



Draft Directive Coverpage



WIOA Data Validation

General Instructions

The attached Directive is being issued in draft to give the Workforce Development Community the opportunity to review and comment prior to final issuance.

Submit any comments by email no later than **January 31, 2025**.

All comments received within the comment period will be considered before issuing the final Directive. Commenters will not be responded to individually. Rather, a summary of comments will be released with the final Directive.

Comments received after the specified due date will not be considered.

Email

WSBDataValidation@edd.ca.gov

Include "Draft Directive Comments" in the email subject line.

If you have any questions, contact the Data Validation Unit at WSBDataValidation@edd.ca.gov.



Draft Directive

Date: January 2, 2025 Number: WSDD-268



WIOA Data Validation

Executive Summary

This policy provides the guidance and establishes the procedures regarding the *Workforce Innovation and Opportunity Act* (WIOA) data validation requirements. This policy applies to the following programs: Title I Adult, Dislocated Worker, and Youth, Title III Wagner-Peyser, Trade Adjustment Assistance (TAA), National Dislocated Worker Grant (NDWG), and Jobs for Veterans State Grant (JVSG), and is effective immediately.

This policy contains some state-imposed requirements. All state-imposed requirements are indicated by ***bold, italic*** type.

This policy supersedes Workforce Services Directive *WIOA Data Validation* (WSD22-04) dated September 1, 2022. Retain this Directive until further notice.

References

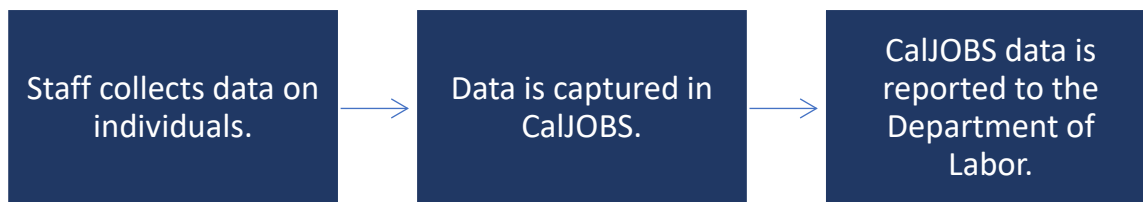
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- WIOA (Public Law 113-128) Section 116(d)(5), Section 185(a)(3)(c), and Section 188
 - Title 2 *Code of Federal Regulations* (CFR) Part 200: *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance), Section 200.334.
 - Title 29 CFR Part 97: *Retention and Access Requirements for Records* (Uniform Guidance), Section 97.42
 - Training and Employment Guidance Letter (TEGL) [23-19, Change 2](#), *Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs* (May 12, 2023)
 - [TEGL 7-18](#), *Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)* (December 19, 2018)
 - [Workforce Services Directive](#) WSD24-07, *Performance Guidance* (November 26, 2024)
 - WSD24-05, *CalJOBS Activity Codes* (October 10, 2024)
 - WSD22-15, *WIOA Data Validation Source Documentation* (August 12, 2022)
 - WSD20-10, *CalJOBS Participant Reporting* (April 8, 2021)
 - WSD18-02, *Data Change Request Form Procedure* (July 31, 2018)

Background

The WIOA offered a historic opportunity to align performance-related definitions, streamline performance indicators, integrate reporting, and ensure comparable data collection and reporting across programs. It also requires the collection and reporting of program-specific data and assesses the effectiveness of programs using performance accountability indicators and performance reporting requirements.

Figure 1 illustrates a high-level overview of the flow of data in the workforce system.

Figure 1



The Employment Development Department (EDD) must conduct data validation on program participant files annually. Data validation verifies the accuracy of data entered in CalJOBSSM and reported to the Department of Labor (DOL). The purpose of data validation procedures are as follows:

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

The EDD Central Office Workforce Services Division's Program Data and Reporting Group administers the department's data validation efforts. The EDD uses data validation findings to assess the accuracy of program participant data pulled from CalJOBS and reported to the DOL.

Policy and Procedures

Definitions

Data Validation – The series of internal controls that verifies the accuracy, validity, and reliability of data.

