Workforce Development System
Technical Advisory #23-03
April 28, 2023

TO: Workforce Development Community

SUBJECT: Data Element Validation (DEV) for Titles I and III under the Workforce Innovation and Opportunity Act (WIOA), National Dislocated Worker Grants (NDWGs), the Trade Adjustment Assistance (TAA) Program, and the Jobs for Veterans State Grants (JVSG) Program

PURPOSE

Establish New York State Department of Labor (NYSDOL) guidance regarding DEV under WIOA for Title I Adult, Dislocated Worker (DW), and Youth programs; NDWGs; the Title III Wagner-Peyser (W-P) Act Program; the TAA Program; and the JVSG Program.

Rescind and replace Workforce Development System-Technical Advisory (WDS-TA) #11-12.2 – Data Element Validation for the Workforce Investment Act, Wagner-Peyser, Veterans Employment and Training Service and Trade Adjustment Assistance/Trade and Globalization Adjustment Assistance Programs (December 11, 2014).

Rescind and replace WDS-TA #10-3.1 – Requirements for the Collection of Additional Participant Demographic Information upon Receipt of Intensive or Training Services under Title I-B of the Workforce Investment Act of 1998 (October 22, 2014).

POLICY

Local Career Center staff must validate data elements for WIOA Titles I and III, NDWGs, the TAA Program, and the JVSG Program.

DEV will be conducted as part of NYSDOL's annual Program monitoring in Local Workforce Development Areas (LWDAs).

WIOA Title I and III, NDWG, TAA, and JVSG program staff must participate in annual data validation training.

ACTION

DEV refers to the proper validation of information as it is captured in the State Management Information System (MIS), including but not limited to, the One-Stop

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Operating System (OSOS). Data validation helps ensure accurate documentation of participant eligibility and performance reporting, as well as safeguarding data integrity. Several requirements must be met to ensure proper DEV is captured.

A. Source Documentation

Local Career Center staff must use source documentation to validate the data elements listed on **Attachment A: Data Element Validation (DEV) for Adult, Dislocated Worker (DW), and Youth; National Dislocated Worker Grant (NDWG); Wagner-Peyser (W-P); Trade Adjustment Assistance (TAA); and Jobs for Veterans State Grants (JVSG) Program Participants**.

There are several types of source documentation used to validate data elements. Staff are advised to refer to **Attachment A** to determine which verification sources are allowed for each data element. Some of the most common methods of source documentation include:

1. Cross-Match – A cross-match requires detailed supporting evidence for the data element in a database, such as the New York State (NYS) Department of Motor Vehicle (DMV) cross-match detailed in Section C.2 of this WDS-TA.

2. Self-Attestation – Self-attestation is a statement written or affirmed by the participant that includes:

    a. The participant's status;

    b. The participant's signature; and

    c. The date.

    The self-attestation can be written or electronic/digital. Per Training and Employment Guidance Letter (TEGL) 23-19, Change 1, "Electronic signatures or a submission from the participant such as an email, text, or unique online survey response is considered an electronic signature or verification; it must be participant generated and traceable to the participant." When self-attestation is the verification method used, a paper or digital copy of the source document must be retained.

    Self-attestation is not to be used as a first resort as there are other source documentations that have a higher integrity than self-attestation. However, when self-attestation is allowed, the lack of source documentation beyond self-attestation must not delay or prevent enrollment and receipt of services in a program.

    Note: Local areas considering restrictions on the use of self-attestation are advised to consider the impact of such a decision with respect to equity and access for populations with barriers to obtaining eligibility and reporting documents.

3. Case Notes – Case Notes refers to Comments entered into the appropriate State MIS after Career Center staff have viewed and verified source documentation, but do not retain a paper copy. This method is intended to minimize the administrative burden associated with obtaining and retaining copies (paper or electronic) of the source documents used to validate participant information. It is not intended to

eliminate paper but reduce it. It will still be necessary to retain copies (paper or electronic) for certain data elements and/or levels of service. Record Retention standards for LWDAs, as stated in WDS-TA #16-02: Retention of Records by Local Workforce Development Boards (March 18, 2016), must also be met.

