Policy Letter #15

TO: **All Mid-Carolina Service Providers**

FROM: **Samantha Wullenwaber, Director**

SUBJECT: **Data Validation & Self-Attestation Policy**

PURPOSE

This policy defines data validation and provides guidance and procedures on the appropriate use of self-attestation to document eligibility for enrollment in Workforce Innovation and Opportunity Act (WIOA) programs administered within the Mid-Carolina Workforce Development Board (Mid-Carolina WDB) local area. The policy ensures that service providers obtain and maintain appropriate documentation verifying participant eligibility for all applicable criteria prior to enrollment in WIOA-funded programs.

BACKGROUND

WIOA requires that individuals receiving program services need to meet specific federal eligibility criteria prior to enrollment. Verification of eligibility **MUST** be supported by appropriate documentation maintained in the participant's file.

Data Validation is a series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data. The establishment of a shared data validation framework requires a consistent approach across programs to ensure that all program data is consistent and accurate.

The purposes of validation procedures are to:

- verify that the performance data being reported is valid, accurate, reliable, and comparable across programs;
- identify anomalies in the data and resolve issues that may cause inaccurate reporting;
- outline source documentation required for common data elements; and
- improve program performance accountability through the results of data validation efforts.

In certain circumstances, obtaining third-party documentation may be difficult or may impose an undue burden on the applicant. In such cases, self-attestation may be used as an allowable method to verify certain eligibility criteria when other documentation is not reasonably available.

Self-attestation, also referred to as a participant or applicant statement, occurs when a participant declares his or her status regarding a particular eligibility element and signs and dates a form verifying that statement. Self-attestation is intended to support access to services while maintaining program integrity and compliance with federal and state guidance.

ACTION

Mid-Carolina Local Area

Mid-Carolina WDB is aware that the Youth and Wagner-Peyser programs may have different

elements required compared to the Adult and Dislocated Worker programs and attention should be paid to ensure each program is validated according to its respective list of required elements.

All records will be retained as outlined in the Records Retention section.

Records Retention
All Data Validation records and documentation will be maintained in accordance with Federal records retention requirements, as given in 2 CFR 200.333:

> *Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient.*

Training
Mid-Carolina WDB will provide additional staff training, on at least an annual basis, on the importance of accurate data entry and allowable source documentation as given in WIOA and Wagner-Peyser Employment Act Participant Eligibility.

Eligibility Documentation Requirement
WIOA program services shall only be provided to eligible individuals, including youth, adults, and dislocated workers, who meet federal eligibility requirements prior to enrollment in WIOA programs. Each eligibility criterion applicable to the participant must be supported by appropriate verification documentation within the participant's file.

Definition of Self-Attestation
Self-attestation occurs when a participant or applicant identifies his or her status for a specific eligibility data element and certifies that information by signing and dating a statement verifying the accuracy of the information provided.

The key elements of self-attestation include:

1. The participant (or applicant) identifying his or her status for a permitted eligibility data element; and
2. The participant signing and dating a form attesting to the accuracy of the information provided, including a disclaimer acknowledging the self-identification.

Use of Self-Attestation for WIOA Title I Programs
For WIOA eligibility determinations, self-attestation may be used to verify certain eligibility barriers that may be difficult to document through third-party verification or where obtaining documentation may cause undue hardship for the applicant.

Adult & Dislocated Worker
Self-attestation may be used for Adult & Dislocated Worker eligibility barriers including, but not limited to:

- Employment or unemployment status
- Termination, layoff, or dislocation circumstances
- Homeless individual and/or housing instability

- Offender status

Youth
Self-attestation may be used for Youth eligibility barriers including, but not limited to:

- Homeless and/or runaway youth
- Offender status
- Pregnant or parenting youth
- Youth requiring additional assistance
- School dropout status

Self-attestation **MAY NOT** be used for the following:

- Verification of date of birth; or
- Verification of the basic skills deficient barrier; or
- Verification of income; or
  Income Eligibility Verification
  A participant may be determined eligible based on the Lower Living Standard Income Level (LLSIL) when bank statements verify that no income was received during the applicable eligibility period.

  The supporting documentation **MUST** include a comprehensive case note describing the verification process, identifying the documents reviewed, and clearly explaining the basis for the eligibility determination.

  For self-employed participants, staff must select "Quarterly Estimated Tax for Self-Employed Persons (Schedule C)" as the income-verification source in the case management system, as illustrated in the screenshot below. This selection is required to support accurate data entry and validation.
- Documentation related to family size factors used in determining low-income status, such as dependency status.

Exhaustion of Documentation Options
Applicants seeking enrollment in WIOA programs must make reasonable efforts to provide third-party verification documentation whenever possible. Service providers must ensure that all available options to obtain appropriate documentation have been explored prior to accepting self-attestation.

Self-attestation should only be used when obtaining documentation would create an undue burden or when documentation cannot reasonably be obtained.

Service Provider Responsibilities
Service providers must ensure that:

- Self-attestation is used only for allowable data elements.
- Self-attestation forms are properly signed and dated by the participant.
- Self-attestation documentation is maintained within the participant's case file.
- **A CASE NOTE IS ENTERED IN NCWORKS ONLINE EXPLAINING WHY SELF-ATTESTATION WAS ACCEPTED IN LIEU OF THIRD-PARTY VERIFICATION**.

Service providers should also periodically review participant documentation to ensure that self-attestation statements remain accurate and consistent with available supporting documentation.

Monitoring and Validation
The Mid-Carolina WDB will conduct periodic monitoring of participant files. Monitoring activities will incorporate random sampling methodologies to validate the accuracy and appropriate use of self-attestation documentation.

Monitoring reviews will ensure compliance with federal, state, and local policies governing eligibility documentation.

REFERENCES

TEGL 07-18, Change 1: Guidance for Validating Jointly Required Performance Data Submitted under WIOA
TEGL 23-19, Change 3: Guidance for Validating Required Performance Data Submitted by Grant Recipients of USDOL Workforce Programs
OG 16-2021, Change 6: Defining Data Validation Process and Procedures

ATTACHMENTS

Attachment A: Data Validation Process and Procedures
Attachment B: Participant Individual Record Layout (PIRL) Elements
Attachment C: Mid-Carolina Workforce Development Board AD & DW Self-Attestation Form
Attachment D: Mid-Carolina Workforce Development Board NEXTGEN Self-Attestation Form

CREATION DATE

July 2022

REVISION DATES

January 2024
December 2024
March 2026
September 2026