Data Element – A standardized unit of information with a unique meaning that is captured in CalJOBS and reported to the DOL.

Source Document – Physical or electronic document(s) or record(s) that supports the data captured in CalJOBS and reported to the DOL.

Data Element Validation (DEV) – The process of using source documentation to confirm the data captured in CalJOBS and reported to the DOL.

Population Size – The total number of participants served in the last four quarters (rolling four quarters) of the Program Year’s second quarter WIOA Quarterly Performance Report.

Sample Size – The number of participant case files to be reviewed.

CalJOBS Value – The value captured in CalJOBS for a data element.

Reported Value – The value reported to the DOL for a data element.

Audit Outcome – The outcome after validating the reported value against source documentation.

Error Rate – The frequency of errors.

Single Data Element Error Rate – The percentage of total errors for a specific data element.

Total Program Error Rate – The percentage of total data element errors for a single program.

Data Element Validation

Data Element Validation (DEV) is an annual process that begins in January each year. The process requires collaboration between the Local Areas, EDD Central Office Workforce Services Division, and the Workforce Services Branch (WSB) field divisions. The Data Integrity and Validation Unit (DIVU) within the Central Office Workforce Services Division leads DEV and uses the Local Area Management Information System (MIS) Administrators and WSB CalJOBS Single Point of Contacts (SPOCs) as the primary contact for the process. The following outlines DEV activities:

- Training on DEV requirements are available for all program staff.
- The DIVU hosts a kick-off meeting for all Local Area MIS Administrators and WSB CalJOBS SPOCs in the cohort. This meeting provides an in-depth overview of DEV process, responsibilities, and expectations.
- The Local Area MIS Administrator informs the DIVU how source documents will be provided.

- The sample size for each area’s programs is identified, and random samples are pulled.
- DIVU provides MIS Administrators and WSB CalJOBS SPOCs the list of CalJOBS State IDs included in their sample 15 business days prior to beginning DEV. MIS Administrators and WSB CalJOBS SPOCs must ensure participant files are ready for DEV.
- The DIVU conducts DEV on all programs.
- DIVU provides MIS Administrators and WSB CalJOBS SPOCs the preliminary DEV results of each program. Directions on how to correct the identified data errors and the deadline for completing the data corrections is provided.
- The DIVU updates the preliminary DEV results based on corrections made by program staff.
- DIVU provides the final DEV results to the MIS Administrators and WSB CalJOBS SPOCs.
- Technical assistance is provided to areas with an error rate above the threshold.

For more detailed information on each step in the process, refer to the corresponding sections in this Directive. *Data Element Validation Process Flow Chart* (Attachment 1) provides a visual representation of the process.

DEV Cohorts

The DIVU conducts annual DEV for all Local Areas and WSB Field Divisions over a three-year period. The schedule is roughly grouped by each of the three Field Divisions, starting with the northern part and ending with the southern part of the state. For a list of the Field Divisions and Local Areas in each cohort, refer to *Data Element Validation Cohorts* (Attachment 2).

This three-year rotation will repeat indefinitely, or until updated. At the end of each three-year rotation, the schedule is evaluated and adjust, as needed. The adjustments are documented in a Directive.

DEV Sample

The DIVU uses the CalJOBS Participant Individual Record Layout (PIRL) Data Sampling tool to identify the participant records to validate. The tool pulls the sample using the data submitted to the DOL for the second quarter of the current Program Year. Samples may be targeted to specific barrier(s), service(s), or general (all records). The targeted barriers and services may change based on priorities or areas that need improvement. The samples include data for both active program participants, as well as participants who exited within the last eight quarters.

The sample size is based on each program’s population size and is calculated using a confidence level of 95% and a confidence interval of 15. Table 1 provides the sample size or number of participant case files selected for each program based on the population size.

Table 1

<i>Population Size</i>	<i>Sample Size</i>
0-14	All Records
15-19	14
20-29	18
30-49	23
50-99	30
100-199	35
200-299	37
300-499	39
500-699	40
700-999	41
1,000-4,999	42
5,000+	43

Please see the PIRL Reporting Timelines on [DOL's website](#) for further guidance on which exit cohorts are reported for each performance indicator. For more information on performance indicators, refer to *Performance Guidance (WSD24-07)*.

