



U.S. Department of Labor Employment and Training Administration

Data Validation

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Keith Rowe

Karen Staha

Session Outline

1. Getting to Square One
2. Data Validation Results
3. Source Documentation Requirements
4. Common DV Review Findings
5. Issues/Challenges/Considerations



Performance Management

**Data
Collection**

**Data
Processing**

**Reports and
Information**

**Data validation
affects every aspect of
performance management.**

*“Performance is your reality.
Forget everything else.”*

- Harold Geneen

The Data Validation Initiative

Purpose of USDOL's Initiative

To support improved management of federal programs and respond to data quality issues cited by oversight agencies

Data Validation (DV) Directives

- ❑ Eleven guidance letters/notices to date
 - ❑ Initial Guidance – TEN 14-02 (5/28/03)
 - ❑ Latest Guidance – TEN 08-09 (08/25/09)
- ❑ All ETA performance-related guidance is at:
www.doleta.gov/performance

What Does *Data Validation* Mean?

In the context of the USDOL DV Initiative for federal employment and training programs:

❑ **Report Validation (RV)**

Pertains to aggregate reports and ensures performance calculations are accurate (e.g., ETA 9091 or WIA Annual Report); and

❑ **Data Element Validation (DEV)**

Pertains to individual data elements within required reports and ensures the data used in the calculations are accurate (e.g., Date of Birth).

Both processes are required to ensure performance data are reliable!

Report Validation (RV)

Programs that submit year-end aggregate reports must validate their reports prior to submission.

WIA

Wagner-Peyser/ Jobs for Veterans' State Grants

[Not Trade]

Report validation is largely a technical function, performed at state level.

How RV Works

States import their data into specialized software to compare the software's calculated performance outcomes to the State's calculated outcomes.

- ❑ Validation counts are the figures computed from the DRVS software; reported counts are what was reported by the State.
- ❑ The software computes error rates.
- ❑ ALL states must upload RV results to ETA's online management information system (EBSS)
- ❑ **Note:** States that use DART software to generate Labor Exchange (LX or Wagner-Peyser/VETS) program reports do not need to perform LX RV.

Data Element Validation (DEV)

- ❑ **Pertains to all programs**, but is minimal for the LX (Wagner-Peyser/VETS) program.
- ❑ **Involves checking data in participant records against allowable source documentation** to verify compliance with federal definitions. Elements either “pass” or “fail” validation.
- ❑ Except in case of LX, **DEV is labor-intensive**, because it involves state staff conducting reviews of a **sample** of participant records from across the state.

How DEV Works

The DRVS software generates a sample of participant records to be “inspected” by state staff.

- ❑ A random sample for Workforce Investment Act Programs (WIA) and Trade Act programs
- ❑ 25 total records for Wagner-Peyser Employment Services (LX or Labor Exchange)

“DEV Worksheets” for each record are also generated.

The worksheets contain elements selected for validation that apply to the participant.

How DEV Works (cont.)

State validators use appropriate guidance to note allowable source documentation & check the accuracy of each data element.

Documentation must either **MATCH** the element or **SUPPORT** the element.

Most source documentation is located at the **One-Stop level**.

Some documentation is stored at state-level only (e.g., **wage record information** must be checked against the state's wage record files).

The Essence of Data Validation

It's all about Data Quality and Performance Management!



- Are the data used in the calculations accurate?*
- Are the calculations reported by the state accurate based on federal reporting specifications?*

National Data Validation Results

PY 2007 DEV Results

WIA Data Element Validation

- Top 5 elements with the highest Overall Error Rate
- Elements chosen with at least 1000 records sampled
- 50 states submitted results

Program Exit Date

FS	Element	Validated Cases	Errors
Adult	Program Exit Date	13510	1192
DW	Program Exit Date	1959	701
NEG	Program Exit Date	4762	340
OY	Program Exit Date	6835	513
YY	Program Exit Date	10462	863

Date of Degree or Certificate

FS	Element	Validated Cases	Errors
OY	DateDegree/ Certificate	6835	875
YY	DateDegree/ Certificate	10462	1635

Date Exited Training

FS	Element	Validated Cases	Errors
Adult	DateExitTraining	13510	1213
DW	DateExitTraining	11959	864
NEG	DateExitTraining	4762	190

Date of Dislocation

FS	Element	Validated Cases	Errors
DW	DislocationDate	11959	1317
NEG	DislocationDate	4762	597

NEG Project 1

FS	Element	Validated Cases	Errors
NEG	NEGProject1	4762	281

National Data Validation Results

PY 2008 Report Validation Results

- ❑ 33 states utilized DRVS for reporting WIA RV results.
- ❑ 11 states had significant (>2%) percent differences for at least one report element.
- ❑ Top 5 report elements had the most instances of differences > 2%.
- ❑ All but 6 states utilize ETA (DRVS) or ETA-approved software for LX RV results. Only one state showed any significant differences.

Report Validation Results

Older Youth 12 Months Earnings Change Numerator and Rate (Table L)

- ❑ 6 out of 11 states had significant differences.
- ❑ Range of percent difference was between 31% and -77.

Older Youth Out of School Earnings Change (Table I)

- ❑ 5 out of 11 states had significant differences.
- ❑ Range of percent difference was between -2% and -22%.

Older Youth Wages at Entry Numerator (Table L)

- ❑ 5 out of 11 states had significant differences.
- ❑ Range of percent difference was between 38% and -48%

Report Validation Results (con't)

Literacy Numeracy Denominator

- ❑ 5 out of 11 states had significant differences.
- ❑ Range of percent difference was between 6% and -7%.

