

SCSEP Data Validation Peer Insight Session 3.31.2026

Mauro, Kevin M - ETA CTR 0:07

Please take a moment to unmute to accept the consent prompt and re-mute yourself and thank you all for being here. I will now hand it back over to Ali to begin.

Slaughter, Alison S - ETA 0:21

Great. Thank you so much, Kevin.

Alright. Welcome again.

Slaughter, Alison S - ETA 0:26

Today is hopefully the 1st of a few peer insight sessions that we are planning to have on data validation as we make that transition into this new framework for SCSEP grantees. For this session we have a few slides that we're going to go through.

It will be mostly a review of what we talked about during the webinar back in February and we'll review some of those frequently asked questions that we've been receiving both from the webinar and that we've gotten via e-mail and then we also have a presentation from Julie with the state of Michigan, which will then launch us into our discussion and questions for each other.

The next session we hope will be a little bit more targeted on grantee collaboration and will likely feature some breakout discussions.

So look out for a future invitation for additional sessions.

For now and I think I saw my ..oops. I think I stopped sharing my screen. Let me bring that back up. That would be helpful, Alright.

So our goals for today are to strengthen our collective understanding of the requirements and expectations for the SCSEP data validation framework. We are going to share approaches to policies so that our peers can learn from what others are planning to implement.

We're going to be asking questions openly and help each other problem solve around challenges you're facing with data validation and then exchange practical tools, tips and strategies. I will ask again. We'll have plenty of time for discussion towards the end of the call. We do have 90 minutes for our session today. If you are, you can ask questions at any time.

I will try to pause a few times through some of our presentation for questions. If you want to, you can put something in the chat to save a question so you don't forget it.

We do ask if you are putting something in the chat and actually when you share something and unmute your mic, if you can just repeat your name and the grantee that you're here with that will just help us follow up if we need to reach out and discuss

anything offline with you all.

We might not be able to answer all questions today, but we are logging them all. We're going to be incorporating them into an FAQ tool that we're working on, and hopefully we'll have questions for things that were answered today during our next few sessions. So please ask away, but as a reminder, please put your name and the grantee you're with in the chat just so we can help identify who everyone is.

Alright, I have a few slides to go through some of the basics of the data validation framework. So, as a reminder, during our webinar back in February, we talked about these four components or pillars of our framework.

The first is our data integrity support systems and for SCSEP, that is GPMS and WIPS. It could also be any other internal system that you might use. If you have a separate case management system or way that you're tracking. Could be documents, financial records, any of that.

#2 is the actual policies that you all are creating and that we're going to be focusing on today that detail your internal processes and procedures.

#3, then is our source documentation lists and that is an attachment to of TEGL 23-19 change 3 and it's also copied over into our SCSEP data validation tool.

That's posted on the COP. Then lastly, #4 is about feedback loops and there are sort of several of these loops that are incorporated into the TEGL.

There is feedback within a grantee between staff and sub grantees, and between data validation staff and grantee leaderships.

That would be when you're actually monitoring your sub grantees, how you're communicating, any issues that you find and how they might communicate that they have any training needs or technical assistance.

It also occurs between DOL and grantees as we are looking to incorporate and begin quarterly data analysis calls and then of course any of that feedback that you work through with your FPO. When it comes to monitoring.

So those are our four core tenets.

Today we'll be focusing a lot on grantee policy and I think that's probably why all of you are here, although the feedback loops will be, you know, integrated into those policies, our systems are pretty set are the source documentation list is set and although they are incorporated as part of your policy, we'll be focusing today on how folks are writing that and drafting that.

So during the February webinar, we focused a lot on what is different about the new framework as compared to what was previously done within SCSEP around data validation.

But I do want to highlight today.

You know, there are a lot of things that have remained the same, so that includes the,

the goals or the basis of data validation, right.

We want accurate, valid and reliable data. The previous version also included a list of source documents for validatable elements that was provided by DOL.

It also includes monitoring files for compliance and grantees previously conducted that there were worksheets involved that were provided by DOL, but grantees were the ones that were actually monitoring and reviewing those files for compliance and then ensuring sub grantees or service providing staff are following those data validation requirements. All these things have remained the same.

What has shifted a bit is sort of the process and where it starts and all of that we hope is laid out in your policy.

So let's briefly review the components of a strong data validation policy.

