



# Montana Department of LABOR & INDUSTRY

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2 **Division: Workforce Services Division**  
3 **Category: WIOA**  
4 **Effective Date: 01/01/2020**  
5 **Last Revised: 07/01/2021**  
6 **Policy No.: 01-20**

## Data Validation Policy

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8 **Background:** Workforce Innovation and Opportunity Act (WIOA) section 116(d)(5) requires that the U.S.  
9 Department of Education and U.S Department of Labor (USDOL) establish data validation guidelines for grant  
10 recipients to ensure information included in their performance reports is valid, accurate, and reliable. Data  
11 validation safeguards the accuracy of annual statewide performance reports and data integrity and promotes  
12 timely resolution of data inconsistencies and inaccuracies. Supported by a series of internal controls or quality  
13 assurance techniques, Montana Department of Labor & Industry’s (MDLI) Workforce Services Division will verify  
14 the accuracy, validity, and reliability of twenty-four common data elements and other required program-specific  
15 data elements to improve performance accountability and achieve positive outcomes for individuals served  
16 across USDOL workforce development programs.

17 **Scope:** This policy applies to MDLI’s Workforce Services Division (WSD) as Montana’s administrative  
18 agency for U.S. Department of Labor programs that include WIOA Adult, Dislocated Worker, and Youth  
19 programs; the Trade Adjustment Assistance (TAA) program; WIOA National Dislocated Worker Grants (DWG);  
20 Jobs for Veterans State Grants (JVSG); the Monitor Advocate System; and Senior Community Employment  
21 Program (SCSEP); and the Employment Service program authorized under the Wagner-Peyser Act, as amended  
22 by Title III.  
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## Policy:

### A. Data Validation Requirements:

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- 26 • Are applicable to WIOA Core Programs and the Trade Adjustment Assistance (TAA) Program.
  - 27 • Are applicable to the following Non-Core Programs:
    - 28 ○ National Dislocated Worker Grants (DWG)
    - 29 ○ Jobs for Veterans State Grants (JVSG)
    - 30 ○ Monitor Advocate System – all requirements that apply to Wagner-Peyser Employment  
31 Services apply to this system.
    - 32 ○ Senior Community Service Employment Program (SCSEP)
  - 33 • Must comply with federal and state laws; rules, and policy; and
  - 34 • Meet record retention time frames based on Primary Indicator of Performance exit date; not the date  
35 that the client stops receiving Veteran, Wagner-Peyser, WIOA, or TAA services.
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38 **B. Data Validation Process:**

39 Montana's Data Validation process consists of two main components - report validation (RV) and data element  
40 validation (DEV):

- 41 • RV - Report validation is accomplished by processing an entire file of participant records to check the  
42 accuracy of the state calculations used to generate the USDOL quarterly and annual performance reports  
43 submitted through the Workforce Integrated Performance System. In addition, the state conducts  
44 quarterly queries of the MIS database to report and correct errors or missing data found in participant  
45 records to ensure all applicable records are reported on accurately in quarterly and annual performance  
46 reports. The Workforce Services Division (WSD) Reporting Analyst is responsible for this process.
- 47 • DEV - The data element validation is conducted using samples of Participant Individual Record Layout  
48 (PIRL) data to assess accuracy against source documentation for program exiters' files to ensure  
49 compliance with federal definitions. WSD's Monitoring Team is responsible for this process.

50 **C. Monitoring of Service Providers:**

- 51 • MDLI's monitoring of service providers will include verification of the integrity and validity of data across  
52 workforce development programs.
  - 53 ○ Monitoring staff will provide service providers and program managers with a written summary  
54 of identified errors or missing data and a request to correct the inaccuracies.
  - 55 ○ WSD's Monitoring Team and Reporting Analyst will provide technical assistance.
  - 56 ○ Service providers will respond in writing with documentation and/or information in order to  
57 correct identified errors, missing data, or inaccuracies.
  - 58 ○ The Monitoring Team will respond in writing when all deficiencies have been addressed.

59 **D. Training:**

- 60 • MDLI's monitoring and other appropriate staff will attend data validation training annually.

61 **E. Attachment: Federal Required Source Documentation**

62 **References:**

- 63 • [TEGL 7-18 Guidance for Validating Jointly Required Performance Data](#)
- 64 • [TEGL 7-18 Attachment I – Source Documentation Validation Instructions](#)
- 65 • [TEGL 23 -19 Guidance for Validating Required Performance Data](#)