

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 Directive finalizes Workforce Services Draft Directive WIOA Data Validation (WSDD-234), issued for comment on May 27, 2022. The Workforce Development Community submitted one comment during the draft comment period. A summary of comments, including all changes, is provided as Attachment 1.

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, *Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs* (June 18, 2020)
 - TEGL 7-18, *Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)* (December 19, 2018)

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

- Workforce Services Directive (WSD) 22-03, *WIOA Data Validation Source Documentation* (August 12, 2022)
- WSD22-01, *Performance Guidance* (July 18, 2022)
- WSD20-10, *CalJOBS Participant Reporting* (April 8, 2021)
- WSD20-01, *WIOA Regional Planning Units* (August 28, 2020)
- WSD18-02, *Data Change Request Form Procedure* (July 31, 2018)

BACKGROUND

Section 116 of WIOA establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of states and Local Workforce Development Areas (Local Area) in achieving positive outcomes for individuals served by the workforce development system's programs. The WIOA provides a historic opportunity to align performance-related definitions, streamline performance indicators, integrate reporting, and ensure comparable data collection and reporting across programs, while also requiring the collection and reporting of program-specific data.

To comply with WIOA regulations, the Employment Development Department (EDD) is required to conduct data validation on program participant files on an annual basis. Data validation is a series of quality assurance techniques established to verify the accuracy, validity, and reliability of data entered into CalJOBSSM and reported to the Department of Labor (DOL). The establishment of a shared data validation framework that requires a consistent approach across programs ensures that all program data routinely and accurately reflects the characteristics and performance of each program. Ultimately, the purposes of validation procedures are as follows:

- Verify the performance data reported by grant recipients to the 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 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. Data validation compares data entered into CalJOBS against source documentation. The EDD utilizes the data validation findings to assess the accuracy of program participant data pulled from CalJOBS and reported to the DOL.

POLICY AND PROCEDURES

Data validation encompasses various activities that ensure the accuracy of quarterly and annual performance reports, safeguards data integrity, and promotes the timely resolution of data anomalies and inaccuracies.

Definitions

Data Element Validation (DEV) – The process of validating source documentation against data reported in CalJOBS, and ultimately, to the DOL.

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

Error Rate – The frequency of errors.

Population Size – The total number of participants served in the current PY's second quarter WIOA Quarterly Performance Report (rolling four quarters).

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

Single Data Element Error Rate – The percentage of the total errors for a specific data element to the total number of that specific data element reviewed.

Total Program Error Rate – The percentage of total data element errors to the total number of data elements reviewed.

Data Validation

Data validation activities are categorized into two categories: data element validation (DEV), and data integrity practices.

Data Element Validation (DEV)

The Program Data and Reporting Group will utilize the CalJOBS Participant Individual Record Layout (PIRL) Data Sampling tool to identify the participant records to validate. The PIRL Data Sampling tool utilizes the data submitted to the Department of Labor (DOL) via the current PY's second quarter certified PIRL file to randomly pull sample files for DEV. Each PY, DEV will include data for both active program participants, as well as participants who exited within the last ten quarters. The following provides an example of the performance cohorts that dictate the participants pulled for DEV:

Table 1

Measure	Cohort Timeframe	Example for PY 21*
Participants Served	Served in most recent completed quarter and the 3 prior quarters	1/1/2021 – 12/31/2021
Exiters	Exiters in 4 quarters prior to most recent completed quarter	10/1/2020 – 9/31/2021
Employment Rate 2nd Quarter after Exit	Exiters in 5 to 8 quarters prior to most recent completed quarter	1/1/2020 – 12/31/2020
Median Earnings 2nd Quarter after Exit	Exiters in 5 to 8 quarters prior to most recent completed quarter	1/1/2020 – 12/31/2020
Employment Rate 4th Quarter after Exit	Exiters in 7 to 10 quarters prior to most recent completed quarter	7/1/2019 – 6/30/2020
Credential Attainment	Exiters in 7 to 10 quarters prior to most recent completed quarter	7/1/2019 – 6/30/2020
Measurable Skills Gains	Served in most recent completed quarter and the 3 previous quarters	1/1/2021 – 12/31/2021

*Using the rolling 4 quarters of data reported to the DOL in the second quarter of PY 2021.

Please reference *Performance Guidance* (WSD22-01) for definitions on each of the measures, as well as a Periods of Performance Reporting Cohorts chart.

