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DEPARTMENT OF LABOR AND EMPLOYMENT

WORKFORCE DEVELOPMENT PROGRAMS

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TECHNICAL ASSISTANCE NOTICE: 06-3 (revision #3)
SUBJECT: Avoiding Data Element Validation Errors
DATE: May 27, 2011

Please Note: The following technical assistance notice should be viewed as an Official state communication from CDLE's Workforce Development Programs Office. The contents of this TAN may be incorporated into future PGLs on related subjects. All revisions to the TAN are yellow highlighted.

PURPOSE:

To provide updated guidance and technical assistance to Regions regarding documentation standards and methods for avoiding the most common Data Element Validation errors, and to provide the results of Data Element Validation (DEV) for PY09. During the PY09 DEV review (conducted between November 2010 and January 2011), CDLE noticed repeat misses of data elements that were identified in previous program years. It is expected that data elements failures covered in this TAN will decrease in frequency as older case records are cycled out of the review sample. New or updated information, based upon PY09 Data Validation findings, is highlighted in yellow and reflects a more intensive review process implemented as a result of the US Department of Labor Data Validation Review of Colorado practices conducted during the summer of 2010.

The most recent policy guidance on WIA Data Element Validation is PGL 09-17-WIA, Data Validation Procedures. Please review Attachment A of this PGL for detailed information on the definitions of all WIA data elements that are subject to validation, and comprehensive lists of acceptable forms of documentation. CDLE will issue new policy guidance each year. Regions need to review the guidance in this TAN and continue to implement appropriate quality control procedures to ensure a reduction in errors.

Attachment A of this TAN provides an "at-a-glance" resource with information on the most common data element errors for PY09.

Attachment B of this TAN provides statewide data on the frequency of errors for all WIA data elements with a PY09 failure rate of greater than 5%, plus the overall error rate for each WIA program.

(Note: Common data element errors from previous program years that occurred in PY09 at a rate of less than 5% have been moved to the end of this document and the attachment B lists.)

A. Veteran Status (Element 12)

The US Department of Labor requires that veteran status be documented by a copy of the DD 214 in the case file or a cross match with a veterans data base (which is not done in Colorado). See TAN 06 - 1, dated January 16, 2006, for more detailed information on meeting this requirement.

B. Employment Status (Element 16)

A participant's Employment Status at Participation impacts WIA common measures performance, because one's status results in either inclusion or exclusion from the Adult and Dislocated Worker Entered Employment measure and the Youth Placement measure. The only acceptable forms of documentation for this element are (1) pay stubs or (2) case notes showing information collected from participant. If an applicant self-reports that they are employed at the time of intake on their WIA application, this should be noted in the case notes to avoid a data validation failure.

C. TANF (Element 21)

The US Department of Labor requires TANF status to be documented when marked "yes" on the WIA application. Self-attestation alone will not meet validation requirements. A copy of the TANF public assistance records or Colorado Benefits Management System (CBMS) printout showing TANF eligibility must be placed in the client file.

D. Other Public Assistance (Element 22)

US Department of Labor requires Other Public Assistance Recipient status to be documented when marked "yes" on the WIA application. Self-attestation alone will not meet validation requirements. A copy of authorization to receive cash public assistance, a copy of public assistance check, medical record showing cash grant status, refugee assistance records, or cross match with public assistance database print-out, obtained through CBMS, must be placed in the client file.

E. Dislocation Date (Element 25)

In a number of instances, the Connecting Colorado date of dislocation for a Dislocated Worker did not match the documentation in the case file. When documenting the last day of employment for the job of dislocation, WIA staff should ensure that the date entered into the Connecting Colorado record matches the date on the supporting document in the case file.

F. Homeless Runaway Indicator (Element 26)

US Department of Labor requires homeless and runaway individuals to document their status through a letter from a person or organization providing them residence or through a signed and dated self-attestation.