These elements are all found on page four of the TEGl.

They're essentially all those elements, but posed as a question.

So when you are working to draft your policy, these are the types of questions that you want to be answering in that document.

How will you identify and correct errors or missing data and how will you document that that missing or incorrect information was corrected?

How often will you conduct a review of program data in the TEGl? DOL recommends quarterly, however that's a recommendation.

So depending on the size your grantee or some of your internal processes that could shift. How will you and how often will you provide training to appropriate program staff on data validation procedures? Again, in the policy document DOL recommends annually. But again, that might depend on your grantee and your specific scenario.

What is your plan for ensuring that program staff are following your data validation policy or procedure, and how will you take appropriate corrective action if the procedures are not being followed?

What is your procedure for storing program records to meet federal requirements?

And how will you and how often will you assess the effectiveness of the data validation process? Again, DOL recommends annually.

That could depend based on your grantee and who will you will be included in that process, who will be assessing?

Who will you get feedback from? And then how will you adjust and share that that change in your process?

So those are those core tenets, and these are the parts that the your policy should be responding to. There are a couple additional questions that you can consider.

They're sort of integrated into TEGl 23-19, but they're not specifically in that list of elements. So some other things that we recommend you think through are how will you select files for monitoring?

Will you incorporate a sampling methodology and how will you determine the time frames for files eligible for validation?

We're going to look through a sample or some options that you could use today, but DOL does not provide a software for sampling and we also don't tell you how you should be sampling.

That's up for your organization to determine.

Another consideration is what staff or team will actually conduct the data validation and whoever that is, how will you ensure that you'll maintain independence between the staff that are actually collecting the data, reporting into GPMS and those that are actually validating the documents?

Again, this will likely look very different based on the type of organization you are. If you have sub grantees or if you self-administer, you know it might be harder or easier to make that to distinguish and sort of maintain that independence between the data collection and the validation staff.

And then last, will you require any additional data elements to be validated?

So attachment two of the TEGl has the DOL required elements but as a grantee you may determine that there are additional elements or documents that you want your sub grantees to collect to maintain records or compliance.

We'll talk through some examples later on, and then I'm curious to hear if others have thought through this and determined that there might be other elements that they want validated by their sub grantees. Alright. I'm going to keep moving.

I have two more slides and then I'll pause and take a look at the chat and see if we have any questions.

So I did want to explicitly address a question.

We've been receiving related to the validation of the disability element.

So disability, which is also PIRL 202, which maps to that attachment to document previously for a disability to be factored into the most in need, measure it required documentation above self-attestation and that was actually log into GPMS. As you can see below in this screenshot. We had sort of a 2-phase question. The first had asked if the individual had a disability and then the second, was the disability self-reported or is it is documented and the is documented represented?

You know, documents above a self-attestation. However, with this new guidance self-attestation is now an allowable source document both to validate the priority of service and to be factored into the most in need measure.

So in an upcoming release, the disability reported as question will be removed.

So the only one that will remain is the one on the left there that says individual with a disability and the internal and WIPS QPR will be updated to calculate disability as it relates to the most in need measure based only on this one question on the left.

It will no longer be contingent on that self-reported or is documented.

So before only the one on the left was for the priority of service and the one on the right was required for most in need.

And now those are essentially just one question and self-attestation is allowable for attesting to a disability.

I do want to highlight and emphasize that severe disability, which is PIRL, 2810 and frail, which is PIRL 2812 are separate elements and they have distinct definitions from disability, and those are outlined in our regulations.

So self-attestation is not an acceptable source document.

You'll see noted in attachment two and on that tool we have. If you go down to these elements, self-attestation is not listed for severe disability and frail, so although it's allowable for disability. It is not for severe disability and frail.

Alright. I'm going to pause here.

I apologize, I'm going to switch to my other screen so I can see the chat.

I see one question. Where would I find the data policy checklist TEGL 23-19 change 3 and that is from Lynn with Idaho, I believe. I'm going to put the link to 23-19 change 3 in the chat. Any other questions on what we've reviewed before required components or disability policy?

Do you see one more to self-attestation for disability also acceptable for a family of one? I need to review policy so that policy related to family size which is part of eligibility income is all documented in TEGL 12-06.

