Data Validation
Continuous Improvement

September 10, 2013

Set Goals
Plan
Evaluate
Implement

Promoting a flexible, innovative, and effective workforce system within the State of Michigan.
Poll

How many of you are new to WIA Data Validation?
The Big Picture

Reviews USDOL in 2002
Identifies two major problem areas:
1) Data accuracy
2) Data reliability

Issues TEGL in 2003 to announce implementation of Data Validation (DV) reviews
Holds regional meetings in 2003 & 2004
National conference presentations in 2006 & 2007

Begins conducting reviews in 2004
Data Quality
is the combination of..

Data Accuracy  -AND-  Data Reliability

Data Validation is the process of verifying the accuracy of participant data that is collected and entered into the One Stop Management Information System (OSMIS).
Fill in the blank:

All information pertaining to WIA participants must be entered on the OSMIS within __2__ business days of the time in which the information is available for entry.

This includes: activities, beginning and end dates, participant status, and any other information required to be reported on the OSMIS for all WIA participants who receive services from the MWA.
Accurate reporting is a requirement, but it is also a tool.

Accurate reporting identifies:

- A true representation of the local participant population/services/activities/barriers/contractor trends
  - Has the demographic changed?
  - Is there a need to (re)prioritize funding?
  - Is there a need to identify additional local barriers?

Inaccurate reporting signifies:

- Lack of understanding of federal and/or state policy and expectations
- Policy/procedural gaps
- Need for training
- Need for changes in OSMIS
Data Quality is the combination of...

**Data Accuracy**

Data Validation is the process of verifying the accuracy of participant data that is collected and entered into the One Stop Management Information System (OSMIS).

- **AND-**

**Data Reliability**

Will the file show that acceptable source documentation was collected prior to entering the participant status information into OSMIS?
Data Validation Training and Employment Guidance Letter (TEGL)

- Always refer to the most recent TEGL, which outlines required source documentation for the corresponding review.

- This TEGL may be found at: www.doleta.gov/performance/reporting

- TEN 4-13, issued August 28, 2013, stated:
# How to Read a TEGL

*This image was taken directly from TEGL 28-11*

## Data Elements and Source Documentation Requirements

<table>
<thead>
<tr>
<th>DRVS Field Number</th>
<th>Data Element</th>
<th>Data Element Definition</th>
<th>Code Value</th>
<th>Adult</th>
<th>DW</th>
<th>NEG</th>
<th>OY</th>
<th>YY</th>
<th>Match/Support</th>
<th>Source Documentation Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>21</td>
<td>TANF (Needy Family Status) #120</td>
<td><strong>Record 1 if the individual is a person who is listed on the welfare grant or has received cash assistance or other support services from the TANF agency in the last six months prior to participation in the program.</strong> Record 2 if the individual does not meet the condition described above.</td>
<td>1 = Yes</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
<td>Support</td>
<td>Adults/DW Exiters who did not receive Intensive or Training Services: State MIS, self-attestation, case notes. All Youth and Adults/DW Exiters who received Intensive or Training Services: Cross-match with TANF public assistance records.</td>
</tr>
</tbody>
</table>

**Watch out for specifics, such as timeframes**

**WE DO NOT VALIDATE NEGATIVES**

**Do we validate?**
## The Review Process

<table>
<thead>
<tr>
<th>Element #</th>
<th>Data Element</th>
<th>Value</th>
<th>DEV Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>DateOfBirth</td>
<td>01 13 19XX</td>
<td>Date = Match</td>
</tr>
<tr>
<td>12</td>
<td>VeteranStatus</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>EmploymentStatus</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>20</td>
<td>LowIncomeStatus</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>21</td>
<td>NeedyFamilyStatus</td>
<td>Code Value of 2 = did not receive assistance (negative) = gray</td>
<td></td>
</tr>
<tr>
<td>22</td>
<td>OtherPublicAssistanceStatus</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>34</td>
<td>ProgramParticipationDate</td>
<td>XX 15 2004</td>
<td></td>
</tr>
<tr>
<td>35</td>
<td>ProgramExitDate</td>
<td>XX 10 2010</td>
<td></td>
</tr>
<tr>
<td>61</td>
<td>OtherExitReasons</td>
<td></td>
<td></td>
</tr>
<tr>
<td>66</td>
<td>FirstCoreServiceDate</td>
<td>XX 15 2004</td>
<td></td>
</tr>
<tr>
<td>68</td>
<td>FirstIntensiveService</td>
<td></td>
<td></td>
</tr>
<tr>
<td>69</td>
<td>DateEnterTraining</td>
<td></td>
<td></td>
</tr>
<tr>
<td>70</td>
<td>DateExitTraining</td>
<td></td>
<td></td>
</tr>
<tr>
<td>74</td>
<td>TrainingService1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The Million Dollar Question
Which agencies will be selected?

