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Category: WIA
Subject: PY11 Data Validation Procedures
Source:
Revise/Replace: PGL#: 11-16-WIA
Contact: Workforce Development Programs Director
Distribution: Managers, Workforce Development Staff, Workforce Region Directors
Colorado One-Stop System Policy Guidance Letter#: 12-10-WIA
Date: 11/02/2012

I. REFERENCES: Workforce Investment Act of 1998 Sections 136 and 185; 20 Code of Federal Regulations 667.300; TEGL No. 17-05 and TEGL No. 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 WIA Standardized Record Data (WIASRD)*; TEGL 7-11, *WIA Annual Report Narrative*; TEGL 28-11, *Program Year 2011/Fiscal Year 2012 Performance Reporting and Data Validation Timelines*; 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 revised Data Elements and Source Documentation Requirements for Program Year (PY) 2011 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 2011 (July 1, 2011 – June 30, 2012). On May 9, 2012, USDOL issued TEGL No. 28-11, *Program Year 2011/Fiscal Year 2012 Performance Reporting and Data Validation Timelines*. This notice impacts the state's Program Year 2011 WIA Annual Reporting and Data Element Validation requirements.

CDLE is now releasing the revised Data Elements and Source Documentation Requirements that will be used to perform Data Element Validation for Program Year 2011 (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 PY11 WIA Annual Report. For this year, on-site file reviews will be conducted between November 2012 and January 2013. Data Element Validation reports will be submitted to USDOL by CDLE on or before February 1, 2013.

IV. POLICY/ACTION: Data Element Validation file reviews will be conducted by CDLE's Data Validation team beginning in the month of November 2012. 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 to a central location to facilitate the review.

NOTE: Each region must make available a minimum of two computers with Connecting Colorado access 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 2013.

To assist the regions in understanding the Data Validation requirements, Attachment A: *Data Elements and Source Documentation Requirements* lists the revised elements for PY2011. The list provides the types of source documentation acceptable to validate key data elements. Program operators are encouraged to review 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 PY11 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.”

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, Acting Director
Workforce Development Programs

ATTACHMENTS:

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