



2011 TRADE & DISLOCATED WORKER MEETING

Winning Strategies in Economic Decline



Performance Counts

Julian Hardy

Lane Kelly

Discussion Topics

- *TAPR Reporting and Related Issues*
- *Common WIASRD Errors Data Validation Issues*

How It Affects Things

Think about the following quotation:

*“All data should come with a label –
Warning: These data were compiled by busy
people with other priorities.”* – ESP Solutions Group

– How can we avoid GIGO*?

* Garbage In Garbage Out

Why It Matters

- ETA Programs (i.e. TAA) are designed to expand program benefits, enhance service delivery and ultimately improve quality of life.
- Services Matter!
- Make the Sell for Reauthorization

Why does collecting good TAA data matter?

- Confirms to Congress and other governmental stakeholders that the TAA program is able to successfully respond to the societal challenges that the TAA program was originally created to address.

Reporting Requirement Basics

- WIASRD – WIA Standard Record Data (Individual Records)
- TAPR – Quarterly & Final Reports
- ETA 9090 – Quarterly Reports
- ETA 9091 – Annual Report
- ES 9002 – Quarterly Reports

Connecting the Dots

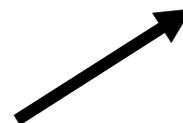
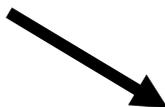
WIASRD – Individual Records

Data used to build the reports



TAPR – Quarterly Reports

Quarterly Report Format – Standard Report Format



Customized Software or Computer Programs

WIASRD – Individual Records

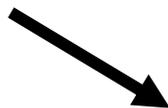
Data used to build the reports



ETA 9090 – Quarterly Reports

ETA 9091 – Annual Report

Quarterly & Annual Report Format –
Standard Report Formats



Customized Software or Computer Programs

TAPR – Final Report

ETA 9091 – Annual Report

ES 9002 – Q4 Report

Data Validation Conducted on These Reports

How is data that is collected used?

- Training counts
- TRA recipient counts and payouts
- Training and all other Trade-related benefits and services for TRA

What are some of the data issues that are not related to current or future edit checks?

- State, County, ZIP
Data Element (DE) 101/102/103)
- WIB Code, Agent/Liable
(DE 105/952)
- Training, Training Expenditures
(DE 1208/1230)
- Employed 2nd Quarter, Employment Match
(DE 1507/1508/1515)
- Efforts to Improve Outcomes

Is (Y)our Data Correct?

- Electronic data
- Source Documentation
 - Four Types of Source Documentation:
 - Cross-Match
 - State MIS
 - Self-Attestation
 - Case Notes
 - Two Types of Validation Rules:
 - Match
 - Support

Who Analyses the Data?

- **States**
- **SPRA**
- **ETA National and Regional Offices**
- **Capitol Hill think tanks**
- **Congressional Sources**

