WIOA Data Validation Policy

I. PURPOSE:

The Workforce Innovation and Opportunity Act (WIOA) provides for the provision of high-quality services for participants who utilize our One-Stop centers. In order to accurately report the services provided by our PA CareerLink® centers, verifiable data must be collected. This policy provides guidance on federal data element validation for WIOA programs under Title I-B, Title III, and the Trade Adjustment Assistance (TAA) program.

II. REFERENCES:

- Workforce Innovation and Opportunity Act (WIOA)
- 20 CFR 667.300
- 2 CFR 200.328
- Workforce Solutions for North Central PA Board (NCWDB) Policies
- Participant Individual Record Layout (PIRL), US Department of Labor
- Training and Employment Guidance Letters No. 23-19, Change 1 & 2; No. 07-18; No. 10-16 Change 3; No. 14-18; No. 5-18, No. 10-23
- Training and Employment Notice (TEN) 14-02
- Workforce System Policy (WSP) No. 01-2015, Change 1
- Workforce System Policy, Self-Attestation
- PA WIOA Common Measures Data Validation Policies & Procedures
- PA WIOA Common Measures Data Validation Guide
- Commonwealth Workforce Development System (CWDS) Help Center documents:
- WIOA Data Validation Training Questions and Answers
- Labor Exchange (W-P) Data Validation Checklist
- WIOA Title I Adult Data Validation Checklist
- WIOA Title I Dislocated Worker Data Validation Checklist
- WIOA Title I DWG Data Validation Checklist
- WIOA Title I Youth Data Validation Checklist

III. BACKGROUND:

Data validation is a series of internal controls or quality assurance techniques established to verify the

accuracy, validity, and reliability of data. Establishing a shared data validation framework across programs ensures all program data consistently and accurately reflect the performance of each grant recipient. To that end, the purposes of validation procedures for both DOL-only and jointly required performance data are to:

- Verify that the performance data reported by grant recipients to DOL are valid, accurate, reliable, and comparable across programs;
- Identify anomalies in the data and resolve issues that may cause inaccurate reporting;
- Improve program performance accountability through the results of data validation efforts; and
- Outline source documentation required for common data elements.

PIRL data elements are reported based on common measures for all WIOA programs included in the reporting cycle. Therefore, all data entered into the Common Measures Program Activity Log in the Commonwealth Workforce Development System (CWDS) will have an impact on performance reporting and WIOA Common Measures Data Validation.
States are required to conduct annual audits of certain data elements of randomly selected case files. In PA, the audits, or data element validations, are done at designated offices in selected Local Workforce Development Areas (LWDAs) and Bureau of Workforce Partnership and Operation's (BWPO's) Central Office. Data validation is conducted on a 3-year cycle for the North Central PA region.

IV. DEFINITIONS:

Case Notes – Case notes are statements in the Commonwealth Workforce Development System (CWDS) 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 name of the case manager who obtained the information. For a case note to be used as an acceptable source of documentation, or at the very least a back-up to other documents, all the required information related to the data element must be provided paying particular attention to a case note's title and description.

Common Measures Performance Indicators – Common Measures performance indicators is data that local areas and States have to report to the US Department of Labor.

Cross Match – A cross-match is a process where data from different sources such as public assistance and UC wage records are compared and linked to verify information and ensure accuracy of a data element. The cross match must include the participant name and confirm supporting information such as dates of participation and services rendered.

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

Documentation – Documentation means to maintain physical evidence, which is obtained during the

verification process, in participant files. Examples of such evidence are copies of documents (where legally permitted)

Personal Information and Personally Identifiable Information (PII) – PII is any information that can be used to directly or indirectly identify an individual; such as describing anything about a person, indicating actions done by or to a person, or indicating a person's personal characteristics, which can be retrieved from a system by a name, identifying number, symbol, or other identifier assigned to a person. This information can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

Participant Individual Record Layout (PIRL) – The PIRL is the standardized data layout used by the U.S. Departments of Labor and Education to track the characteristics, activities, and outcomes of individuals participating in federally funded programs, specifically those under the Workforce Innovation and Opportunity Act (WIOA). The PIRL provides a consistent framework for reporting data across different programs and grantees.

Self-Attestation – (also referred to as an applicant statement) occurs when an individual states his or her status for a particular data element, such as "runaway youth," and then signs and dates a form acknowledging this status. The key elements for self-attestation are: (a) the individual identifying his or her status for permitted elements and (b) signing and dating a form attesting to this self-identification. Self-attestation, as defined in Attachment II of Training and Employment Guidance Letter (TEGL) 23-19, Change 2, is a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. Electronic signatures may include a submission from the participant such as an email, text, or unique online survey response that is participant generated and traceable to the participant.
Self-attestation can be used where listed as an acceptable source of documentation in the PA WIOA Common Measures Data Validation Guide.

Verification – Verification means to confirm eligibility requirements through examination of documents (e.g., birth certificates or public assistance records) or speaking with representatives of authorized agencies.

V. POLICY:

A. Per Workforce System Policy (WSP) No. 01-2015, Change 1, accurate data must be entered in CWDS and PA CareerLink® timely and within 30 calendar days of the actual occurrence (services, outcomes, etc.). Delays in data entry can negatively impact reporting, performance, and data validation.

