



Policy Number 6
Issued: October 19, 2017
Revised: February 20, 2020
By: Wyoming Workforce Development Council

1.0 Purpose

The Wyoming Workforce Development Council (WWDC), as the Governor's chosen Workforce Innovation and Opportunity Act (WIOA) administrative entity, provides this policy to the workforce system regarding the State of Wyoming's Data Element Validation and monitoring requirements for the WIOA Title I Programs and the Wagner-Peyser Employment Services Program as amended by Title III.

2.0 Data Validation Policy

2.1 Data WIOA Validation - Data Validation is a series of internal controls established to verify the accuracy, validity, and reliability of data. 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 required by 2 CFR 200.328. This data validation ensures that all programs are consistent and accurately reflect the performance of each core program. Data validation is required to:

- Verify that the performance data reported to 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.

The common data elements and source documentation are indicated in the State of Wyoming WIOA Procedures as required by USDOL TEGL 7-18. It is required to obtain at least one source document for each data element listed for each participant in a WIOA Title I program.

2.2 Data Validation Review - The U.S. Department of Labor, Employment and Training Administration, requires states to validate the accuracy of their annual performance report submissions to ensure decisions about WIOA policy and funding are made based on a true picture of program outcomes.

2.2.1 Responsibility and Scope - Quarterly data reviews are completed in conjunction with quarterly reporting to monitor for data errors, missing data, out-of-range values, and anomalies. These reviews are to assure compliance with applicable Federal requirements and programmatic performance expectations are being achieved. Annual data element validations are conducted to ensure the data elements in participant records are accurate in order to maintain system integrity, ensure completeness of data, and to identify and correct specific issues associated within the reporting process. The effectiveness of the data validation process will be assessed annually and revisions will be made as needed.

2.2.2 Case Manager Responsibility – Workforce Center staff are responsible to ensure the following:



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2.2.2.1 Data entry into Wyoming at Work is accurate and timely;

2.2.2.2 Acceptable source documents in hard copy are retained in each participant's folder to substantiate every data element required to be validated. For data validation purposes, data, such as Individual Employment Plan showing enrollment dates and WIOA activities, are not appropriate source documents. Instead, hard copies of these forms shall be retained in each participant file for data validation.

2.2.2.3 The source document used to support each required element is acceptable for that element, as listed and described in Wyoming WIOA Procedures.

2.2.2.4 If multiple sources are listed for the same data element and the sources conflict, the most reliable source is used to determine if the element passes or fails. For example, for Education Status at Participation, copies of records from an educational institution are a more reliable source than participant self-attestation.

2.2.2.5 If using any of the following source documents, it must fully comply with the requirements set forth below:

Self-Attestation:

Self-attestation (also referred to as a participant statement) occurs when a participant states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status.

The key elements of self-attestation are: (a) the participant identifying his or her status for permitted elements, and (b) signing and dating a form attesting to this self-identification.

Case Notes:

Case notes refer to either paper or electronic statements by the case manager that identify, at a minimum, the following: (a) a participant's status for a specific data element, (b) the date on which the information was obtained, and (c) 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 maintained in the State's management information system. Records can be numeric, graphic, or text. They can also include magnetic storage media such as tapes or disks.



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2.2.2.6 **Pre-Validation** - Each Workforce Center is encouraged to conduct periodic pre-validation reviews of a sample of files in their possession throughout each program year. The purpose of this review is to ensure that each staff is properly maintaining files according to established procedure.

2.2.2.7 **Scoring** - Each data element that is required to be validated and that is supported or matched by acceptable documentation is scored as a "pass." Conversely, any data element that is required to be validated and that is not supported or matched by acceptable documentation, or is inconsistent with other documents, is scored as "fail."

2.2.2.8 **Interaction with Staff During the Validation Process** – Workforce Center and WIOA program staff are not allowed to make corrections relating to data validation throughout the review process. Prohibited activities include adding labels, relabeling documents, and/or altering data in the participant's file. If a document cannot be found, staff members will be given an opportunity to locate an alternate document for data validation.

2.2.2.9 **Decisions on the Use of Questionable Source Documents for Validation** - In cases when it is unclear whether or not a certain source document fulfills the requirements for validation, the validation team will decide whether a particular document is acceptable for a positive data validation.

2.2.2.10 **Data Validation Results** - Results from the data validation review will be provided to WWDC.

