WIOA DATA VALIDATION SOURCE DOCUMENTATION

EXECUTIVE SUMMARY

This policy provides the guidance and establishes the procedures regarding the *Workforce Innovation and Opportunity Act* (WIOA) program participant source documentation 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). This policy 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 Source Documentation WSDD-244, issued for comment on February 16, 2023. The Workforce Development Community submitted seven comments during the draft comment period. A summary of comments, including all changes, is provided as Attachment 3.

This policy supersedes Workforce Services Directive *WIOA Data Validation Source Documentation* (WSD22-03), dated August 12, 2022. Retain this Directive until further notice.

REFERENCES

- *Workforce Innovation and Opportunity Act* (WIOA) (Public Law 113-128) Sections 116(d)(5), 185(a)(3)(c), and 188
- 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 13, 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 WSD22-01, *Performance Guidance* (July 18, 2022)
- WSD20-10, *CalJOBS Participant Reporting* (April 8, 2021)

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

- WSD19-06, *CalJOBS Activity Codes* (December 27, 2019)
- WSD18-02, *Data Change Request Form Procedure* (July 31, 2018)
- WSD17-01, *Nondiscrimination and Equal Opportunity Procedures* (August 1, 2017)
- WSD16-08, *Release of Confidential UI Information* (October 3, 2016)
- WSD14-04, *WIA Title I Eligibility* (September 25, 2014)

BACKGROUND

As the administrator of California's Title I Adult, Dislocated Worker, and Youth, Title III Wagner-Peyser, TAA, NDWG, and JVSG programs, the Employment Development Department (EDD) is required by federal regulations to submit accurate participant reports to the Department of Labor (DOL) on a quarterly and annual basis. To meet this requirement, the EDD administered programs are required to enter timely and accurate data into CalJOBS^{SM}.

Data validation is a series of quality assurance techniques established to verify the accuracy, validity, and reliability of data entered into CalJOBS and reported to the DOL. The establishment of a shared data validation framework that requires a consistent approach across programs ensures all program data routinely and accurately reflects the characteristics and performance of each program. Ultimately, the purpose of validation procedures are as follows:

- Verify the performance data reported 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 CalJOBS and Program Accountability Section administers data validation activities. Data element validation is conducted by comparing data entered into CalJOBS against source documentation. The EDD utilizes the data validation findings to assess the accuracy of program participant data obtained from CalJOBS and reported to the DOL.

The EDD is required to conduct data element validation on program participant files annually. For additional guidance on the data validation sampling methodology, procedures, schedule, and technical assistance thresholds, please see *WIOA Data Validation* (WSD22-04).

POLICY AND PROCEDURES

To ensure data entered into CalJOBS and reported to the DOL is accurate, Local Workforce Development Area (Local Area) and EDD staff are required to collect and maintain the applicable source documents for each program participant at the date of program entry, during the period of participation, and after program exit. For detailed definitions of date of participation, period of participation, and program exit, please see *Performance Guidance* (WSD22-01).

Definitions

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

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.

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

Data Validation Source Documentation

Each program that undergoes data validation has specific data elements validated against source documentation. For example, an individual's date of birth (data element) may be validated using a valid California driver's license (source document). Attachment 1 outlines the appropriate source documentation for each data element. The following information provides clarification and direction for each of the items in *WIOA Source Documentation List* (Attachment 1).

The document is organized into three tables:

1. Source documentation is required to be collected and maintained for each data element.
2. A signed program application is required as source documentation for each data element. The program application can be physically, or digitally signed either using CalJOBS or another technology. For more information on the CalJOBS Remote Electronic Signature feature, please see the *CalJOBS Remote Electronic Signature User Guide* located in the Staff Online Resources section of CalJOBS.
3. Program staff do not need to take additional action for each data element.

Each table includes the following information:

Data Element # – This column provides the assigned data element number from the DOL ETA 9172 *Participant Individual Record Layout (PIRL).*

Data Element Name – This column identifies the name of the data element. For a definition of each data element and how it is captured in CalJOBS, please see *WIOA Source Documentation – CalJOBS Data Element Entry Location* (Attachment 2).

Adult – This column indicates if a source document is required for Title I Adult program participants.

Dislocated Worker – This column indicates if a source document is required for Title I Dislocated Worker program participants.

Youth – This column indicates if a source document is required for Title I Youth program participants.

NDWG – This column indicates if a source document is required for NDWG program participants.

Wagner-Peyser – This column indicates if a source document is required for Title III Wagner-Peyser program participants. The same source documentation requirements apply to the Monitor Advocate System.

The Monitor Advocate System protects the standard of services provided to migrant and seasonal farmworkers under the Wagner-Peyser Act Employment Service program. Therefore, as part of a WIOA core program, all the requirements that apply to the Wagner-Peyser Act Employment Service for data validation will apply to the Monitor Advocate System.

