STATE OF MICHIGAN
DEPARTMENT OF LABOR AND ECONOMIC OPPORTUNITY
LANSING

GRETCHEN WHITMER
GOVERNOR

SUSAN CORBIN
DIRECTOR

OFFICIAL
Policy Issuance (PI): 21-28

Date:	October 13, 2021
To:	Michigan Works! Agency (MWA) Directors
From:	Krista Johnson, Division Administrator *SIGNED* Talent Development Division Workforce Development
Subject:	Workforce Innovation and Opportunity Act (WIOA) Data Validation for Title I Adult, Dislocated Worker, Youth, and Title III Wagner-Peyser Employment Services
Programs Affected:	WIOA Titles I and III
References:	WIOA of 2014, Public Law 113-128 (29 United States Code (USC) Section 3101, *et. seq.*)
	WIOA Final Rule 20 Code of Federal Regulation (CFR) Part 682, et al.
	United States Department of Labor Training and Employment Guidance Letter (TEGL) 7-18, issued December 19, 2018
	TEGL 23-19, issued June 18, 2020
	TEGL 25-19, issued June 8, 2020
Rescissions:	PI 10-09, Change 1
Background:	The Michigan Department of Labor and Economic Opportunity, Workforce Development (LEO-WD), in partnership with the MWAs, assists job seekers in obtaining and advancing in employment, education, training, and supportive services to foster individual success in the labor market. WD's state and federally funded job seeker and business services are designed to strengthen and improve our public workforce system, help equip our citizens to enter high-quality jobs and careers, and help employers hire and retain skilled workers.

LEO is an equal opportunity employer/program.
Auxiliary aids, services and other reasonable accommodations are available upon request to individuals with disabilities.
WORKFORCE DEVELOPMENT, 201 N. WASHINGTON SQ., LANSING, MI 48913 • www.michigan.gov/workforce • 517-335-5858

Data Validation (DV) is a series of internal controls and quality assurance techniques established to verify the accuracy, validity, and reliability of data. The establishment of a shared DV framework that requires a consistent approach across programs ensures that all program data consistently and accurately reflects the performance of each grant recipient. DV procedures aim to:

- Verify that program and performance data reported by MWAs are valid, accurate, reliable, and comparable across programs.

- Identify anomalies in data and resolve issues that may cause inaccurate reporting.

- Outline source documentation required for common data elements.

- Improve program performance accountability.

Policy: In addition to TEGL 7-18 issued by the Departments of Labor and Education, on June 18, 2020, the U.S. Department of Labor (USDOL) issued TEGL 23-19 providing guidance and expectations for validating participant data for programs funded only through USDOL, including those that are both WIOA core programs and "non-core programs." Non-core programs include programs authorized by WIOA, as well as programs authorized by other federal legislation.

The following WIOA core programs funded through USDOL are subject to DV:

- WIOA Title I Adult, Dislocated Worker, and Youth
- WIOA Title III Wagner-Peyser Employment Service

Non-core programs are required to follow the program-specific guidance related to DV discussed in TEGL 23-19 and subsequent changes. To meet the objectives of accurate, valid, and reliable program data, these non-core programs are highly encouraged to also implement the DV framework outlined in federal guidance.

Non-core program DV guidance will not be covered in this policy. Questions regarding non-core programs should be directed to your respective administrators and coordinators.

Trade Adjustment Assistance guidance will be provided in separate, program-specific guidance.

WD will use a combination of system automated and manual file review efforts to conduct DV. The system automated process includes:

1. During quarterly and annual reporting cycles, individual customer data will be uploaded to the Workforce Integrated Performance System (WIPS) using the Participant Individual Record Layout (PIRL).

2. In the WIPS, the full PIRL file passes through preliminary DV and edit check protocols, scanning all individual and programmatic data elements.

3. Edit checks search for date range errors and inconsistencies, anomalies, and business rule errors (example: if element a = 1, then element b cannot = 2).

4. Once the full PIRL file successfully clears edit check protocols in the WIPS, an ETA 9173 or ETA 9169 report is generated in the WIPS.