The Case Notes process requires staff to:

    a. Identify the information to be collected (relevant data element) using an allowable verification source from **Attachment A**;

    b. Ensure the information is accurately recorded in the appropriate State MIS data field(s); and

    c. Record in MIS Comments:

        i. The information (data element) that has been validated; and

        ii. The source used to validate the information; and

        iii. Pertinent data from the verification source; and

        iv. The date staff validated the data element (viewed the verification source) if different from the date of data entry.

4. Electronic Records may include:

    a. Participant Source Documents – Participant source documents maintained in the grantee's MIS or other official record keeping system; and

    b. Grantee participant service record – Grantee participant information generated and maintained by the grantee regarding the specific services received by a participant. The information may be generated and maintained through the grantee's MIS or other official record keeping system.

Please see the Attachments Tab OSOS Guide for further information on the electronic records permitted to be maintained in OSOS.

B. Types of Participant Information

There are three (3) types of participant information that must be collected and validated to comply with federal reporting requirements:

1. Demographic Information;
2. Services Information; and
3. Outcome Information.

Any data element labeled *"at Participation" (e.g., Age at Participation)*, must be entered before entering first service in the appropriate State MIS.

Not all participant information is subject to DEV.

1. Demographic Information – Used to determine program eligibility and to report on participant characteristics/special populations. Source documentation and validation

requirements for demographic information will depend on the level of service received by the participant.

Note: Many new demographic information data elements, including but not limited to, Disability; Veterans; Homeless participant; Homeless Children and Youths; and Runaway Youth at Program Entry, have been added for participant DEV.

Additional information on all demographic information data elements can be found in **Attachment A**.

2. Services Information – Used to report on the services received by a participant.

    Self-service/Information Only (SS/IO) services – For participants receiving SS/IO services only, there are no source documentation or DEV requirements. Individuals desiring access to SS/IO services must be directed to complete the appropriate self-service portal online registration.

    Career Services – Per TEGL 10-16, Change 2 Attachment VII, there are five (5) types of career services provided to WIOA Adults and DWs:

    a. Basic career services;

    b. Individualized career services;

    c. Training services;

    d. Supportive services; and

    e. Follow-up services.

    Note: The full list of available career services, including the definition of each service, is available in WIOA at 20 CFR §678.430.

    Services information must be recorded in the appropriate State MIS within **five (5) business days of service provision.** Proper data entry and documentation of services in the MIS must comply with DEV requirements.

3. Outcome Information – Used to calculate performance measures and to report on outcomes achieved by participants.

    Outcome information, such as employment data through quarterly wage matching, can be populated administratively. However, Career Center staff do enter Individual Training Account (ITA) outcomes and other training outcomes related to Credential Attainment, Measurable Skills Gains, and On-the-Job Training (OJT) employment outcomes.

Demographic and service information is captured and recorded by local Career Center staff in the appropriate State MIS. Each data element must be verified using one (1) form of source documentation.

C. Date of Birth (DOB) Validation

To comply with federal guidance, some situations will require staff to retain source documentation (paper or electronic) for validation purposes. Case Notes cannot be used for the DOB data element.

There are three (3) methods to verify DOB in NYS:

1. Through the Unemployment Insurance (UI) System; or

   For any customer who is currently receiving UI, or has received UI in the past, DOB will be considered validated through the UI System. Therefore, any customer listed as a UI Claimant or Exhaustee for the current or any previous enrollment is considered validated for DOB.

   No MIS comment referencing the method of DOB validation is required for customers whose DOB is validated through the UI System.

   Please see the OSOS Guide for Verifying Date of Birth in the DOB Tab for additional information on verifying DOB through the UI System.

2. NYS DMV Cross-Match; or

   NYSDOL has implemented a DOB validation policy using the "Record of cross-match" with NYS DMV for WIOA participants who are not UI customers. Therefore, any customer who has a valid ID issued by the NYS DMV (NYS driver's license, driver's permit, or non-driver identification) and receives a verification of the DMV# through the appropriate State MIS will be considered validated for DOB.

   In order for this cross-match to take place, local Career Center staff must input NYS DMV ID numbers in the DOB section in OSOS. Please see the OSOS Guide for Verifying Date of Birth in the DOB Tab for data entry procedures. The DMV cross-match is not considered valid unless the DMV# is included on the DOB section and the Process Response/Match Found box is populated.

   No MIS comment referencing the method of DOB validation is required for customers whose DOB is validated by this method.