Participant records and Michigan Works! Agencies are randomly selected by the Data Reporting and Validation System (DRVS)

HIGHER NUMBER OF EXITED PARTICIPANTS = HIGHER PROBABILITY OF SELECTION
If your agency is selected:

- The agency will receive notification via email
- The agency will receive a call to determine a review date

**Q. When will WDA be on site?**
**A.** Reviews will begin in late October and will conclude no later than mid-January of each year

- The call will be followed with a formal notification

**Q.** Does the MWA need to submit any documentation prior to the review?
**A.** Yes. The MWA must submit a list of WDB approved credentials, if applicable -AND- the local definition of ‘Youth who Needs Additional Assistance’. *This is new.*

**Q.** How long will the agency have to gather files?
**A.** For the PY 2012 review, agencies will have

- Four (4) business days for 50 files or less
- Five (5) business days for 51 or more files
Q. Which participants are subject to review?
A. The Program Year 2012 Data Validation review will cover participants who exited between
*April 1, 2011 and September 30, 2012*.

Q. Does this include Incumbent Workers?
A. Yes.
Why is this timeline important?

- It may be used to determine future review timelines
  
  Example: The Program Year 2013 Review will cover participants who exited between April 1, 2012 and September 30, 2013

- It may be used to determine which participants are subject to being selected for two reviews

- It may be used to run queries
What can queries do?
Help you tackle problem areas.

Most Common Findings

**USDOL**
- #1 FINDING= Incorrect or missing source documentation
- Over-reliance on MIS
- Internal forms not found acceptable

**WDA**
- #1 FINDING= Incorrect or missing source documentation
- Data entry errors
- Timeframes
- Reporting credentials
Program Year 2011 Review - Most Common Errors

**Adult**
- Date of Birth
- Credential Type
- Low Income Status
- Employment Status at Participation

**Dislocated Worker**
- Date of Birth
- Credential Type
- Date of Dislocation
- Other Public Assistance Status

**NEG**
- Veteran Status
- Program Exit Date
- Date of Dislocation
- Employment Status at Participation
Program Year 2011 Review - Common Errors

<table>
<thead>
<tr>
<th>Older Youth</th>
<th>Younger Youth</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Date Attained Degree or Certificate</td>
<td>- Date Attained Degree or Certificate</td>
</tr>
<tr>
<td>- Enrolled in Education</td>
<td>- Enrolled in Education</td>
</tr>
<tr>
<td>- Other Public Assistance Status</td>
<td>- Other Public Assistance Status</td>
</tr>
<tr>
<td>- Credential Type</td>
<td>- Exit School Status</td>
</tr>
</tbody>
</table>
True or False?

A Student ID card may be used to verify Enrollment in Education

FALSE
Enrolled in Education: DRVS 77
Acceptable Source Documentation:

Another example of specific requirements found in the TEGL language
Let’s Build this Case Note!

**Case Note Basics**

- Case Manager (CM) Name
- Participant Status
- Date on which the information was obtained

**Verification** from an educational institution or training provider that the individual is enrolled in education

**Additional information:**

- Who you made contact with (ex: counselor; vice principal)
- Contact’s information (phone number/email)
- Student name
- Educational institution or training provider
- Dates of enrollment
Detailed Case Noting

Don’t:

<table>
<thead>
<tr>
<th>Date</th>
<th>Program</th>
<th>Subject</th>
<th>Comments</th>
<th>Staff</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>08/14/2013</td>
<td>YTHOLD</td>
<td>ENROLLMENT VERIFICATION</td>
<td>John Doe is enrolled in high school.</td>
<td>Mates, Chelsea</td>
<td>DHS Central Admin</td>
</tr>
</tbody>
</table>

