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DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS**

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WIA BULLETIN NO. 09-09

TO: WIA Partners

SUBJECT: WIA Data Validation Policies and Procedures

PURPOSE

The purpose of this Bulletin is to transmit policy and procedures for WIA data validation.

BACKGROUND

The U.S. Department of Labor, Employment and Training Administration (ETA), requires states to conduct annual validation of data submissions for federally-funded employment and training programs, including the Workforce Investment Act (WIA) programs. The intent of the validation is to ensure the accuracy of information collected and reported on program activities and program outcomes.

For WIA, the ETA requires a data validation review to be conducted of all Title IB programs, including the Adult, Dislocated Worker, National Emergency Grant (NEG), and Youth programs. The data validation process involves the examination of a random sample of participant records by an external reviewer/data validator to confirm approximately 25 to 75 different data elements per participant record selected. States are required to use federal software to extract the sample for each program. Samples are drawn from exiters in each program for the preceding Program Year.

In Hawaii, WDD Administration uses the federal software to extract samples from **HireNet Hawaii** for the data validation review. WDD Administration conducts the review by determining whether hard copy source documents match or support the sample data. Three broad categories of data are reviewed:

- Eligibility/Intake,
- Participant Activities, and
- Exit/Post Program.

While Counties have been responsible for ensuring that data entered into HireNet Hawaii are accurate and valid, U.S. Department of Labor recommended that the state issue policy to clarify data validation requirements and insure consistency among local areas. This Bulletin is the result of that recommendation, and its initial development was in consultation with U.S. Department of Labor.

A draft of these policies was sent to the counties for review and comments on 1/11/08 and 11/28/08. Staff members of the various counties were briefed on the validation process and received training in the procedures to be utilized in the review. The validation for PY 2007 utilized the same policies and procedures as the prior year. Additionally, suggestions from counties and members of the validation teams were considered in the development of the framework and guidelines detailed in this bulletin.

POLICY

Counties are responsible to ensure the following

1. Data entry into HireNet is **accurate** and **timely**;
2. Acceptable source documents in **hard copy** are retained in each participant's folder to substantiate every data element required to be validated. For data validation purposes, HireNet Hawaii data, such as an Individual Employment Plan showing enrollment dates and WIA activities, are not appropriate source documents. Instead, hard copies of these forms shall be retained in each participant file for data validation.
3. **The source document used to support each required element is acceptable for that element, as listed and described in Data Validation Elements and Source List, Enclosure 1, except as described in 4.c. below.**
4. The source document matches or supports the data element.
 - a. Whenever "match" is indicated in the Data Validation Element and Source List, the element must **exactly match** data generated for the sample. For example, if the sample identifies a participant's date of birth as July 1, 1958, the date on the source document (birth certificate, driver's license, etc.) must also be July 1, 1958.
 - b. Whenever "support" is indicated in the Data Validation Element and Source List, the source document must **support** the data element identified in the sample. For example, if a participant is identified as being Basic Skills Deficient, source documents, e.g., assessment tests or school records, must support this information.

- c. In a few cases, state and local sources listed may not be acceptable documentation for a data element. For example, state or local public assistance records usually contain individual identifiers, such as social security numbers, that are acceptable source documents to validate individual identifiers. However, some state or local public assistance records may *not* have individual identifying information. In these cases, these documents are *not* acceptable source documents for individual identifiers.

On the other hand, a document not listed in the Data Validation Elements and Source List, *may* be an acceptable source because it may have the information necessary to validate the data element.

- 5. If multiple sources are listed for the same data element and the sources conflict, the **most reliable source is used** to determine if the element passes or fails. For example, for Education Status at Participation (DRVS Field# 16), copies of records from an educational institution are a more reliable source than participant self-attestation.
- 6. If using any of the following source documents, it must fully comply with the requirements set forth below:
 - a. Cross-Match: A cross-match requires staff to find detailed supporting evidence for the data element from another database. An indicator or presence of an SSN in a non-WIA database is not sufficient evidence. For example, TANF participation can be determined by a cross-match with the state's public assistance database. It is not sufficient to find that the sampled SSN is present in the public assistance database; staff must also find dates of participation and services rendered.
 - b. State MIS: Unless otherwise noted, state MIS refers to specific, detailed information that is stored in HireNet. An indicator, such as a checkmark on a computer screen, alone is not acceptable source documentation. For example, a state MIS usually contains date of first training service. However, to be an acceptable source to validate date of first training service, in addition to the date of first training, detailed information about the type of training and the organization that provided the training should be available in HireNet. State MIS sheets are required in all files and should be located at the very front of the Eligibility/Intake section of each folder.
 - c. Self-Attestation: Self-attestation occurs when a participant states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status. The key elements for self-attestation are: (a) the participant identifying his or her

status for permitted elements and (b) the participant signing and dating a form attesting to this self-identification. The form and signature can be on paper or in the state management information system, with an online signature.

