**WIOA Young Adult Programs**

# Chapter 19: data validation policy

## Summary:

The U.S. Departments of Labor and Education jointly issued initial WIOA data validation guidance in TEGL 7-18, dated December 19, 2018. Since June, 2020 the U.S. Department of Labor has issued guidance and expectations for validating participant data for programs funded through DOL. TEGL 23-19, Change 1 (10-25-2022) and TEGL 23-19, Change 2 (5-12-2023) superceded the initial issuance of TEGL 23-19 in 2020 (since rescinded by DOL). This issuance provides overarching guidance and guidelines to states and local Workforce Investment Boards as data validation policies and procedures are developed. This TEGL also includes an updated cohort of data elements reported to DOL and is included with this chapter.

Relevant Laws, Rules or Policies

[Workforce Innovation and Opportunity Act (Public Law 113-128)](http://www.gpo.gov/fdsys/pkg/PLAW-113publ128/html/PLAW-113publ128.htm)

[WIOA Final Rule (Dated 08-19-2016)](https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15975.pdf)

[WIOA Final Rule: Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions (Dated 08-19-2016)](https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15977.pdf)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 23-14 (Dated 3-26-15)](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=4244)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 8-15 (Dated 11-17-15)](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=6073)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 21-16 (Dated 3-2-17)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7159)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 7-18 (Dated 12-19-18)](https://wdr.doleta.gov/directives/corr_doc.cfm?docn=4255)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 14-18 (Dated 3-25-19)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7611)

[Office of Management and Budget Code of Federal Regulations 2 CFR 200](https://gov.ecfr.io/cgi-bin/text-idx?SID=970b58af63fde7ba10fd201add7ec48c&mc=true&tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl) (Uniform Guidance)
[U.S. Dept. of Labor Training and Employment Notice No. 12-21 (Dated 10-15-21)](https://wdr.doleta.gov/directives/corr_doc.cfm?docn=9977)

[U.S. Dept. of Labor Training and Employment Notice No. 14-21 (Dated 10-27-21)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=6118)

[U.S. Dept. of Labor Training and Employment Notice No. 18-21 (Dated 1-4-22)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3439)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 10-16, Change 2 (Dated 9-15-22)](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2022/TEGL%2010-16%20Change%202/TEGL%2010-16%20Change%202.pdf)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 23-19, Change 1 (Dated 10-25-22](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2019/TEGL%2023-19%20Change%201/TEGL%2023-19%2C%20Change%201%20%28Complete%20document%29.pdf))

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 23-19, Change 2 (Dated 5-12-23)](https://www.dol.gov/agencies/eta/advisories/tegl-23-19-change-2)

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## Policy:

The following “core” WIOA programs funded through the U.S. Department of Labor are subject to data validation:

* WIOA Title I Youth
* WIOA Title I Adult
* WIOA Title I Dislocated Worker
* WIOA Title III Wagner-Peyser Employment Services

In addition to the WIOA “core” programs listed above, DOL data validation policy in TEGL 23-19, Change 1 and TEGL 23-19, Change 2 also applies to the following “non-core” programs:

* Trade Adjustment Assistance (TAA)
* National Dislocated Worker Grants
* Senior Community Service Employment Program (SCSEP)
* Federal YouthBuild
* Apprenticeship Program Grants administered by the federal Office of Apprenticeship
* Job Corps
* Indian and Native American Program
* H1-B Job Training Programs (for grants awarded 7/1/16 or later)
* National Farmworker Jobs Program
* Jobs for Veterans State Grants
* Reentry Employment Opportunities

Primary responsibility for data validation procedures is shared between the Agency Performance staff from DEED and Employment and Training Programs Division staff from DEED.

Most of the data elements contained in [TEGL 7-18, Attachment 1](https://wdr.doleta.gov/directives/attach/TEGL/TEGL_7-18_Attachment_I.pdf) subject to this policy either originate from Workforce One, or are populated from databases maintained at the state and/or federal level. Most wage detail information comes from Minnesota’s Unemployment Insurance database, while wage information from other states is provided through a national wage database maintained and administered by DOL.

Data validation helps ensure the accuracy of quarterly and annual performance reports submitted by the State of Minnesota, safeguards data integrity, and promotes the timely resolution of data anomalies and inaccuracies.

The purposes of data validation are fourfold:

* Verify that performance data reported to DOL are valid, accurate, reliable and comparable across programs;
* Identify anomalies within the data and resolve issues that may cause inaccurate reporting;
* Outline source documentation requirements; and,
* Improve program performance accountability through the results of the data validation effort.

State-Level Responsibilities

Agency Performance staff and appropriate staff from the Employment and Training Programs division of DEED are responsible for the following:

* Developing written procedures for data validation that contain a description of the process for identifying and correcting errors or missing data, including electronic data checks;
* Providing the Governor’s Workforce Development Board and all local Workforce Development Boards, service providers and the general public with an opportunity to comment on draft data validation procedures prior to adoption and implementation;
* Providing on an annual basis (at a minimum) training to appropriate staff at the state and local level on policies and procedures related to Data Validation;
* Establishment of reasonable monitoring protocols consistent with 2 CFR 200.328 that ensure local program staff are following established written data validation procedures and taking corrective actions if these procedures are not being followed;
* A quarterly review of program data that may identify errors, missing data, out-of-range values and other anomalies[[1]](#footnote-1).
* Documentation that missing and erroneous data identified in the review process have been corrected within a specified timeframe; and,
* An annual review (minimum) of processes and procedures associated with Data Validation, including revisions/updates as warranted or required.

Local Agency Responsibilities

In addition to appropriate training and technical assistance provided by DEED on Data Validation policy and procedures, agencies providing services to WIOA participants will also be expected to be responsible for the following:

* Understanding clearly which WIOA participants and/or exiters identified through state-level policy may be subject to Data Validation;
* Staying updated on what constitutes “acceptable documentation” for any given data element subject to review;
* Ensuring all impacted agency staff cross-train other staff and that the in-house training takes place in a timely manner;
* Ensuring that documentation that is relevant to Data Validation is collected, recorded correctly in WF1 in an accurate and timely manner for all participants and/or exiters;
* Properly maintaining, storing and securing appropriate client documentation either through electronic means or traditional casefiles;

Source documentation requirements found in TEGL 7-18 are available at <https://wdr.doleta.gov/directives/attach/TEGL/TEGL_7-18_Attachment_I.pdf>. The additional documentation requirements described in TEGL 23-19, Change 2 for all DOL programs can be found at: <https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2019/TEGL%2023-19%2C%20Change%202/Attachment%20II%20%28PDF%29.pdf>

Any reference to “Electronic Records” as acceptable sources of documentation should be interpreted as data entered into Workforce One by the local service provider.

Related Links

[WIOA Young Adult Website](https://mn.gov/deed/youth)

1. Since Minnesota subscribes to services from FutureWorks that provide monthly updates on WIOA Title I and Title III performance, each PIRL file is subject to WIPS edits prior to sending it to FutureWorks for publishing and distribution online. Any errors reported in any affected record through WIPS are isolated, identified and sent to appropriate DEED program staff for resolution as quickly as possible each month. [↑](#footnote-ref-1)