



2021 Summer Conversation Series: Data Validation Summit

July 14, 2021

Welcome from the OPDR Division of Performance!



Data Validation Summit Agenda

- ✓ Welcome and Introductions
- ✓ Networking Activity
- ✓ Data Validation Policy and Guidance in Action
- ✓ Data Validation Monitoring Panel
- ✓ Open Discussion Forum
- ✓ Next Steps



Let's Network



Aliens Have Landed!



Visitors from the planet
Xyqun'drakiltz IV have
arrived on Earth!

They are friendly and curious.

They especially want to learn
about data validation.

However...

Aliens Have Landed!



Being from a distant star
system...

They don't speak or read English!

Or any other Earth language!

How you can help them learn...

Aliens Have Landed!



Using only images (pictures, GIFs, emoji, etc.), describe what data validation means to you.

Put your responses in the “Aliens Have Landed!”

Mural at
<https://bit.ly/3yVbbPB>.

Data Validation Policy & Guidance in Action



Data Validation Policy and Guidance in Action Agenda

- ✓ Requirements Refresher
- ✓ Clarifications
- ✓ Questions and Scenarios
- ✓ Next Steps
- ✓ Resources



Policy & Guidance in Action Moderator



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Policy & Guidance in Action Presenters



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Policy & Guidance in Action Presenters (1)



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Policy & Guidance in Action Presenters (2)



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U.S. Department of Labor,
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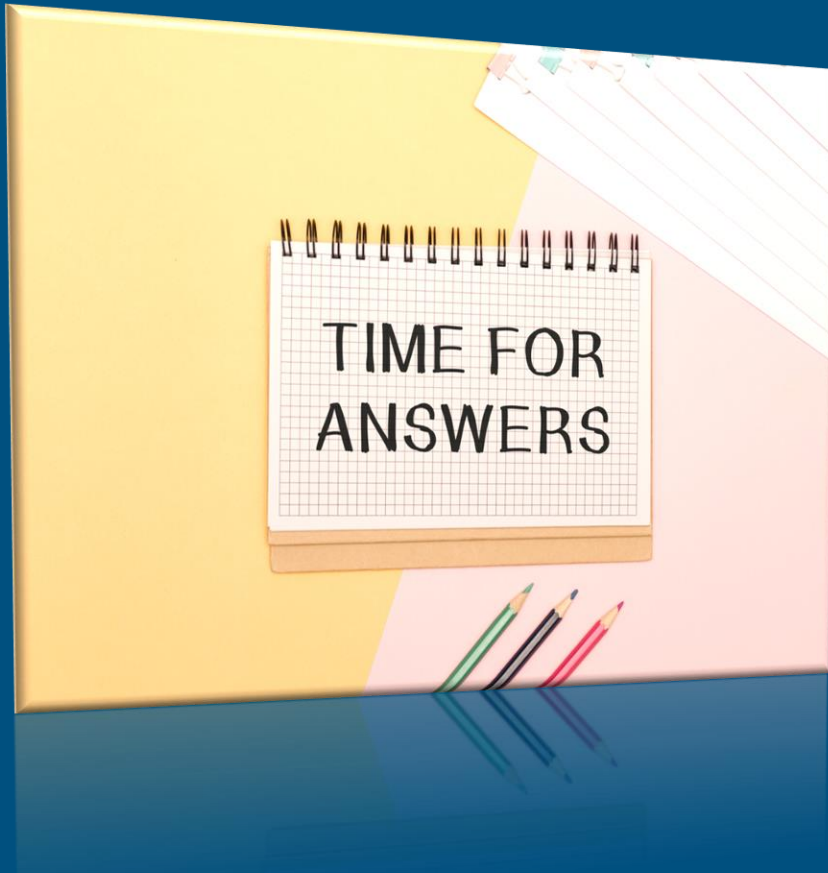
MYTHS VS FACTS

Data Validation Myths

Myth or Fact?

1. State data validation monitoring must be conducted concurrently with program monitoring.
2. States have to have a DD-214 on file to serve a veteran.
3. Using self-attestation for every element is a best practice.
4. Federal record retention requirements do not apply to data element validation.
5. The State must have a data validation policy.

Data Validation Myths vs. Facts: Answers



1. **State data validation monitoring must be conducted concurrently with program monitoring.**

MYTH: There is no requirement for these two different types of monitoring to be done together — but you CAN!

2. **States have to have a DD-214 on file to serve a veteran.**

MYTH: Follow program eligibility requirements.

3. **Using self-attestation for every element is a best practice.**

MYTH: This strategy puts the State at risk — even OIG says so!

4. **Federal record retention requirements do not apply to data validation.**

MYTH: Sorry, you DO have to hold onto those records for at least 3 years from the last action.

5. **The State must have a data validation policy.**

FACT: Really, it's TRUE! Yes, you must have a policy.

Requirements Refresh

WIOA section 116(d)(5)

▶ Joint Training and Employment
Guidance (TEGL) 7-18

DOL Only Data Validation Guidance TEGL
23-19

TEGL 5-18 State Performance Narrative

▶ Quarterly Report Analysis (DOL tool)

Refresher: ETA's Data Integrity Approach

WIPS

Report validation—WIPS calculates state performance reports to ensure standardized application of formula calculations

Valid value edit checks that ensure data are submitted according to the PIRL

Logical validations enforce consistency across PIRL elements

Data Validation Guidance

Establish state data validation policy requirements

Set monitoring and technical assistance expectations

Set state data element validation and supporting documentation requirements

Quarterly Report Analysis

Communicates data expectations where logical validations cannot be applied

Presents data graphically

Tracks data quality and progress over time

Clarifications

“What did you mean?”



