Washington State
WorkSource System Policy

Policy Number: 1003, Revision 7

Policy Title: Data Element Validation

Effective Date: October 7, 2025

1. Purpose:

To provide guidance regarding federal Data Element Validation (DEV) requirements for programs under Title I-B and Title III of the Workforce Innovation and Opportunity Act (WIOA) and the Trade Adjustment Assistance (TAA) program.

This seventh revision further defines and clarifies allowable source documentation for determining basic skills deficiency in section 4 and in Attachment B.

2. Background:

The Employment Security Department (ESD), as the state administrative entity, provides guidance on data validation and source documentation requirements for WIOA Title I-B formula programs, the Wagner-Peyser Employment Services program as amended by WIOA, including the Monitor Advocate System, and the Trade Adjustment Assistance (TAA) program.

The Monitor Advocate System protects the standard of services provided to migrant and seasonal farmworkers (MSFWs) under the Wagner-Peyser Act Employment Service program. Therefore, as part of a WIOA Core Program, all the requirements that apply to the Wagner-Peyser Act Employment Service for data validation will apply to the Monitor Advocate System.

ESD, as the grantee receiving funding from the U.S. Department of Labor (DOL), requires WIOA Title I-B formula programs to maintain and report accurate and reliable program and financial information. Data validation requires the state to ascertain the validity, accuracy and reliability of report and participant record data submitted to DOL, as set forth in Section 116 of WIOA. Data validation consists of two separate functions: report validation and data element validation (DEV). Report validation checks the accuracy of the state calculations used to generate USDOL performance reports as submitted through the Workforce Integrated Performance System (WIPS). Data element validation checks the validity, accuracy and reliability of the data used by the state to perform the calculations.

DEV is an annual activity conducted by ESD. Selected samples of participant data reported on the most current annual Participant Individual Record Layout (PIRL) data submitted through WIPS is reviewed against source documentation in customer records for compliance with federal definitions. ESD also validates Wagner-Peyser records.

The WorkSource System is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Language assistance services for limited English proficient individuals are available free of charge.

DEV should not be confused with WIOA and TAA eligibility verification requirements. Although DEV may verify the existence of source documentation for some eligibility criteria, the process does not validate participant eligibility. Training and Employment Guidance Letter (TEGL) 23-19, Change 2 contains the most current U.S. Department of Labor Employment and Training Administration (DOLETA) guidance on documentation requirements.

DEV training, tutorials and frequently asked questions are located on the DOLETA Data Validation website.

3. **Policy:**

It is the state's policy to ensure, to the maximum extent feasible, the accuracy of the data entered by WIOA core and non-core programs into the state MIS. Source documentation for required data elements can be found in Attachment B.

Non-core programs include Jobs for Veterans State Grants (JVSG), National Dislocated Worker Grants (DWG) and others outlined in TEGL 23-19, Change 2. Non-core programs are highly encouraged to fully implement data element validation that aligns with this policy. This includes periodic data element reviews to ensure that data entered, and its supporting documentation, is accurate and reliable. Establishing regular (e.g., quarterly) data reviews is a promising practice for identifying and correcting errors to improve performance reporting, as well as ensuring the data accurately reflects the program participants, services, and outcomes.

As recipients of WIOA Title I-B, Title III and TAA funds, ESD and Local Workforce Development Boards (LWDBs) are required to collect and report accurate information for these programs. DOL mandates annual DEV to maintain and demonstrate system integrity, assess the accuracy of submitted participant data, and identify and correct problems associated with data entry processes.

a. State level responsibilities

1. Provide overall guidance, training and technical assistance for data validation standards in accordance with federal guidance;
2. Conduct DEV activities during annual monitoring visits in accordance with 2 CFR 200.328;
3. Utilize the feedback process outlined in WIOA Title I Policy 5414, Revision 1 (WIOA Title I-B Monitoring) to identify and resolve any errors identified;
4. Maintain records per state and federal records retention rules;
5. Provide annual DEV training as part of Workforce Monitoring tool reviews; and
6. Annually review the results of data validation efforts and the effectiveness of the data validation process and revise as needed.

b. Local level responsibilities

1. Develop internal controls to ensure data reported in the state MIS is valid, reliable, and aligns with source documentation in accordance with this policy;
2. Provide training to LWDB staff and/or local subrecipient staff on the importance of correct data entry and allowable source documentation on an annual basis, at a minimum;
3. Regular (recommend quarterly) data element review of program data for errors, missing data, and other anomalies, including missing documentation;
4. Ensure appropriate staff receive ESD's statewide DEV training annually;

5. Maintain records per state and federal records retention rules; and
6. Ensure that state monitoring staff have access to source documents for review upon notification.

c. Data element process and requirements

Attachment A details Washington's DEV process and requirements.

d. Approved data elements

Data elements identified for DEV review in each program year are found in the monitoring tools checklists posted annually on the Workforce Professionals Center website.

e. Alignment of DEV and eligibility documentation

Although DEV does not validate participant eligibility, it is the policy of the state to use DEV documentation requirements outlined in TEGL 23-19, Change 2 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.

f. Allowable source documentation

Attachment B details the allowable source documentation for data element validation in Washington. For data elements that allow self-attestation, state-provided self-attestation forms can be found in Attachment C.

4. Definitions:

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

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).

Self-Attestation – Self-attestation means a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. DOL broadly interprets what is considered an electronic/digital signature. 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. Grantees must retain documentation of the self-attestation.

