COLORADO
Department of
Labor and Employment

CDLE

Workforce Development Programs
633 17th Street, Suite 700
Denver, CO 80202

Category/Subject: Program Year 2014 (PY14) Data Validation Procedures
Colorado Policy Guidance Letter#: MIS-2015-02 (prior #15-17-WIA)
Revise/Replace PGL#:   14-10-WIA
Date: November 30, 2015
Distribution: Managers, Workforce Development Staff, Local Workforce Area Directors

New and revised language is 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*; and, TEGL 6 -14, *Program Year (PY) 2013 / Fiscal Year (FY) 2014 Data Validation and Performance Reporting Requirements and Associated Timelines*, dated September 10, 2014.

II.   **PURPOSE:**
To provide Local Workforce Areas with the Data Elements and Source Documentation Requirements for Program Year (PY) 2014 Data Element Validation of Workforce Investment Act (WIA) Title IB programs.

III.   **BACKGROUND:**
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.* Since this TEGL has not been updated by USDOL for PY 14, this Program Guidance Letter will continue the policy and procedures for implementing the Data Validation requirements for Program Year 2014 (July 1, 2014 – June 30, 2015).

CDLE is now releasing the Data Elements and Source Documentation Requirements that will be used to perform Data Element Validation for Program Year 2014 (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 PY14 WIA Annual Report. For this year, a combination of on-site and remote file reviews will be conducted between November 2015 and January 2016. Data Element Validation reports will be submitted to USDOL by CDLE on or before February 1, 2016.

During the period of April 6 -10, 2015, the USDOL's Dallas Regional Office conducted a review on the state's program reporting and data validation processes. The review was very complimentary on the progress that the state and local areas have made since their last review in June 2010. USDOL was especially pleased with the declining error rates and stated, "It should be noted, however, that when reviewing error rates over time and since the prior review, error rates have precipitously dropped, which is commendable and demonstrative of the significant strides made at the state and local levels relative to ensuring the accuracy of critical data elements." Although we still have some error rates above the 5% threshold, they are trending downward and with continued focus and training, we are confident that we can achieve this goal. Furthermore, the collaboration between the local areas and the state in the development of the participant cycle and regular data validation training has been described by USDOL as a promising practice and model for other states. CDLE appreciates and commends the workforce areas on their diligent attention to data validation, which was evident in the successful USDOL review.

IV.   **POLICY/ACTION:**
Data Element Validation file reviews will be conducted by CDLE's Data Validation team beginning in the month of December 2015. Local areas 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, local areas will have a five-day notice before the review to allow for the collection of case files at a central location within the local area. 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 local area, 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 2016.

To assist the local areas 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 PY14. The list provides the types of source documentation acceptable to validate required data elements. No changes have occurred in this document.

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. This document has been revised to reflect minor changes to the data element reporting values and definitions as published in TEGL 6-14, to clarify source documentation requirements, and to list the new Data Element numbers for easy reference with the full

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:

- o Date should correspond with service provided.
- o 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."
- o Case notes should be detailed as to the actions taken- e.g. "Verified enrollment in Cherry Creek High School with the administrative assistant Mary."
- o Case manager's initial or name who obtained the information.

V.   **IMPLEMENTATION DATE:** Immediate.

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 A: Data Elements and Source Documentation Requirements for PY 13
Attachment B: WIA Data Validation Desk Aid