Do:

<table>
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<tr>
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<th>Subject</th>
<th>Comments</th>
<th>Staff</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>08/14/2013</td>
<td>YTHOLD</td>
<td>ENROLLMENT VERIFICATION</td>
<td>This Case Manager spoke with Mary Smith, Counselor, at Mt. Pleasant West High School to confirm that John Doe was enrolled on 9/5/2011 and is still currently enrolled. Mary Smith may be reached at (989) 555-0000.</td>
<td>Mates, Chelsea</td>
<td>DHS Central Admin</td>
</tr>
</tbody>
</table>
Where else do we need detailed case notes?

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</tr>
</thead>
</table>
| 16                | Employment Status at Participation #115 | **Record 1** if the participant is a person who either (a) did any work at all as a paid employee, (b) did any work at all in his or her own business, profession, or farm, (c) worked 15 hours or more as an unpaid worker in an enterprise operated by a member of the family, or (d) is one who was not working, but has a job or business from which he or she was temporarily absent because of illness, bad weather, vacation, labor-management dispute, or personal reasons, whether or not paid by the employer for time-off, and whether or not seeking another job.  

**Record 2** if the participant is a person who, although employed, either (a) has received a notice of termination of employment or the employer has issued a Worker Adjustment and Retraining Notification (WARN) or other notice that the facility or enterprise will close, or (b) is a transitioning service member. | 1 = Employed | Yes | Yes | Yes | Yes | Yes | Support | Adults/DW/NEG Exiters who did not receive Intensive or Training Services: State MIS, self-attestation. Case notes.  
All Youth and Adults/DW/NEG Exiters who received Intensive or Training Services: Pay stub, case notes showing information collected from participant. |
Employed at Participation Tool
Equifax Work Number

Date of Participation between 4/11/11 and 8/4/12
= Sufficient Source Documentation
Public Assistance Recipients

- Low Income Status (20)
- TANF (Needy Family Status) (21)
- Other Public Assistance (22)
A Bridge card may be used to verify receipt of public assistance

FALSE
Public Assistance Receipt Tool- MI BRIDGES
HTTPS://WWW.MIBRIDGES.MICHIGAN.GOV
Required: 
1) Type of assistance; 
2) Dates of receipt; and 
3) Client name

MI BRIDGES BENEFIT SUMMARY
BRIDGES System
Benefit Summary

<table>
<thead>
<tr>
<th>Case Number / Benefit #</th>
<th>Grantee / Provider Name</th>
<th>TOA</th>
<th>Service Type</th>
<th>Pay Begin Date / End Date</th>
<th>Benefit Type</th>
<th>Payment Amount</th>
<th>Recoup Amount</th>
<th>Warrant #</th>
<th>Warrant / Available Date</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>101192183 / F23807144</td>
<td>Client</td>
<td></td>
<td>FAP</td>
<td>02/01/2006-02/28/2006</td>
<td>Ongoing</td>
<td>$494.00</td>
<td>$0.00</td>
<td></td>
<td>02/04/2006 Paid</td>
<td></td>
</tr>
<tr>
<td>101192183 / F23288988</td>
<td>Client</td>
<td></td>
<td>FAP</td>
<td>01/01/2006-01/31/2006</td>
<td>Ongoing</td>
<td>$494.00</td>
<td>$0.00</td>
<td></td>
<td>01/04/2006 Paid</td>
<td></td>
</tr>
</tbody>
</table>
DHS Eligibility Notice

*Similar to a Case Action Notice, which is also acceptable source documentation

ELIGIBILITY NOTICE - Michigan Department of Human Services

The Department of Human Services will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, height, weight, marital status, political beliefs or disability. If you need help with reading, writing, hearing, etc., under the Americans with Disabilities Act, you are invited to make your needs known to a DHS office in your county. This institution is an equal opportunity provider.

AUTHORITY: Federal 7 CFR 273.10(g) COMPLETION: Voluntary. PENALTY: None
AUTHORITY: P.A. 280 of 1939, as amended. COMPLETION: Voluntary. PENALTY: None.