DV for Veterans Data and Jobs for Veterans State Grants (JVSG)

- ▶ New Desk Reference on GPS covers DV issues relating to veterans
- ▶ Covers topics relevant to all employment and training programs + JVSG specific topics



DV Topics for Veterans Data (1)

- ▶ Eligibility requirements vs. Data Validation requirements
 - While often overlapping, not always 100% the same
- ▶ Veterans Priority of Service impact on DV requirements
 - For most programs, VPOS is the trigger for DV requirements on PIRL 301
 - Reminder: VPOS occurs at the point at which a decision is made to commit financial resources for such programs/services to one individual over another.
- ▶ Can we serve veterans without a DD-214?
 - YES!

DV Topics for Veterans Data (2)

Reporting and Documenting PIRL 301

- Reminder: Source Documentation is not optional, but for certain elements, like PIRL 301, it may not be required for all participants
- Only one type of source document is required, and may include:
 - DD-214,
 - Cross-Match with Department of Defense Records,
 - Cross-Match with Veterans Service Database, or
 - Letter from the Department of Veterans' Affairs

DV Requirements in JVSG

- Self Attestation of veteran status is sufficient for JVSG enrollment, must obtain source documentation once priority of service is given (the point at which a decision is made to commit financial resources for such programs/services to one individual over another).
- JVSG grantees are encouraged to implement the DV framework in TEGL 23-19 section 4.B., including establishing a DV policy that involves regular quarterly reviews.

Future Updates to DV Requirements

- DOL is considering options for expanding the list of allowable source documentation for veteran status.

WIOA Title I Youth:

*What documentation
do I need for the Youth
program?*



WIOA Title I Youth

- ▶ To ensure equity in access to the WIOA Youth program, eligibility documentation should not be a barrier to enrolling youth
- ▶ Self-attestation is allowable as the source documentation for many WIOA Youth program eligibility data elements including the following:
 - ▶ School status
 - ▶ individual with a disability
 - ▶ pregnant or parenting
 - ▶ youth who needs additional assistance
 - ▶ foster care youth
 - ▶ homeless
 - ▶ ex-offender
 - ▶ English language learner
 - ▶ low income

QUIZ TIME

Data Validation Quiz Show! (1)

True or False?

1. States need to maintain a hard copy of all source documentation.
2. DOL gives states a sampling methodology.
3. Data Validation is only required before the annual report is submitted.
4. States have to collect all of the source documentation options for Youth program participants.
5. States submit their data validation element methodology in WIPS.

Data Validation Quiz Show! (2)

True or False Answers

1. States need to maintain a hard copy of all source documentation.

FALSE: Electronic records are acceptable. You CAN keep paper copies but consider all those the trees.

2. DOL gives states a sampling methodology.

FALSE: However, it is true that DOL recommends states use a statistical sampling methodology.

3. Data Validation is only required prior to submission of the annual report.

TRUE: DOL recommends validating data quarterly, but requires validation prior to the submission of the Annual Report.

4. States have to collect all the source documentation options for the Youth program.

FALSE.

5. States submit their data validation methodology in WIPS.

FALSE: States should report their data validation methodology in the Annual Report Narrative. And YES, we do read the reports.

Frequently Asked Questions & Scenarios





Question (1)

Is a post program survey a form of self-attestation? Does a post program survey need to be signed and dated by the participant to be considered valid?



Answer (1)

- ▶ Signed: A follow-up survey must be signed by the program participant to be considered valid.
- ▶ E-signature: Electronic signatures or submissions from the participant such as email, text, or unique online survey responses.
- ▶ Time period: The document must indicate the wages for the time period being referenced.



Question (2)

Can states add other source documentation items to the list that DOL has in the TEGL? Occasionally a local area may have documentation that is frequently available in their local area but is not on the DOL list.



Answer (2)

Tip: Local documents probably fit under one of the source documentation options.

States
May:

Reduce the list of allowable federal source documentation,

Add additional specifications to the existing requirements, and/or clarify which state or local documentation meets the federal standards.

They
May
Not:

Make substitutions for the approved source documentation list.

Expand the federal list of allowable source documents.



Question (3)

Element #1813 Date Completed, During Program Participation, an Education or Training Program Leading to a Recognized Postsecondary Credential or Employment (WIOA) – source documentation signed follow-up survey response from program participant.

Is the survey response to be signed by staff or the participant?



Answer (3)

- ▶ The follow-up survey must be signed by the program participant.
- ▶ Electronic signatures are acceptable.





Question (4)

Electronic records.

Currently we have chosen not to use electronic records for almost all elements where they are allowable because of the electronic records definition.

Please provide examples of how to use electronic records for the elements.



Answer (4)

► Electronic Records are:

“participant records created, stored or transferred in a form that only a computer can process and maintained in the State's management information system. Records can be numeric, graphic, or text. They can also include magnetic storage media such as tapes or disks.”

► Official records can be scanned documents, uploaded documents or image files, electronic signatures etc.



