

Workforce Development Board

UPPER SAVANNAH WDA INSTRUCTION NUMBER: PY'21-05

TO: Upper Savannah Grantees

ISSUANCE DATE: April 18, 2022

EFFECTIVE DATE: April 18, 2022

SUBJECT: WIOA Data Validation Policy

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Purpose: The purpose of this instruction is to provide data validation procedures for the Upper Savannah Workforce Development Area on the policy and procedures required under the Workforce Innovation and Opportunity Act (WIOA) regarding the data validation process.

References: TEGL 23-19 Guidance for Validating Required Performance Data Submitted by Grant Recipients of USDOL Workforce Programs and State Instruction 20-09 Performance Data Validation for DOL Workforce Programs

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 that requires a consistent approach across programs ensures that all program data consistently and accurately reflect the performance of all programs. To that end, the purposes of validation procedures are to:

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

Policy: Pursuant to the Department of Labor's TEGL 23-19 Guidance for Validating Required Performance Data Submitted by Grant Recipients of USDOL Workforce Programs and State Instruction 20-09 Performance Data Validation for DOL Workforce Programs, each Local Workforce Development Board (LWDB) must develop its own data integrity review policy for WIOA Adult, Dislocated Worker and Youth Programs that aligns with all federal and state laws, regulations, and guidance.

Upper Savannah staff will

- be responsible for conducting quarterly data validation reviews on Adult, Dislocated Worker, and Youth participant files to verify that the performance data elements reported are valid, accurate, reliable, and comparable across programs;
- complete quarterly reviews in October, January, April, and July on both active and exited records for the previous quarter.
- use the latest Participant Individual Record Layout (PIRL) document found at <https://www.dol.gov/agencies/eta/performance/reporting#current-reporting-reg> for definitions/instructions, program specific requirements and source documentation needed to perform data validation on each data element;
- be expected to provide data validation documentation to requesting agency, when requested; and
- use the source documentation requirements found in TEGl 23-19, Attachment II, Source Documentation for WIOA Core/Non-Core Programs DOL-only Data Element Validation, to validate required program elements.

Staff Training: All staff who assist with the WIOA participant files will receive training annually, and on an on-going as needed basis, on the importance of accurate data entry and record keeping as it relates to obtaining positive performance outcomes. The training may be conducted either in-person, virtually, or written instructions. Training will include allowable source documentation requirements contained in TEGl 23-19, Attachment II, and other relevant state policies such as State Instructions 20-15 Participant Eligibility for WIOA Title I Programs and 20-09 Performance Data Validation for DOL Workforce Programs.

Correcting Missing or Erroneous Data: At WIOA Eligibility, during WIOA Participation, and prior to WIOA Exit, staff will ensure sufficient source documentation is collected and/or maintained as required in the SC Works Online System (SCWOS) and the participant hardcopy file. Corrective actions taken for erroneous or missing data noted during the review may include but are not limited to submitting detailed change requests to correct inaccurate data, providing additional training or technical assistance to staff responsible for the erroneous data entry, if applicable, collecting missing documentation to verify required data elements, if applicable.

Personally Identifiable Information and Record Retention: Staff must maintain and store participant information in a manner that ensures confidentiality in accordance with 29 CFR 38.41 and State Instruction 16-11, Confidentiality of Equal Opportunity Records, including keeping all Personally Identifiable Information (PII) or legally sensitive information (e.g., information about criminal history, medical history, etc.) in a separate locked file. **PII and legally sensitive information must never be included in a case note.**

For Upper Savannah record retention policy, please refer to the Upper Savannah Record Retention Overview document attached. Records related to Equal Opportunity (EO) complaints must be kept for three years following the complaint resolution, or if the complaint resolution is appealed to DOL, records must be retained for three years following the resolution of the appeal.

Operation Plan: Upper Savannah conducts a systematic desktop review each month. Reviewing one new enrollment, one person in training, one person not in training, and one person in follow-up for each case manager. Initially Upper Savannah was to use a process similar to the state's early approach to data validation and request a sample of files to review after termination to review all applicable data elements.

After reviewing plans created by other workforce areas, Upper Savannah decided to reconfigure the desktop monitoring to include data validation. We will continue the mostly monthly frequency (at least two months in each quarter). By doing the review monthly and targeting efforts to each case manager, we have the greatest possibility of finding mistakes and staff training gaps early.

