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ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER WIOA NO. 7-18
OPERATING GUIDANCE for the WORKFORCE INNOVATION AND
OPPORTUNITY ACT (WIOA)

TO: STATE AND LOCAL STAKEHOLDERS IN THE WORKFORCE
INNOVATION AND OPPORTUNITY ACT
STATE WORKFORCE AGENCIES

FROM: MOLLY E. CONWAY /s/
Acting Assistant Secretary

SUBJECT: Guidance for Validating Jointly Required Performance Data Submitted under
the Workforce Innovation and Opportunity Act (WIOA)

1. **Purpose.** This guidance provides information to States and grantees of the U.S. Departments of Labor (DOL) and Education (ED) (collectively “the Departments”) on the performance accountability system requirements set forth in section 116 of WIOA. Specifically, this guidance provides information about the guidelines States must use in developing procedures for ensuring the data submitted are valid and reliable.
2. **References.** See Attachment II.
3. **Background.** Section 116 of WIOA establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of States and local areas in achieving positive outcomes for individuals served by the workforce development system’s six core programs. These six core programs are the Adult program, Dislocated Worker program, and Youth program, authorized under WIOA title I and administered by DOL; the Adult Education and Family Literacy Act (AEFLA) program, authorized under WIOA title II and administered by ED; the Employment Service program authorized under the Wagner-Peyser Act, as amended by WIOA title III and administered by DOL; and the Vocational Rehabilitation (VR) program authorized under title I of the Rehabilitation Act of 1973, as amended by WIOA title IV and administered by ED. WIOA provides a historic opportunity to align performance-related definitions, streamline performance indicators, integrate reporting, and ensure comparable data collection and reporting across all six core programs, while also requiring the collection and reporting of program-specific data.

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Through this guidance, the Departments elaborate on the performance accountability guidelines required to be developed under WIOA section 116. This guidance provides States with a general framework for data validation. Specifically, the Departments have developed this guidance pursuant to WIOA section 116(d)(5), which requires the Departments to establish data validation guidelines to ensure the information contained in program reports is valid and reliable. States must develop data validation procedures consistent with these guidelines.

4. Joint Data Validation Framework. Data validation is a series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data. Establishing a joint data validation framework based on a consistent approach shared by the Departments will ensure that all program data are consistent and accurately reflect the performance of each core program in each State. To that end, the purposes of validation procedures for jointly required performance data are to:

- Verify that the performance data reported by States to the Departments 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 common data elements; and
- Improve program performance accountability through the results of data validation efforts.

While States must utilize a data validation strategy, the specific design, implementation, and periodic evaluation of that strategy is left to the discretion of the State so long as those strategies or procedures are consistent with these guidelines.

Data validation helps ensure the accuracy of the annual statewide performance reports, safeguards data integrity, and promotes the timely resolution of data anomalies and inaccuracies. As such, it is recommended that States incorporate their data validation procedures into their internal controls procedures, which are required by 2 Code of Federal Regulations (CFR) §200.303. State VR agencies should also consider related guidance issued in Rehabilitative Services Administration (RSA) Policy Directive 16-04.

Each State must develop data validation procedures that include:

- Written procedures for data validation that contain a description of the process for identifying and correcting errors or missing data, which may include electronic data checks;
- Regular data validation training for appropriate program staff (e.g., at least annually);
- Monitoring protocols, consistent with 2 CFR §200.328, to ensure that program staff are following the written data validation procedures and take appropriate corrective action if those procedures are not being followed;
- A regular review of program data (e.g., quarterly) for errors, missing data, out-of-range values, and anomalies;
- Documentation that missing and erroneous data identified during the review process have been corrected; and

- Regular assessment of the effectiveness of the data validation process (e.g., at least annually) and revisions to that process as needed.

The Departments also will be conducting data validation to verify data accuracy once States submit their performance reports.

5. Source Documentation for Common Data Elements. Procedures developed by the States must include regular data element validation through core program monitoring on 24 common data elements. The Departments selected these elements based on their importance to reporting accurate performance outcomes and to ensure data consistency across core programs. States are encouraged to implement a sampling methodology of their participant files and conduct file reviews of data elements against source documentation. In Attachment I of this guidance, the Departments identify acceptable source documentation necessary to validate these selected data elements. States may: (1) maintain supporting documentation for program-specific data elements not included in this joint guidance; (2) conduct additional source document validation on more data elements; and (3) require additional source documentation in their procedures.

Each Department will, as necessary, issue further program-specific guidelines regarding data validation and provide program-specific technical assistance to States and grantees. In addition, DOL will issue guidance on source documentation requirements for the DOL-only Participant Individual Record Layout (PIRL) data elements.

- 6. Action Requested.** States are requested to distribute this information to the appropriate State and local staff.
- 7. Inquiries.** Questions concerning this guidance should be directed to the appropriate regional office.
- 8. Attachments.**
- Attachment I – Source Document Validation Instructions
 - Attachment II – References