

JOHN HICKENLOOPER
Governor

ELLEN GOLOMBEK
Executive Director

WILLIAM B. DOWLING
Employment and Training Director

ELISE LOWE-VAUGHN
Workforce Programs, Policy and
Strategic Initiatives Director



DEPARTMENT OF LABOR AND EMPLOYMENT
WORKFORCE DEVELOPMENT PROGRAMS

633 17th Street, 7th Floor
Denver, Colorado 80202-3627

| |
|---|
| Category: WIA |
| Subject: Program Year 2013 (PY13) Data Validation Procedures |
| Source: Federal/State |
| Revise/ <u>Replace</u> : PGL#: 13-07-WIA |
| Contact: Workforce Development Programs Director |
| Distribution: Managers, Workforce Development Staff, Workforce Region Directors |
| Colorado One-Stop System Policy Guidance Letter#: 14-10-WIA |
| Date: December 8, 2014 |

Revisions from PGL 13-07-WIA are Yellow Highlighted

I. **REFERENCES:** Workforce Investment Act of 1998 Sections 136 and 185; 20 Code of Federal Regulations 667.300; TEGL 17-05 and TEGL 17-05 Change 2, *Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues*; TEGL 9-07, *Revised Incentive and Sanction Policy for WIA Title IB Programs*; TEGL 17-09, *Quarterly Submission of Workforce Investment Act Standardized Record Data (WIZARD)*; TEGL 28-11 and TEGL 28-11 Change 1, *Program Year 2011/Fiscal Year 2012 Performance Reporting and Data Validation Timelines*; TEGL 4-13, *Workforce Investment Act (WIA) Performance Reporting System*; TEGL 6-13 *Workforce Investment Act (WIA) Program Year (PY) 2012 Annual Report Narrative and*, PGL 12-06-WIA, *Guidance on Data Integrity and the Customer Participation Cycle for WIA and TAA Programs*

II. **PURPOSE:** To provide Workforce Development Regions with the Data Elements and Source Documentation Requirements for Program Year (PY) 2013 Data Element Validation of Workforce Investment Act (WIA) Title IB programs.

III. **BACKGROUND:** This Program Guidance Letter provides policy and procedures for implementing the Data Validation requirements for Program Year 2013 (July 1, 2013 – June 30, 2014). On September 10, 2014, USDOL issued Training and Employment Notice No. 6-14, *Program Year (PY) 2013/Fiscal Year (FY) 2014 Data Validation and Performance Reporting Requirements and Associated Timelines*. This notice impacts the state's Program Year 2013 WIA Annual Reporting and Data Element Validation requirements.

CDLE is now releasing the Data Elements and Source Documentation Requirements that will be used to perform Data Element Validation for Program Year 2013 (Attachment A).

NOTE: Data Element Validation is conducted to ensure that the data elements in participant records that are used to calculate aggregate reports are accurate. Data Element Validation

involves on-site reviews of a sample of participant records against source documentation to ensure compliance with federal definitions. The sample files are selected by the U.S. Department of Labor (USDOL) software from exiters reported on the PY13 WIA Annual Report. For this year, a combination of on-site and remote file reviews will be conducted between November 2014 and January 2015. Data Element Validation reports will be submitted to USDOL by CDLE on or before February 1, 2015.

IV. POLICY/ACTION: Data Element Validation file reviews will be conducted by CDLE's Data Validation team beginning in the month of November 2014. Regions will receive a schedule of on-site visits via email, and a list of files to be reviewed will be sent separately. To minimize travel time and costs, and ensure that deadlines are met, regions will have a five-day notice before the review to allow for the collection of case files at a central location within the regions. The Data Validation team may request that participant files be mailed or transported to a central location to facilitate the review.

NOTE: Each region must make internet access available for use by the Data Validation team during on-site reviews.

Once the Data Element Validation is completed in a region, the Data Validation team will provide feedback regarding the initial results. In addition, final results will be available after report data has been reviewed and submitted to USDOL by CDLE. This is anticipated during February 2015.

To assist the regions in understanding the Data Validation requirements, Attachment A: *Source Documentation Requirements for Program Year (PY) 2013 Workforce Investment Act (WIA) Data Elements Validation* lists the elements for PY13. The list provides the types of source documentation acceptable to validate required data elements. For the PY 13 data element validation, USDOL has reformatted the document guide to accommodate their Enterprise Data Reporting and Validation System (E-DRVS). Also there have been minor changes to some of the data elements definitions and coding. One new data element has been added and two have been deleted. The more significant changes are listed below:

- New addition: Special ETA Project ID for certain ETA special projects (VRAP, REUC, VRUC, and WOJT).
- Deleted: 1) Received Employment Services #345 for youth and 2) Received Additional Support for Youth Services #347 (mentoring (AM) or comprehensive counseling services (CS)).
- New termination codes were added to the Other Reasons for Exit #327 as follows: Other ETA Exclusions, TAA demonstration, WIA Youth excluded from performance measures.
- For youth, the data elements for Educational Achievement #344, Summer Employment Opportunities #346, Leadership Development #348 and Follow-Up #349 now require the most recent date of service rather than a Yes or No value. Note: for youth follow up, leadership development activities, adult mentoring and supportive services that are provided to youth participants as follow up services should not be recorded as such.
- For Type of Recognized Credential #619, a new code for Post Graduate Degree was added.

Program operators are encouraged to review Attachment B, Technical Assistance Notice (TAN) #06-3, revision #3, Avoiding Data Validation Errors, dated May 27, 2011 for further guidance on documentation standards and methods for avoiding the most common errors.

NOTE: TAN #06-3 will be subject to changes and/or additions based on the results of PY13 WIA Data Element Validation.

Attachment B: *WIA Data Validation Desk Aid* is offered as an additional tool to help staff meet source documentation requirements. The purpose is to provide case managers, intake specialists, and other program staff with a quick reference guide to ensure proper documentation of all elements that need to be validated. This is not meant to be an exhaustive list of the applicable documentation standards for each element. A full list is available in Attachment A of this PGL. The documentation guidelines provided in the desk aid are the most common items that are used to support each element. In instances where there may be a question as to whether an element can be documented with an item not listed on the desk aid, Attachment A should be considered the authoritative source.

For most items, more than one allowable documentation source is listed. Unless stated, only one choice is needed.

Where an element can be documented with case notes, the case note needs to meet the following criteria:

- Date should correspond with service provided.
- Case note should be explicit as to the service provided- e.g. "Completed IA with client today," "Provided client with LM information," "Discussed new job and provided VG on strategies for obtaining higher pay/additional hours."
- Case notes should be detailed as to the actions taken- e.g. "Verified enrollment in Cherry Creek High School with the administrative assistant Mary."
- Case manager's initial or name who obtained the information.

Note: Each region is encouraged to consult with their Regional Liaison when questions arise regarding data validation requirements. This is to ensure accurate reporting of eligibility, target group characteristics and barriers to employment, and to support the increased enrollment of these individuals as part of achieving local performance objectives.

V. IMPLEMENTATION DATE: Immediately upon receipt.

VI. INQUIRIES: If you have any questions regarding Data Element Validation procedures, please contact Rob Hanni at 303-318-8815 or rob.hanni@state.co.us.

Elise Lowe-Vaughn, Director
Workforce Programs, Policy, and Strategic Initiatives

ATTACHMENTS:

Attachment 1: Data Elements and Source Documentation Requirements for PY 13
Attachment 2: WIA Data Validation Desk Aid