The PIRL Data Sampling tool enables samples to be targeted to specific barrier(s), service(s), or general (all records). The targeted barriers and services may change based on priorities, or identified areas of improvement.

The following table provides the number of cases selected from each program. The sample size was calculated using a confidence level of 95% and a confidence interval of 15, and is based on each program's population size.

Table 2

Population Size	Sample Size
0-14	All Records
15-19	14
20-29	18
30-49	23
50-99	30
100-199	35
200-299	37

Population Size	Sample Size
300-499	39
500-699	40
700-999	41
1,000-4,999	42
5,000+	43

For each program participant, each applicable data element is scored as pass, fail, or unable to validate for DEV. Each data element supported by applicable documentation per *WIOA Data Validation Source Documentation* (WSD22-03) Attachment 1 is scored as a “pass,” whereas any data element not supported by the appropriate documentation will be scored as a “fail.” If a participant’s file is unable to be located or appropriate source documentation is missing, all applicable data elements will be listed as “unable to validate.” Additionally, if the source documentation is illegible, the data element will be listed as “unable to validate.” Data Elements that are marked as “fail” and “unable to validate” will be counted towards the DEV Error Rate.

Technical assistance will be triggered for any program if the error rate is above 10.0% for the total program, or for a single data element.

Calculating the DEV Error Rates

There are two types of error rates: Total Program Error Rate, and Single Data Element Error Rate. The following scenario shows how to calculate both the Total Program Error Rate, as well as the Single Data Element Error Rate.

Example – Local Area Abc’s Title I Adult program has a program population of 75, which results in a sample size of 30. Within those 30 case files, 250 data elements need to be verified. Of the 30 case files, 25 are English Language Learners (ELL) at program entry.

Table 3

Local Area	Abc
Program	Title I Adult
Population Size	75
Sample Size	30
Total Data Elements being Validated	250
Total Data Elements Failed/Unable to Validate	10
Number with ELL Data Element	25
Number with ELL Data Element that Failed/Unable to Validate	3

Utilizing the example data in Table 3, use the following steps to calculate the Total Program Error Rate:

- Step 1: Using Table 2 identify the sample size based on the population size.
Example: Population size is 75, so sample size = 30.
- Step 2: Identify the number of data elements verified in all case files.
Example: 250 data elements validated in the 30 case files.
- Step 3: Count the number of “fails” and “unable to validates” received.
Example: After DEV was completed, 10 data elements were not supported by source documentation, and were marked as a “fail” or “unable to validate.”
- Step 4: Calculate the error rate by dividing the number of fails/unable to validate by the total number of data elements validated, and multiple by 100.
Example: $(10 / 250) \times 100 = 4.0\%$
- Step 5: The error rate is 4.0%, which is below 10.0%, so this is considered a successful Total Program Error Rate.

Utilizing the example data in Table 3, use the following steps to calculate the Single Data Element Error Rate:

- Step 1: Using Table 2 identify the sample size based on population size.
Example: Population size is 75, so sample size = 30.
- Step 2: Identify the number of a single data element verified in all case files.
Example: 25 of the case files have a “yes” indicated for the ELL data element.
- Step 3: Count the number of “fails” and “unable to validates” received on the ELL data element.
Example: After DEV was completed, 3 ELL data elements were not supported by source documentation and were marked as a “fail” or “unable to validate.”
- Step 4: Calculate the error rate by dividing the number of fails/unable to validate for the ELL data element by the total number of ELL data elements validated, and multiple by 100.
Example: $(3 / 25) \times 100 = 12.0\%$
- Step 5: The error rate is 12.0%, which is not below 10.0%, so this is considered an unsuccessful Single Element Error Rate, and technical assistance will be provided.

The consideration of the Total Program Error Rate, as well as the Single Data Element Error Rate enables the Program Data and Reporting Group to identify DEV error trends as a whole, as well as by data element to ensure the appropriate technical assistance is provided to the program, and incorporated into annual data validation training.

After the conclusion of DEV, each program is provided the results of their DEV, including direction on how to correct any applicable data elements in CalJOBS, as well as the deadline for completing the data corrections prior to annual report submission. The respective administrator of that program receives the feedback broken up by program. The error rate is recalculated after corrections are made. If technical assistance is needed as a result of an unsuccessful DEV, the Program Data and Reporting Group will coordinate with the program to schedule technical assistance.

