SECTION 8 – PERFORMANCE, DATA REPORTING, AND ACCOUNTABILITY

8.1 Purpose

This section establishes uniform standards governing performance accountability, measurable skill gains, credential attainment, placement verification, data validation, and reporting integrity for all workforce programs administered or overseen by the New River/Mount Rogers Workforce Development Board.

The purpose of this section is to:

• Ensure performance outcomes are supported by documentation
• Maintain accuracy of reported data
• Protect against performance disallowance
• Align services with negotiated performance targets
• Demonstrate internal control over performance reporting
• Establish accountability for accurate reporting of program outcomes

Performance reporting must comply with federal regulations, grant-specific requirements, and guidance issued by Virginia Works.

8.2 Performance Accountability Framework

Programs shall align service delivery with applicable performance indicators established under federal law, grant agreements, or state guidance.

Performance indicators may include:

• Measurable Skill Gains (MSG)
• Credential Attainment
• Employment in the 2nd Quarter after Exit
• Employment in the 4th Quarter after Exit
• Median Earnings
• Effectiveness in Serving Employers
• Grant-specific performance measures

Where federal or state negotiated targets exist, program operations must align with achievement of those targets.

Program staff must ensure that services provided to participants support measurable progress toward these outcomes.

8.3 Measurable Skill Gains (MSG)

Measurable Skill Gains must be documented in accordance with federal definitions and applicable reporting guidance.

Allowable MSG types may include:

• Educational functioning level gain
• Secondary school diploma or equivalent attainment
• Postsecondary transcript progress
• Satisfactory progress toward training milestones
• Skills progression tied to occupational training

Each MSG reported must:

• Occur within the program year being reported
• Be supported by source documentation
• Be entered into the official reporting system in a timely manner
• Be verified during internal review

Unsupported MSG entries are prohibited.

8.4 Credential Attainment

Credentials reported must:

• Be industry-recognized or postsecondary-recognized
• Be aligned with the participant's training pathway
• Be supported by official documentation

Acceptable documentation may include:

• Credential certificates
• Official transcripts
• Licensing verification
• State registry confirmation

Credentials that do not meet federal definitions shall not be reported.

Copies of credential documentation must be retained in the participant file.

8.5 Placement Verification

Placement outcomes must be verified through acceptable documentation.

Primary source:

• State wage record data (where available)

Secondary or supplemental sources may include:

• Employer verification forms
• Pay stubs
• Offer letters
• Apprenticeship registration confirmation
• Postsecondary enrollment verification

Self-attestation may only be used when permitted under applicable federal or state guidance and must include written justification.

No placement outcome may be reported without supporting documentation.

8.6 Data Entry Timeliness

All performance data must be entered:

• Within required reporting timelines
• Consistent with case file documentation
• Without backdating
• Without unsupported assumptions

Delayed data entry that compromises reporting accuracy is prohibited.

8.7 Data Validation and Internal Controls

In accordance with 2 CFR §200.303, the Workforce Development Board shall maintain internal controls over performance reporting.

Internal controls shall include:

• Periodic participant file review
• Documentation verification prior to outcome entry
• Cross-check of system data with source documentation
• Supervisory review of high-impact outcomes
• Removal or correction of unsupported data

Performance data must be audit-ready at all times.

8.8 Data Integrity Standards

Data entered into official reporting systems must:

- Match case file documentation
- Reflect accurate service start and end dates
- Reflect accurate enrollment and exit dates
- Reflect accurate credential types
- Reflect accurate wage information

Data discrepancies must be corrected promptly once identified.

8.9 Global Exclusions (Where Applicable)

Where federal regulations permit global exclusions:

- Exclusions must be documented
- Supporting documentation must be retained
- Duration and justification must be recorded
- Exclusions must comply with applicable reporting rules

Improper use of exclusions is prohibited.

8.10 Staff Training and Accountability

Staff responsible for data entry and performance reporting shall:

- Receive training on performance indicator definitions
- Receive training on reporting timelines
- Understand documentation standards
- Understand consequences of inaccurate reporting

Submission of knowingly inaccurate or unsupported data is prohibited and may result in disciplinary action.

8.11 Monitoring and Performance Review

Supervisory staff shall conduct periodic performance reviews which may include:

- Review of MSG documentation
- Credential verification review
- Placement documentation review
- Cross-check of data systems with participant files
- Comparison of actual performance against negotiated targets

Findings shall be documented and corrective action implemented when necessary.

8.12 Corrective Action

Failure to comply with performance and data integrity standards may result in:

• Data correction
• Removal of unsupported outcomes
• Development of a corrective action plan
• Staff retraining
• Increased monitoring
• Referral under fraud reporting procedures, when warranted

8.13 Alignment with Financial Controls

Performance outcomes tied to financial expenditures must align with fiscal documentation.

Training expenditures, supportive services, incentives, and employer payments must correspond to documented services and participant outcomes.

Unsupported services or outcomes may result in disallowed costs or questioned expenditures during monitoring or audit.