I don't want to stay off the top of my head if that is correct or not, so I'll need to look more into that unless anyone else in our call has that available to them. But we will certainly follow up on that question. And Amanda, can you remind me what grantee you're with?

Amanda Woodley 13:18

I'm with A4TD.

Slaughter, Alison S - ETA 13:21

Awesome. Thank you.

McNeace, Michi - ETA CTR 13:23

Ali, this is Michi.

Slaughter, Alison S - ETA 13:26

Hey Michi

McNeace, Michi - ETA CTR 13:26

In this case, I don't believe self-attestation for disability for a family of one.

So basically, I believe Amanda's asking if there's an exception.

A person who has a disability and they want to be counted as a family of one, if they are technically a family two or three or four.

I believe that's her question.

Slaughter, Alison S - ETA 13:54

Yep.

McNeace, Michi - ETA CTR 13:54

So I don't. Yeah.

Slaughter, Alison S - ETA 13:55

OK.

Yep, we'll definitely look further into that, and we'll try to have a response and add that into our FAQ. That's a great question. Thanks, Amanda.

What else? In this area, do you have questions on before we keep moving?

Alright. As you think of things, feel free to add them in the chat and we'll keep working on addressing them.

OK, we are getting into the fun stuff. We are going to be talking about sampling, getting a little bit of statistics here. So I'm sharing in a chat.

We have a new resource available on the Community of Practice.

It's all about sampling and data validation written by our talented performance and SCSEP subject matter expert Sheldon Bond, who's with Mathematica under our N-Touch BCT contract and has worked for a long time with SCSEP and specifically on sampling for SCSEP. So, I encourage all to look at that link. We are going to look at it together.

I just want to point out a few things. It is a little technical, I will say.

So I recommend a few read throughs, especially if like me, you didn't necessarily want to revisit your statistics class that you had to take long ago.

So this is a few things I want to highlight about this.

There is a section here about designing your data validation and sampling plan.

It walks through some broad steps about how to approach sampling, so for some of this it's the same for most grantees, right?

We're defining our validation objectives.

Why do we want to sample cases?

Well, because it doesn't make sense to review every single case every quarter, right? Because that's not time and cost effective and you know that's not the requirement we want to make sure that we're sampling and looking at a few files, but it's not a requirement that you look at everyone.

Determine your resource constraints.

This again is going to be very dependent on the type of grantee you are.

Do you have dedicated staff that will be doing data validation?

Do you have access to internal software or suites that will allow you?

To automate some of this, some of the sampling or will you be using tools like Excel?

We're going to look at an example of that in a little bit.

Step 3, Determine your sampling methodology. So, how will you sample, and we'll look below at the sampling equation and then you know, consistently reviewing and refining that sampling approach. So along with that annual review of your policy. Also, looking and seeing if there are ways that you can better sample your cases so that you are getting sort of a true picture of what files look like in your region. So, what we have here, a calculation which is the common calculation for sample size.

There's a lot of variables there, but they are defined down here.

N is our population size, so that's how many people we might be looking at.

We have a Z score. We have the proportion and then we also have.

I think we might be missing a character here; we'll add that back in.

I think that's for E . That looks a bit complicated for all of us.

However, we do have a sample size calculator linked here, so want to show everyone that we have, you know, there are plenty of free and publicly available tools that you can use to sample and it plugs all of that data in for you.

So that is the link here. You do not have to use this one.

You don't have to follow anything in the in the blog, this is.

These are all just options that you have available to you for actually sampling cases, and we hope that it's helpful for you as you sort of discuss what makes most sense for your organization. There are some simple samples that used to be taken out of the legacy system SPARQ so it gives you the number of participants that so that would be the population and then the sample sizes that were pulled.

So that might help give you a sense if your sample sizes are sort of meeting what used to be sampled. Then there's also a bit of a discussion on different sampling techniques here. The two that I highlighted stratified samples and cluster samples. So, if we take the example of sub grantees, a stratified sample would. So we would characterize each participant by their subgrantee and then when you had your sample size, you would pick a specific number from each of those subgrantees so that you make sure that you're proportionally selecting participants within a subgrantee based on how many

people that sub grantee has in your total population?

And again, I'm going to show you an example of this in a little bit cluster sampling. If we take the example of sub grantee, it would be randomly selecting a few sub grantees and then you would sample everyone within that sub grantee.