G. Program Participation Date (Element 34)

The program participation date must match the date on which the client began receiving his/her first service funded by the program following a determination of eligibility. There were many instances in which no actual service occurred on this date, including some where this was a purely administrative action done by the case manager alone. The date of enrollment should be the date of the first service. Services and dates should be well documented in case notes and on forms, if applicable.

H. Program Exit Date (Element 35)

Most files used the method of "hard exits" to terminate their clients from the program. This is not an acceptable practice. Clients should be exited using a "soft exit" approach. After a period of 90 days of not receiving a service by the program, the date of exit is applied retroactively to the date that the last service funded by the program was provided. For more information on soft and hard exits please refer to USDOL Training and Employment Guidance Letter (TEGL) 17-05, *Common*

I. First Youth Service Date (Element 38)

In a number of instances, the date indicated in documentation in the case file and the case notes was inconsistent with the date reported in Connecting Colorado. The date in Connecting Colorado must match the actual date on which the service was provided. Additionally, the date of enrollment must match this date.

J. Other Exit Reasons (Element 61)

Some cases failed to document or support the other reasons for exit. This needs to be supported through either case notes or through information from an institution or facility as appropriate per case.

K. First Core Service Date (Element 66)

In many cases, the first core service date was entered into Connecting Colorado on a different day than the actual service occurred. Services needed to be accurately dated in Connecting Colorado and should be well-documented with explicit case notes stating the service provided and forms in the file where applicable.

L. First Intensive Service Date (Element 68)

As with the first core service date, the date of the first intensive service was entered into Connecting Colorado on a different day than the actual service occurred. Services need to be accurately dated in Connecting Colorado and should be well-documented with explicit case notes stating the service provided and forms in the file where applicable.

M. Date Enter Training (Element 69)

The Date Entered Training is reported from the start date of the training service recorded in Connecting Colorado. In several instances, the date recorded by the caseworker did not match the source documentation in the client file. Caseworkers are reminded to cross match this element between the dates of service and vendor training information or vendor training documentation.

N. Date Exit Training (Element 70)

In many cases, the Date Completed or Withdrew from Training did not match the source documentation in the client file. A record with a training service closed on a certain date must be consistent with the dates of service and vendor training information or vendor training documentation.

O. Enrolled in Education (Element 77)

Reporting a Youth participant as Enrolled in Education impacts the Degree/Certificate Attainment performance measure (see PGL08-16-WIA, Attachment A for detailed information on Connecting Colorado reporting for this element). The only acceptable forms of documentation for this element are (1) Applicable records from education institution certifying enrollment or (2) case notes with verification from education institution or training provider that the individual is enrolled in education.

P. Employment Services (Element 79)

Employment Services must be validated when employment-related services are entered into Connecting Colorado. The case manager must document these services through forms, internal or external, placed in the file or through case notes. A

number of files had an LM entered into Connecting Colorado but no documentation, which can be done with a case note showing that the labor market information was provided to the client.

Q. Summer Employment (Element 80)

These items failed this year because Work Experiences did not match summer dates. Work Experiences, either WE or WU services, that take place between May, 1 and September 30 need to be documented with activity sheets, sign-in sheets, attendance records or case notes.

R. Additional Support (Element 81)

A counseling service (CS) was often used to denote everyday case management activities and not comprehensive counseling, as is the US Department of Labor's intent for this category. Counseling (CS) should only be used to mark comprehensive counseling such as adult mentoring of at least 12 months, drug and alcohol abuse counseling, or referrals to an appropriate service. The AD service may be utilized for documenting case management activities that do not result in a service provided to the client.

S. Leadership Development (Element 82)

Leadership Development is required to be validated when the LD service is entered in Connecting Colorado. In many of these circumstances, there was a lack of documentation to support this code or there was evidence that the youth did not attend the program as expected and the LD was still in the services on Connecting Colorado.

