

**Kansas Department of Commerce  
Workforce Services  
Policy and Procedures Manual**

**Data Validation Procedure**

**Originating Office:** Commerce Regulatory Compliance (CRC) **Subject:**

WIOA USDOL Validation

**Issued:** March 27, 2014

**Revised:** July 20, 2016

**Purpose:** To transmit state guidance regarding procedural steps for implementing the USDOL mandated Enterprise Data Reporting and Validation System (E-DRVS).

**References:** Workforce Innovation and Opportunity Act (WIOA), assorted USDOL training and employment guidance letters (TEGLs) e.g., NO. 03-03, Change 1, NO. 03-03, Change 2; Training and Employment Notice (TEN) 14-02; ETA User Handbook for E-DRVS.

**Background:** The State as a grantee receiving funding under USDOL Employment and Training Administration (ETA) programs is required to maintain and report accurate and reliable program and financial information. Data validation requires the State to ascertain the validity of report and participant record data submitted to the ETA and to submit reports to the Agency on data accuracy.

Data validation consists of two separate functions: report validation and data element validation. Because there are two basic sources of reporting error, validation requires two methods. Report validation checks the accuracy of the state calculations used to generate the ETA 9090 quarterly report and ETA 9091 annual report. Data element validation checks the accuracy of the data used by the state to perform the calculations. ETA only requires states to perform report and data element validation for the ETA 9091 annual report.

The validation process is intended to accomplish the following goals:

- Detect and identify specific problems with a state's WIOA reporting process, including software and data problems, so as to enable the state to correct the problems;
- Ensure that critical performance data used to direct incentives and sanctions and to meet ETA's GPRA responsibilities are reasonably accurate by calculating an error rate for selected data elements validated on the ETA 9091;

- Provide tools that help states and local areas analyze the causes of their performance successes and failures by displaying participant data organized by performance outcomes;
- Minimize the burden on states in conducting the validation by providing standardized software (E-DRVS) that reads records in the WIOASRD format and performs all of the processing required to conduct the validation; and
- Further minimize the burden on the states by selecting the smallest possible validation samples necessary to compute valid error rates.

States submit WIOA Standardized Record Data (WIOASRD) records and an annual performance report, the ETA 9091, to the Employment and Training Administration on an annual basis, and submit a quarterly performance report, the ETA 9090, on a quarterly basis. ETA requires states to validate the accuracy of their annual submissions to ensure that ETA decisions about WIOA policy and funding are made based on a true picture of program outcomes. Report validation checks the accuracy of the state calculations and data element validation checks the accuracy of the data used to perform the calculations. In report validation, states compare their ETA 9091 reported values to 9091 validation values generated by the E-DRVS. States that use the E-DRVS to prepare their 9091 reports do not need to conduct a full report validation. In data element validation, all states compare key data elements against samples of WIOA participants.

Responsibility for completing data validation tasks will be divided among various staff within the Commerce units as follows: Workforce Service Unit (WFS), Americas JobLink Alliance – Technical Support (AJLA-TS) and Regulatory Compliance Unit (CRC)

Responsibilities with data validation will be disseminated as follows:

**WFS Program Managers** are responsible for assuring that programmers and validators have the resources needed to complete the validation as required by ETA. They are also responsible for keeping the data validation effort on schedule. Among the program managers will be a Systems Reporting Analyst responsible for loading the files into the E-DRVS.

**AJLA-TS Programmers** maintain the case management system (**KANSASWORKS**) and have the primary responsibility for building the validation extract file in the format specified in the record layout. The data file will then be shared via a secure file transfer portal to the WFS Systems Reporting Analyst. This unit will also maintain source data for wage records and other data elements collected for the purpose of quarterly (ETA 9090), annual (ETA 9091), and data validation reporting.

**CRC Monitors** conduct the data validation once the extract file has been imported into the E-DRVS. Monitors must be state staff who are independent of the data collection process.

WFS, CRC, and AJLA-TS work in unison to complete data validation annually.

The process and assignment of validation responsibilities include, but are not limited to the following action steps:

1. WFS Program Managers, including Local Area partner staff, collect data elements and documentation supporting data elements on an ongoing basis. This data collection becomes the foundation for the data validation efforts performed at the end of the program year.
2. At program year end, the WFS System Reporting Analyst will generate the validation sample based on the file extract provided by AJLA-TS.
3. WFS Systems Reporting Analyst will then provide the data validation sample to the CRC unit for onsite monitoring efforts at the Local Area.
4. CRC arranges a mutually agreeable time with the Local Areas for the onsite validation of participant files, two days prior to the scheduled time, the data validation sample for the Local Area is released. Collection of field work verification of select *participant data elements (eligibility, enrollment, goal attainment, etc.)* for pass/fail against file documentation is conducted by CRC.
5. WFS System Reporting Analyst will be responsible for requesting the source file for wage records from AJLA-TS, which will include Kansas UI wage files, WRIS files and FEDES files based on the sample drawn for validation. For the state UI wages, Commerce will access the Kansas Department of Labor (KDOL) BASI file to compare the wages or, if the BASI file is not available or wages have been updated since reported, a request will be sent to AJLA-TS for the wages that come through the interface between **KANSASWORKS** and KDOL.
6. AJLA-TS owns the responsibility to load the files and validate the loaded files transfer correctly. AJLA-TS will provide the wage files via a secure file transfer protocol (sFTP) site.
7. AJLA-TS will provide the WFS System Reporting Analyst, the WRIS and FEDES files for those individuals on the sample. Following the validation of wages, the file will be deleted and removed an electronic shredding tool such as Eraser.

8. CRC will data enter the results from the onsite data validation reviews and submit reporting to USDOL ETA via E-DRVS. Furthermore, CRC will collaborate with Local Area partners as well as USDOL ETA staff to resolve any reporting variance as noted below:
  1. CRC will notify the Local Area in regards to specific data element variances identified with an above 5% reporting error rate.
  2. The Local Area will research and analyze case files, policy and/or procedure and training plans in an effort to remedy the data element variances.
  3. When the research effort is complete, Local Areas will communicate the resolutions for each of the specified data elements and plan of action for remedy to avoid future occurrences.
  4. CRC will share Local Area responses with the WFS Systems Reporting Analyst, who will review and respond if further action is needed.

**Contact:** Questions regarding this process guidance should be directed to Director, Commerce Regulatory Compliance, (785) 296-2122, [crc@ks.com](mailto:crc@ks.com).

**Attachments:** None.