Again, not saying you have to use either these and it will pretty much depend on the type of grantee you that you that you work within.

We're going to look at the stratified sampling that tends to be what I in a different world, would recommend if I were on the grantee level.

But again, all of that is up to you to decide.

And then last, we have a little bit more of an explanation of what the process used to look like.

So you can jog your memory and see if there's anything from that that you want to include in your own process.

So a great resource encourage you to read through if you have any questions, feel free to send them our way and we can incorporate or we can work with Sheldon as well to answer any sampling specific questions.

Seeing no questions, we are going to move forward with our example.

What I want to sort of make sure is get my point across today is that it doesn't have to be complicated how you sample there are again lots of software and programs that can automate a lot of this for you. You can plug things in and it shoot things out for you, but that's not required.

Especially, you know if you have resource constraints in your organization.

So I want to show an example today using that free calculator and then an excel sheet for how you could sample using stratified sampling for your grantee. On the screen here I've listed how you can pull reports in GPMS to get you list of cases to include in your population that end value.

And so we have a difference between our eligibility sample and our performance sample. Eligibility is looking at those that are currently active enrolled. Both of these, I would recommend using the current exited report to get that list of cases.

For the performance sample, you'd also be validating the outcomes from that individual.

So you want to make sure that all four quarters of follow-up have passed so that you can validate if they had any successful follow-ups that you are able to validate their employment documentation. So, I'm going to pull over my Excel file here and I have those instructions listed here for pulling those cases.

I've already pulled a list of my case ID's, and I have them in my second tab here let me see if I can zoom in a little bit. So, for this example, I have 4 sub grantees and in total I have 183 cases. So, I'm going to go to my calculator and under population size, I'm

going to put 183. I'm also going to change. It defaults to that the standard equation that was listed in the blog. I am going to adjust my margin of error a bit.

You know it's not sampling cases is not quite as statistical as maybe like in a research study when you want to make sure you have a full set of individuals that represent your total population.

So I'm going to back this up a little bit to 15 and that gives me a sample size of 35. I will show you what it looks like at 5. You get a much larger sample, size 125.

I am not saying one is better than the other, for this example I'm going to be using 15. I think the biggest thing you want to make sure you have in your policy is however you choose to set up this equation, be consistent. Just do that.

Every time that you are sampling Alright, I put my population size in 183.

My sample size is 35 and go back to my spreadsheet. I have already calculated that for my 183 participants 49 are with subgrantee, GA 351 are with 5 and so forth.

So I'm going to put in my sample size here.

And so we've done #1, we've identified our subgrantees and number participants in each. We've determined our sample size at 35. Step three is calculating essentially the proportion of people that we're going to sample from each subgrantee. So, in order to do that, I'm going to take bear with me. We're going to use a few equations.

Sub grantee participants divided by total participants, which would be my population or 183 times the number of people in the sample. So, I'll just do a simple. So, I want to do subgrantee participants divided by my population size times my sample size. I'm going to drag that down. So, I get my equation for each of these.

I've added just a simple round equation here so that I have a full a full number rather than a decimal. You can do that manually as well, so I have in my sample that I will be taking 9 from subgrantee 3, 10 from subgrantee 5, 8 from 10, 8 and from 12.

Alright, now that I have established, I am going to generate a random number for all of my cases and that will help me randomly select the cases that will be in our sample.

So I'm going to go back to my other spreadsheet and we'll use this equation here.

You don't have to use between 1 and 1000, you can just do any random number.

I find it easier to have a little bit of a limitation just so that the numbers make more sense to me, but that all is preference so random between I'm going to do 1 and 1000 and when I click enter it will give me a value and I can see here it goes between 1

Oops, I think I did one in 100.

I wanted to do one in 1000.

Alright, so I have random numbers selected between one and 1000.

This is, I think, something that makes it a little easier.

I copy all my values and I'm going to paste them.

Right now, every time I sort it changes the order and I don't know that I have randomly

put a random number, I don't want that to change.

So I'm going to copy all and I'm going to paste as values only and that way it's not based on an equation and it's not going to change on me.

So same numbers. I just changed how it shows up in my Excel file.

Now I'm going to sort them from smallest to largest.

And I'm going to go by each subgrantee.

So I have determined in the subgrantee 3 that I want to take 9 of those participants.