The Upper Savannah Workforce Development Director and/or Deputy Director will review the reports completed in February, March, April, May, and June for the previous months. We will ask to see paper copies of anything not found in the desktop review. A summary will be compiled.

The contractor will implement scanning all documents by May 1 and will eliminate paper files on new clients by June 30, 2022. The scanned documents will mean that data validation can be done via the established desktop monitoring. At that point, the Director/Deputy Director will be responsible for reviewing the desktop monitoring, asking for corrections, and recording actions taken. Any documents that include confidential information should not be scanned but placed in a lock file. There should be no personal identifiable information (PII) visible on any of the scanned documents.

Action: Please ensure that all appropriate staff receive this policy and understand their responsibilities for performance data validation.

Questions regarding this instruction should be directed to the Workforce Development Staff at 864-941-8050.



Ann Skinner
Workforce Development Director

UPPER SAVANNAH COUNCIL OF GOVERNMENTS

/s/

Attachments:

Record Retention Overview

Monthly Internal Monitoring & Data Validation Template

Record Retention Overview

To ensure that all required hard copy case files for participants are maintained for a time period sufficient to cover data validation and audits, records must be maintained for **five years**. Therefore, hard copy case files, including WIA/WIOA eligibility case files, for all WIA/WIOA participants who exit from WIA/WIOA must be maintained per the chart below:

Program Year	Exit Dates	Destroy Date
PY 2004	April 1, 2004 – March 31, 2005	March 31, 2010
PY 2005	April 1, 2005 – March 31, 2006	March 31, 2011
PY 2006	April 1, 2006 – March 31, 2007	March 31, 2012
PY 2007	April 1, 2007 – March 31, 2008	March 31, 2013
PY 2008	April 1, 2008 – March 31, 2009	March 31, 2014
PY 2009	April 1, 2009 – March 31, 2010	March 31, 2015
PY 2010	April 1, 2010 – March 31, 2011	March 31, 2016
PY 2011	April 1, 2011 – March 31, 2012	March 31, 2017
PY 2012	April 1, 2012 – March 31, 2013	March 31, 2018
PY 2013	April 1, 2013 – March 31, 2014	March 31, 2019
PY 2014	April 1, 2014 – March 31, 2015	March 31, 2020
PY 2015	April 1, 2015 – March 31, 2016	March 31, 2021
PY 2016	April 1, 2016 – March 31, 2017	March 31, 2022
PY 2017	April 1, 2017 – March 31, 2018	March 31, 2023

For Case Files of WIA/WIOA Applicants Who Were Never Enrolled

Hard copy case files for WIA/WIOA applicants who have complete applications but were not enrolled within 90 days of the eligibility determination or were determined ineligible for WIA/WIOA services must be maintained for **three years past the Eligibility Date**.

For Case Files of Individuals with a Partial WIA/WIOA Application

Hard copy case files for individuals with a partial WIA/WIOA Application must be maintained for **three years past the Application Date**.

TAA Record Retention

Hard copy case files for Trade should be maintained for the following timeframes:

- Enrolled Trade Participants – Five (5) years from the end of the fiscal year (FY) based on the year the participant exited from the Trade program
- Partial/Applied but Never Enrolled – Three (3) years from the end of the FY based on the date of the application.

**WIOA Monthly Internal Monitoring Summary
& Data Validation**

Review of Month 2021

for the Month Due **Month 2021**

		Adult, DW, Youth			
		Case Manager	Case Manager	Business Services Rep	Business Services Rep
A.	Review at least one eligibility determination record for each case manager each month. (Priority of Service)	State ID: (Last Name, First Initial) Elig Date: A DW Y Stwd NDWG Applicant's elig criteria: Adult Priority = Elig document scan = Yes or No Elig documents scanned: Enrollment Date: Youth - Assm't, Plan, Element =	State ID: (Last Name, First Initial) Elig Date: A DW Y Stwd NDWG Applicant's elig criteria: Adult Priority = Elig document scan = Yes or No Elig documents scanned: Enrollment Date: Youth - Assm't, Plan, Element =		
	Reviewer Comments:				
	Supervisor Comments:				