T. Follow Up Services (Element 83)

US Department of Labor requires that follow up services consist of actual services and not administrative contacts or attempted contacts. Follow up notes should describe what services were provided.

U. Type of Recognized Credential (Element 102)

In many cases, the education attainment code entered in Connecting Colorado did not match the specific type of credential contained in the client case file. WIA staff should make sure that the code used in Connecting Colorado accurately reflects the credential achieved by the WIA client.

V. Youth Goals Set and Attained (Elements 103-150)

In many cases the youth goals were not documented within the case file or in the case notes. At times, the dates entered into Connecting Colorado were not consistent with the dates documented on ISS forms or in case notes. Goal attainment and attainment dates were also inconsistent or lacking documentation. The dates need to be accurately documented and entered.

W. Attained Diploma, GED, or Certificate (Element 151)

The Type of Recognized Credential (Element 102) should not be confused with the Attained Diploma, GED or Certificate (Element 151). In a number of instances, the caseworker did not obtain a copy of the diploma, GED, or certificate for inclusion in the client case file. US Department of Labor requires a copy of transcripts, certificates, diploma, or a letter from the school system to support this element.

X. Date Degree Certificate (Element 152)

When documenting the date of High School or GED attainment, the date of attainment entered in Connecting Colorado should match the date on the diploma or equivalency certificate, or any relevant document signed by an official of the awarding authority; or the date of notification of passing scores on a GED report of scores. The date the caseworker learned of the High School/GED attainment is not acceptable.

Y. School Status at Exit (Element 153)

This element failed due to a lack of acceptable documentation. The only acceptable forms of documentation for this element are: Transcripts, certificates, diploma, letter or documentation from school system, or case notes.

Z. Youth Placement Information (Element 154)

This element failed due to a lack of acceptable documentation. The only acceptable forms of documentation for this element are: a documented cross-match with other agencies, apprenticeship verification, documentation of military service, advanced training, or post secondary education, transcripts, registration forms, community college info, employer contacts, U.I. wage records, Wage Record Interchange System records, or case notes.

AA. Literacy and Numeracy Testing (Elements 156-164)

Missing test results, or test information incorrectly entered into Connecting Colorado, impacts numerous data elements related to literacy/Numeracy testing. The date of the test, the test score, and the educational level must match the documentation on file. Case managers must keep a copy of the test scoring sheet that shows the date of the test, total score and grade levels in the case file. Case notes should also detail the participant's progress.

Common data element errors from previous program years that occurred in PY09 at a rate of less than 5%:

A. Date of Birth (Element 3)

In most instances the birth date was identified as a Data Element Validation error due to the birth day coming from the Unemployment Insurance database to the main page of new Connecting Colorado applicant records as the first of the month. This requires workforce center staff to enter the correct date manually, so that the birth date in the Connecting Colorado record matches the documentation in the client case file.

B. Low Income (Element 20)

USDOL requires that low income Adult participants be reported as such even though income level is not always an eligibility factor (as with "priority of service"). Regions should ensure that individual and family income reported on the WIA application is accurately entered into Connecting Colorado, because this data element is subject to validation. When entering income information into Connecting Colorado, always ensure that family income is not less than individual income (e.g. Family Size = 1; Individual Income = \$10,000; family income must be at least \$10,000).

C. Offender (Element 27)

Although Offender status may be documented through self-attestation, this data element often became a Data Element Validation error because of the failure to enter Offender status into Connecting Colorado. Case managers need to be aware that

when Offender is marked “yes” on the WIA application, in the client case file, it must also be entered into Connecting Colorado on the WIA enrollment screen.

The accuracy and reliability of data element validation reports are fundamental elements of good public administration. Additional information on program monitoring and improving program results and be found at:

http://www.doleta.gov/performance/reporting/tools_datavalidation.cfm

For additional assistance on Data Element Validation, please contact your State Workforce **Program Monitor** at Workforce Development Programs.