




INSTRUCTION NOTICE
#PY21-02

TO: Greenville County WIOA Service Providers

FROM: Dean E. Jones, WIOA Administrator 

SUBJECT: Greenville County WIOA Data Validation Policy

EFFECTIVE: October 25, 2021

EXPIRATION DATE: Indefinitely

PURPOSE

The purpose of this guidance is to provide instructions to the Greenville County Workforce Development Area (GCWDA) on the policy and procedures required under the Workforce Innovation and Opportunity Act (WIOA) regarding data validation process. This policy is to establish a procedure to verify the accuracy, validity, and reliability of WIOA data.

REFERENCES

TEGL 23-19 Guidance for Validating Requiring Performance Data by Grant Recipients of USDOL Workforce Programs and State Instruction 20-09 Performance Data Validation for DOL Workforce Programs

BACKGROUND

Pursuant to the Department of Labor's TEGL 23-19 Guidance for Validating Requiring Performance Data by Grant Recipients of USDOL Workforce Programs and the State Instruction 20-09 Performance Data Validation for DOL Workforce Programs, each Local Workforce Development Board (LWDB) must develop its own data integrity review policy that aligns with all federal and state laws, regulations, and guidance for WIOA Adult, Dislocated Worker, and Youth Programs participant records.

POLICY

The Greenville County Workforce Development Board (GCWDB) Programmatic Monitor and Service Provider Staff will conduct an internal quarterly data validation audit on active and exited Adult, Dislocated Worker, and Youth participant files. The scope of the review will be to compare a sample of participant records against source documentation to ensure compliance with Federal, State, and Local policies and procedures. Only data elements which focus on eligibility, performance, and services will be examined. TEGL 23-19, Attachment II Source Documentation for WIOA/Non-Core Programs, provides multiple forms of acceptable source documentation and the most objective form should be utilized to determine if the data element is valid and accurate. The source documentation types include: Cross-

Match of Detailed Supporting Evidence; Self-Attestation/Participant Statement; Electronic or Paper Case Notes; and Electronic Records.

1. Required Staff Training

All staff who assist with the WIOA participant files will receive Data Validation training at the minimum of one (1) time per program year. The training may be conducted either in-person or virtually. The focus of the training will be to emphasize the need for accurate data entry and record keeping as it relates to program performance.

2. Staff Responsibility

GCWDB Programmatic Monitor

A quarterly review will be conducted during the first month following the end of the quarter for active and exited WIOA Adult, Dislocated Worker and Youth Program files utilizing the GCWDB Local Audit Checklist (attachment). A report of the results will be submitted to South Carolina Department of Employment and Workforce via the File Transfer Protocol (FTP) site. To the extent possible, corrective actions will be taken for erroneous or missing data noted during the review. Additional staff training and technical assistance will be provided, as needed or requested.

Service Provider Staff

At WIOA Eligibility, during WIOA Participation, and prior to WIOA Exit, staff will utilize the File Folder Checklist to ensure sufficient source documentation is collected and/or maintained as required in the SC Works Online System (SCWOS) and the participant hardcopy file. In accordance with 29 CFR 38.41 and State Instruction 16-11, Personally Identifiable Information (PII) or legally sensitive information, e.g. criminal history, medical history, etc. must be maintained in a separate locked file. For erroneous or missing data, service provider staff will submit detailed change requests and/or collect additional documentation to ensure the accuracy of the data within five (5) days of notification.

ACTION

This policy will be provided to the appropriate staff to ensure their understanding of the procedure and their responsibility in the data validation process.

ATTACHMENTS

PY21-02 Attachment 1 – GCWDB Local Audit Checklist

GCWDB Local Audit Checklist

Monitoring/Desktop Review Data Validation

Monitor:

Date:

Participant Name:

State ID:

App ID:

Application Date:

Eligibility Date:

WIOA Participation Date:

Eligibility Staff:

Current/Last Case Manager:

Funding: Adult Dislocated Worker Out-of-School Youth In-School Youth

SCWOS/CF Match Yes No Social Security Number Verification

SCWOS/CF Match Yes No Address Verification

SCWOS/CF Match Yes No Date of Birth and Age Verification

SCWOS/CF Match Yes No Selective Service / Draft Status Verification

SCWOS/CF Match Yes No Citizenship / Alien Status Verification

SCWOS/CF Match Yes No Disability Verification

SCWOS/CF Match Yes No Military Service/Veteran Verification

SCWOS/CF Match Yes No Disabled Veteran Verification

SCWOS/CF Match Yes No Employment Verification

Employment Experience Years _____ Months _____ Currently Employed Yes No

SCWOS/CF Match Yes No Dislocated Worker Category _____ Verification

SCWOS/CF Match Yes No Actual Layoff/ Separation Date Verification

SCWOS/CF Match Yes No Unemployment Compensation Verification

SCWOS/CF Match Yes No Education Level Verification

SCWOS/CF Match Yes No School Status

SCWOS/CF Match Yes No Youth Below School Grade

SCWOS/CF Match Yes No Highest Grade Verification

SCWOS/CF Match Yes No High School Graduate Verification

SCWOS/CF Match Yes No High Poverty Verification

SCWOS/CF Match Yes No Displaced Homemaker Verification

SCWOS/CF Match Yes No Homeless Verification

SCWOS/CF Match Yes No Runaway Verification

SCWOS/CF Match Yes No Offender Verification

SCWOS/CF Match Yes No Parenting Youth Verification

SCWOS/CF Match Yes No Basic Skills Verification

SCWOS/CF Match Yes No TANF Verification

SCWOS/CF Match Yes No Supplemental Security Income Verification

SCWOS/CF Match Yes No SNAP Verification

SCWOS/CF Match Yes No Foster Child Verification

SCWOS/CF Match Yes No Youth Requires Additional Assistance Verification

SCWOS/CF Match Yes No Family Size Verification

SCWOS/CF Match Yes No Family Income Verification Low-Income Adult: Yes No

SCWOS/CF Match Yes No Training Actual Start Date

SCWOS/CF Match Yes No Credential

Notes