B. **The state requires local areas to be responsible for maintaining acceptable source documentation** of the data elements identified in the PA WIOA Common Measures Data Validation Guide**. This includes** uploading verification documents in CWDS and maintaining paper case file information, as needed. All Data Validation records and documentation will be maintained in accordance with

Federal records retention requirements, as given in 2 CFR 200.333.

1. **Source Documentation:**
    a. Local PA CareerLink® Center staff must use source documentation to validate the data elements in CWDS. These are to be uploaded into CWDS where applicable to ensure accurate data validation. This includes, the WE01/EE01, the WIOA Application (if applicable), and as part of any applicable outcome.
        i. There are several types of source documentation used to validate data elements. Staff are advised to refer to the resources available in CWDS to determine which verification sources are allowed for each data element. These include Adult, Dislocated Worker (DW), and Youth; Wagner Peyser (WP); Trade Adjustment Assistance (TAA); and National Dislocated Worker Grants (NDWG) Program Participants.
        ii. Documents and checklists to assist with Data Validation are located in CWDS in "How-Tos," "Documents," "WIOA Common Measures Data Validation Policies & Procedures and Program Checklists."
        iii. While the collection of source documentation for data validation will often take place at the same time as the determination of an individual's program eligibility, these actions serve different purposes. Eligibility determination only needs to confirm that an individual meets the requirements of a program before becoming a participant in the program.

C. Responsibilities of Workforce Solutions:

1. Provide overall guidance and technical assistance for data validation standards in accordance with federal and state guidance;
2. Develop internal controls to ensure data reported in CWDS is valid and reliable in accordance with this policy. Internal controls to include monitoring review for accurate data validation;
3. Ensure accurate data validation for the Title I and III programs;
4. Ensure that state monitoring staff have access to source documents for review upon notification.

D. Responsibilities of the Local PA CareerLink® staff:

1. Develop internal controls to ensure data reported in CWDS are valid and reliable in accordance with this policy. Internal controls may include conducting routine case reviews, reviewing reports, or any other activity that identifies incorrect data and implements corrections;
2. Use source documentation to validate data elements in CWDS as indicated in V. A. 2.;
3. Ensure appropriate staff receive data validation training annually;
4. Correct identified data validation errors during quarterly reviews; and
5. Ensure state monitoring staff have access to source documents for review upon notification.

VI. PROCEDURES:

A. Responsibilities of Workforce Solutions:

1. Monitor the data entry and upload of data verification for elements in CWDS via quarterly random sample of participating cases;
2. Request and Monitor physical files while making on-site monitoring visits;
3. Document errors for correction during the monitoring process;
4. Notify the Title I and III staff of the results of the monitoring;
5. Facilitate correction of issues and anomalies during quarterly reviews and before annual data validation by the BWPO Quality Assurance staff;
6. Ensure appropriate staff receive data validation training annually;
7. Provide state monitoring staff with requested files, source documents, and any other needs for review upon notification.

B. Responsibilities of the Local PA CareerLink® staff:

1. Be familiar with all policies, procedures, guidance, and Help Center resources available relevant to data validation;
2. Attend all training as required;
3. Have participants sign the necessary releases of information to obtain verification source documentation from outside entities as needed;
4. Collect source documentation from participants or agencies in order to validate data elements in CWDS; taking care to ensure the document verifies the element with participant name and information required for the element;
5. Copy original documents and ensure legibility of documents. Complete Document Inspection forms as needed;
6. Provide guidance to participants on the use of the WIOA Self-Attestation Form;
    a. Assist participants in obtaining further documentation once enrolled in a workforce program, such as a birth certificate, driver's license, etc. via the provision of supportive services;
7. Upload documents into CWDS in appropriate sections to validate data elements including those collected on enrollment as well as documents required to validate services, and outcomes;
8. Enter detailed case notes which include dates that are consistent with any available document. Label case notes in a manner to make data validation a simplified process.
9. Title I and Title III staff will keep paper files which at the least:
    a. Identify the participant, including PID and services received.
    b. Include all items and documents not part of the case records available in CWDS; and
    c. Maintain copies of all documents or original signed forms used to validate elements.
10. Keep all PII according to Workforce Solutions *Policy on Handling and Protection of Personally Identifiable Information (PII).*
11. Submit/surrender all physical files upon request by local, state, and federal reviewers as applicable.

VII. POLICY EXCEPTIONS:

Any discrepancies arising between Workforce Solutions policy and or procedures with federal and

state provisions due to current or future revisions will default to the current minimum federal and state regulations and guidance available. Workforce Solutions policy and or procedures may set forth stricter requirements than provided by federal and state guidance, but in no case will local policy and or procedures not meet minimum federal and state policy.

VIII. RESCISSIONS:

None

IX. EXPIRATION:

Ongoing

X. INQUIRIES:

Questions shall be directed to:
Pam Streich, Executive Director at pstreich@ncwdb.org; or
Donna Hottel, Strategic Planning and Project Manager at dhottel@ncwdb.org; or
Tonya Mauk, Oversight and Project Manager at tmauk@ncwdb.org

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XI. POLICY HISTORY:

This policy is reviewed annually (at a minimum), typically during the first week of July, by Workforce Solutions' staff to assess and implement any necessary changes, edits, updates and revisions.

Name of Staff Reviewer	Date of Review	Description of Change	Effective Date
Pam Streich, Tonya Mauk & Donna Hottel	09/10/2025	Review and formatting updates.	09/01/2025
Pam Streich, Tonya Mauk & Donna Hottel	05/01/2025	Issued	05/01/2025