



Workforce Issuance

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☒ Policy ☐ Information

To: Chief Elected Officials
MassHire Workforce Board Chairs
MassHire Workforce Board Directors
Title I Administrators
MassHire Career Center Directors
Title I Fiscal Officers
MDCS Operations Managers

cc: WIOA State Partners

From: Alice Sweeney, Director
Department of Career Services

Date: January 29, 2021

Subject: Data Element Validation for FY 2021

Purpose: To notify MassHire Workforce Boards, MassHire Career Center Operators, and other local workforce development partners of Data Element Validation to be conducted by staff of MassHire Department of Career Services (MDCS) beginning in February 2021 and concluding by the end of June 2021, where possible. The Data Validation will be conducted as part of the FY21 Annual & Career Center Certification (CC) Monitoring.

Background: Since the introduction of the Workforce Innovation and Opportunity Act (WIOA), the U.S. Department of Labor, Employment and Training Administration (ETA) no longer provides the system/process for Data Validation, it is now the full responsibility of state agencies. Section 116 of WIOA establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of achieving positive outcomes for individuals served by the workforce development systems for the core programs. States are required to

ensure reporting accuracy by reviewing samples of customer records against source documentation to ensure compliance with Federal definitions. MDCS is responsible for validating WIOA Title I Adult, Dislocated Worker, and Youth and Title III Wagner-Peyser Employment Service, and TRADE.

Data validation is a series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data. The purpose of validation procedures for required performance data are to:

- Verify that the performance data reports are valid, accurate, reliable and comparable across programs;
- Identify anomalies in the data and resolve issues that may cause inaccurate reporting;
- Outline source documentation required for common data elements; and
- Improve program performance accountability through the results of data validation efforts.

Owing to the pandemic and the lack of access to physical documents, MDCS will employ a virtual process that will rely on records selected by the MassHire Workforce Boards.

Process:

Following are the key features of the Data Validation:

1. Data Validation will align with the FY21 Annual & Career Center Certification (CC) Monitoring.
2. Validation will be remote - no on-site hard copy file review will be done due to the COVID-19 pandemic.
3. The customer sample will be selected from the FY21 CC Workforce Board random customer sample list.
4. A sub-sample of 3 from the following WIOA Title 1 Programs will be validated for all MassHire Workforce areas:
 - a) Adult
 - b) Dislocated
 - c) TRADE
 - d) Youth
5. Accepted source documentation for *modified remote validation*:
 - a) Self-Attestation
 - b) MOSES/MIS
 - c) Case Notes
 - d) Electronic Records
 - e) Scanned eligibility documentation

6. Scanned documents will be sent to a secure specified SharePoint drive or other approved platform.
7. The follow-up process for correction of failed elements will be included as part of the FY22 annual monitoring Workforce Board review.
8. The 34 total elements that MDCS Program staff will validate utilizing the above aforementioned accepted site source documentation are listed below:

<u>Number</u>	<u>Element</u>
200	Date of Birth
202	Disability
402	Long term unemployed
409	School Status of entry
410	Date of Dislocation
411	Most recent date of separation
600	TANF
603	SNAP
702	Youth Assistance
800	Youth Homeless
802	Low Income
803	ESL Learners
804	Basic Skills
900	Date of Program entry
901	Date of Program exit
902	Date 1 st CM service
906	Date 1 st Youth service
915	TAA Petition #
923	Reason for Exit
924	TAA Application
925	TAA benefit/service
1003	Most recent basic service
1201	Most recent individualized service
120	Care Plan created
1300	Received Training
1305	Date entered training
1307	Training completed
1308	Date completed
140	Supportive services
1412	Follow up service
1800	Type of credential
1801	Date attained
1810	Date of MSG – skills progression
1813	Date completed leading to a recognized credential/employment

Note: Training credentials and other documentation may be difficult to obtain for validation - due to business and vendor closings or disruptions during pandemic.

Action

Required: MassHire Workforce Boards will assign a Workforce staff person to work with the MDCS validator to scan and upload all necessary requested source documentation. Scanned documents will be sent to a secure specified SharePoint drive or other approved platform. MDCS staff conducting the Data Validation will reach out to each area prior to the actual visit identifying the customer files (approximately 15) that will be reviewed and work with staff assigned to upload the required documents. It will not be necessary to conduct an Entrance Meeting.

MDCS cautions against making any changes to the case files in advance of its review as it may cause data elements to fail validation.

Inquiries: Please direct all inquiries to Michaels Williams, MDCS Financial Oversight and Liaison Manager at Michael.V.Williams@detm.org

Attachment: Training and Employment Guidance Letter (TEGL) 2-19, *Guidance for Validating Jointly Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs.*

Non-Active