

Workforce Services Policy – Data Validation

Executive Summary

1. What is the general purpose of this policy?

To establish the framework, expectations and requirements for the data validation process. This will include specific details for each program on how its data will be validated.

2. What are the notable guidelines conveyed within this policy?

- Establishment of the local and State requirements for quarterly and annual data validation
- Establish the random sampling methodology
- Identify how records will be documented and maintained

3. What must the Local Workforce Development Board do to meet the requirements of this policy?

- Conduct data validation on a quarterly and annual basis
- Participate in annual training
- Respond timely to any corrective action needs

4. How does this policy affect the workforce system?

This policy establishes a framework on how each program will validate its data. The requirements and framework established in this policy will help ensure that all federal and State reporting will have integrity in its data.



STATE OF TENNESSEE
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Workforce Services Policy- Data Validation

Effective Date: November 13, 2020

Duration: *Automatic Annual Renewal*

Purpose:

Data validation is a series of internal controls—or quality assurance techniques—to verify the accuracy, validity, and reliability of data. Data validation framework requires a consistent review across programs to ensure that all data consistently and accurately reflect the performance of each grant recipient. Data validation procedures:

- Verify that the performance data reported by grant recipients to the United States Department of Labor (USDOL) 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.

Scope:

Office of the Governor, Tennessee Department of Labor and Workforce Development (TDLWD); Division of Workforce Services (WFS); Tennessee Department of Economic and Community Development (ECD); Tennessee Department of Education (TDOE); Tennessee Department of Human Services (DHS); State Workforce Development Board (SWDB); Title I – Adult, Dislocated Worker, and Youth Programs, Title II – Adult Education and Family Literacy Act Program(AE); Title III – Wagner-Peyser Act Program (WP); Title IV – Vocational Rehabilitation Program (VR); Regional Planning Council (RPC); Local Workforce Development Boards (LWDB); Local Workforce Development Areas (LWDA); American Job Center (AJC); One-Stop Operator (OSO); Workforce System Sub-Recipients (Sub-Recipients); Workforce System Partners (Partners)

I. Applicable Programs for Data Validation:

The purpose of data validation is to validate the data of programs. All USDOL programs must be validated annually. Along with those required programs, the Tennessee Department of Labor and Workforce Development (TDLWD) will require additional programs operated by the Workforce Services (WFS) Division to undergo data validation. These programs include:

- Title I- Adult, Dislocated Worker, and Youth

- Title II- Adult Education and Family Literacy Act (AEFLA)
- Title III- Wagner-Peyser
- Trade Adjustment Assistance (TAA)
- Jobs for Veterans State Grants (JVSG)
- Senior Community Service Employment Program (SCSEP)
- Apprenticeship Program Grants
- National Dislocated Worker Grants (NDWG)
- H1-B Job Training Programs
- National Farmworker Jobs Program (NFJP)
- Reemployment Services and Eligibility Assessment (RESEA) Program
- Supplemental Nutrition Assistance Program- Employment & Training (SNAP E&T)
- Indian and Native American (INA) Program¹
- Job Corps²
- Reentry Employment Opportunities (REO)³

II. **Frequency of Data Validation:**

Data validation will be conducted by both the Workforce Services Division staff (WFS staff) and by each Local Workforce Development Board (LWDB). The frequency will be on a quarterly basis, culminating in an annual review.

A. **Quarterly Data Validation:**

Both WFS staff and the LWDB will be responsible to conduct data validation on the applicable programs listed in this policy. Below are the responsibilities for each party to be done each quarter.

1. **LWDB Quarterly Responsibilities:**

Each LWDB will be responsible to conduct quarterly review of each program for which they are a sub-recipient of program funds. The results of their data validation must be submitted quarterly to the State Workforce Development Board (SWDB) along with LWDB's quarterly monitoring report.

The specific steps on conducting the review of each program will be listed in separate monitoring guidance as well as be provided during staff training. The LWDB must conduct the number of reviews based on the sample size established by WFS. Notification of sample size will be sent to the LWDBs through a 'Notice of Data Validation' (Attachment A).

During the validation process, any files that contain data errors will be expected to be corrected within 30 business days after the submission of their quarterly monitoring report.

2. **WFS Quarterly Responsibilities:**

WFS staff will be responsible to conduct quarterly reviews on all programs listed in this policy. The results of the data validation from each program will be sent to the Program Integrity unit twenty-five (25) calendar days after the end of each quarter.

The specific steps on conducting the review of each program will be listed in the attachments as well as be provided during the staff training. WFS staff must conduct a quality review of the

¹ Currently not operating this program

² Currently not operating this program

³ Currently not operating this program

samples submitted by each LWDB. This sample size will be a reduced sample based on the number of samples reviewed by the LWDB.

During the validation process, any files that contain data errors will be expected to be corrected within 30 business days after the submission of the quarterly monitoring, as long as it is not past the allowable editable period.

