EMPLOYMENT AND ECONOMIC DEVELOPMENT

MINNESOTA

Data Validation Overview

Today's Overview of Data Validation

- What is Data Validation?
- Purposes of Data Validation
- Statutory and Regulatory/Policy Citations

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Overview – What is Data Validation?

Data Validation is a series of internal controls or quality assurance techniques established to verify the accuracy, validity and reliability of the data. This framework requires a consistent approach across programs to ensure that all program data consistently and accurately reflects the performance of each grant recipient.

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Overview – Purposes of Data Validation

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

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Statutory Citation

Federal WIOA Law (Public Law 113-128) authorizes Data Validation in Section 116(d)(5) of WIOA as follows:

DATA VALIDATION.—In preparing the State reports …. each State shall establish procedures, consistent with guidelines issued by the Secretary (of Labor), in conjunction with the Secretary of Education, to ensure the information contained in the reports is valid and reliable.

Regulatory/Policy Citations

To date, two Training and Employment Guidance Letters (TEGLs) have been issued that deal with Data Validation:

TEGL 7-18 (issued on 12/19/2018) was issued jointly by the U.S. Dept. of Labor and U.S. Dept. of Education, providing initial guidance to states covering the six "core" programs under WIOA:

- Adult, DW and Youth Formula Grant Programs (Title I of WIOA);
- Adult Education and Family Literacy Act (Title II of WIOA);
- Employment Service-Wagner-Peyser (Title III of WIOA); and,
- Vocational Rehabilitation Programs under Title I of the Rehabilitation Act of 1973 (as amended under Title IV of WIOA)

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Regulatory/Policy Citations (Continued)

TEGL 23-19 (issued 6/18/2020) from the U.S. Dept. of Labor, provides additional guidance to states covering programs under DOL jurisdiction (including four of the six core programs: Adult, DW, Youth and Wagner-Peyser).

- TEGL 7-18 **and** TEGL 23-19 both provide detailed specifications on data elements subject to validation and allowable documentation.

- Data elements referenced in TEGL 7-18 focus primarily on data elements shared jointly between DOL and Education.

- TEGL 23-19 provides additional details relating to programs funded through DOL, including additional elements unique to DOL and allowable documentation including data elements related to eligibility requirements. An update to TEGL 23-19 is expected sometime next spring.

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State Level Responsibilities

- Develop written procedures for conducting data validation, including describing processes for identifying and correcting errors or missing data;

- "Regular" data validation training for appropriate program staff (at least annually);

- Monitoring protocols that ensure program staff are following the written data validation policy and procedures and take appropriate corrective action if those procedure are not being followed;

State Level Responsibilities (continued)

- A regular data integrity review of program data (recommended quarterly by DOL) for errors, missing data, out-of-range variances and other data anomalies;

- Documentation that missing and erroneous data identified have been corrected;

- Establish documentation processes for maintaining records (per federal records retention policy on results) which may include: copies of worksheets on data elements or records reviewed, frozen quarterly wage records for wage record matching used for reporting outcomes, trends in common data accuracy issues, error rates and corrective action efforts made after data validation reviews; and,

State Level Responsibilities (continued)

- "Regular" assessments of the effectiveness of the state's data validation process (DOL recommends at least annually) and revisions to policy and/or process as needed.

- FINALLY: DOL already provides Minnesota (and every other state) with an analysis of quarterly WIOA Title I data for adult, DW and youth. Program performance staff in ETP work with the Performance Reporting group to respond in a timely manner to these reports.

WDA/Subgrantee Responsibilities

- Assurances that local program staff at the WDA (and subgrantee level, where appropriate) understand state data validation policy;

- Appropriate local staff participate in training provided by the state;

- <u>Encourage</u> local program staff to develop complementary local policies and internal procedures to systemically review data towards improving overall data quality.

Questions?

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