- d. Case Notes: Case notes refer to either paper or online statements by the case manager.
7. Staff members are encouraged to familiarize themselves with the Data Elements and Source Documentation Requirements Guide and Label Templates for Data Element Validation. They should also be familiar with the Label Templates used for Data Validation, so as to properly label and highlight all pertinent pieces of documentation. It is the county's responsibility to ensure that all staff members are familiar with the process and to periodically hold validation briefings for staff members, especially after new employees are hired.
8. Each County and WIA Provider is encouraged to conduct periodic pre-validation reviews of a sample of files in their possession throughout each program year. The purpose of this review is to ensure that each staff is properly maintaining files and labeling documents according to established procedure.

PROCEDURES

1. Uniform Filing of Participant Records

Counties shall ensure each program operator files their participant records in a consistent manner throughout their local area. A standardized filing system would expedite the data validation review and facilitate coordination and continuity of service delivery within programs on each county.

In the event Counties would like to consider other filing systems, Enclosures 4 and 5 provide North Carolina's system. Their system is provided as a resource and not as a directive. However, each county should establish consistency within each program operator.

2. Counties shall use labels as described below to clearly identify source documents and the data elements validated by the documents:
 - a. Print templates of label codes and data validation elements found in Enclosure No. 2 on yellow self-adhesive labels.
 - b. Apply these self-adhesive labels at the bottom right corner of **each source document**. If there are multiple labels for a particular source document, apply labels next to each other at the bottom without covering important information.

- c. **On each source document, highlight each data element being validated in yellow.**
- d. If a source document validates more than one element, handwrite in ink the applicable label code next to each element. Label codes consist of codes for program, category, and number as follows:

Program

- A = Aadult
- DW = Dislocated Worker
- OY = Older Youth
- YY = Younger Youth
- NG = National Emergency Grant

Category

- E = Eligibility/Intake/Application
- A = Employment Activities
- XP = Exit and Post-Program Activities

Number

- U.S. Department of Labor's reference number for each data element found in the first column, Hawaii Data Validation Elements and Source List, Enclosure 1.

Example

Code AE2 represents the following: A = Adult program participant, E = Eligibility/Intake/Application, 2 = date of birth data validation element.

- e. **Source documents lacking proper labeling will not be considered as acceptable documents in the state's data validation review.**
- f. Labels should be applied to all forms and documents when these forms are received. Doing so will help ensure that all relevant documentation is present and marked in each file.
3. Data Element Validation Checklists

Counties are responsible to complete a Data Element Validation Checklist for each participant whose file was selected in the sample for the state's data validation review. A separate Checklist for each program is provided in Enclosures 3A to E. The completed checklist should be retained at the top of documents in the participant file.

Enter the following codes in the Checklist for each data element:

- Checkmark (✓) – if it is a match or support.
- N/A – if the element does not need to be validated.
- “No” – if the element is required to be validated, but the source document is not obtained. Provide an explanation in the Comments column.

4. Scoring

Each data element that is required to be validated and that is supported or matched by acceptable documentation is scored as a “pass”. Conversely, any data element that is required to be validated and that is *not* supported or matched by acceptable documentation, or is *inconsistent* with other documents, is scored as a “fail.” Thus, data elements lacking properly labeled source documents will be scored as “fail”, even if the documents are in file.

5. Interaction with Staff During the Validation Process

County and WIA Provider staff members are not allowed to make corrections relating to data validation throughout the review process. Prohibited activities include adding labels, relabeling documents, and altering data in the file. If a document cannot be found, staff members will be given an opportunity to locate an alternate document for data validation while in the presence of a validation team member. Files are not to be removed from the specified validation area.

6. Decisions on the Use of Questionable Source Documents for Validation

In cases when it is unclear whether or not a certain source document fulfills the requirements for validation, the validation team leader, in consultation with team members, decides whether a particular document is acceptable for a positive data validation.

7. Data Validation Report

A report conveying the results of the data validation will be provided to each county for review.

TIMELINE


It is anticipated that the timeline for data validation generally will be as follows, subject to changes in federal requirements or deadlines:

- October 15: DD Administration extracts samples of exiters from preceding program year and provides lists of participants from each program to Counties.

- November 1 WDD Administration begins data validation review.
- January 29: WDD Administration completes data validation review.
- January 30: WDD Administration submits data validation results to U.S.
Department of Labor

INQUIRIES

Questions regarding this bulletin should be directed to Ms. Rae Ordinado, Workforce Development Division, at (808) 586-9057.



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ENCLOSURES AVAILABLE UPON REQUEST.