Example: Element 200 Date of Birth

Allows one of the following source documentation:

- ▶ Driver's License
- ▶ Baptismal Record
- ▶ Birth Certificate
- ▶ DD-214
- ▶ Report of Transfer or Discharge Paper
- ▶ Federal, State or Local Identification Card
- ▶ Passport
- ▶ Hospital Record of Birth
- ▶ Public Assistance/Social Service Records
- ▶ School Records or ID Cards
- ▶ Work Permit
- ▶ Family Bible

Example (1)



A participant presents a work permit for date of birth.



Case manager uploads the image into the case management system.



Question (5)

Cross-Match.

Discuss how to use cross-match to document specific PIRL elements.



Answer (5)

“A cross-match requires validators to find detailed supporting evidence for the data element in a database. An indicator or presence of a Social Security Number (SSN) in an administrative non-WIOA database, i.e., a database not maintained by a WIOA core program such as data from the State’s Department of Motor Vehicles, is not sufficient evidence for a cross-match. State validators must also confirm supporting information such as dates of participation and services rendered. States must have data sharing agreements in place as appropriate.”

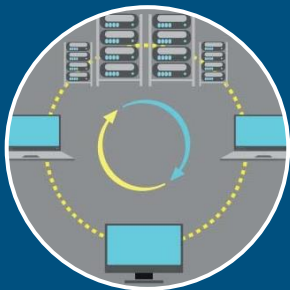
Example (2)



Participant reports receiving state benefits for low income residents



State data sharing agreement with state benefit system



Workforce system communicates with state benefit system

- Confirms participation
- Start and End dates
- Documents in case management system

Next Steps (1)

TEGL 23-19, Change 1

- ▶ Updates
- ▶ Data Validation for Apprenticeship



WHAT'S
NEXT?

What's Next?: Data Validation & Apprenticeship

The Office of Apprenticeship is currently considering source documentation for Grantees who use the PIRL (ETA 9172) to report individual record data for performance outcomes.

The Office of Apprenticeship does not have specific policy guidance at this time. Currently grantees appear to be using the ETA 671 as source documentation. We are exploring its efficacy, and also that of the Davis-Bacon Apprenticeship Certification.

- Apprenticeship State Expansion (ASE) Grants
- State Apprenticeship Expansion (SAE20) Grants
- Youth Apprenticeship Readiness Grants (YARG)
- State Apprenticeship Expansion, Equity, and Innovation Grants (SAEEI)

Resources (1)

- ▶ Training and Employment Guidance Letter 7-18
Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA) published December 19, 2018
https://wdr.doleta.gov/directives/corr_doc.cfm?docn=4255
- ▶ Training and Employment Guidance Letter 23-19
Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs published June 18, 2020
https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=9155
- ▶ DOL Performance Website
Data Integrity Resources
www.dol.gov/agencies/eta/performance/reporting/data-integrity
- ▶ FAQs: https://www.dol.gov/agencies/eta/coronavirus#Perf_all
- ▶ WIOA Desk Reference - Veterans and JVSG Data Validation:
<https://performancereporting.workforcegps.org/resources/2021/06/07/20/46/WIOA-Desk-Reference-Veterans-and-JVSG-Data-Validation>
- ▶ Webinar: WIOA Joint Data Validation Overview
<https://performancereporting.workforcegps.org/resources/2019/01/18/22/16/Webinar-WIOA-Joint-Data-Validation-Overview>
- ▶ Webinar: Overview: Validating Required Performance Data Submitted by DOL Grantees
<https://www.workforcegps.org/events/2020/06/25/14/53/Overview-Validating-Required-Performance-Data-Submitted-by-DOL-Grantees>
- ▶ Webinar: Best Practices: Data Validation of Required Performance Data for WIOA Title I and III Grantees
<https://www.workforcegps.org/events/2021/01/12/18/16/Best-Practices-Data-Validation-of-Required-Performance-Data-for-WIOA-Title-I-and-III-Grantees>

Data Validation Monitoring Panel



Monitoring Panel Moderator



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Regional Performance Specialist

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Agenda

- ✓ State Monitoring Approaches
- ✓ State Statistical Sampling Methodologies
- ✓ ETA Monitoring Approaches



State Data Validation Monitoring: Tennessee



Data Validation Requirements – TEGL 23-19

- ▶ Written procedures for conducting data validation reviews that contain a description of the process for identifying and correcting errors or missing data, which may include electronic data checks;
- ▶ Regular data validation training for appropriate program staff (DOL recommends at least annually)
- ▶ Monitoring protocols, consistent with 2 CFR 200.328, to ensure that program staff are following the written data validation policy and procedures and take appropriate corrective action if those procedures are not being followed;
- ▶ A regular data integrity review of program data (DOL recommends quarterly) for errors, missing data, out-of-range variances in values reported, and other anomalies;
- ▶ Documentation that missing and erroneous data identified during the review process have been corrected;
- ▶ Documentation processes for maintaining records per the Federal records retention policy on results, which may include: copies of worksheets on data elements or records reviewed, frozen quarterly wage records for wage record matching used for reporting outcomes, trends in common data accuracy issues, error rates, and corrective action efforts made after data validation reviews
- ▶ Regular assessments of the effectiveness of the data validation process (DOL recommends at least annually) and revisions to that policy and process as needed.