So I would just count down. 1-2 down to 9 and I could just copy and paste them in another file and that's those are going to be the cases that I'm going to be sampling. I can do the same thing with five. This one I wanted 10 and so I would take 10 cases. And I would end up with a list of 35 different cases and that's what I would you know provide to each subgrantee and say I want you to pull files on these cases. I can show you too.

Just quickly the difference. If I didn't select. What is funky is that I'm seeing two 12s, so I'm going to change this one to 13 just so we don't have any confusion there. If I didn't stratify by subgrantee and I just took the first 35. Let's see what that looks like.

Sorry for the scrolling. Alright, if I just took the first 35 cases and put them in another sheet and I filtered. I'm just trying to compare. If I didn't stratify, what would the distribution look like? And again, I'm randomly selecting, so this is going to change every time, but based on not stratifying I have.

9, for 3.

I have 10 for 05, I have 7 for 10 and I have 9 for 12.

So they're not far off from my stratified sample of what I selected by myself. They're pretty.

Slaughter, Alison S - ETA 27:51

Equal again.

That's not always going to be exact because it's random and so that those numbers will change, but all to show if you're not stratifying by sub grantee, you know that's not required. You can just randomly select and if you only have. If you have a mass amount of subgrantees or a small amount that might change how you actually want to stratify and also thinking about how many people you have in each of grantee. Some grantees have you know only one sub grantee to serve another state.

Some grantees like to have a single sub grantee for every county that they serve and so that might that might change a little bit how you decide to stratify if you're a national grantee and you serve in 10 states, you could choose to stratify by state rather than subgrantee. All of those are things that you can sort of explore as you are building out your policy.

Alright. I'm going to pause again.

Open up my chat.

OK. I see a couple of questions. Jeff said, by number of participants are you suggesting how many slots are assigned or how many participants there were during that quarter?

Great question, Jeff. It sounds like it answered for yourself, but just to clarify, it would be the total number of participants that were either served or were within the follow up period based on if you're looking at an eligibility or performance sample.

So not necessarily slots, but actually the population of those that were served.

Jenna, asking me some technical questions.

There's a question about the margin of error and what are the pros and cons of having a 5% error rate versus a 20% error rate? That's a great question.

I can do a little bit more. I'm not an expert on sampling, so I can do a little more research and give some insight into that. Essentially, margin of error is looking at.

It's like how confident you are that you're pulling a list of people that are representing your population. So, if you are lowering any of those values. Then your confidence will change and that's part of that confidence interval there.

Trent shared in the chat a smaller margin of error will mean more files needed to be reviewed, and that's because of the that input into the full calculation.

Does anyone else have any insight who may be more versed in stats than I am that wants to share on the call? And again, I can provide some more, some more insight into that from Sheldon as well.

Yeah, Jenna.

Holzberg, Jenna J - ETA 30:55

I am going to caution everyone to really kind of reflect on this.

With this margin of error rate, because you don't want to necessarily take the easy way out of reviewing too few files just to check the box.

Slaughter, Alison S - ETA 31:05

Agreed.

Holzberg, Jenna J - ETA 31:11

I mean I think 5% error rate seems like a pretty good rate to maintain, but it also means a much more heavier lift for the data validation review.

I was going to just follow up with another question like if that is the case, if we want to do a 5% error rate and let's say that gives you like 200 files that you need to look at, can you break this up over the course of like each four quarters. So, it's not like you're doing like 200 files all at once.

Slaughter, Alison S - ETA 31:41

Yeah, I think that could be a great way to do it.

Honestly, if that's the way you're going to do it, you could.

Yeah, I think that's fine. I would just make sure that like if you are going to be breaking it up, that you're still sort of sampling across all of your service areas rather than saying like, OK, this quarter we're going to choose this one because if you're waiting a year to look at a specific subgrantee service area.

A year might go by before you catch it.

There's a common error across all your files, so if you are going to be dividing that up. Just try to make sure that you are looking at all of your service areas, but yeah, that's certainly an option. Thanks for bringing that up.

Thanks, Jenna. Victoria has some additional context in here. She says margin of error is related to your confidence interval. So, a useful example is that if a poll based on a sample of voters says 52% of voters support a candidate with a margin of error.

Of $\pm 3\%$. It means that the true level of support in the full population likely falls somewhere between 49% and 55%.

