

COMMONWEALTH OF KENTUCKY  
DEPARTMENT OF WORKFORCE DEVELOPMENT

**POLICY NAME:** Data Validation

**POLICY NUMBER:** 23-011

**DATE OF ISSUE:** July 13, 2023

**EFFECTIVE DATE:** July 13, 2023

**APPLIES/OF INTEREST TO:** Education and Labor Cabinet staff and Local Workforce Development Boards and staff

**FOR FURTHER INFORMATION CONTACT:** [workforce@ky.gov](mailto:workforce@ky.gov)

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**PURPOSE:**

Data validation is a series of internal controls — or quality assurance techniques — to verify the accuracy, validity, and reliability of data. Data validation framework requires a consistent review across programs to ensure that all data consistently and accurately reflect the performance of each grant recipient. Data validation procedures include:

- Verify that the performance data reported by grant recipients to the United States Department of Labor (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.
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**POLICY:**

**I. Applicable Programs for Data Validation:**

All USDOL programs must be validated annually. The Kentucky Department of Workforce Development (DWD) also requires additional programs to undergo data validation. These programs include:

- Title I- Adult, Dislocated Worker, and Youth
- Title II- Adult Education and Family Literacy Act (AEFLA)
- Title III- Wagner-Peyser
- Trade Adjustment Assistance (TAA)
- Jobs for Veterans State Grants (JVSG)
- Apprenticeship Program Grants
- National Dislocated Worker Grants (NDWG)
- Reemployment Services and Eligibility Assessment (RESEA) Program

## **II. Frequency of Data Validation:**

Data validation will be conducted by both DWD staff and each Local Workforce Development Board (LWDB). Data validation will occur on an annual basis, though the DWD recommends that data validation occur for relevant programs on a quarterly basis as well.

### **A. Annual Data Validation:**

At the end of each program year after the submission of the certified annual report, annual data validation training classes shall be conducted. Staff members from each Local Workforce Development Area (LWDA) must attend these trainings. DWD will alert the LWDAs to the minimum number of staff expected to participate in these training classes, though the LWDAs are encouraged to send additional staff involved with data validation beyond the minimum requirement. These classes will serve as a method to train LWDB staff and their contractors on data validation, as well as conduct data validation exercises. For example, during the training classes, each LWDA will use samples from another LWDA to conduct data validation exercises.

Before annual data validation takes place, each LWDB staff member will have the opportunity to receive training on required performance reporting, as well as review applicable documentation for data validation along with a validation tool. Please note that the annual data validation process is anticipated to be a four (4) week process.

The submitted annual report will be utilized to pull samples for the training classes based on the established sample size for each program. The samples are organized into ten record sets. Each record will be sorted vertically within a Data Element Validation (DEV) sample tool established by DWD staff. The tool will include the data element number that



corresponds to the PIRL, a listing of appropriate documents, and a list of the applicable programs for each data element.

Local staff members who are participating in the DEV are to check each file in the Case Management System of Record to ensure that the appropriate documentation is present to support program eligibility, enrollment, and service provision. After validation, the data elements are evaluated to determine which elements had the highest incidence of error. Each LWDB will receive a report from DWD staff that identifies where the highest error rates occurred so they can perform an internal audit of their files and make necessary corrections.

### **III. Random Sampling Methodology:**

Random sampling for the annual data validation review is conducted by first determining the proportionate number of enrollments in each program in a local area to the total number of enrollments in each program across the state. If a given area is responsible for 10 percent of the total enrollments for the state, then 10 percent of that area's total enrollments are counted. This is done to determine each local area's proportion of the total. When each local area's proportion is determined, those numbers are totaled, divided by ten (10), and rounded up to determine how many records will be sampled by each area.

To select the sample, DWD staff shall sort the PIRL first by area, next by program and then by active or exited status. The desired number of records are manually chosen in a nonsequential, random fashion from the sorted PIRL for each local area. For areas with programs that do not have enough participants to meet the sample size, one hundred percent of their files for that program will be included in the sample. The remaining number of files are then pulled from the local area that contributed the largest percentage of enrollments.

### **IV. Staff Training for Data Validation:**

All staff that conducts data validation is required to attend training on how to validate each program's data. This training will be conducted, at a minimum, one (1) time per year by staff from the DWD's Division of Technical Assistance. DWD will determine whether this training is conducted virtually or in-person at the DWD Central Office.

### **V. Annual Report Validation:**

The annual report must be validated before it is submitted to USDOL. The report is validated through two methods as described below:

#### **A. Annual Data Validation**

The annual data submitted by program and LWDB staff shall be used to create the Annual Report.

## **B. Ongoing Data Checks**

LWDB staff must perform quarterly data checks in the case management system of record to ensure there are no data anomalies prior to DWD submitting quarterly performance reports. LWDB staff shall have ten (10) calendar days post performance quarter to fix any data issues. Data issues can be identified through report queries in the case management system and/or EBI.

