dislocated Worker
 - Y = Youth
 - NEG = National Emergency Grant

Category

 - E = Eligibility/Intake/Application
 - A = Employment Activities
 - XP = Exit and Post-Program Activities

Number

 - USDOL's PIRL Data Element Number for each data element found in the first column of Attachment 1, Source Documentation for WIOA Core Programs.
 - e. Labels should be applied to all forms and documents when these forms are received. As a result, it will help ensure that all relevant documentation is present and marked in each file.
3. **Scoring** – Each data element that is required to be validated and that is supported or matched by acceptable documentation is scored as a “pass.” Conversely, any data element that is required to be validated and that is not supported or matched by acceptable documentation, or is inconsistent with other documents, is scored as “fail.”

4. **Interaction with Staff During the Validation Process** – County and WIOA program staff are not allowed to make corrections relating to data validation throughout the review process. Prohibited activities include adding labels, relabeling documents, and/or altering data in the participant's file. If a document cannot be found, staff members will be given an opportunity to locate an alternate document for data validation while in the presence of a validation team member. Files are not to be removed from the specified validation area.
5. **Decisions on the Use of Questionable Source Documents for Validation** – In cases when it is unclear whether or not a certain source document fulfills the requirements for validation, the validation team will decide whether a particular document is acceptable for a positive data validation.
6. **Data Validation Results** – Results from the data validation review will be provided to each County.

ATTACHMENT

Attachment 1: Source Documentation for WIOA Core Programs

REFERENCES

Training and Employment Guidance Letter WIOA No. 7-18 Operating Guidance for the Workforce Innovation and Opportunity Act

INQUIRIES

Inquiries regarding this bulletin may be directed to Jayson Muraki at (808) 586-8674.



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Attachment 1: Source Documentation for WIOA Core Programs

C: DLIR ASO-WIOA Unit