

Kansas Department of Commerce

Workforce Services

Policy and Procedures Manual

Policy Number: 5-33-00

Policy Originating Office: Workforce Services (WFS)

Subject: Workforce Innovation and Opportunity Act (WIOA) Required Data Validation for Department of Labor Programs

Issued: November 15, 2019

Revised: November 15, 2019, October 1, 2021, May 1, 2024

Purpose: To transmit state guidance regarding policy and procedural steps for implementing the US DOL guidance for validating required performance data (Training and Employment Guidance Letters 23-19, Change 1 and Change 2) to ensure data submitted are valid and reliable. This includes performance data validation for the following: Title I; Adult, Dislocated Worker and Youth Programs, Title III Wagner-Peyser Program and TAA Program, JVSG Program, RETAINWORKS Program, and Apprenticeship Grants.

References: Workforce Innovation and Opportunity Act (WIOA), U.S. Department of Labor (USDOL) and TEGL 23-19, Change 1 and Change 2, 2 CFR 200.328

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 program.

The State as a grantee receiving funding under US DOL 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 ETA on data accuracy.

There are different processes used by Commerce under the umbrella of data integrity which include:

- Report validation through WIPS edit checks
- Data quality check of quarterly PIRL/QPR reporting
- Ongoing performance oversight and data quality reviews
- Data validation

Commerce incorporates this data validation policy and procedure into existing internal controls and required monitoring per 2 CFR 200.328

This policy outlines the data validation process which compares MIS data to source documentation. The purpose of data validation procedures are to:

- Verify that 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 the data validation efforts;
- Outline source documentation required for common data elements

Kansas will incorporate data validation procedures into the internal controls procedures as required by 2 CFR 200.303.

Data Integrity

A critical part of program data integrity will be the regular reviewing Participant Individual Record Layout (PIRL) files and Quarterly Performance Reports (QPR) before submission. These reviews will check for errors, missing data, out-of-range values, and anomalies. These reviews are part of an overall effort to ensure data integrity but is not Data Validation and thus not covered in totality within this policy. Data Validation is the process of comparing Management Information Systems (MIS) data to source documentation and is the focus of this policy.

Electronic edit checks are performed quarterly, in advance of submitting reports to DOL. Electronic edit checks include checking for errors, missing data, out-of-range values and anomalies. Local area administrative entities and/or program managers are notified of data flagged through this process for review and appropriate action.

Local Administrative entities and program managers are given 20 days to respond with documentation verifying missing and/or erroneous data identified during the review process have been corrected.

Part of the overall data integrity process will include a regular assessment of the effectiveness of the data validation process, and revisions to the process as needed.

Commerce staff representing Workforce Services, Commerce Regulatory Compliance (CRC) and American's JobLink Alliance (AJLA) will meet periodically but no less than annually to review the results of data validation efforts and the effectiveness of the data validation process. This group will collectively draft revisions as needed.

AJLA will document missing and erroneous data identified during the review process to note that corrections have been made. AJLA will make a list of common errors and provide that to Workforce Services Staff so common errors can be addressed during training.

Report Validation

States submit WIOA Participant Individual Record Layout (PIRL) Data records and an annual performance report, to the Employment and Training Administration on an annual basis, and submit a Quarterly Performance Report (QPR), the PIRL, on a quarterly basis. ETA requires states to validate the accuracy of their quarterly 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 PIRL reported values to values generated by the below methodology. In data element validation, all states compare key data elements against samples of WIOA participants.

Data Validation Procedures

The steps for the Data Validation process are as follows:

1. Quarterly Performance in uploaded in WIPS accordingly with certification of the final file.
2. Samples of 10% of records per program will be provided to CRC.
3. CRC will perform data element validation utilizing KANSASWORKS.com as primary source documentation.
4. CRC will provide results for each program to Workforce Services.
5. Workforce Services will determine if any corrective action or improvements are needed prior to end of the next quarter and provide direction to local areas and program staff accordingly.
6. Local area and program staff will be notified and data errors and will have 30 days to correct those errors and provide documentation as such to State Workforce Service staff.
7. Process repeats every quarter.

Data reviewed will include, those elements identified through current US DOL Guidance TEGL 23-19, Change 2, Attachment II. Data validation will include electronic file data checks as well as physical file examination and comparing source documentation to data elements recorded for identifying discrepancies, errors, or missing data. The Local Area Staff/Program Managers who are responsible for collection and reporting of the data, will be

notified of any errors for correction. Any error rate above 2% will lead to Technical Assistance in the corresponding local area.

Samples are drawn down 20 days after the end of each quarter and not for any given PY after the annual report has been submitted for that program year.

Approximate quarter sample date and due date for the Data Validation results are shown in the table below:

Quarter	Performance Report Period	Sample Date	DEV Results Due
1	07/01 to 09/30	10/20	12/31
2	10/01 to 12/31	1/20	3/31
3	01/01 to 03/31	4/20	6/30
4	04/01 to 06/30	7/20	9/30

Workforce Services will monitor data corrections that are due by noting the date when corrections were sent to local area and program staff. Corrections are due back within 30 days, and Workforce Services will follow-up with local area and program staff if corrections have not been sent in by the 30-day deadline.