Thanks so much, Victoria. So, it goes back again to that confidence interval.

How confident are you that your sample is representing your population through your cases. Thanks everyone. Alright. I see a couple more in here.

Wanda has a question. Did I understand you to say that this portion is recorded and will be shared among grantees? Yes, we are actively recording this session and we will share this this first portion, we are going to turn it off when we get to the Q&A section.

Dan asked, if I was currently doing this for an eligibility sample? Yes, Dan, I think I pulled a list of cases intending that to be for an eligibility sample, but I think you would still pull the same data. It would just change the type of report that you are pulling.

So if you're in your current and exited report. If you're looking at your eligibility sample, you're looking for current active cases, and if you're looking at a performance type sample. You would be looking at those that have exited and are within a certain time frame again. You also don't have to separate by performance and eligibility.

That's how it was done in the legacy system, and I think that makes a lot of sense or I would encourage you to think about that because it gets to sort of two different populations of cases. And if you're waiting all the way until someone exits.

To validate their case, you might be missing something that's happening when they were enrolled and you aren't able to maybe go back and correct that and so taking a sample from both some from performance and some from eligibility I think is a good practice to work through. Question from Julie from Michigan will the Excel I made be available for us to use? Yes, we can provide this Excel with an example with those

equations there as well. Alright anything else on sampling? Thanks for sticking with me through some rough statistics. We'll get some more, some more resources on that.

A question from Lynn in the chat before we move on, Lynn asks, is there best practice regarding data elements validations?

Lynn, can you share a little bit more about what you mean for that question?

Lynn Fyanes 35:11

Yeah, I think you just went over that regarding stratification like I'm looking at the data element sheet, and it's got, you know, pages and pages of different data elements. Do we take all these data elements and review you know 1- 43 records or do we just pick a random selection of the data elements and validate 43 records randomly.

Slaughter, Alison S - ETA 35:32

That's a great question.

I think ultimately that's up to you to determine. I think I would recommend that when you select your cases that you look at all elements present mostly from a logistical standpoint. If you already have access to that case because you're sampling it.

If you can go through all of those elements at once, that allows you to do it within one case rather than having to request you know a larger number of files for just one data element.

So I would recommend whatever you sample that you look at all those elements.

But of course, if you're looking at cases that are currently active, you won't have any results for that, like employment quarter two, employment quarter 4, you won't have follow up data for those. So, you won't necessarily look at all of them and not all of them may be applicable to each grantee, right? So a lot of those are based on like most in need characteristics and if that participant doesn't have them, you won't be validating.

So although there are those 43 elements, you won't necessarily look at all of them for each participant, but I would kind of have that list open and look, look and see if they meet any of those elements, does that make sense?

Lynn Fyanes 36:39

Yeah, that makes sense.

And for the sampling size, are we looking at the participant or are we sampling the data element? So, if I have 43 data elements or 43 participants.

Slaughter, Alison S - ETA 36:56

If you served, let's say you served 43 participants in PY 25 and that was the timeline that

you're choosing to sample your population would be 43 and then if you plug that into your calculator, it'll give you a sample size based on what you put in for that margin of error.

Lynn Fyanes 37:15

Right. And then you look at the data elements.

Slaughter, Alison S - ETA 37:17

And then you look at each data element for that for however many participants you are selecting your sample, yep.

Lynn Fyanes 37:24

OK. Got you. So, we're not really pick and choose in the data elements we're really going through all of them.

Slaughter, Alison S - ETA 37:28

Exactly. Yep.

Lynn Fyanes 37:30

OK.

Thank you.

Slaughter, Alison S - ETA 37:31

Yeah, great question. Right. Any other questions on sampling?

OK, I'm going to share my screen again. I have a few FAQs we're going to walk through and then in about 3 slides Julie is going to be up to talk through some of their strategy.

So Julie is onboard. Alright, I want to walk through a few FAQs. Most of these are a repeat of what we talked about during the February webinar. Some of those questions that were responded to. One was from an All-Grantee Call that we had. So, I just wanted to go through some of these again. We're working on a document that puts all these together, but I wanted to start by walking through some of the most common ones we've been hearing. As you're getting started on your policies, lots of questions about what is the actual timeline for implementing this TEGL.