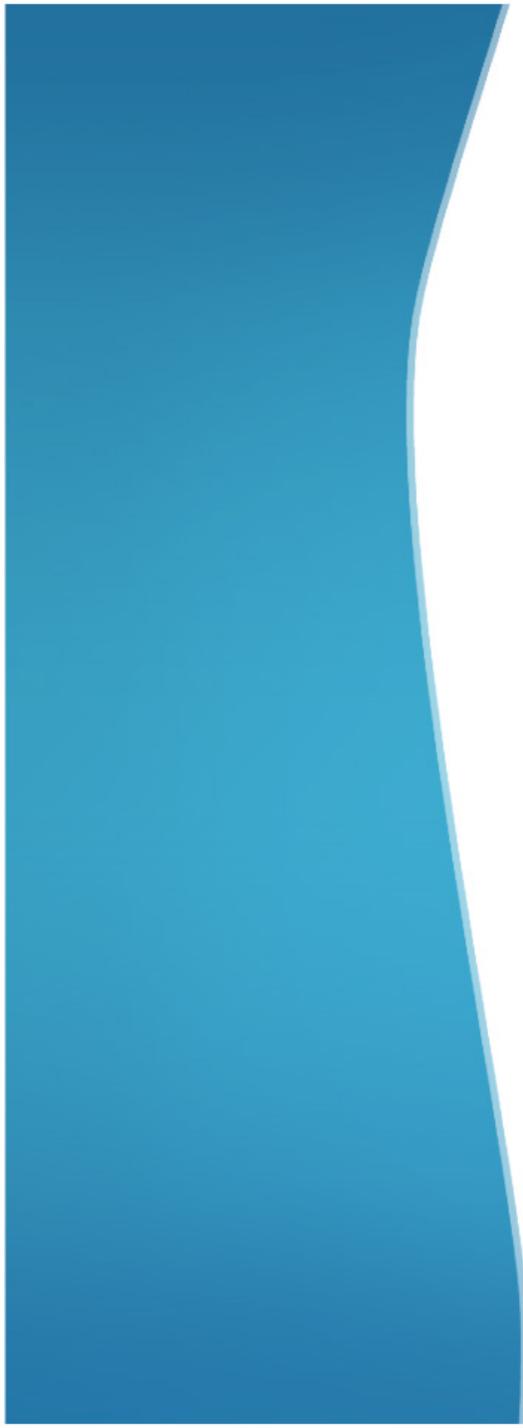
Common Congressional Requests

1. How many credentials were obtained in WIA programs from PY 2007 - PY 2009
2. What were the WIA outcomes by program, state and ethnicities
3. How many people got jobs by service type (i.e. core, intensive, training)
4. How many veterans were served in WIA programs by state
5. How many exiters received training under WIA by state, program, ethnicity/race, how many of them got a job
6. Total participant by state, program, race, for all ETA programs

Common Congressional Requests (Cont'd)

7. How many low income persons were served by program, how many were trained, how many got jobs
8. How many Adult and Dislocated Workers with disabilities got jobs
9. How many Adult and Dislocated Workers were trained in health care occupations, how many were trained in green occupations
10. How many Out-of-School Youth received a credentials 2007-2009
11. How many people received training by gender
12. How many adults received ARRA-funded OJT compared to the total number trained by state





WIASRD Issues

COMMON WORKFORCE INVESTMENT ACT STANDARDIZED RECORD DATA (WIASRD) REPORTING ERRORS

Individual Information:

- Not reporting disability status (Item 104) for many individuals: should be 1 or 2, not 0 or blank for almost everyone.
- Not reporting Hispanic (Item 105) for many individuals.
- Not reporting Recently Separated Veteran (Item 114) for many veterans.
- Incorrect reporting of high school graduates in Highest Grade Completed (Item 119).

COMMON WORKFORCE INVESTMENT ACT STANDARDIZED RECORD DATA (WIASRD) REPORTING ERRORS (cont'd)

Individual Information (cont'd):

- Not including Food Stamps recipients in Other Public Assistance Recipient (Item 121).
- Not reporting the Date of Actual Qualifying Dislocation for many dislocated workers.
- Not reporting adult characteristics for all or many individuals.
 - Homeless (Item 125).
 - Offender (Item 126).

COMMON WORKFORCE INVESTMENT ACT STANDARDIZED RECORD DATA (WIASRD) REPORTING ERRORS (cont'd)

Program Activities and Services Information (Program Participation Data):

- Incorrect reporting of NEG participants.
 - Not providing records for all NEG participants.
 - Incorrect reporting of the NEG Project ID (Items 313a to 313c).

COMMON WORKFORCE INVESTMENT ACT STANDARDIZED RECORD DATA (WIASRD) REPORTING ERRORS (cont'd)

Program Activities and Services Information (Services and Other Related Assistance Data):

- Incorrect reporting of Employment and Training Programs Related to Food Stamps (Item 325).
- Not reporting new service fields:
 - Core self-service and informational activities (Item 331).
 - Date of first staff-assisted core service (Item 332).
 - Workforce information services (Item 333).
 - Date completed, or withdrew from, training (Item 336).
 - Prevocational activities (Item 339).

COMMON WORKFORCE INVESTMENT ACT STANDARDIZED RECORD DATA (WIASRD) REPORTING ERRORS (cont'd)

Program Activities and Services Information (Additional Youth Services Data):

- Incorrect reporting of enrolled in education (Item 343).
 - Should generally be 'yes' if a youth was in school at either participation (Item 129) or exit (Item 670).