TAA – This column indicates if a source document is required for TAA program participants.

JVSG – This column indicates if a source document is required for JVSG program participants.

Allowable Source Documents – Provides a list of the allowable source documents needed to perform validation on each data element. Most data elements have multiple forms of acceptable source documentation. If there are multiple documents collected for the same data element and the sources conflict, the most objective source document determines if the data is valid and accurate. The source documentation types include the following:

- Cross-match – A cross-match utilizes supporting evidence for the data element in a database administered by a WIOA core program. The description of the allowable source documentation for each data element identifies the allowable databases.
- Self-Attestation – Self-attestation (also referred to as a participant or applicant statement) occurs when a participant states their status for a particular data element, and then signs and dates a form acknowledging this status. The key elements for self-attestation are as follows:
  - The participant identifying their status for permitted elements.
  - The participant signing and dating a form attesting to this self-identification. The form and signature can be on paper or in CalJOBS with a remote signature. For more information on the CalJOBS Remote Electronic Signature feature, please see the *CalJOBS Remote Electronic Signature User Guide* located in the Staff Online Resources section of CalJOBS.

  Note that self-attestation is not the primary method of gathering documentation to verify data elements. Self-attestation may be used when an item is unverifiable, or it is unreasonably difficult to obtain. The applicant's difficulty in obtaining documentation does not need to entail hardship or suffering to justify using self-attestation.

- Case Notes – Case notes refer to either paper or electronic statements by the case manager that identify, at a minimum, the following:
  - A participant's status for a specific data element.
  - The date on which the information was obtained.
  - The case manager who obtained the information.

- Electronic Records – Electronic records are participant records created, stored, or transferred in a form that only a computer can process and are maintained in CalJOBS.

While the collection of source documentation for data validation often takes place at the same time as the determination of an individual's program eligibility, these actions serve different purposes. Eligibility determination confirms that an individual meets the requirements of a program before becoming a participant in the program, whereas DEV is validating that data entered into CalJOBS is accurate. Some of the data elements and their allowable source documents outlined in *WIOA Source Documentation List* (Attachment 1) may overlap with eligibility documentation requirements. For DEV purposes, where self-attestation is identified as an acceptable source document, the lack of source documentation beyond self-attestation must not delay or prevent enrollment and receipt of services in a program. Please reference *WIA Title I Eligibility* (WSD14-04) for additional guidance on eligibility documentation.

The following five data elements require source documentation that falls under the purview of the WIOA Section 188 Nondiscrimination:

- Data Element 200 – Date of Birth
- Data Element 202 – Individual with a Disability
- Data Element 701 – Pregnant or Parenting Youth
- Data Element 803 – English Language Learner
- Data Element 806 – Single Parent at Program Entry
- Data Element 923 – Other Reasons for Exit (if medical related option is selected)

For more information about data information collection and maintenance for nondiscrimination data, please see *Nondiscrimination and Equal Opportunity Procedures* (WSD17-01).

Program staff are required to maintain source documentation as physical files and/or as electronic files. Program staff are highly encouraged to utilize electronic records whenever possible. The benefits of using electronic files include, but are not limited to the following:

- Eliminates the need for physical storage, including storage costs.
- Decreases paper waste and saves on supply costs.
- Ensures more secure storage of sensitive information.
- Eliminates lost or misfiled paper documents.
- Safeguards files from being damaged or destroyed in a disaster (e.g., flood or fire).
- Promotes seamless service delivery in a telework environment.

CalJOBS can maintain electronic documents using the CalJOBS Document Management and Scanning module. This module provides a secure, centralized place to manage source documents. The benefit of a centralized location for source documents is that it enables the leveraging of the documents across programs, which reduces the collection burden on program participants and staff. The use of the CalJOBS Document Management and Scanning module is highly encouraged. For more information on how to utilize the CalJOBS Document Management and Scanning Module, please see the *CalJOBS Document Management and Scanning Module Guide Card* located in the Staff Online Resources section of CalJOBS.

Staff are responsible for ensuring the data in CalJOBS is accurate and timely. If CalJOBS information is incorrect, staff should follow the guidance outlined in *Data Change Request Form Procedure* (WSD18-02).

ACTION

Each Local Area is required to have procedures for the collection of program participant source documentation in alignment with the information provided in this Directive. Local Areas have the discretion to add additional requirements (if desired) but must adhere to policies in this

guidance at a minimum. The use of the document management module in CalJOBS is strongly encouraged.

Staff administering the Wagner-Peyser, TAA, and/or JVSG programs are required to collect source documentation as outlined in this Directive. Staff must also utilize the CalJOBS Remote Electronic Signature, and Document Management and Scanning features, as appropriate.

Bring this Directive to the attention of the appropriate staff.

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. WIOA Source Documentation List (DOCX)
2. WIOA CalJOBS Data Element Entry Location (DOCX)
3. Summary of Comments (DOCX)