5. The ETA 9173 and ETA 9169 reports generated in the WIPS are validated against the One-Stop Management Information System (OSMIS) reports and certified in the WIPS by the LEO-WD Data and Performance Reporting Section.

For manual file review, all MWAs are subject to selection for DV beginning with Program Year (PY) 2021. DV file review will be conducted concurrently with Comprehensive Programmatic Reviews on a biennial basis by WD, at a minimum. File review may take place either virtually or on-site. In alternate years that MWAs are not selected for DV by WD, an internal review must be conducted.

Participant records must reflect accurate recording of data in accordance with definitions and allowable source documentation listed in the most recent Data Validation guidance provided by the USDOL for all elements selected. If one of the selected elements fails to meet the federal definitions for source documentation, the entire record fails the DV process. The additional elements remain subject to validation and will be validated under the federal WIOA DV requirements.

At the conclusion of the DV process, cumulative error rates for each element, by program, will be calculated based on all the participant records reviewed. WD will also calculate the error rate for each element, by program, for each of the selected MWAs. Results will be provided along with a summary of observations no later than 30 days after the conclusion of the DV process.

A satisfactory DV performance pass rate is 80 percent or higher of total files validated. MWAs who fail to achieve a satisfactory pass rate or fail to demonstrate compliant data collection standards for source documentation will be subject to technical assistance and/or a corrective action plan. When appropriate, these results will be included in Comprehensive Programmatic Review reports.

Source Documentation

For most data elements, the DV guidelines provide multiple forms of acceptable source documentation. If multiple sources are collected for the same data element and sources conflict, the most objective source will be used to determine if the data element is valid and accurate. Common source documentation types include:

Cross-Match: A cross-match requires detailed supporting evidence for the data element in a database. An indicator or presence of a Social Security Number in an administrative or non-WIOA database (i.e., a database not maintained by a WIOA core program), such as data from the State's Department of Motor Vehicles, is not sufficient evidence for a cross-match. Validators must also confirm supporting information such as dates of participation and services rendered.

Self-Attestation: Self-attestation (also referred to as a participant statement) occurs when a participant states their status for a particular data element and then signs and dates a form acknowledging the status. The form can be on paper or in an electronic format with signature and date. A signed and dated registration form, objective assessment, and/or Individual Service Strategy/Individual Employment Plan may be used to validate elements that include self-attestation as an acceptable type of source documentation. Additional acceptable forms of self-attestation include an online survey response, follow-up survey response, text message, email, or social media message directly from the participant that displays their name, status, and the date the information was collected.

Case Notes: Case notes refer to either paper or electronic statements by the case manager that identify, at a minimum, a participant's status for a specific data element, the date on which the information was obtained, and the case manager who obtained the information.
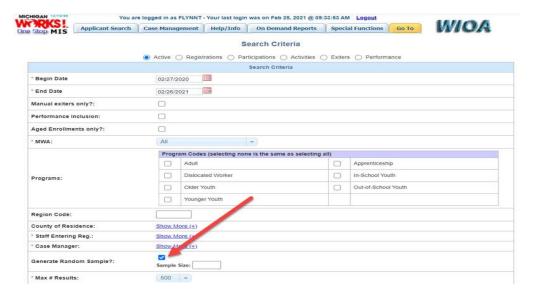
Electronic Records: Electronic records are participant records created, stored, or transferred in a form that only a computer can process and are maintained in the OSMIS. Records can be numeric, graphic, or text. They can also include magnetic storage media such as tapes or disks, electronic signatures, or submissions from the participant such as e-mail, text, or unique online survey responses.

WD and local areas do not have the authority to make substitutions or expand upon the federal list of allowable source documents.

Sample Selection

WD will review files of both active and exited participants. Participants selected will have a registration date on or after July 1st of three program years prior to the current program year. No fewer than 10 and no more than 45 files per program will be selected per review unless necessary for a targeted review.