Client Name Here
3071 GRANT HWY
[ MANISTEE, MI 49660

Client Name Here

V3765115A
ID# 0095252729
LOAD 51-00-00-03-06
March 10, 2008

You applied for assistance on 2/11/08. You are eligible for FIP effective 3/1/08. You are eligible for MEDICAID effective 2/11/08. Your monthly grant includes the following:

- Monthly Payment Standard
- Budgetable Income
- Grant Amount
- Administrative Recoupment

*MONTHLY BENEFIT AMOUNT
489
165
324
0.00
324.00

*If shelter, heat and/or electric are vended, your checks will be reduced by the amount vended. You will receive separate notices when vending starts or stops, and a list of specific grant deductions with each regular warrant. Your cash grant will be at least $2.00 per month if you are eligible for cash assistance.
Credentials

A credential must be awarded in "recognition of an individual's attainment of measurable technical or occupational skills necessary to gain employment or advance within an occupation."

Refer to the contents of TEGL 15-10, Attachment 2, issued December 15, 2010, for guidelines regarding credentials.
Credential Elements

- Type of Credential (102)
  - Attained Diploma, GED, or Certificate (151)
  - Date Attained Degree or Certificate (152)
The Most Common Credential Errors are:

- Incorrect GED documentation
- Incorrect NCRC documentation
- Data entry errors due to:
  - Incorrect OSMIS entry
  - Incorrect date entries
  - Entering ‘credentials’ that are not true credentials
Q. Does a Cardiopulmonary Resuscitation (CPR) certificate or an Occupational Safety and Health Administration (OSHA) certificate count as a credential?

A. No. While CPR or OSHA training may provide benefit to participants as they begin to gain general knowledge about occupations and occupational standards, participants are unlikely to gain employment or advance within an occupation based solely upon receiving a CPR or an OSHA certificate.

Our MOST commonly asked questions relate to two areas:

1) GEDs
2) Where to record credential information
Scenario

Jane Doe is a WIA Older Youth participant. She attained a GED on November 18, 2009. Jane’s CM prints her unofficial GED transcript from the WDA website and places it in the file.
Question 1- Will the unofficial GED transcript suffice for required source documentation?
Unofficial = Unacceptable

Online Unofficial GED Score Report

<table>
<thead>
<tr>
<th>Participant Name</th>
<th>Total Score: 3250</th>
</tr>
</thead>
<tbody>
<tr>
<td>Participant Address</td>
<td>DOB: 01/01/1992</td>
</tr>
<tr>
<td>Status: Passed</td>
<td>Average Score: 650</td>
</tr>
</tbody>
</table>

This unofficial score report is provided to examinees for immediate feedback on test results. This report is not official for employment, postsecondary education, agency report, etc. If the examinee has passed, an official transcript and a diploma will be mailed to the address provided.

Following are the results of the GED Tests you have taken. The first group of scores represents the five highest scores and constitutes the total score and average score presented above. The second group of scores shows other tests taken. Information about required passing and non-passing scores is provided below.

Date of last test is different from the Issue Date on the official GED, and is therefore unacceptable.

<table>
<thead>
<tr>
<th>Scores</th>
<th>Date</th>
<th>Form</th>
<th>Format</th>
<th>Score</th>
<th>Highest Score</th>
<th>% Rank</th>
<th>Test Center #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Language Arts, Writing</td>
<td>04/28/2011</td>
<td>IE</td>
<td>EP</td>
<td>630</td>
<td>Yes</td>
<td>90</td>
<td>MI-3000250510</td>
</tr>
<tr>
<td>Social Studies</td>
<td>03/31/2011</td>
<td>IE</td>
<td>EP</td>
<td>570</td>
<td>Yes</td>
<td>76</td>
<td>MI-3000250510</td>
</tr>
<tr>
<td>Science</td>
<td>03/31/2011</td>
<td>IE</td>
<td>EP</td>
<td>690</td>
<td>Yes</td>
<td>97</td>
<td>MI-3000250510</td>
</tr>
<tr>
<td>Language Arts, Reading</td>
<td>05/02/2011</td>
<td>IC</td>
<td>EP</td>
<td>780</td>
<td>Yes</td>
<td>99</td>
<td>MI-3000250510</td>
</tr>
<tr>
<td>Mathematics</td>
<td>04/26/2011</td>
<td>IE</td>
<td>EP</td>
<td>580</td>
<td>Yes</td>
<td>79</td>
<td>MI-3000250510</td>
</tr>
</tbody>
</table>