**WIOA Monthly Internal Monitoring Summary
& Data Validation**

Review of Month 2021

for the Month Due **Month 2021**

		Adult, DW, Youth			
		Case Manager	Case Manager	Business Services Rep	Business Services Rep
B.	Perform a monthly desktop review of at least one client in training, one client not in training and one client in follow-up for each case manager each month.				
	(Case notes up to date, IEP up to date, Acty 202, timesheets, grades, F/U - are they finding people)				
	In Training	State ID: (Last Name, First Initial) Enrollment Date: Youth - Assm't, Plan, Element =	State ID: (Last Name, First Initial) Enrollment Date: Youth - Assm't, Plan, Element =		
	Look at training activity code.	Training Activity = (Name of Training) Actual Begin Date - Proj End Date Measurable Skills Gain ?? Credential ??	Training Activity = (Name of Training) Actual Begin Date - Proj End Date Measurable Skills Gain ?? Credential ??		
	Does assessment seem to support training? <i>YES or Why NOT</i>	Date Completed Assmt: Support Training =	Date Completed Assmt: Support Training =		
	Does IEP include training? <i>YES or NO</i>				
	Does the client have a good resume? <i>YES, Need Work, NO</i>	# Resumes available in WOS = Resume Detail Score =	# Resumes available in WOS = Resume Detail Score =		
	Does case notes indicate client is attending and making satisfactory progress? <i>YES Making Progress, Notes Indicate Struggle, NO Current Note W/I last month</i>				
	If client is within one month of completion, is there a case note from BSR? <i>N/A, Yes Connected, NO Not Connected</i>				
	Reviewer Comments:				
Supervisor Comments:					

**WIOA Monthly Internal Monitoring Summary
& Data Validation
Review of Month 2021
for the Month Due Month 2021**

Adult, DW, Youth			
Case Manager	Case Manager	Business Services Rep	Business Services Rep
Not in training	State ID: (Last Name, First Initial) Enrollment Date: Total # of actys not voided = Total # of Counseling actys = Youth - Assm't, Plan, Element =	State ID: (Last Name, First Initial) Enrollment Date: Total # of actys not voided = Total # of Counseling actys = Youth - Assm't, Plan, Element =	
What was the last activity?	Training Activity = (Name of Training) Date of acty: Measurable Skills Gain ??	Training Activity = (Name of Training) Date of acty: Measurable Skills Gain ??	
When is the last time they were seen in person? <i>Just Date</i>	Last Face-to-Face Case Note Date =	Last Face-to-Face Case Note Date =	
Does it seem that they are put in activities to keep them from exiting? <i>YES, NO Needs To Be Reviewed</i>			
If they are not working, what is the next step for them --> Is there a next scheduled appointment in case notes? <i>YES with Date or NO</i>			
Review IEP. Is it current? <i>Review Dates --> YES Current or NO Not Current</i>	Goal Est. Dates for Completion = Objectives Review Dates =	Goal Est. Dates for Completion = Objectives Review Dates =	
Does client have resume? <i>YES or NO</i>	# Resumes available in WOS = Resume Detail Score =	# Resumes available in WOS = Resume Detail Score =	
If the person is job ready, is there notes from BSR? <i>YES or NO</i>			
Reviewer Comments:			
Supervisor Comments:			

**WIOA Monthly Internal Monitoring Summary
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Review of Month 2021**
for the Month Due **Month 2021**

		Adult, DW, Youth			
		Case Manager	Case Manager	Business Services Rep	Business Services Rep
In follow-up	State ID: (Last Name, First Initial) Enrollment Date: Exit Date:	State ID: (Last Name, First Initial) Enrollment Date: Exit Date:			
	What contact has been made as required? Is supplemental data gathered for those self employed? Is there an attempt to get credential information? Is there a copy of Credential? YES or NO Are individuals not employed provided assistance --> What is employment status? Training Related?	Q1 = Q2 = Q3 = Q4 =	Q1 = Q2 = Q3 = Q4 =		
	Training = Credential attained? Copy of Credential? Measurable Skills Gain =	Training = Credential attained? Copy of Credential? Measurable Skills Gain =			
	Employment Status = Training Related =	Employment Status = Training Related =			
	Actys -> Wage Info: 1st Qtr after Exit = 2nd Qtr after exit = 3rd Qtr after exit = 4th Qtr after exit =	Actys -> Wage Info: 1st Qtr after Exit = 2nd Qtr after exit = 3rd Qtr after exit = 4th Qtr after exit =			
	Reviewer Comments:				
	Supervisor Comments:				