WD will use a Random Sample Generator created for WIOA and Wagner-Peyser in the OSMIS for random participant selection. The random sample selection is accessible only via the participant reports. The tool allows users to request a random sample between 1 and 100 customers, along with other criteria necessary (program type, timeframe, demographics, etc.). MWAs are encouraged to use this tool when conducting internal reviews as well.
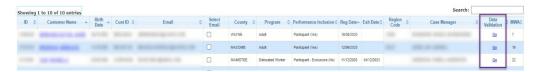

Data Element Validation

The DV process is conducted by comparing participant record data reported to the USDOL against source documentation collected and maintained in the participant's case file. Participant records will be validated against source documentation maintained in the participant's case file to ensure compliance with federal definitions and data collection standards for source documentation.

WD will use the DV worksheet to record DV results for each participant. This worksheet is available for all participants that are subject to DV and can be accessed in the OSMIS using one of the following ways:

1. Clicking the 'Data Validation' tab at the bottom of the WIOA or Wagner-Peyser participant record.

2. Clicking the "Go" link under the Data Validation column in the Random Sample results list.

The PIRL Value column of the DV worksheet will default to display the most recent quarter of data reported to the USDOL. These are the values that will be validated by WD unless otherwise indicated by your coordinator. However, another quarter can be selected by using the "Select a different PY/Quarter to generate new worksheet" dropdown (the available quarters in the dropdown include quarters starting with the registration date through the current quarter and are specific to the participant).

The OSMIS Value column may be used to validate the data found in the PIRL Value column when 'Electronic Records' or 'State Management Information System (MIS) Database' is listed in the Source Documentation Requirements column. Occasionally, the OSMIS Value column will read a value of Calculated. A value of Calculated indicates that the PIRL Value reported to the USDOL may be pulled from more than one area of the OSMIS. This requires the validator to go into the participant's record to manually locate the field(s) containing the data to compare to the PIRL Value column's data.

Wagner-Peyser DV elements reviewed by WD will be limited to those with Electronic Records or State MIS Database listed in the Source Documentation Requirements column.

DV worksheets may be printed or exported to an Excel spreadsheet. In accordance with Section 1-1 of the WIOA Manual, due to the nature of the information contained in the worksheets, including disability status, printed copies of worksheets for internal quality assurance reviews must be maintained apart from any other information regarding the individual. This may be accomplished by:

1. Creating a separate file or storing the DV worksheet in an existing file dedicated to disability information. It is mandatory that a different color file is used for disability information to make it easily identifiable. This file may be stored within the larger participant file and removed as necessary.

   -Or-

2. Maintaining the required copy of the review report submitted to WD and the corresponding worksheets in a separate secured file.

Federal record retention requirements apply to DV reports submitted to WD and review-specific worksheets. Therefore, documentation must be maintained for a minimum of three years following each review for participants selected for local or state level reviews.

The Data and Performance Reporting Section has developed a Data Validation Tools Information Guide to provide additional guidance on random sampling and the worksheet generator. This guide is available in the OSMIS under the Help/Info tab under Guides. Additionally, a training video on the use of these tools is available in the OSMIS under the Help/Info tab under Training Videos.

Action: In alternate years when an MWA is required to conduct an internal review, a report containing, at a minimum, MWA name, dates of the review, lead reviewer contact name and information, file sample size per program, error rate per program, and specific areas of concern, including any technical assistance needed, must be provided to WD by the end of the PY. A copy of this report and the participant list and worksheets must also be retained in-house in accordance with federal record retention requirements.

The requested report shall be submitted electronically to the Talent Development Division at [LEO-TSDIV@michigan.gov.](mailto:LEO-TSDIV@michigan.gov). Please copy your assigned WIOA State Coordinator on your email submission.

Inquiries: Questions regarding this policy should be directed to your WIOA State Coordinator.

This policy is available for downloading from the [WD's website](#).

WD is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Please contact Ms. Paula Hengesbach by telephone at 989-388-3272 or by email at HengesbachP@michigan.gov for details.

WD is funded by state and federal funds; more details are available on the Legal Disclaimer page at www.michigan.gov/workforce.

**Expiration
   Date**:   Continuing

KJ:KP:ph