DEV Source Documentation Access

To facilitate the collection of program files, MIS Administrators and WSB CalJOBS SPOCs are provided the CalJOBS State IDs for their sample(s). MIS Administrator and WSB CalJOBS SPOCs must then provide the source documentation to the DIVU within 15 business days. The source documents can be made available in one of the three following ways:

1. Electronically via the CalJOBS Document Management and Scanning module.
2. Electronically via a secure electronic file sharing system.
3. Physically in a Local Area's office.

Wagner-Peyser, TAA, and/or JVSG program staff must collect source documentation via the CalJOBS Document Management and Scanning module. Therefore, DIVU completes DEV for these programs electronically via CalJOBS.

Local Area MIS Administrators must provide the method for providing source documentation to the DIVU by the end of February of their scheduled year. If an office visit is required to view physical documents, the Local Area must provide all files in a single office location organized by program, and a private space for DIVU staff.

For more information on the Document Management and Scanning module, refer to the *CalJOBS Document Management and Scanning Module Guide Card* found in the Staff Online Resources section of CalJOBS. For more information on allowable source documentation, refer to *WIOA Data Validation and Source Documentation (WSD22-15)*.

DEV Audit Outcomes and Error Rate Calculations

Each data element's reported value is validated against an allowable source document in *WIOA Data Validation Source Documentation* ([WSD22-15](#)), and is given an audit outcome of pass, fail, unable to validate, or not applicable. Table 2 describes the data element outcomes.

Table 2

<i>Audit Outcome</i>	<i>Definition</i>
Pass	When an allowable source document is available, and the data matches the reported value.
Fail	When an allowable source document doesn't match the reported value.
Unable to Validate (UTV)	When an allowable source document is not available, unusable, or illegible.
Not Applicable (N/A)	When a data element's Reported Value is "9 – Participant did not self-identify," "9 – Information not yet available," or "999999.99." These data elements are not validated.

The error rate is the frequency of data elements with an audit outcome of fail or UTV. Calculate the error rate using the following formula:

$$\left(\frac{\text{\# of Data Elements Failed or UTV}}{\text{Total \# of Data Elements being Validated}} \right) \times 100 = \text{Error Rate}$$

There are two types of error rates: Total Program Error Rate and Single Data Element Error Rate. The Total Program Error Rate is the frequency of errors for a single program. The Single Data Element Error Rate is the frequency of errors for a single data element within a program.

The Total Program Rate is calculated by dividing the number of fails and UTV by the total number of data elements validated, and then multiplying by 100.

The Single Data Element Error rate is calculated by dividing the number of fails and UTV for a specific data element by the total number of data elements validated for the same data element, and then multiplying by 100.

Example

The following scenario gives an example of how to calculate the two error rates.

The program population of a Local Area's Title I Adult program is 75. This results in a sample size of 30 participants (refer to Table 1). For those 30 participants, 250 data elements need to be validated. Of the 30 participants, 25 are English Language Learners (ELL) at program entry.

Table 3

<i>Population Size</i>	75
<i>Sample Size</i>	30
<i>Total Data Elements Validated</i>	250
<i>Total Data Elements Failed or UTV</i>	10
<i>Number with ELL Data Element</i>	25
<i>Number with ELL Data Element that Failed or UTV</i>	3

The following steps show how to calculate the Total Program Error Rate using the example data in Table 3:

1. Find the number of data elements verified in all case files: 250 data elements were validated.
2. Count the number of fails and UTVs received: 10 data elements were marked as fail or UTV.
3. Calculate the error rate by dividing the number of fails and UTV by the total number of data elements validated, and multiple by 100.

$$\left(\frac{10}{250}\right) \times 100 = 4.0\%$$

The Total Program Error Rate is 4.0%.

