

SECTION 23 – PERFORMANCE VERIFICATION AND DATA VALIDATION PROCEDURES

23.1 Purpose

This section establishes detailed operational procedures for documenting, verifying, validating, reviewing, and reporting performance outcomes across all workforce programs administered or overseen by the Workforce Development Board.

These procedures ensure:

- Measurable Skill Gains are properly documented
- Credentials meet federal definitions
- Employment outcomes are verified
- Wage information is accurate
- Exit dates are correct
- Data entered into reporting systems matches source documentation
- Performance reporting withstands monitoring and audit

All staff are responsible for maintaining reporting integrity.

23.2 Systems of Record

For WIOA Title I programs, the Virginia Workforce Connection (VaWC) serves as the official system of record for participant enrollment, services, and performance reporting.

For workforce programs administered directly by the New River/Mount Rogers Workforce Development Board that are not required to utilize VaWC, the Board's B2B Engage system serves as the official internal system of record.

Data entered into any reporting system must reconcile with source documentation maintained in participant files in accordance with the documentation standards established in Section 19 – Case File Management and Documentation Standards.

23.3 Measurable Skill Gain (MSG) Verification Procedure

Before a Measurable Skill Gain (MSG) is entered into the reporting system:

1. Case manager identifies the qualifying MSG type.
2. Verify the gain occurred within the program year.
3. Collect source documentation, which may include:
 - Educational functioning level gain documentation
 - Training milestone verification
 - Transcript showing credit completion
 - Documentation of diploma or equivalent
4. Confirm the gain meets the federal definition of a Measurable Skill Gain.
5. Upload documentation into the participant file.
6. Enter the gain into the reporting system within the required timeframe.

Supervisory review is required prior to quarter-end reporting.

MSG may not be reported without supporting documentation.

23.4 Credential Verification Procedure

Before reporting a credential:

1. Confirm the credential meets the federal definition of a recognized postsecondary credential.
2. Confirm the credential aligns with the participant's training pathway.
3. Obtain documentation such as:
 - Copy of certificate
 - Official transcript
 - Licensing documentation
 - Registry confirmation
4. Verify the credential award date.
5. Upload documentation to the participant file.
6. Enter the credential into the reporting system.

OSHA-10 is not considered a recognized credential under federal performance reporting definitions.

Supervisory review is required prior to reporting.

23.5 Employment Verification Procedure

Employment verification must follow the following documentation hierarchy.

Primary Source

- State wage record data

Secondary Sources (when primary is unavailable)

- Employer verification form
- Pay stub
- Offer letter
- Apprenticeship documentation

Procedure:

1. Confirm employment start date.
2. Confirm employer name.
3. Confirm wage rate.
4. Document verification source.
5. Enter placement into the reporting system.
6. Retain documentation in the participant file.

Self-attestation may only be used where permitted and must include written justification.

23.6 Wage Verification and Median Earnings Procedure

When wage information is required:

1. Verify wage data through state wage record data or approved documentation.
2. Confirm wage data corresponds to the correct reporting quarter.
3. Enter wage data accurately into the reporting system.
4. Document the source of wage verification.

If supplemental wage documentation is used:

- Justification must be documented.
- Supervisory approval is required.

23.7 Exit Review Procedure

Prior to confirming participant exit:

1. Confirm no services have been provided during the required no-service period.
2. Confirm no future services are scheduled.
3. Review the participant file for completeness.
4. Confirm the final status of the Individual Service Strategy (ISS) is documented.
5. Confirm credential documentation is complete, if applicable.
6. Confirm employment documentation has been collected, if applicable.
7. Complete and document the Exit Review Checklist.

Supervisory approval is required before final exit entry.

Retroactive exit date adjustments must be documented and approved.

23.8 Global Exclusion Documentation

If a global exclusion applies:

1. Confirm the participant meets federal exclusion criteria.
2. Obtain required documentation.
3. Document the exclusion period and justification.
4. Enter the exclusion into the reporting system.
5. Retain supporting documentation in the participant file.