B. Annual Data Validation:

At the end of each program year after the submission of the certified annual report, annual data validation classes are scheduled. These classes will consist of various staff members from each LWDA to include service providers, one-stop operator managers, and LWDB staff. Each LWDB will be required to provide a minimum number of staff (established by WFS) to participate in these classes. These classes will serve as a method to train LWDB staff and their contractors on data validation, as well as conduct data validation. Each LWDA will be required to use the samples from an LWDA that is not their own to conduct data validation. Before the data validation takes place, each LWDB staff member will receive training on required performance reporting, as well as a review of applicable documentation for data validation along with a validation tool. The annual data validation process is a four (4) week period.

The submitted annual report will be utilized to pull samples for these classes based on the established sample size for each program. The samples are organized into ten record sets. Each record is sorted vertically within the DEV sample tool established by TDLWD Performance staff. It includes the data element number that corresponds to the PIRL, a listing of appropriate documents and a list of the applicable programs for each data element.

Staff members who are participating in the Data Element Validation are to check each file in VOS to ensure that the appropriate documentation is present to support program eligibility, enrollment and service provision. After validation, the data elements are evaluated to determine which elements had the highest incidence of error. Each LWDB receives a report from WFS performance staff to identify where the highest error rates are so they can perform an internal audit of their files and make necessary corrections.

III. Random Sampling Methodology:

Random sampling for the annual data validation review is conducted by first determining the proportionate number of enrollments in each program to the total number of enrollments in each program across the state. If a given area is responsible for 10 percent of the total enrollments for the state, then 10 percent of that area's total enrollments are counted. This is done to determine each area's proportion of the total. When each area's proportion is determined those numbers are totaled and divided by nine, rounded up, to determine how many records will be sampled by each area.

To select the sample, Performance staff sort the PIRL first by area, next by program and third by active or exited status. The desired number of records are manually chosen in a nonsequential, random fashion from the sorted PIRL for each area. For areas with programs that do not have enough participants to meet the sample size, one hundred percent of their files for that program will be included in the sample. The remaining number of files are then pulled from the area that contributed the largest percentage of enrollments.

IV. Staff Training for Data Validation:

All staff that conducts data validation throughout the year must receive training on how they are to validate each program's data. This training will be conducted, at a minimum, one (1) time per year by WIR²ED staff and program leads. The training will be conducted in-person at the TDLWD Central Office, unless travel restrictions prevent staff from attending. Otherwise, training will be conducted in a virtual setting utilizing video conferencing technology.

V. Annual Report Validation:

The annual report must be validated before it is submitted to USDOL. The report is validated through two methods as described below.

A. Quarterly and Annual Data Validation:

The first method for validating the annual report is through the records of the validation that has taken place quarterly and annually by program and LWDB staff.

B. Quarterly Performance Reports:

Before the quarterly submission of performance reports, the reports are processed, and run through a process of checks including valid values edit checks and logical rules edit checks in WIPS. If any records come back that need to be corrected, those errors are identified and assigned to the appropriate program staff for correction. The responsible staff will then review and make corrections within five (5) calendar days. After errors are corrected, the file is then re-processed and submitted in WIPS.

VI. Documentation Process:

All data validation records that are conducted quarterly and annually is maintained on internal servers by WFS. All reports are submitted to the Program Integrity unit to compile and maintain the data validation efforts.

VII. Corrective Action:

The data validation process is aligned with the overall monitoring process for the Workforce Services Division. Any issues identified through data validation will follow the established corrective action process in the Workforce Services policy for monitoring.

Attachments:

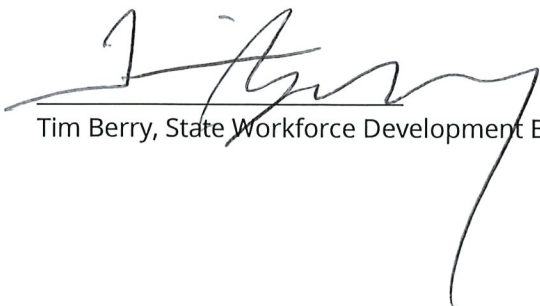
Attachment A: Notice of Data Validation

References:

TEGL 23-19 and TEGL 7-18

Contact:

For any questions related to this policy, please contact the Program Integrity Unit at Workforce.Board@tn.gov.



Tim Berry, State Workforce Development Board Chair

Attachment A



Notice of Data Validation

This notice serves as an update to quarterly data validation requirements. This notice will provide the Local Workforce Development Boards (LWDBs) with the required programs to conduct data validation and sample sizes for those programs. This notice will be effective beginning with the submission of the quarterly monitoring report due on **[MM/DD/YYYY]**. This notice replaces the last notice submitted on **[MM/DD/YYYY]**.

All LWDBs must conduct data validation on a quarterly basis and submit those results with their monitoring report on the 30th day following the end of the quarter. The following programs must have its files validated with the required sample size:

[Required Program Name]

Sample size: x% exited and x% active

[Required Program Name]

Sample size: x% exited and x% active

[Required Program Name]

Sample size: x% exited and x% active

[Required Program Name]

Sample size: x% exited and x% active