Tennessee Data Validation Policy

- ▶ Tennessee's DEV policy can be found at the following link;
<https://www.tn.gov/content/dam/tn/workforce/documents/wfs/WFSPolicyDataValidation.pdf>
- ▶ The DEV policy establishes three main objectives; Local and State requirements for quarterly and annual data validation, random sampling methodology and how records will be documented and maintained

DEV Training

- ▶ TDLWD conducts training concurrently with the Annual Data Element Validation as outlined in the State's DEV policy.
- ▶ The first day of annual DEV consists of training
- ▶ Topics include: an overview of WIOA Performance TEGL 10-16 change 1, TEGL 7-18, TEGL 23-19, Overview of Data Validation Process, the state DEV policy, Previous WIOA Performance and DEV results, How to conduct DEV, Monitoring protocols, and Data Integrity
- ▶ Members of the Monitoring team, Fiscal unit and Program managers are invited to provide training on topics adjacent to monitoring, validation and program administration.

DEV Summary

- ▶ TDLWD takes samples directly from the PIRL file for each program
- ▶ Wages are removed from the PIRL records prior to being provided for review by the validators
- ▶ Each grand planning region has a lead validator who is responsible for receiving the samples from central office and dividing them among the other validators in the local areas
- ▶ The samples are written to excel files that are disseminated to validators in each local area across the state
- ▶ After the files are validated they are collected by the lead validators and returned to central office for analysis
- ▶ No LWDA validates files from within their own grand planning region
- ▶ The goal of the TDLWD is to achieve and maintain an error rate below 5% on data elements which directly impact WIOA Performance reporting.
- ▶ Chief among the State's concerns are the areas in which the LWDAs failed to maintain an error rate below 5%.

Virtual DEV

- ▶ During the height of the COVID-19 pandemic TDLWD began to operate on a decentralized basis resulting in a Virtual DEV process
- ▶ Leading up to DEV samples were prepared by TDLWD performance staff
- ▶ Lead validators act as the first line support to answer DEV related questions
- ▶ Central office performance staff supports more complex questions
- ▶ Samples sent out to the leads in compressed file format
- ▶ Video conferencing was used to conduct day 1 training
- ▶ Local areas were given 2 weeks to complete validation of all samples
- ▶ Central office performance staff evaluated results
- ▶ Local areas given an opportunity to dispute findings, update documents and make corrections
- ▶ Final results calculated and shared with local areas

Quarterly Monitoring

- ▶ The State conducts ongoing program monitoring each quarter
- ▶ Quarterly Monitoring is conducted by program staff
- ▶ Random sampling techniques are used to select a number of active and exited cases to perform a review of program records.
- ▶ Monitoring evaluates a set of attributes for each selected participant
- ▶ The attributes are unique to each program and ensure that participants consistently meet eligibility criteria
- ▶ The overarching goal of monitoring is to ensure that program staff are administering the program in accordance with federal law and guidance established by applicable TEGs.

Random Sampling

- ▶ DEV samples are pulled directly from the most recently certified annual PIRL file
- ▶ The certified file is used in order to take advantage of the edit checks employed by WIPS
- ▶ Samples consist of non-consecutive participant records where possible
- ▶ The records are copied into an Excel Macro that transposes each record from horizontal to vertical onto its own tab in the workbook
- ▶ On the tab with the transposed sample are columns containing the PIRL Data element number, Data element name and acceptable documentation
- ▶ Additionally, there is a column that helps to record a pass/fail state for each element
- ▶ Each workbook contains 10 samples

Sample Size (1)

- ▶ Identify the total number of exiters from each LWDA
- ▶ Sum the number of exiters in each area to determine the total number of exiters for the program
- ▶ Determine the percentage that each area contributed to the total
- ▶ Multiply the percentage of the contribution to the total by the number of exiters in the LWDA to determine the number of samples the area will contribute to the sample size
- ▶ Sum the sample contributions to determine the total sample size
- ▶ Finally divide the total sample size by the number of LWDAs to obtain the normalized sample size for each area.

Sample Size (2)

Participant Location	Participants	% of Total	Sample Contribution
Northwest	398	9.23%	37
Greater Memphis	897	20.79%	187
Southwest	394	9.13%	36
Northern Middle	630	14.60%	92
Southern Middle	138	3.20%	4
Upper Cumberland	309	7.16%	22
East Tennessee	823	19.08%	157
Northeast	223	5.17%	12
Southeast	502	11.64%	58
Total Participants	4314	Total Sample Size	605

Samples/Area = 67

Sample Macro (1)

- ▶ The sample data is organized using an excel macro created by TDLWD staff and consists of several parts
- ▶ The sample macro is used to transpose sample records into a vertical format and create an editable digital record of the validation for that sample set
- ▶ The records created using the macro consist of a sample list and 10 individual sample records
- ▶ Each sample contains a listing of acceptable verification documents, PIRL data element number and name, the data to be verified and a pass or fail indicator with drop down selector
- ▶ As validation is conducted failed elements will automatically be reflect in the sample list

Sample Macro (2)

- ▶ The sample macro is used to transpose sample records into a vertical format and create an editable digital record of the validation for that sample set

The screenshot displays the 'Sample' application window. At the top, a formula bar shows 'C10' and 'TN'. Below it is a data table with columns A through G. The table contains 10 rows of sample data. Below the data table, there are three buttons: 'Step 1: Transpose Sample', 'Step 2: Filter Blanks', and 'Step 3: Fill Sample List'. The bottom of the window shows a tabbed interface with 'Sample' as the active tab, followed by 'Sample List', 'sheet1', 'sheet2', 'sheet3', 'sheet4', 'sheet5', 'sheet6', 'sheet7', and 'shee ...'.