Improper use of exclusions is prohibited.

23.9 Data Entry Timeline Standards

All reportable events must be entered:

- Within five (5) business days of documentation receipt
- Prior to quarterly reporting deadlines
- Without backdating or estimation

Failure to enter data timely may impact performance reporting accuracy.

23.10 Quarterly Internal Data Validation Review

At least quarterly, supervisory staff shall conduct internal data validation reviews which include:

- Random selection of participant files
- Comparison of reporting system entries to file documentation
- Recalculation of income or wage documentation when necessary
- Validation of MSG documentation
- Validation of credential documentation
- Validation of employment documentation

Findings must be documented.

Corrections must be made prior to official report submission.

23.11 Pre-Submission Performance Certification

Prior to submission of official quarterly or annual performance reports, the Program Manager shall conduct a final review of reported outcomes.

This review shall confirm:

- Measurable Skill Gains are supported by documentation
- Credentials meet federal definitions
- Employment outcomes are verified
- Wage data aligns with source documentation
- Exit dates are accurate

Upon completion of review, the Program Manager shall certify that reported data is supported by source documentation.

23.12 Performance Monitoring Dashboard Review

Quarterly performance review shall include:

- Measurable Skill Gain attainment rates
- Credential attainment rates
- Second Quarter Employment Rate
- Fourth Quarter Employment Rate
- Median earnings
- Youth performance indicators

Performance trends must be analyzed.

If performance falls below established targets:

- Root cause analysis must be conducted
- Corrective action plans must be developed
- Implementation must be monitored

23.13 Data Integrity and Fraud Safeguards

Staff shall not:

- Report outcomes without supporting documentation
- Backdate services or credentials
- Alter documentation
- Inflate performance numbers

Suspected falsification must be reported in accordance with organizational fraud reporting procedures.

Intentional misreporting may result in disciplinary action.

23.14 Corrective Action Procedure

If data validation reveals deficiencies:

1. Document the finding.
2. Correct the reporting system entry.
3. Notify the case manager responsible for the record.
4. Provide retraining when necessary.
5. Conduct follow-up review.

Repeated deficiencies may result in increased supervisory oversight.

23.15 Alignment with Fiscal Controls

Performance documentation must align with:

- Training expenditures
- Supportive service expenditures
- Employer reimbursement documentation

Unsupported outcomes may trigger fiscal review.

23.16 Official Reporting System Authority

All official performance reporting shall be derived from the designated state reporting system, the Virginia Workforce Connection (VaWC).

Data entered into the reporting system must reconcile with source documentation retained in participant files.

Internal spreadsheets or tracking tools may supplement internal management processes but shall not replace the official reporting system as the authoritative data source.

23.17 Performance Documentation Hierarchy

To ensure the accuracy and reliability of reported performance outcomes, the Workforce Development Board establishes the following documentation hierarchy for verifying participant outcomes.

Whenever possible, primary source documentation must be used to support reported outcomes. Secondary documentation may be used only when primary documentation is unavailable and must include written justification.

Primary Documentation (Preferred)

- State wage record data
- Official transcripts or registrar records
- Official credential certificates or licensing verification
- Training provider completion documentation
- Employer payroll records

Secondary Documentation (When Primary Is Not Available)

- Employer verification forms
- Pay stubs
- Offer letters
- Apprenticeship registration documentation
- Training provider verification letters

Supplemental Documentation (Limited Use)

- Participant self-attestation
- Case manager notes summarizing participant statements

Supplemental documentation may only be used when:

- Primary and secondary documentation are not reasonably available; and
- Written justification explaining the circumstances is included in the participant file.

Narrative case notes alone may not be used as the sole source of verification for measurable skill gains, credentials, employment outcomes, or wage information.

Supervisory review is required when secondary or supplemental documentation is used to support reportable outcomes.