WIA Adult Participants

- ❑ 5 out of 11 states had significant differences.
- ❑ Range of percent difference was between -2% and -13632%.

Source Documentation

Whether electronic or paper, the purpose of source documentation is to have an auditable trail that documents eligibility, services delivered and outcomes received.

It's about accountability!



Guidance

Location! Location! Location!

WIA

PY08 – TEN 8-09 Attachment A

Trade

FY09 – TEN 8-09 Attachment D

LX

The State verifies the accuracy of data elements using its source databases (State MIS, UI/WRIS/FEDES cross-match).

Validation Rules

- Match** – the data on the worksheet must be the same as the data on the source document.

For example, if the worksheet shows the birth date to be 7/1/1975, the source documentation must show the exact same date.

- Support** – the data on the worksheet must be similar to the data in the source documentation.

- This instruction is used, when the information must be processed or interpreted.
- For example, if the worksheet shows a participant to be basic skills deficient, the source documentation must support this interpretation.

Allowable Source Documentation

Four common types of source documentation are:

- MIS (or Management Information System),
- Cross-Match,
- Self-Attestation, and
- Case Notes.



MIS

MIS refers to specific, detailed information that is stored in the state's management information system that supports an element.

An indicator, such as a checkmark on a computer screen, is not **acceptable source documentation** in and of itself.

Example of MIS - Date of Exit

DRVS# 35

What information would you look for in your MIS to pass this data element?

- The services provided
- Date of last service
- There were no other qualifying services provided within 90 days following this service.
- The participant was not scheduled for a future service (no gap in service per TEGl 17-05).

Cross Match

Cross match requires accessing a non-WIA MIS to find detailed supporting evidence for the data element.

An indicator or presence of a SSN or checkmark in a non-WIA database is not **sufficient evidence**.

Example of Cross Match - Youth Placement Information

(DRVS #154)

State XX uses a cross-match with their Higher Education Administration as the source document for verifying placement into post-secondary education.

What information would you need to pass this data element?

- Name or some other personal identifier
- Information showing enrollment in post-secondary education
- Date that indicates the youth was enrolled in the first quarter after the exit quarter

Self-Attestation

Self-attestation is when a participant states his/her status for a particular data element, and then signs and dates a form acknowledging this status.

The key elements for self-attestation are:

- ❑ The participant identifying his/her status for permitted elements, and
- ❑ Signing and dating a form attesting to this self-identification.

Example of Self-Attestation – Displaced Homemaker

DRVS# 24

What type of information/language must be included on a self-attestation form to be considered an acceptable source document for this data element?

A. The individual:

- Has been providing unpaid services to family members in the home, and
- Has been dependant on the income of another family member, and
- Is no longer supported by that income, and
- Is unemployed or underemployed, and
- Is experiencing difficulty in obtaining or upgrading employment
- Applicant signature, date signed

Case Notes

Case notes refer to either paper or electronic statements by the case manager that identify, at a minimum, the following:

- a participant's status for a specific data element,
- the date on which the information was obtained, and
- the case manager who obtained the information.

Types of Source Documentation Misc.

- ❑ Only one of the listed source documents is required to validate a data element
 - Beware of conflicting information!
- ❑ State Source Documentation Requirements



Common DV Findings

Failure to Follow Federal DV Requirements

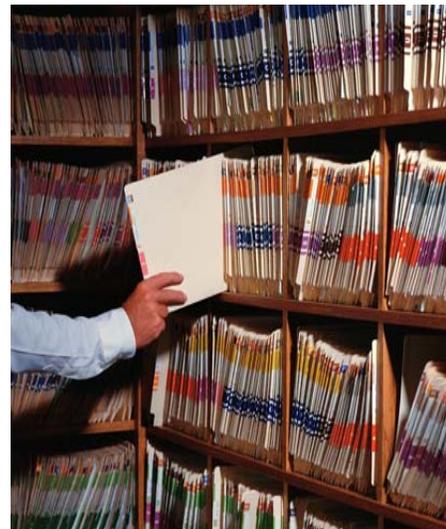
- Record Retention
- Source Documentation
- Validation Rules - Match or Support
- Failure to Submit RV and DEV Summaries



Failure to Follow Federal DV Requirements

Record Retention

- UI/WRIS wages
- DEV worksheets
- Local case files



Failure to Follow Federal DV Requirements

Source Documentation Issues

- ❑ Using documents that are not on ETA's list of acceptable source documents
- ❑ Youth who needs additional assistance
- ❑ Date of birth



Failure to Follow Federal DV Requirements

- Validation Rules - Match or Support**
 - Insufficient information
 - Conflicting information
- Failure to Submit RV and DEV Summaries**
 - DRVS used for producing federal reports
 - States that use DART for LX reporting
- Failure to Validate all Required Data Elements**

Other DV Review Findings

- ❑ Failure to accurately record **Participation and Exit Dates**
- ❑ Poor case notes
- ❑ Separation of duties



Issues, Challenges, Considerations

- ❑ **Policy changes** affecting definitions and calculations
- ❑ **Software changes and releases** to keep up with policy changes
- ❑ **Handbooks** not updated
- ❑ Overwhelming **demand for technical assistance (TA)**
- ❑ **State resource requirements**

Follow Up

For questions about data validation,
please send to etaperforms@dol.gov.

Check out www.doleta.gov/performance.

Keith Rowe at rowe.keith@dol.gov

Karen Staha at staha.karen@dol.gov