



Category/Subject: MIS - Program Year 2015 (PY15) Data Validation Procedures
Colorado Policy Guidance Letter#: MIS-2016-02
Revise/Replace PGL#: MIS-2015-02
Date: December 12, 2016
Distribution: CDLE Management/Finance, State/Local Workforce Directors & Staff, Partners

**I. REFERENCES:**

- Workforce Investment Act of 1998, Sections 136 and 185;
- TEGL 9-07, *Revised Incentive and Sanction Policy for WIA Title IB Programs*;
- TEGL 22-15, *Program Year (PY) 2015 / Fiscal Year (FY) 2016 and Program Year (PY) 2014 / Fiscal Year (FY) 2015 Data Validation and Performance Reporting Requirements and Associated Timelines*, dated May 12, 2016.

**II. PURPOSE:**

To provide Workforce Development Local Areas with the Data Elements and Source Documentation Requirements for Program Year (PY) 2015 Data Element Validation of Workforce Investment Act (WIA) Title IB programs.

**III. BACKGROUND:**

On May 12, 2016 USDOL issued TEGL 22-15, *Program Year (PY) 2015 / Fiscal Year (FY) 2016 and Program Year (PY) 2014 / Fiscal Year (FY) 2015 Data Validation and Performance Reporting Requirements and Associated Timelines*. This Program Guidance Letter will continue without change to the policy and procedures for implementing the Data Validation requirements for Program Year 2015 (July 1, 2015 – June 30, 2016). USDOL issued a new Source Documentation Requirements for PY 2014 and PY 2015 for WIA Data Elements Validation in TEGL 22-15. This Source Documentation Guide is not materially different than the previous one.

CDLE is now releasing the new Data Elements and Source Documentation Requirements that will be used to perform Data Element Validation for Program Year 2015 (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 PY15 WIA Annual Report. For this year, a combination of on-site and remote file reviews will be conducted between December 2016 and January 2017. Data Element Validation reports will be submitted to USDOL by CDLE on or before February 1, 2017.

#### IV. POLICY/ACTION:

Data Element Validation file reviews will be conducted by CDLE's Data Validation team beginning in the month of December 2016. 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.

**NOTE: Each local area 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 2017.

To assist the local areas in understanding the Data Validation requirements, **Attachment A: Source Documentation Requirements for Program Year (PY) 2014 and (PY) 15) Workforce Investment Act (WIA) Data Elements Validation** lists the elements for PY15. The list provides the types of source documentation acceptable to validate required data elements

**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.

**V. IMPLEMENTATION DATE:** Immediately upon receipt of this PGL

**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](mailto:rob.hanni@state.co.us).



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**ATTACHMENTS:**

A: Data Elements and Source Documentation Requirements for PY 14 and PY 15.

B: WIA Data Validation Desk Aid