In the TEGL there's a line that says you implement the revisions at the convenience of the grantee, but no later than with participants who have a start date of July 1, 2026.

So for any cases, let's say you do decide to wait until July 1 to implement.

Any cases enrolled July 1 and after.

We'll be using the source documentation requirements laid out in attachment two of

TEGL 23-19. Any case enrolled prior to that would rely on the previous guidance through the data validation handbook. When we make that transition, the SCSEP data validation handbook will no longer be a resource or guidance for SCSEP grantees.

We are working to pull out relevant content that is not just about data validation, but other parts of the SCSEP grant. In terms of actual data validation guidance after that implementation date, the TEGl is the official guidance for SCSEP grantees.

As a reminder, the development of a policy is highly encouraged, but it is not required and that is laid out in attachment one of there's some program specific guidance.

There's a paragraph on SCSEP. However, I do want to emphasize that what is required at a minimum is that you adhere to the requirements and attachment 2, so that is not optional. That's required. We do highly encourage you to implement the full framework, which includes creating your own policy or procedure. That will support and protect your grant from incurring disallowed costs or being cited for other compliance findings. Policy and procedure highly encouraged. Adhering to attachment two is required.

Again, this is about the data validation handbook there are some differences between that handbook and what is an attachment 2 of the TEGl.

What is correct depends on the implementation date after July 1.

At a minimum, the TEGl 23-19 will be the official guidance going forward.

Again, we're pulling out some relevant resources from the DV handbook, but that will be sort of sunset as guidance for SCSEP grantees.

The second one on the page came up during an All Grantee Call, so I wanted to repeat it to make sure everyone heard that response. SCSEP is not checked in attachment two of the TEGl for PIRL 800, which is homeless. A participant is homeless still.

Our data element as of July 1, 2026, and this response is that homeless or at risk of homelessness is still participant characteristic and is included in the most in need measure and as it's defined in the regulations. At risk of homelessness, which is element 2805 is selected for SCSEP and we encourage grantees to also validate homeless, which is element 800 and has similar source documentation. That was something missed on our end. We'll plan to update the tool as soon as possible.

This is a combined element in some places, and it's separated in some instances and so we encourage that. If your participant identifies as homeless, that you are still validating that through the source documentation listed for at risk of homelessness.

Alright and last one here. What is the end process of validation? Are we entering information into a system or sending it to DOL? I think this question stemmed out of that. Previously there were forms that you filled out and then they were generated for DOL to view. Under this new framework, grantees do not need to send DOL information on their monitoring after each time they monitor, however, DOL, through regional offices, will conduct monitoring of these requirements.

And during these reviews, you can expect federal staff to conduct activities related to data validation that could include checking to see what your data validation policy looks like. Reviewing that you comply with those policies that you have set forth, verifying that your training staff and that if any corrective action was needed, it was implemented.

Reviewing files and source documentation.

Reviewing those results that you had during your quarterly monitoring and then analyzing any of those integrity reports that we'll be generating from the program office side.

These reviews may result in findings or requirements or corrective actions. So again, we don't need you to e-mail us your results every quarter. However, you should keep that documentation as they can be part of your federal monitoring and that is all laid out in the TEGl.

Alright. I'm going to pause one more time.

Dan had a question. Did I hear you say there are 43 sub data elements? I was using that is, as an example Dan, I can't tell you off the top of my head how many elements there are. If anyone wants to count in the data validation tool.

Otherwise, I can count afterwards and we can get you that number.

I'm not quite sure what the total number is.

Yeah, Michi.

McNeace, Michi - ETA CTR 43:42

Joyce found the answer for your question about disability family of 1. The TEGl says self-attestation is acceptable.

Slaughter, Alison S - ETA 43:48.

Awesome. Thank you so much Michi. And that is according to TEGl 1206, correct.

McNeace, Michi - ETA CTR 43:56

No TEGl 23. Our DV TEGl.

Slaughter, Alison S - ETA 44:01

Oh, our TEGl. OK.

For OK, I think.

I think the question.

McNeace, Michi - ETA CTR 44:05

It says for disability family of 1. Joyce sent a screenshot said she found it in, so it includes that having a disability and claiming family of one.

Slaughter, Alison S - ETA 44:12

OK, sounds good.

We'll still double check offline.

But I think that is our answer. Thanks, Michi and Joyce.