Pass or Non-Pass Information

The passing standard for the 2002 Series GED is a minimum of 410 on each of the five tests in the battery AND an average (mean) score of 450 on the total battery. This 410 and 450 passing standard is the minimum passing standard set by GEDTS. Each state, province and territory may set a passing standard that exceeds the GEDTS standard score requirement for earning a high school credential, but may not go below the GEDTS score requirement. Adults who pass the GED Tests earn scores that meet or exceed the performance of that demonstrated by 4 of every 10 traditional high school graduates. If the candidate has not taken all five tests, “INCOMPLETE” is marked. Candidates who do not pass can retake the GED Tests in order to raise their scores. The local GED Examiner can provide information about retesting. Candidates with non-passing scores are encouraged to contact local adult education programs and enroll in instructional classes.
Question 2 - What could the CM have done instead?
Q. When should I have the participant submit this signed form to the MWA?
A. Be proactive! This may be as early as registration if deemed appropriate.

Q. When should this form be submitted to WDA?
A. Upon completion of GED testing, if the participant has passed all exams.

Q. How long will it take to receive the transcript?
A. Estimate 2 – 14 business days to process all requests.

Q. How do I get a copy of an Official GED Transcript?
A. ↓ ↓ Use this form ↓ ↓
✓ Attained Diploma, GED, or Certificate (151)
✓ Date Attained Degree or Certificate (152)

Remember, always refer back to the TEGL- Appropriate source documentation for Elements 151 and 152 includes transcripts, certificates, a diploma, or a letter or other documentation from the school system.
Question 3 - Where is this information pulled from in OSMIS?
OSMIS ENTRY:
Attained Diploma, GED, or Certificate (151) & Date Attained Degree or Certificate (152)
Applies to Older Youth and Younger Youth

Enter/Update Status Screen
Commonly Mistaken:

This data is ONLY used for Type of Recognized Credential (102) Applies to Adults, Dislocated Workers, and Older Youth
Also Commonly Mistaken:

The only High School Diploma equivalent that Michigan recognizes is a GED.

The Certificate of Completion is not to be entered as a credential.
Q. Are individual test scores acceptable source documentation?
A. No

Q. Is the Work Keys transcript acceptable source documentation?
A. Yes

Q. Where do I find the transcript?
A. Under ‘Certificate Details’

Q. Do I still need to send the participant their NCRC?
A. Per PI 08-30, Change 3, MWAs will provide instructions and assistance, as appropriate, to those participants who wish to obtain a printed copy of their NCRC. The only acceptable source documentation for the NCRC for data validation and performance purposes is a copy of the actual NCRC or a printed copy of the Certificate Details screen in its entirety, which may be found at: http://www.act.org/certificate/account.html.
Where do I enter the NCRC?
Quarterly Follow-Up

Employed in 1st, 2nd, and 3rd Quarter after Exit Quarter (84; 89; 91)
Type of Employment Match in 1st, 2nd, and 3rd Quarter after Exit Quarter (85; 90; 92)
Tips

✓ Always refer to the TEGL
✓ Double check your data entry
✓ Triple check your data entry at the time of exit
✓ Develop checklists
✓ Get a second opinion- run the scenario past your colleague
✓ Conduct internal audits
✓ Standardize your file structure
True or False?

WDA and DOL reviewers make assumptions when reviewing files.

FALSE
Technical Assistance

- Always available by request

- Technical assistance and/or corrective action is mandated for agencies that do not meet a minimum of 80%
Questions?

Thank you for attending!
Contact Information

Chelsea L. Mates
Workforce Investment Act Section
Workforce Development Agency, State of Michigan
(517) 373 - 8013
MatesC@Michigan.gov

PLEASE NOTE: Many agencies prefer sub-contractor questions to be directed to the MWA Data Validation contact prior to contacting WDA.