	A	B	C	D	E	F	G
1	341	1821143 TN		13	37766		
2	342	2298549 TN		13	37766		
3	348	3866336 TN		13	37766		
4	363	3809436 TN		1	37830		
5	368	1141500 TN		29	37821		
6	369	1113814 TN		29	37821		
7	376	3905629 TN		13	37757		
8	426	2972754 TN		9	37801		
9	427	1256232 TN		9	37803		
10	435	3905450 TN		9	37801		
11		0				0	
12	0	100	101	102	103	105	106
	Obs Number	Unique Individual Identifier (WIOA)	State Code Of Residence (WIOA)	County Code Of Residence	Zip Code Of Residence	Special Project Id - 1	Special Pro 2

Sample Macro (3)

- ▶ Each sample contains a listing of acceptable verification documents, PIRL data element number and name, the data to be verified and a pass or fail indicator with drop down selector

	A	B	C	D	E	F
	Acceptable Verification	Data Element Number	Data Element Name	Data	Pass or Fail	
1	SSN Card, Passport, Military ID, Other Federal or State ID with SSN	100	Unique Individual Identifier (WIOA)		Fail	
3	WIOA Intake or registration form, State MIS, case notes	105	Special Project Id - 1	1821143	Pass	Fail
7	A hard or electronic copy of the participant's one of the following: License, Identification	200	Date Of Birth (WIOA)		Pass	

Sample Macro (4)

- ▶ The records created using the macro consist of a sample list and 10 individual sample records on separate sheets
- ▶ As validation is conducted failed elements will automatically be reflect in the sample list

	B	F	L	AC	AS	BB	BC	BG	BK
1	100	105	200	301	400	409	410	600	604
2	Unique Individual Identifier (WIOA)	Special Project Id - 1	Date Of Birth (WIOA)	Eligible Veteran Status	Employment Status At Program Entry	School Status At Program Entry	Date Of Actual Dislocation	Temporary Assistance To Needy Families	Other Public Assistance Recipient
3	1821143		19830114	0	0	5	20190730	0	0
4	Fail	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
5	2298549		19860207	0	0	5	20190516	0	0
6	Pass	Pass	Pass	Fail	Pass	Pass	Pass	Pass	Pass
7	3866336		19591012	0	0	5	20180604	0	0
8	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
9	3809436		19711206	0	0	3	20180128	0	0
10	Pass	Pass	Fail	Pass	Pass	Pass	Pass	Pass	Pass
11	1141500		19780723	0	0	5	20170911	0	0
12	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
13	1113814		19800916	0	0	5	20180922	0	0
14	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
15	3905629		19890503	0	0	5	20181102	0	0
16	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
17	2972754		19921130	0	0	5	20180617	0	0

Error Rate Calculator (1)

- ▶ After DEV is complete the validated samples are collected from the LWDAs and reviewed by staff to ensure that validation was completed on each record
- ▶ The sample list from each area is compiled into an error rate calculator to determine the error rate for each data element in that area
- ▶ Error rates are calculated for each LWDA, then for the state for each program
- ▶ A by LWDA list of the error rates is generated and the results are sent to their respective areas to give them an opportunity to contest or correct any errors

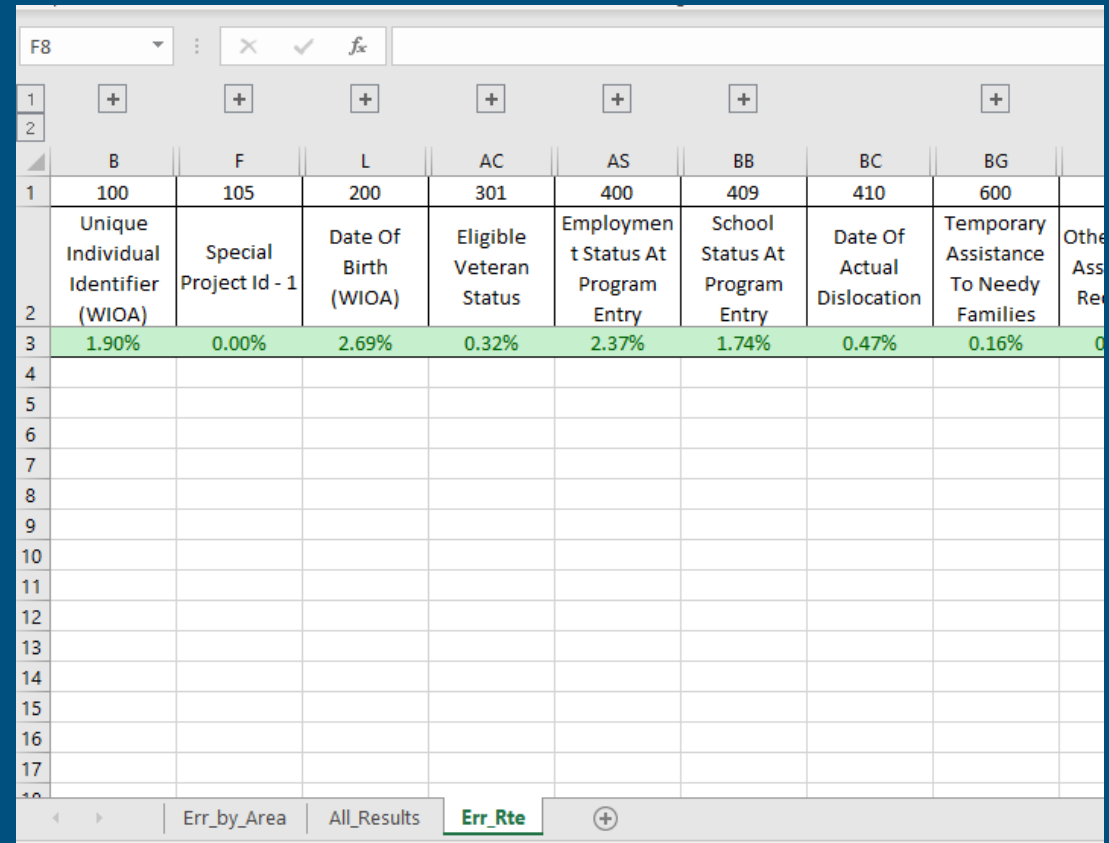
Error Rate Calculator (2)