Local areas are to provide screenshots as documentation that missing and erroneous data has been corrected. Screenshots must not include Personable Identifiable Information (PII), but should only serve that data corrections have been made.

Final deadlines are emailed out to local area and program manager towards the end of every program year. This deadline will denote a specific date to have any and all corrections made for that program year in order for the State to have time to pull the PIRL file for the annual report and certification.

Sampling Methodology

Each sample is selected using a two-state stratified sample design. At the first state, a state is divided up into five sampling strata. The five strata correspond to the five local workforce development areas within the state. Within each of these strata, primary sampling units (PSUs) are formed and selected. The PSUs for the sample are defined as employment service offices. The PSUs are randomly selected using a probability-proportionate-to-size (PPS) procedure that gives a higher chance of selection to PSUs having a larger number of files. To counter balance this propensity to selection offices having the largest caseloads, the sampling scheme selects the same number of records within each PSU regardless of PSU size. In this manner, a record that is created during the sampling period will be included in the sample with approximately equal probabilities within sampling strata regardless of the relative size of the PSU.

Samples will be files from the current program year to include both active participants and participants that have exited during the same program year.

Commerce has developed a full sampling methodology and it can be found using the following link under Reference Materials:

<https://ksworksstateboard.org/policies-and-procedures/>

Data Validation Frequency

Commerce will conduct a quarterly random-sample audit on the 20th day following quarter end. The random-sample will consist of the Participant Individual Record Layout (PIRL) data files from at least 10% of total enrollment for each program (e.g., Adult, DW, Youth, Wagner-Peyser, TAA, JVSG RETAINWORKS, and Apprenticeship grants) to secure better statistical data.. In addition, the stratified random sample will include individuals with participation set and those who exit the program during the reporting period. By using this stratified random sample, where the five local workforce service areas constitute the strata and the sampling fraction in each of the strata is proportional to that of the population.

Error Rates

Error rates are evaluated two different ways. First, a review is done of each program across the entire state. For instance, the Adult sample is reviewed and see how many errors there are in the file compared to how many values are entered.

Second, a review is done at the local area level and the error rate calculated for each local area for all programs combined. Errors rates are compared to overall values in the samples for each local area. Reviews are done through the programs at the local area level and noted if any error rates go above 2%.

If error rates trends go above 2% in any program year, a meeting is scheduled with Training and Technical Assistance staff to describe the issues found. Training and Technical Assistance staff then follow up local area and program managers to schedule training accordingly.

Data Validation Responsibilities

Americas JobLink Alliance (AJLA) will be responsible for pulling the random samples every quarter and provide the samples to the Workforce Services Unit. AJLA will maintain the case management system (KANSASWORKS.com) 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 Workforce Services Unit.

The Workforce Services Unit will place the sample files on a Shared Drive and notify CRC the Data Validation procedure is ready. The Workforce Services Unit will be responsible for assuring that programmers and validators have the resources needed to complete the validation as required by ETA and this policy. Workforce Services Unit are also responsible for keeping the data validation effort on schedule. Workforce Services will be responsible for loading the files into the Random Sampling System. This Workforce Services Unit will also maintain source data for wage records and other data elements collected for quarterly and annual PIRL, and data validation reporting.

CRC will conduct the Data Validation and notify the Workforce Services Unit of any errors. Workforce Services Unit will work with local areas and Program Managers to correct any errors that our found. If there is an error rate above 2%, Technical Assistance will be given to the corresponding local area. CRC will conduct the data validation once the extract file has been imported into the Random sampling system. Monitors must be state staff who are independent of the data collection process. CRC is required to have the Data Element Validation (DEV) completed two weeks prior to the following quarter end date.

Local area and program managers are responsible for correcting any erroneous data and providing documentation back to the State Workforce Services staff that the data has been corrected. Documentation should be in the form a screenshots but must not include any Personal Identifiable Information (PII).

Record Maintenance

Data validation records will be maintained consistent with State Policy #5-13-00: Record Maintenance and Retention

Copies of all records, validations sheets and other documents will be kept on the Shared Drive and maintained for future auditors to review if needed.

Training

Regular data validation training for Commerce Regulatory Compliance (CRC) staff will be conducted annually.

Training will be on the identification, collection and reporting of key data elements as well as available processes for periodic reviews of program data. Training will be conducted by Commerce Staff assigned technical assistance, training, and reporting analyst's responsibilities.

Commerce Regulatory Compliance Unit (CRC) will be provided training regarding the utilization of the MIS as the source for validating response. Training also includes PIRL elements and general navigation of the worksheets developed and the proper way to translate the system data of the elements reviewed.

Source Documentation for Data Elements

Regular data element validation monitoring on data elements identified in TEGL 23-19 Change 1 and TEGL 23-19 Change 2, Attachment II

Contact: Questions regarding this policy and process guidance should be sent to workforcesvcs@ks.gov

Attachments:

TEGL 23-19, Change 2, Attachment II



Attachment II
(PDF).pdf