## **VI. Documentation Process:**

All data validation records that are conducted annually are maintained on internal servers by DWD. All reports are submitted to the DWD's Division of Technical Assistance to compile and maintain the data validation efforts.

As part of the data validation process, the Division of Technical Assistance has created a Checklist of Required Documentation to Upload to KEE Suite (or other identified case management system of record). *See Attachment A.*

## **VII. Corrective Action:**

The data validation process is aligned with the overall monitoring process for DWD. Any issues identified through data validation may result in a finding on the annual monitoring report prepared by DWD's Division of Technical Assistance.

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**REFERENCES:**     TEGL 23-19 and TEGL 7-18

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### Checklist of Required Documentation to Upload to KEE Suite

- ☐ Social Security Number (A, DW and Youth)
- ☐ Date of Birth (A, DW and Youth) (A, DW and Youth)
- ☐ Individual with a Disability (A, DW and Youth)
- ☐ Eligible Veterans Status (A, DW)
- ☐ UI Eligible Status (A, DW)
- ☐ Long Term Unemployed at Program entry (A, DW)
- ☐ Date of Actual Dislocation (A, DW)
- ☐ TANF Recipient (A, DW)
- ☐ Exhausting TANF Within 2 Years (A, DW)
- ☐ SSI/SSDI (A, DW)
- ☐ Low Income Status at Program Entry (A, DW and Youth)
- ☐ Displaced Homemaker at Program Entry (A, DW)
- ☐ Participated in Postsecondary Education During Program Participation WIOA (A, DW and Youth)
- ☐ Enrolled in Secondary Education Program (A, DW and Youth)
- ☐ Date Enrolled in Post Exit Education or Training Program Leading to a Recognized Postsecondary Credential (A, DW and Youth)
- ☐ Type of Second Recognized Credential (A, DW and Youth)
- ☐ Date Second Attained Recognized Credential (A, DW and Youth)
- ☐ Type of Third Recognized Credential (A, DW and Youth)
- ☐ Date Third Attained Recognized Credential (A, DW and Youth)
- ☐ Date of Most Recent MSG: Postsecondary Transcript/Report Card (A, DW and Youth)
- ☐ Date of Most Recent MSG: Secondary Transcript/Report Card (A, DW and Youth)
- ☐ Date of Most Recent MSG: Training Milestone (A, DW and Youth)
- ☐ Date of Most Recent MSG: Skills Progression (A, DW and Youth)
- ☐ Date Enrolled During Program Participation in an Education or Training Program Leading to a Recognized Postsecondary Credential or Employment (A, DW and Youth)
- ☐ Date Completed, During Program Participation, an Education or Training Program Leading to a Recognized Postsecondary Credential or Employment (A, DW and Youth)
- ☐ Youth 2<sup>nd</sup> Quarter Placement Title 1 (Youth)
- ☐ Youth 4<sup>th</sup> Quarter Placement Title 1 (Youth)
- ☐ Category of Assessment (A, DW)
- ☐ Youth Barrier Documentation (Youth)
- ☐ Youth Eligibility Documentation (Youth)
- ☐ Citizenship (A, DW and Youth)
- ☐ Selective Service (A, DW and Youth)
- ☐ Priority of Service (A, DW and Youth)
  - ☐ Low Income
  - ☐ Basic Skills Deficient
  - ☐ Recipient of Public Assistance
- ☐ WIOA-2 (A, DW and Youth)
- ☐ Calculation of low-income (Adult and Youth)
- ☐ School cost comparison (Trade, ITA training; A, DW and Youth)

- ☐ COA - Cost of Attendance (A, DW and Youth)
- ☐ ITA (Individual Training Agreement)
- ☐ Vouchers / Invoices / Proof of Payment for training and supportive services unless generated within KEE Suite (A, DW and Youth)
- ☐ Worksite Training Agreement (A, DW and Youth)
- ☐ Amendments to agreement(s) (A, DW and Youth)
- ☐ Employment Agreement (A, DW and Youth)
- ☐ Timesheets (A, DW and Youth)
- ☐ Paystubs for WEX/OJT (A, DW and Youth)
- ☐ Transcripts (A, DW and Youth)
- ☐ Attained Credentials (A, DW and Youth)
- ☐ FAFSA / Financial Aid Award Notices (A, DW, Youth)
- ☐ Executed ITA Budgets (A, DW, Youth)
- ☐ School / Training Grades (A, DW, Youth)
- ☐ Attendance Forms (A, DW, Youth)
- ☐ School / Training Class Schedules (A, DW Youth)
- ☐ Any Additional Documentation Requested by the Division of Technical Assistance

**NOTE:** All documents must be legible to be considered verifiable.

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