- ▶ The sample list from each area is compiled into the error rate calculator to determine the error rate for each data element in that area

	B	F	L	AC	AS	BB	BC	BG	B
1	100	105	200	301	400	409	410	600	60
2	Unique Individual Identifier (WIOA)	Special Project Id - 1	Date Of Birth (WIOA)	Eligible Veteran Status	Employment Status At Program Entry	School Status At Program Entry	Date Of Actual Dislocation	Temporary Assistance To Needy Families	Other Assist Recip
150	Pass	Pass	Pass	Pass	Fail	Pass	Pass	Pass	Pa
151	3627237		19851026	0	1	5		0	
152	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pa
153	3991894		19630722	0	0	5		0	
154	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pa
155	932703		19611004	0	0	5		0	
156	Fail	Pass	Fail	Pass	Pass	Fail	Pass	Pass	Pa
157	3868117		19961129	0	1	5		0	
158	Fail	Pass	Fail	Pass	Fail	Fail	Pass	Pass	Pa
159	3982466		19980728	0	1	5		0	
160	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pa
161	3313595		19910707	0	1	5		0	
162	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pa
163	3883224		19990909	0	0	5		0	
164	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pa
165	3035308		10000001	0	1	5		0	

Error Rate Calculator (3)

- Error rates are calculated for each LWDA, then for the state for each program



	B	F	L	AC	AS	BB	BC	BG	
1	100	105	200	301	400	409	410	600	
2	Unique Individual Identifier (WIOA)	Special Project Id - 1	Date Of Birth (WIOA)	Eligible Veteran Status	Employment Status At Program Entry	School Status At Program Entry	Date Of Actual Dislocation	Temporary Assistance To Needy Families	Other Assistance Received
3	1.90%	0.00%	2.69%	0.32%	2.37%	1.74%	0.47%	0.16%	0.00%
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									

Error Rate Calculator (4)

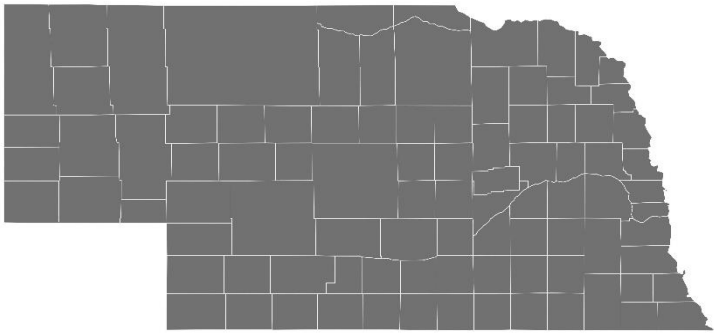
- A by LWDA list of the error rates is generated and the results are sent to their respective areas to give them an opportunity to contest or correct any errors

A12		Upper Cumberland							
1		+	+	+	+	+	+		
2									
	A	C	G	M	AD	AT	BC	BD	
1		100	105	200	301	400	409	410	
	Area	Unique Individual Identifier (WIOA)	Special Project Id - 1	Date Of Birth (WIOA)	Eligible Veteran Status	Employment Status At Program Entry	School Status At Program Entry	Date Of Actual Dislocation	
2									
3	Tennessee	1.90%	0.00%	2.69%	0.32%	2.37%	1.74%	0.47%	
4	East Tennessee	2.78%	0.00%	5.56%	0.00%	4.17%	2.78%	0.00%	
5	Greater Memphis	4.17%	0.00%	6.94%	1.39%	5.56%	5.56%	1.39%	
6	Northeast Tennessee	4.17%	0.00%	1.39%	0.00%	9.72%	2.78%	1.39%	
7	Northern Middle Tennessee	0.00%	0.00%	1.39%	0.00%	0.00%	0.00%	0.00%	
8	Northwest Tennessee	0.00%	0.00%	1.39%	0.00%	0.00%	0.00%	0.00%	
9	Southeast Tennessee	0.00%	0.00%	0.00%	0.00%	0.00%	1.39%	0.00%	
10	Southern Middle Tennessee	1.39%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
11	Southwest Tennessee	0.00%	0.00%	0.00%	1.39%	0.00%	1.39%	0.00%	
12	Upper Cumberland	0.00%	0.00%	1.39%	0.00%	1.39%	1.39%	0.00%	
13	Instructions:								
14	1) Copy and paste the completed DEV samples from each sample list for the area being validated. Ensure that you are only inputting samples from one program and one LWDA.								
15									
16									
17	2) Once all of your completed samples are copied and pasted from the sample lists select the exact match.								
18									
Err_by_Area		All_Results	Err_Rte	+					

Questions?