WIOA Monthly Internal Monitoring Summary
& Data Validation

Review of Month 2021

for the Month Due Month 2021

		Adult, DW, Youth			
		Case Manager	Case Manager	Business Services Rep	Business Services Rep
C.	Review the internal monitoring reports from contractors each month and file them electronically. (Grantee reports due 8th of each month)				
D.	Review all relevant ad hoc reports monthly				
	Ad Hoc Reports:				
	Caseload Report (run date:) - total # of participants listed on report	# participants listed on report for CMgr = _____	# participants listed on report for CMgr = _____	---	
	Extended Participants Report (run date:) - total # participants listed on report	# participants listed on report for CMgr = ____ (year)	# participants listed on report for CMgr = ____ (year)	---	
	Case Manager Not Assigned Report (run date:) - total # participants listed on report	# participants listed on report for CMgr / County = _____ More than 45 days =	# participants listed on report for CMgr / County = _____ More than 45 days =	---	
	Monthly Case Note Report (run date:) - total # participants listed on report	# more than 45 days of total # of participants listed for CMrg	# more than 45 days of total # of participants listed for CMrg	---	
	System Closed Activities Report (run date:) - total # participants listed on report w/# Unassigned	System closed = # of participants listed for CMrg	System closed = # of participants listed for CMrg	---	
	Participants in Training Report (run date:) - total # participants listed on report	Proj End Date passed = # proj end date passed of total # of participants listed for CMgr	Proj End Date passed = # proj end date passed of total # of participants listed for CMgr	---	
	WIOA IF T Pending voucher Approval Report (Youth) (run date:) - total # participants listed on report	# participants listed on report for CMgr = # (Yr) ; # (yr)	# participants listed on report for CMgr = # (Yr) ; # (yr)	---	
	Date of Last Service Report (run date:) - total # participants listed on report w/# Unassigned	# participants listed on report for CMgr =	# participants listed on report for CMgr =	---	
	Youth - Non-Participants (run date:) - total # participants listed on report w/# Unassigned	# participants listed on report for CMgr =	# participants listed on report for CMgr =	---	
	SCWOS Reports:				
	Case Management				
	Soon to Exit Cases (run date:) - total # participants listed on report	15 days or less = total # of participants listed for CMgr	15 days or less = total # of participants listed for CMgr	---	
	Services Provided Employer Reports - by Staff and Services (run date:) for Month of Year	---	---	Total Employers = Total Services =	Total Employers = Total Services =
	Master Summary Reports				
	Staff Activities Summary (run date: for Month of Year)	Indiv registered = ; Resumes created = ; Internal Job Referrals = ; Complete Apps = ; Participations = ; Actys/Svcs = ; Case Notes Added = ; F/U =	Indiv registered = ; Resumes created = ; Internal Job Referrals = ; Complete Apps = ; Participations = ; Actys/Svcs = ; Case Notes Added = ; F/U =	Indiv registered = ; Resumes created = ; Internal Job Referrals = ; Complete Apps = ; Participations = ; Actys/Svcs = ; Case Notes Added = ; F/U =	Indiv registered = ; Resumes created = ; Internal Job Referrals = ; Complete Apps = ; Participations = ; Actys/Svcs = ; Case Notes Added = ; F/U =
	Reviewer Comments:				
	Supervisor Comments:				

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for the Month Due **Month 2021**

		Adult, DW, Youth			
		Case Manager	Case Manager	Business Services Rep	Business Services Rep
E.	Maintain monthly case load records				
	(One-Stop Operator reports, Grantee caseload reports, Track Report numbers, Due 8th of month)				
	SC Works Operator	Received Monthly Reports: Saved on network:			
	Grantee	Received Monthly Enrollment Reports: Saved on Network:			
F.	Handle change notices as necessary			✓	
G.	The Information Systems coordinator will submit a report to the Workforce Development Director no later than the 25th of each month summarizing findings or weaknesses identified through the items listed above a-f.	Date Submitted via email completed report to Workforce Director, Deputy Director			