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BWT/Workforce Development Agency, State of Michigan (WDASOM)
Policy Issuance (PI): 10-09, Change 1

Date: July 15, 2011

To: Michigan Works! Agency (MWA) Directors

From: Liza Estlund Olson, Director, Workforce Development Agency
SIGNED

Subject: Workforce Investment Act (WIA) Data Element Validation (DV) for Adult, Dislocated Worker, Youth and National Emergency Grant Programs

Programs Affected: WIA

References: The WIA of 1998;
WIA Final Rule 20 CFR Part 652, et al.;
TEGL 17-05 and subsequent changes
TEGL 27-10, issued on May 11, 2011

Rescissions: Michigan Department of Career Development Policy Issuance 03-35, issued October 3, 2003.

Background: The U.S. Department of Labor, Employment and Training Administration (USDOL/ETA) mandates annual WIA DV to maintain and demonstrate system integrity, ensure completeness of data, and assess the accuracy of participant data records.

Accordingly, the WDASOM will conduct DV for the WIA Adult, Dislocated Worker and Youth programs including National Emergency Grants (NEGs) on an annual basis. This policy provides local areas with the guidelines and procedures associated with the WIA DV process.



Workforce Development Agency, State of Michigan

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The USDOL/ETA issued an updated TEGL on May 11, 2011, for Program Year (PY) 2010 DV. The changes from PY 2009 to PY 2010 include changes to the required source documentation requirements and clarification for the following Data Reporting and Validation System (DRVS) Fields:

- Field # 3 ('Date of Birth')
- Field # 21 ('TANF Needy Family Status')
- Fields # 156-198 ('Category of Assessment/Type of Assessment Test/Functional Area/Educational Functioning Level')

Policy:

The WIA DV process is conducted by comparing participant records collected by the One-Stop Management Information System (OSMIS) against source documentation collected and maintained in the participant's case file. Participant records will be validated against source documentation maintained in the participant's case files to ensure compliance with federal definitions and data collection standards for source documentation.

Detailed information regarding the DV Process

The following processes will be followed when administering WIA DV:

Timelines

The annual WIA DV process for the previous PY will commence during the second quarter (October 1 through December 31) of the current PY and will conclude no later than January 31.

Selection Process

All MWAs are subject to selection for WIA DV. The WDASOM will use software provided by USDOL/ETA in combination with the OSMIS to randomly select MWAs that will be subject for review in accordance with the federally mandated WIA DV process.

The USDOL/ETA software will randomly select exiters from the time period covered by any of the performance measures for the applicable program year. That is, for PY 2010 DV, program exits occurring between April 1, 2009 and September 30, 2010, may be included in the validation. The software will also randomly select the number and composition of participants and elements selected for each MWA.

Notification

The WDASOM will utilize a two-step notification process when informing MWAs they have been selected for review:

- Step 1: MWAs selected for review under WIA DV will be electronically notified of their selection including the specific programs being validated and the date of the review. Participant records will be reviewed either on-site at the MWA, or at the WDASOM office in Lansing. *The location of the review will be determined by the WDASOM.*
- Step 2: As required by USDOL/ETA, MWAs will be provided with the list of specific participant records that will be validated **two** days prior to the review. It is the responsibility of the MWA to collect all selected files into a central location for on-site review by WDASOM. MWAs submitting files to the WDASOM office must have submission postmarked no later than the **second** day after the list was received. *Submissions postmarked after that date will be considered failed.*

Data Element Validation

Participant records must meet the federal definitions for source documentation for all elements selected. *If any one of the selected elements fails to meet the federal definitions for source documentation, the entire record fails the DV process. The remaining elements are still subject to validation and will be included in the statewide DV results.*

At the conclusion of the DV process, cumulative error rates for each element, by program will be calculated based on all of the participant records reviewed by WDASOM. This data will be provided to the USDOL/ETA as mandated under the federal WIA DV requirements.

The WDASOM will also calculate the error rate for each element, by program for each of the selected MWAs. Local results will be provided along with a written summary of trends and observations no later than 45 days after the conclusion of the DV process.

Technical Assistance/Corrective Action

A satisfactory overall DV performance rate is an 80 percent or greater pass rate of total files validated. MWAs who fail to achieve the satisfactory performance rate or demonstrate an appropriate use of the federal definitions and data collection standards for source documentation when

generating participant data records will be subject to technical assistance training and/or corrective action as determined by the WDASOM.

Additionally, the WDASOM will also provide technical assistance training by request to MWAs that meet or exceed the satisfactory overall rate. Technical Assistance Training requests should be submitted to your WIA State Coordinator.

Action:

All MWAs must electronically submit the names, phone numbers, and e-mail addresses of all staff that should receive communications regarding WIA DV. This includes notification of selection for DV, potential scheduling instructions, and the list of specific participant files selected for review.

DV contacts should be submitted electronically to Ms. Janice Cooper, Specialist, WIA Section at cooperj1@michigan.gov **within 30 days from the issue date of this policy issuance.**

It is the responsibility of the MWA to notify the WDASOM of any changes or updates made to the names, phone numbers, or e-mail addresses provided.

Inquiries:

Questions regarding this policy issuance should be directed to your WIA state coordinator.

The information contained in this policy issuance will be made available in alternative format (large type, audio tape, etc.) upon special request to this office.

Additional resources regarding WIA DV including applicable TEGs and TENs can be found at www.doleta.gov/performance/reporting.

**Expiration
Date:**

Continuing

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