Statistical Sampling Methodology: Nebraska



NEBRASKA'S DATA VALIDATION PROCESSES

State Level

- ▶ System-automated data validation
- ▶ Manual data validation
- ▶ System-supported data validation

Program Level

- ▶ Quality assurance
- ▶ Data validation

STATE LEVEL (1)

System-automated Data Validation Process

- ▶ Data validated quarterly and annually through large-scale, system-automated data validation protocol within Nebraska's MIS
- ▶ 4 steps

STATE LEVEL (2)

System-automated Data Validation Process: Step 1

- ▶ During quarterly and annual reporting cycles, PIRL uploaded to WIPS data validation and reporting clearinghouse

STATE LEVEL (3)

System-automated Data Validation Process: Step 2

- ▶ In WIPS, full PIRL file passes through preliminary data validation and edit check protocols, scanning all individual and programmatic data elements
- ▶ Edit check searches for date range errors and inconsistencies, anomalies, and waterfall errors (example: if element $a = 1$ then element b cannot = 2)

STATE LEVEL (4)

System-automated Data Validation Process: Step 3

- ▶ Once full PIRL file successfully clears edit check protocols in WIPS, full PIRL reports certified in WIPS by Nebraska's Performance Coordinator

STATE LEVEL (5)

System-automated Data Validation Process: Step 4

- ▶ Data validation and edit check process for wage data occurs simultaneously in SWIS clearinghouse during Federal quarterly and annual reporting cycles

STATE LEVEL (6)

Manual Data Validation Process

- ▶ Manual data validation performed according to methodologies and processes established in State policy
 - record sampling *based on* EPSEM principle
 - record sampling process *by* EPSEM
 - required sample sizes

STATE LEVEL (7)

Manual Data Validation Process: Record Sampling based on EPSEM

- ▶ Records sampled based on EPSEM principle (Equal Probability of Selection Method)
 - ▶ participant cases systematically selected so every participant case in the program population has equal probability of being selected
 - ▶ participant case = set of records documenting services provided to an individual program participant
 - ▶ program population = total number of participants served or exited the program during previous full program year (data validation timeframe)

STATE LEVEL (8)

Manual Data Validation Process: Record Sampling Process By EPSEM

- ▶ Required number of participant cases selected from each program population through systematic random sampling
 - ▶ only first participant case is randomly selected and every nth case thereafter is selected
 - ▶ $\text{nth} = \text{program population} \div \text{required sample size}$ Example
 - ▶ if program population is 247, then required sample size is 37, and $\text{nth} = 7$
 - ▶ if participant case #13 is randomly selected as first participant case, then second case will be #20, third will be #27, and so on until required sample size of participant cases has been selected
- ▶ Resources
 - ▶ [random number generator](#): used to randomly select first participant case when manually sampling records
 - ▶ [sample size calculator](#): used to determine required sample size requirements previously defined

STATE LEVEL (9)

Manual Data Validation Process: Required Sample Size

Program population size	Confidence level %	Confidence interval (margin of error)	Required sample size
1 - 99	95	15	30
100 - 199	95	15	35
200 - 299	95	15	37
300 - 399	95	15	39
400 - 499	95	15	39
500 - 599	95	15	40
600 - 699	95	15	40
700 - 799	95	15	41
800 - 899	95	15	41
900 - 999	95	15	41
1000 - 1999	95	15	42
2000 - 4999	95	15	42
5000 - 9999	95	15	43
10000 - 14999	95	15	43
15000 - 19999	95	15	43
20000 - 24999	95	15	43
25000 - 29999	95	15	43
30000 +	95	15	43

STATE LEVEL (10)

Manual Data Validation Process: Confidence Levels And Intervals

► Confidence level

- expressed as percentage representing how often you can be certain of the “true” percentage of the *program population* that has valid data
- 95% confidence level means you can be 95% certain
- most researchers use 95% confidence level

► Confidence interval (*aka* margin of error)

- *if* confidence interval of 15 is used and 85% percent of sample contains valid data, *then* you can be "sure" that if data of entire *program population* were validated, between 70% (85-15) and 100% (85+15) of entire *program population* would have valid data

► Using confidence level of 95% and confidence interval of 15 in combination

- can say you are 95% “sure” that the “true” percentage of *program population* with valid data is between 70% and 100%

STATE LEVEL (11)

Manual Data Validation Process: Completion

- ▶ Following completion of data validation by State Monitor, report provided to Program Administrator for evaluation and reconciliation
- ▶ Report provides Program Administrator with valuable information for
 - program-level data validation and monitoring activities and plans
 - implementation and/or revision of initial and follow-up staff training

STATE LEVEL (12)

System-supported Validation Process

- ▶ Nebraska's MIS now has capability to generate random sample of *participant* cases based on preferred confidence levels and intervals
- ▶ Eliminates need to perform manual record sampling

PROGRAM LEVEL (1)

Quality Assurance

- ▶ Case managers providing program services individually required to conduct daily quality assurance activities
 - Ensuring services provided are accurately documented in Nebraska's MIS within 24 hours of service delivery (or next business day)
- ▶ Program Coordinator conducts monthly quality assurance reviews
 - Evaluating documented services in Nebraska's MIS to ensure program service delivery requirements are occurring and accurately documented

