Subject: Data Element Validation Policy

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Purpose

This policy provides guidance regarding Data Element Validation (DEV) requirements specific to Wagner-Peyser and Workforce Innovation and Opportunity Act (WIOA) Title I-B Youth, Adult, Dislocated Worker, Trade Adjustment Assistance (TAA), and discretionary programs.

Background

Data Element Validation is a federally mandated process. The state annually assesses the accuracy of prescribed data elements in randomly sampled participant files against source documents in program files for compliance with federal definitions (refer to TEGL 07-18 and TEGL 23-19, Change 1). DEV training, tutorials, and frequently asked questions are located on the DOLETA Data Validation website.

Operational Procedure

A. Data Element Validation (DEV)

DEV ensures, to the maximum extent feasible, the accuracy of the data entered into the state's Management Information System (MIS) by WIOA Title-1B core and non-core programs. Source documentation for required data elements can be found in the State's Data Element Validation Policy 1003- Attachment B.

1) Non-core programs include National Dislocated Worker Grants (DWG) and others outlined in TEGL 23-19, Change 1 Non-core programs shall fully implement data element validation that aligns with this policy.

2) Data validation requires subrecipients to ascertain the validity, accuracy, and reliability of report and participant record data submitted and recorded in the MIS. Data validation consists of two separate functions:
   - **Report Validation** checks the accuracy of local calculations used to generate performance reports;
   - **Data Element Validation** checks the validity, accuracy, and reliability of the data used by the state to perform the calculations.

3) DEV is a periodic activity conducted by the Benton-Franklin Workforce Development Council (BFWDC) to identify and resolve any errors compromising Data Validation and DEV. This activity includes periodic data element reviews to ensure that data entered and its supporting documentation is accurate and reliable:
   - Data reviews identifying and correcting errors to improve performance reporting and ensures the data accurately reflects the program participants, services, and outcomes;
   - Data reviews to maintain and demonstrate system integrity, assess the accuracy of submitted participant data, and identify and correct problems associated with data entry processes;
   - Review of results of data validation efforts and the effectiveness of the data validation process and revise as needed;
   - Data review for errors, missing data, and other anomalies, including missing documentation;
   - Selected samples of participant data reported are reviewed against source documentation in participant records for compliance with state, federal and local definitions.

4) Although DEV may verify the existence of source documentation for some eligibility criteria, the process does not validate participant eligibility. DEV should not be confused with WIOA and Trade Adjustment Assistance (TAA) eligibility verification requirements.

5) Data element process and requirements:

The state's Data Element Validation 1003 - Attachment A contains details of Washington's DEV process and requirements.

6) Approved data elements:
Data elements identified for DEV reviews each program year are found in the monitoring tools checklists posted annually on ESD's Workforce Professionals Center website.

7) Alignment of DEV and eligibility documentation:
DEV does not validate participant eligibility, it is the policy of the BFWDC to use DEV documentation requirements outlined in TEGL 23-19, Change 1 as the foundation for WIOA program eligibility documentation for all eligibility components included under DEV requirements. The alignment of these requirements will increase efficiencies and ensure DEV requirements are met (for eligibility components) at the time of participant enrollment. In this way, DEV documentation will fulfill certain eligibility documentation requirements.

8) Allowable source documentation:
Data Element Validation Policy 1003 - Attachment B details the allowable source documentation for data element validation in Washington. For data elements that allow self-attestation, the self-attestation form provided in the BFWDC Eligibility Policy 2015-01 can be used. Additional guidance about the state's self-attestation forms can be found in the state's Data Element Validation Policy 1003 - Attachment C.

Definitions:
1) **Data Validation** – A series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data.

2) **Data Element Validation (DEV)** – The federally mandated process by which the state annually assesses the accuracy of prescribed data elements in randomly sampled participant files against source documents in program files for compliance with federal definitions (refer to TEGL 07-18).

3) **Self-Attestation** – Self-attestation occurs when participants (applicants) state their status for a particular data element, such as pregnant or parenting youth, and then sign and date acknowledgment forms. The key elements for self-attestation are:
   - participants (applicants) identifying their status for a data element and;
   - signing and dating a form attesting to this self-identification. Self-attestation can also be in the form of a signed and dated WIOA eligibility application that is in paper format or either of two electronic formats (a scanned and uploaded copy of the paper document or an application in the state's case management system with the participants' date-stamped electronic signatures).

4) **Periodic Reviews** - An internal review undertaken at regular intervals (i.e., monthly, quarterly, annually).

References:

[Data Element Validation Policy 1003](#)