The following steps show how to calculate the Single Data Element Error Rate using the example data in Table 3:

1. Find the number of a single data element verified in all case files: 25 of the case files have a “yes” indicated for the ELL data element.
2. Count the number of fails and UTVs received on the ELL data element: 3 ELL data elements were not supported by source documentation and were marked as fail or UTV.
3. Calculate the error rate by dividing the number of fails and UTV for the ELL data element by the total number of ELL data elements validated, and multiple by 100.

$$\left(\frac{3}{25}\right) \times 100 = 12.0\%$$

The Single Data Element Error Rate is 12.0%.

The calculation of the Total Program Error Rate and the Single Data Element Error Rate finds trends to ensure the appropriate technical assistance is provided to the program and incorporated into annual data validation training.

DEV Data Element Corrections

Each program is provided their preliminary DEV results after the initial review. The results include guidance on how to correct data elements marked as failed or UTV. All data corrections must occur prior to the submission of the WIOA Annual Performance Report to the DOL in October. DIVU calculates and provides the final results after corrections are made by program staff.

DEV Technical Assistance

Technical assistance is provided to any program with a final error rate of 10% or higher. The purpose of technical assistance is to provide guidance and best practices regarding CalJOBS data entry, allowable source documents, and any other topics that effect the DEV error rate. The DIVU coordinates with the MIS Administrators and WSB CalJOBS SPOCs to schedule technical assistance, if needed.

Data Integrity Practices

CalJOBS is designed to help with the reduction of data errors. Examples of this functionality includes:

- Notifications prevent staff from moving forward with data entry until missing or contradictory values are corrected.
- Durations for activity codes are limited to prevent program applications from inadvertently staying open.
- Restrictions on the timeframe for staff to add, and/or edit data.
- Lockdown of program application after 90 days if enrollment did not occur.
- Program applications automatically exit after 90 days of no participant level services, and there are no planned services.

The Program Data and Reporting Group reviews program data for errors, missing data, out-of-range values, and anomalies on an ongoing basis. Examples of these activities include:

- Quarterly
 - Correction of data errors found by DOL's Workforce Integrated Performance System.
 - Review and correction of data associated to the DOL's Quarterly Report Analysis (QRA) reports and Trade Adjustment Act Data Integrity (TAADI) Self-check tool.
 - Identification of potentially inaccurate data, such as long periods of program participation, trends in exit dates occurring at the end of the quarter, training activities without an occupation code and/or associated credential, and contradictory values.
- Ongoing
 - Processing of Data Change Request forms. For more information on this process, please see *Data Change Request Form Procedure* ([WSD18-02](#)).

- Modification and creation of new business rules in CalJOBS to help with reducing data entry errors.
- Works with the MIS Administrators and WSB CalJOBS SPOCs to ensure data is entered into CalJOBS accurately.
- Assists MIS Administrators, WSB CalJOBS SPOCs, and other staff with understanding system reports to analyze their program data.

Record Maintenance

The Program Data and Reporting Group keeps records of data validation results and activities in accordance with federal regulations. This includes the retention of the following:

- Data Change Requests received and their approval status including the reason for denial, if applicable.
- DEV worksheets with each data element identified as pass, fail, or UTV loaded into CalJOBS.
- DEV reports and feedback provided to the program.
- DOL QRA and DOL TAADI Self-check tool analysis.
- Audit logs in CalJOBS that documents updates to data.
- Documentation of technical assistance provided.

Training

Training on DEV requirements is provided to all program staff on an annual basis. In addition, a recording of the training is available. Recorded trainings can be revisited by staff or used as a tool during onboarding of new staff. DIVU reviews and updates the DEV training annually, as needed.

Action

Bring this to the attention of all Title I Adult, Dislocated Worker, and Youth, NDWG, Title III Wagner-Peyser, JVSG, and TAA staff.

This policy is reviewed annually and updated, as needed.

Inquiries

Title I staff can contact their Regional Advisor with any questions.

Title III Wagner-Peyser, JVSG, or TAA staff can contact their program coordinator with any questions..

/s/ JAVIER ROMERO, Deputy Director
Workforce Services Branch

Attachments:

1. [Data Element Validation Process Flow Chart \(DOCX\)](#)
2. [Data Element Validation Cohorts \(DOCX\)](#)

The EDD is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.