PROGRAM LEVEL (2)

System-supported Data Validation

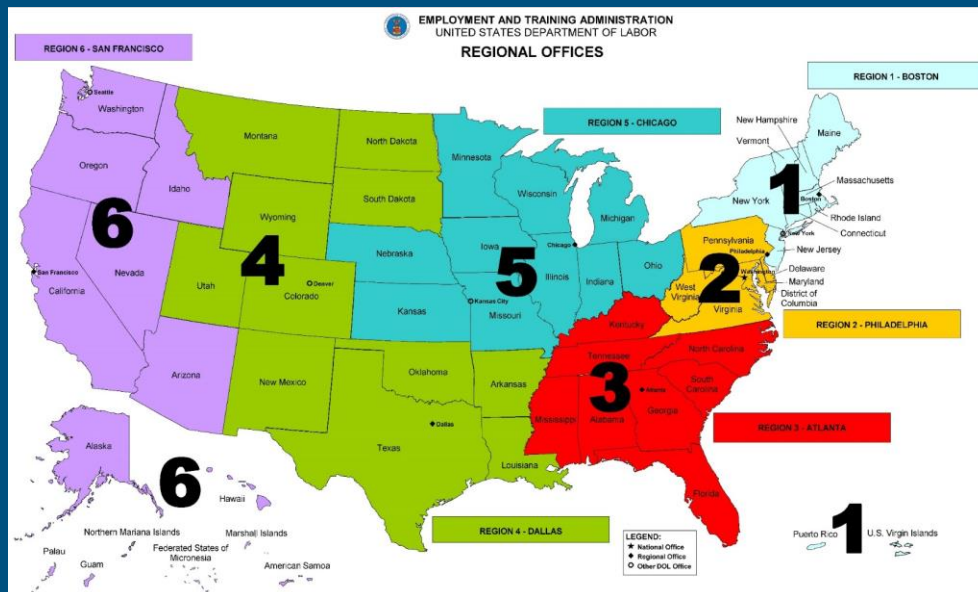
- ▶ State provides to Program Coordinator a random sample of *participant cases* for previous quarter
 - Sampled based on parameters previously defined
- ▶ Program Coordinator conducts quarterly data validation according to requirements established in State policy

RESOURCES (2)

- ▶ State policy: [Records Management, Change 1](#)
defines Nebraska's data validation, monitoring, and quality assurance requirements disclaimer
[Nebraska's policy currently under revision to reflect](#)
 - ▶ new capabilities available in Nebraska's MIS regarding system-supported validation process
 - ▶ mandatory daily quality assurance requirements previously described
- ▶ [sample size calculator](#)
used to determine sample size requirements for manual record sampling process previously described
- ▶ [random number generator](#)
used to randomly select first participant case when manually sampling records as previously described

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Federal Monitoring:



Federal Monitoring

- ▶ May include:
 - ▶ Data validation policies/processes/procedures;
 - ▶ Verifying staff are being trained, and if any corrective action is needed or implemented;
 - ▶ Reviewing files and source documentation;
 - ▶ Reviewing data validation results;
 - ▶ Analyzing data integrity reports generated by DOL
 - ▶ Reviews may result in findings or requirements for corrective action



Federal Monitoring: Readiness Quick Check (1)



1. Data Validation policies that cover all of your programs
2. Your process is auditable
3. Issues are documented
4. Corrections are documented
5. Records are retained for 3 years from the last action

Federal Monitoring: Readiness Quick Check (2)

Policies

“Auditable” trail

- Issues documented
- Issues corrected
- Records retained



Annual Performance Narratives: Data Validation Highlights



State Policies and Procedures



Regular Data Analysis and Correction



File Reviews



Staff Training

Northeast Region's Notable Practices

- ▶ Frontline staff conducting DV
- ▶ Reviewing certain elements in all files
- ▶ Conducting quarterly reviews instead of annual
- ▶ Rotating local area monitoring schedules
- ▶ Self-attestation as a last resort
- ▶ Quality assurance checklists: Eligibility, Exit Review, Data Validation

Northeast Region's Areas for Improvement

- ▶ Lack of detail regarding:
 - Sampling methodology and sample size
 - Data elements to be reviewed
 - Timeline
 - How error rates are calculated
 - Corrective action requirements
- ▶ Inclusion of all relevant programs
- ▶ Descriptions of how the processes are assessed

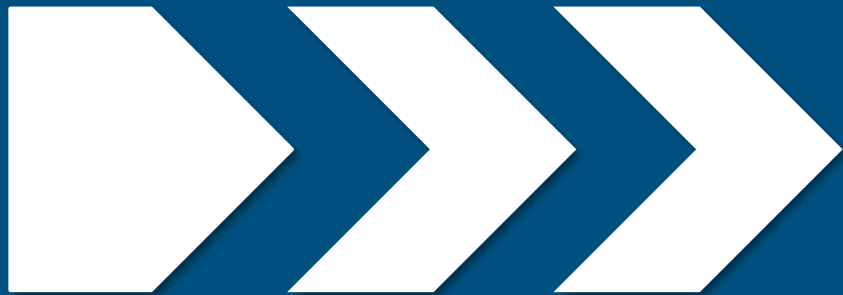
Questions & Discussion



Open Forum



Next Steps (2)



Thank You for Attending!

Additional questions should be sent to
ETAPerforms@dol.gov