3. Using a source document.

   If a customer's DOB has not been verified by UI or DMV, their DOB must be verified using one of the acceptable source documents listed in **Attachment A.**

   When a source document listed in **Attachment A** is used, a copy of the source document (paper or electronic) must be retained. Staff must also enter an MIS comment referencing the source document used for DOB validation.

D. Programs that Require Social Security Number (SSN)

Customers participating in the JVSG Program and NDWGs must provide their SSN. However, documentation of a SSN card, Passport, Military ID, or other government issued ID does not have to be retained in these instances.

E. Data Validation Reviews

DEV is included in the monitoring process of local programs because NYSDOL Program staff must ensure data validation procedures are being followed. The two WDS-TAs that provide guidance on monitoring are:

1. WDS-TA #21-04: Monitoring – New York State Department of Labor (NYSDOL) Workforce Innovation and Opportunity Act (WIOA) Monitoring/Oversight of and Provision of Technical Assistance to Local Workforce Development Boards (LWDBs) and LWDB Responsibilities Relating to NYSDOL's Monitoring Process (June 25, 2021); and

2. WDS-TA #21-05: Monitoring – Remote and/or Onsite Subrecipient Oversight and Monitoring Responsibilities for Chief Elected Officials (CEOs) and Local Workforce Development Boards (LWDBs) (June 25, 2021).

Data validation reviews, including a data integrity review of program data to check for errors, missing data, out-of-range variances in values reported, and other inconsistencies, must be completed annually as part of NYSDOL's Program monitoring to ensure accurate performance reporting and reflect the proper data for program participants, services, and outcomes. Missing and/or inaccurate data identified during reviews must be documented and corrected in a timely manner.

A procedure must be in place for correcting missing data or errors found during the data validation reviews or annual assessments.

WIOA Titles I and III, TAA, and the JVSG program staff must follow this WDS-TA in addition to the Monitoring WDS-TAs. Corrective actions may occur if these procedures are not followed.

Staff must also conduct annual assessments of the effectiveness of their data validation and revise their policies as needed.

F. Annual Data Validation Training

Staff must complete annual data validation training. This will be conducted via webinar each year.

REFERENCES

Workforce Innovation and Opportunity Act (WIOA) §116(d)(5)

Code of Federal Regulations (CFR) 20 CFR §678.430

Training and Employment Guidance Letter (TEGL) 23-19, Change 1: Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs (October 25, 2022)

TEGL 14-18: Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor (DOL) (March 25, 2019)

TEGL 07-18: Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA) (December 19, 2018)

TEGL [16-16](#): One-Stop Operations Guidance for the American Job Center Network (January 18, 2017)

TEGL [10-16, Change 2, Attachment VII](#): Participation Level Services Chart, WIOA Title I Adult, Title I Dislocated Worker, and Title III Employment Service Programs

Workforce Development System-Technical Advisory (WDS-TA) #[16-02](#): Retention of Records by Local Workforce Development Boards (March 18, 2016)

WDS-TA #[18-05](#): Securing and protecting Personally Identifiable Information (PII) and Personal, Private and Sensitive Information (PPSI) within the New York State Workforce Development System

WDS-TA #[21-04](#): Monitoring – New York State Department of Labor (NYSDOL) Workforce Innovation and Opportunity Act (WIOA) Monitoring/Oversight of and Provision of Technical Assistance to Local Workforce Development Boards (LWDBs) and LWDB Responsibilities Relating to NYSDOL's Monitoring Process (June 25, 2021)

WDS-TA #[21-05](#): Monitoring – Remote and/or Onsite Subrecipient Oversight and Monitoring Responsibilities for Chief Elected Officials (CEOs) and Local Workforce Development Boards (LWDBs) (June 25, 2021)

[Attachments Tab OSOS Guide](#)

[OSOS Guide for Verifying Date of Birth in the DOB Tab](#)

INQUIRIES

Questions regarding this TA can be directed to your NYSDOL Program Monitor.

ATTACHMENTS

[A. Data Element Validation (DEV) for Adult, Dislocated Worker (DW), and Youth; National Dislocated Worker Grant (NDWG); Wagner-Peyser (W-P); Trade Adjustment Assistance (TAA); and Jobs for Veterans State Grants (JVSG) Program Participants](#)