3.0 **Monitoring Policy**

3.1 **Monitoring** - Monitoring is a regular, systematic review of programmatic activities, administrative systems, and management practices to determine if they are appropriate, effective and in compliance with the Memorandum of Understanding, WIOA rules and regulations, Department of Labor (DOL) directives and the Wyoming Workforce Development Council (WWDC) policies and procedures.

3.1.1 **Responsibility and Scope** – Monitoring serves as an important mechanism to identify and document corrective actions, provide technical assistance and track progress. Monitoring is performed through desk reviews and onsite visits and may be contracted with a third party. Monitoring activities include but are not limited to a review of program and participant services to include the intake or referral process, eligibility certification, priority of service, registration, objective assessment, classroom training, On the Job Training (OJT), Work experience and supportive services. Monitoring also includes a review of program administration and management practices including reporting, internal control



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systems (e.g. protection of Personally Identifiable Information (PII)), and nondiscrimination and Equal Opportunity (EO) policy and procedures

3.1.2 **Frequency** – Programmatic monitoring is conducted in connection with data validation annually.

3.1.3 **Monitoring Report** – Monitoring is documented by a written report. The monitoring reports are official records of WWDC and are used to review the Operators’ and Service Providers’ programs at a given point in time. The reports provide the background of the program, status of follow-up on previous findings (if applicable), current findings and recommendations (if any) for corrective action along with a timeline for implementation. The reports constitute the basis for future program assessment and evaluation.

3.1.4 **Corrective Action** – If gaps or deficiencies are found during the monitoring process, the monitoring report will include recommendations to address the identified problem areas. The type and extent of the issues identified will dictate the required corrective action. Recommended actions may include:

- **Technical Assistance:** Monitor will recommend the provision of technical assistance or additional guidance when a deficient condition is caused by inadequate information or training.
- **Policy/Procedural Changes:** The monitor will submit the appropriate recommendations for procedural changes to result in acceptable performance.
- **Corrective Action Plan:** Monitor will recommend the creation of a corrective action plan if there are deficiencies which must be addressed by the Operator and/or Service Provider.
 - a) **Corrective Action Plan:** The monitor will work with the Operator and/or Service Provider to outline a corrective action plan which addresses the causes of the problem and aims to prevent future occurrence.
 - b) **Corrective Action Implementation:** Operator and/or Service Provider must implement the recommended corrective action within the timeframe indicated in the monitoring report. The implementation will be closely tracked by the monitor (1) to determine the overall efficiency and effectiveness of the approach, and (2) to measure progress toward resolving the problem. Operator and/or Service Provider are required to respond in writing to the monitor’s recommendations to acknowledge that the corrective action plan is being implemented.

3.1.5 **Follow-up:** As a final step in the monitoring process, the monitor will follow-up on corrective action recommendations and results of any technical assistance. The monitor may also extend the target date for completion of the corrective action if the Operator and/or Service Provider request for extension is reasonable and provides justification for such action.

- **Methodology:** Follow-up may be achieved as follows:



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- a) Desk Review: If the monitoring finding can be addressed through the submission of documentation, follow-up may be achieved through verification of back-up documentation submitted by the Operator and/or Service Provider in response to a monitoring report finding.
- b) Off-Cycle Visit: If the corrective action is crucial to the operation of the program or is required immediately to resolve a problem involving questioned costs, a follow-up visit may be scheduled to confirm that corrective action has been implemented.
- c) Part of Regular Monitoring: If the corrective action will require more time to implement or is of a less severe nature, the action will be followed-up during the course of the next regular monitoring visit.

4.0 References

- 4.1 The Workforce Innovation and Opportunity Act (WIOA) of 2014 (Public Law (Pub. L. 113- 128)) Title I and III
- 4.2 Federal Register/Vol. 81. No.161
- 4.3 U.S. Department of Labor/Employment and Training Administration Training and Employment Guidance Letter (TEGL) No. 7-18
- 4.4 U.S. Department of Labor/Employment and Training Administration Training and Employment Guidance Letter (TEGL) No. 18-16
- 4.5 U.S. Department of Labor/Employment and Training Administration Training and Employment Guidance Letter (TEGL) No. 19-16
- 4.6 U.S. Department of Labor/Employment and Training Administration Training and Employment Guidance Letter (TEGL) No. 21-16
- 4.7 U.S. Department of Labor/Employment and Training Administration Training and Employment Guidance Letter (TEGL) No. 22-15
- 4.8 2 CFR 200 This policy is provided to ensure data integrity and report accurate information to the United States Department of Labor (USDOL).