Schedule for DEV

For PY 19, the EDD conducted DEV on the WIOA Title I Adult, Dislocated Worker, Youth, and Title III Wagner-Peyser core programs. The PY 20 DEV expanded to also include TAA, JVSG, and NDWG. The EDD conducted data validation virtually for PYs 19 and 20. As the first round of DEV under WIOA (and during a pandemic), the EDD accepted volunteers for PY 19 and 20. The following Local Areas participated in DEV for PY 19 and 20:

- San Benito
- San Bernardino
- Solano
- Ventura
- Verdugo

Beginning with PY 21, the Program Data and Reporting Group will conduct annual DEV for all programs in a combination of virtual and/or onsite review for Local Areas by Regional Planning Unit (RPU) as outlined in Table 4. For a list of Local Areas included in each RPU, please see *WIOA Regional Planning Units (WSD20-01)*. Please note that while the schedule is based on RPUs, each Local Area will have their own independent DEV conducted.

PY 21 DEV was completed, and data corrections were made for Wagner-Peyser, JVSG, and TAA programs prior to the submission of the WIOA Annual Performance Report. DEV was also completed, and data corrections made for Title I programs and NDWG for some Local Areas; however, some Local Areas were not required to make corrections prior to the submission of the WIOA Annual Performance Report. More specific information will be included in the WIOA Annual Performance Narrative Report.

Starting in PY 22, DEV will be completed in the spring and summer each year to ensure DEV is completed, and data corrections can be made prior to the submission of the corresponding WIOA Annual Performance Report in October.

To facilitate the collection of program files, program staff will be provided the list of CalJOBS State IDs included in their sample a minimum of 15 business days prior to DEV being conducted. The Program Data and Reporting Group will coordinate with the appropriate staff in each area to schedule DEV prior to providing the list of participants.

Due to the large number of Local Areas and program participants in the state, the following is the schedule for DEV based on the three EDD Workforce Services Branch Divisions, starting with the northern portion of the state, and ending with the southern portion of the state.

Table 4

PY	RPU	Estimated % of Statewide Participants*
2021	North State	1.3%
	North Coast	0.9%
	North Bay	2.0%
	Capital	7.2%
	Middle Sierra	0.3%
	Bay Peninsula	5.7%
	East Bay	4.2%
	North Central Coast	1.9%
	RPU Total	23.5%
2022	Los Angeles Basin	28.0%
	Ventura	1.6%
	South Central Coast	1.2%
	RPU Total	30.8%
2023	San Joaquin	23.0%
	Inland Empire	8.3%
	Orange	3.7%
	Southern Border	10.7%
	RPU Total	45.7%

*Based on the estimated percentage of statewide participants (all programs in PY 20).

This three year rotation will repeat indefinitely, or until updated. At the end of each three-year rotation, the Program Data and Reporting Group will evaluate the population sizes and make adjustments, as needed. These adjustments will be documented via an errata to this Directive.

Data Integrity Practices

CalJOBS assists with the reduction of data errors throughout the completion of the program application and program participation. Examples of this include the following:

- Notifications that prevent staff from moving forward with data entry until missing or contradictory values are corrected.
- Limitations on duration for activity codes to prevent program applications from being inadvertently left 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.
- Automated exit of program applications after 90 days of no participant level services, and no planned service.
- Duplication reduced based on use of social security number as a unique identifier.

The Program Data and Reporting Group reviews program data for errors, missing data, out-of-range values, and anomalies on an ongoing basis. The Program Data and Reporting Group does this through the following:

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

The Program Data and Reporting Group works with program staff to ensure data is entered into CalJOBS accurately, and assists with understanding system reports for program staff to use to analyze their program data.

Record Maintenance

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

- DCRs received and their approval status and reason for denial, if applicable.
- The DEV worksheets with each data element identified as pass, fail, or unable to validate loaded into the CalJOBS PIRL Data Sampling Tool.
- A copy of the DEV feedback provided to the program.
- DOL QRA and analysis comments.
- Audit logs in CalJOBS that documents updates to data.
- DOL TAADI Self-check tool, and analysis of data that needs to be corrected.
- Documentation of technical assistance provided.

Training

Training on DEV requirements will be provided to all program staff on an annual basis. In addition, a recording of the training will be made available so it can be revisited by staff, or

used as a tool during onboarding of new staff. The DEV training will be reviewed and updated annually, as needed.

ACTION

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

This policy will be reviewed annually and updated, as appropriate.

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. [Summary of Comments \(DOCX\)](#)