McNeace, Michi - ETA CTR 44:30

Cool beans.

You're welcome.

Slaughter, Alison S - ETA 44:34

Dan counted up 41 again, Dan, that 43 is not probably an accurate number or it could be. But that was just an example we were using so.

We'll count offline. Alright. I'm going to share again.

So now I am thrilled to introduce Julie Cortwright with the Michigan Bureau of Aging Community Living and support. Michigan has completed a draft of their policy and Julie is going to share with us all today how they kicked off their process.

So with that, I will hand things over to Julie.

Cortright, Julie (DHHS) 45:12

Yeah. Thanks, Ali. Good afternoon, everyone.

I'm Julie. I'm a regional aging Rep in the SCSEP lead for the state unit on aging.

So we're within the Michigan Department of Health and Human Services.

So next slide. With our data validation policy, we got an early start which is thanks to Jenna, our federal project officer.

She's been great to work with, but she's really during our one to one really encouraged us to start thinking about that thinking of the framework.

One of the things that I found really helpful, especially being a state unit on aging, is as soon as the TEGP was released, sharing it with our state unit and MDHHS leadership.

Because this is a little bit outside of scope for the other Older American ACT programs that we monitor.

So sharing that, sharing it with the state workforce development partners and our SCSEP subgrantees just to get their feedback and ask for resources, but just to alert them that we're going to have to develop a policy in a framework and of course the training in February was helpful as well.

Next slide.

So as we started, we really wanted to have an aim and purpose for the SCSEP data validation. I talked to our sub grantees when we were developing this and we wanted something to be very clear, workable and compliant.

Really simple aligned with SCSEP guidance and I heard loud and clear from my sub grantees trying to be as administratively mindful not making more burden than necessary, and then from state unit on aging from our leadership, we wanted something that we could scale or build over time.

Next slide, we looked at our tools and resources and we looked at that data validation handbook cause a lot of this is not new stuff.

So we looked at that.

We looked at the TEGL when it was released.

We looked at our current SCSEP policy manual, but then we also looked at what policies internally, for monitoring, for compliance, for quality assurance.

One of the things as a state unit on aging that I found the most helpful is just really not reinventing the wheel, but reaching out to my workforce development counterparts at the state they have policies, reporting tools they were able to share other peer examples to look at.

And we were able to use that to kind of frame what we're going to look for our policy as a state grantee.

Next slide.

So we're still drafting it, we're going to communicate it by a transmittal letter because that's how we do our policy guidance from the state unit on aging.

And it will be then an attachment to our current SCSEP policy and guidance manual.

I'm talking to our data and IT staff and we're going to have some more conversations about sampling because that's still a fuzzy area that we're trying to work out.

And then we're going to continue to receive feedback.

We already have had feedback from sub grantee and our state workforce partners, so next slide.

Things that were still working. Again, the policy is in a draft form.

Our leadership is looking through it.

We're hoping I'm hoping to have it issued before July 1st, but at the latest July 1st, I'm happy to share a copy of what we have currently, but we're still looking at validation checklist, sample size, what Ali shared earlier is really got me thinking some of our sub grantees are extremely small, so.

We need to factor that in for Michigan too.

So would love to hear other people's thoughts on that.

Or other state grantees potentially of what you're doing if you're extremely small.

We have some that have maybe two to five participants at most and then we're working

on our training materials and then I'm working with our IT department to see if there's any parts that we can automate potentially. And I've been showing them the reports from GPMS that I can pull. So, looking at how we can do that potentially as well. And then last slide, I believe, is just really encouraging. People start simple. I would encourage learning about things that you have existing, especially if you're a state unit. Reach out to your counterparts at the state who do workforce development. They already have these policies and procedures. Engaging partners early helps and then we know in Michigan that we're going to, you know, release this and we're planning on revising because we know that after we implement, there's going to be things that we'll need to change along the way. And that's it. So, thanks Ali.

Slaughter, Alison S - ETA 49:52

Awesome. Thank you so much, Julie.

This was really helpful to see.

I do have a question.

I want to uphold that.

You sort of brought up to the full group and if other folks have questions for Julie, feel free to raise your hand or put something in the chat.

But I will ask Kevin, can we stop the recording?

This is sort of the end of our slides for today.

McNeace, Michi - ETA CTR stopped transcription