Virtual or Remote Documentation – Participant information obtained and verified (a) by electronic means (e-mailed or texted attachments, scans, digital photographs sent in encrypted form; electronic signature platforms such as DocuSign or Verisign); (b) through copies of documents sent via postal pickup or mail drop-off at local one-stop sites; (c) through a combination of the above in order to safeguard Personally Identifiable Information (PII).

5. **References**:

- WIOA Section 116
- 20 CFR 667.300
- 2 CFR 200.328
- Training and Employment Guidance Letter (TEGL) 23-19, Change 2 – Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs.
- Training and Employment Guidance Letter (TEGL) 07-18 – Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)
- Training and Employment Guidance Letter (TEGL) 10-16 Change 2 – Performance Accountability Guidance for WIOA Title I, Title II, Title III, and Title IV Core Programs
- Training and Employment Guidance Letter (TEGL) 14-18 – Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by USDOL
- Training and Employment Guidance Letter (TEGL) 5-18 – WIOA Annual Statewide Performance Report Narrative
- Training and Employment Notice (TEN) 14-02 – Data Validation Initiative
- Workforce Innovation and Opportunity Act Title I Policy 5414, Revision 1– Monitoring

6. **Supersedes**:

WorkSource System Policy 1003 Revision 6, Data Element Validation

7. **Website**:

Workforce Professionals Center

8. **Action**:

Local Workforce Development Boards and their contractors, as well as Employment Security Regional Directors, must distribute this policy broadly throughout the system to ensure that WorkSource System staff are familiar with its content and requirements.

9. **Attachments**:

Attachment A - Washington's DEV Process
Attachment B – Data Elements and Allowable Source Documentation by Program
Attachment C – Self-Attestation

Direct Inquiries To:

Employment System Administration and Policy
Employment System Policy & Integrity Division
Employment Security Department
P.O. Box 9046
Olympia, WA 98507-9046
SystemPolicy@esd.wa.gov

Attachment A – Data Element Validation (DEV) Process

The intent of this process is to ensure the accuracy of data entered into the state MIS and subsequently submitted to USDOL. Local area staff collect documentation supporting data elements on an ongoing basis. The required data elements and source documentation are indicated in Attachment B. The process outlined below is in conjunction with Section 3(a) of WorkSource System Policy 1003, Revision 7.

1. Scope of review

    - Data from the Participant Individual Record Layout (PIRL) file provided for the annual performance report and WorkSource caseload reports will be used to randomly select individual records for the annual data validation process.
    - The sample size, method, and type of records to be reviewed, as well as the current monitoring checklists, will be published annually for each Title I-B core program, the Title III Wagner-Peyser program (including MSFW) and the Trade Adjustment Assistance program.

2. Data elements reviewed

    - Monitoring checklists are the tools used to identify the data elements required to be reviewed each program year.
    - A monitoring tool checklist containing all applicable data elements and documentation required during the reporting period will be used to validate that the correct data is entered into the state MIS.
    - Monitoring tools are updated annually and posted under the “Monitoring” section of the Workforce Professionals Center website.
    - The ESD Workforce Monitoring Unit provides annual training to program staff on the monitoring tools.

3. Error rate

    - ESD scores each applicable data element as either a pass or fail for validation.
        - Each data element that is required to be validated and that is supported or matched by acceptable documentation cited in Attachment B is scored as a “pass.” Conversely, any data element required to be validated that is not supported by acceptable documentation cited in Attachment B, or is inconsistent with other documentation, is scored as a “fail.” Thus, data elements with source documentation that lacks proper labeling or is unreadable will be scored as “fail” even if the documentation is in the file.
    - The programmatic pass/fail error rate must be no more than 20% to be considered a passing report for the area.

4. Communication of DEV results including any items to address

5. The feedback process in WIOA Title I Policy 5414, Revision 1 (WIOA Title I-B Monitoring) outlines corrective action steps, timelines, and the process to resolve identified errors. Items to address will be identified in monitoring reports as outlined in Section 3(e) of WIOA Title I Policy 5414, Revision 1.

6. Documentation and retention

- MIS participant records and source documents will be maintained per state and federal record retention requirements.

Attachment B (link to revised Excel spreadsheet)

Attachment C – Self- Attestation

To ensure properly documented customer self-attestation, ESD strongly encourages LWDBs to use the self-attestation forms provided below, or local versions that are substantially similar. DOL further recommends that staff document the reason for using self-attestation in case notes.

Improperly documented self-attestation or self-attestation on eligibility elements not permitted under federal law or guidance or this policy may result in disallowed costs. Properly documented self-attestation serves as documentary evidence of eligibility determination and does not, by itself, warrant disallowed cost findings. At the same time, properly documented self-attestation does not, by itself, preclude disallowed cost findings if it is determined during monitoring, reviews, or audits that the attestation was false.

Note: Under WorkSource System Policy 1023, Revision 2, local areas formally implementing Integrated Service Delivery with co-enrollment can utilize self-attestation to document that participants are 18 years of age or older, are legally entitled to work in the U.S., and have registered for Selective Service (as applicable) for the purposes of eligibility determinations for the WIOA Title I adult and dislocated worker programs so long as those individuals are provided basic career services only. If those participants subsequently pursue individualized career services or training services, full eligibility documentation is required.

You can download the Adult & DW Self-Attestation form here.

You can download the Youth Self-Attestation form here.