Wage Record Data:

- Not reporting wages in the quarter before registration (Item 614).
- Not reporting wages before registration (Items 612 to 614) for persons who exit after the exit cohort for average earnings or earnings change.

COMMON WORKFORCE INVESTMENT ACT STANDARDIZED RECORD DATA (WIASRD) REPORTING ERRORS (cont'd)

- Education, Credential, and Skill Attainment Data:
- Not reporting education status at exit (Item 670) for youth.
- Incorrect reporting of youth activities.

Data Validation Issues



Why Perform Data Validation?

States and grantees receiving funding under ETA programs are required to maintain and report accurate and reliable program and financial information.

- **Data validation requires States and grantees to –**
 1. **determine the validity of report and participant record data submitted to the ETA and**
 2. **to submit reports to the Agency on data accuracy.**

Legal Authority for Data Validation (cont'd)

- For Trade Adjustment Assistance –
 - 20 CFR 617.57 (a) notes:

“Each State agency will made and maintain records pertaining to the administration of the Act as the Secretary requires and will make all such records available for inspection, examination and audit by such federal officials as the Secretary may designate or as may be required by law.”

Legal Authority for Data Validation

- WIA Regulations at –
 - 20 CFR 667.300(e)(2) notes:
 - “ *States submitting annual performance progress reports that cannot be validated or verified as accurately counting and reporting activities in accordance with the reporting instructions, may be treated as failing to submit annual reports, and be subject to sanction.*”

Legal Authority for Data Validation (cont'd)

- For Wagner-Peyser –

- Section 10(a) of the statute notes:

“Each State shall keep records that are sufficient to permit the preparation of reports required by this Act and to permit the tracing of funds to a level of expenditure adequate to insure that the funds have not been spent unlawfully.”

Cross Regional Review of Data Validation Findings and Related Issues *Summary*

- Key Points:
 - **The analysis is based on 27 separate monitoring reviews across the six ETA regional offices:**
 - R1—7 reviews; R2—2 reviews; R3—3 reviews;
R4—9 reviews; R5—3 reviews; R6—3 reviews.
 - **In order for an issue to be flagged, it had to have been specifically noted across at least two regions.**
 - **The “# of Reviews” does *not* equate to the number of instances of the identified issue.**

Findings	R1	R2	R3	R4	R5	R6	# of Reviews
1. Source Documentation (e.g., lacking, incorrect, misapplied)	x	x	X	x		x	24
2. Incorrect Capture/Coding of Required Data Elements	x		X	x		x	21
3. Record Retention	x	x	X	x	x		21
4. Wage Records Not Available (e.g., not frozen, not accessible)	x	x	X	x	x		17
5. Exit Requirements	x	x	X	x		x	16
6. Veterans' Priority of Service				x		x	7
7. Failure to Submit Required DV Report(s)	x		X	x			6
8. Commencing Participation	x			x		x	6
9. Not Reporting Self-Service Counts (LX or WIA or both)					x	x	2

Findings represent issues of non-compliance and are tied to specific citations.

Areas of Concern	R1	R2	R3	R4	R5	R6	# of Reviews
1. DEV Error Rates >5% for WIA, TAA or both	x	x	X	x	x		16
2. Quality of, or Issues with, Participant Files	x		X	x	x		12
3. Lack of Written Policies/Procedures	x		X	x			9
4. Lack of Formalized Sharing of Annual DV Results	x		X	x			7
5. Staff Capacity Concerns	x		X	x			5
6. Lack of Coordination Across Core Workforce Programs			X	x		x	4
7. Appropriate Separation of Duties		x	X	x			3

Areas of Concern represent opportunities for improvement or issues that may rise to the level of a compliance finding if not addressed.

Other Issues Noted	R1	R2	R3	R4	R5	R6	# of Reviews
1. Youth Program Design, Delivery Issues Identified	x			x			7
2. Issues with Dates of Service (e.g., training dates)	x	x	X	x			9

This category reflects a more subjective analysis of the reports received.

