



**NEW YORK STATE  
WORKFORCE DEVELOPMENT SYSTEM  
TECHNICAL ADVISORY #11-12.2**

**DECEMBER 10, 2014**

**To: Workforce Development Community**

**Subject: Data Element Validation for the Workforce Investment Act, Wagner-Peyser, Veterans Employment and Training Service and Trade Adjustment Assistance/Trade and Globalization Adjustment Assistance Programs**

**PURPOSE**

This Workforce Development System Technical Advisory (WDS-TA) communicates New York State Department of Labor (NYSDOL) guidance regarding Eligibility and Data Element Validation (DEV) for the delivery of Workforce Investment Act (WIA) Title IB, Wagner-Peyser (W-P), Veteran's Employment and Training Service (VETS) and Trade Adjustment Assistance/Trade and Globalization Adjustment Assistance (TAA/TGAA) programs.

**POLICY**

Eligibility refers to the process of determining whether individuals meet the requirements to receive services under the various programs administered through the NYS Career Center system.

Data Element Validation (DEV) refers to the proper validation of information as it is captured in New York's One Stop Operating System (NYOSOS).

The collection and validation of information necessary to comply with federal reporting requirements regarding Eligibility and DEV is a shared responsibility across the WIA, W-P, TAA/TGAA and VETS programs. This responsibility includes assuring:

- a. Information on a participant is reported accurately and timely in NYOSOS; and,
- b. Proper documentation of the information is obtained and recorded in NYOSOS as part of the participant's records.

To streamline the collection and validation of participant information necessary to comply with federal reporting requirements, including eligibility determination and DEV, and to functionally align these requirements across the WIA, W-P, TAA/TGAA and VETS programs, staff verification will be used to validate participant information whenever possible.

***Additional Information and Procedures:***

Topics covered under this section include:

- I. Eligibility and DEV for WIA Adult/DW, W-P, VETS and TAA/TGAA Programs
- II. Eligibility and DEV for WIA Youth Programs

## I. Eligibility and DEV for WIA Adult/DW, W-P, VETS and TAA/TGAA Programs

- A. Types of Participant Information
- B. Staff Verification
- C. DOB Validation

### A. Types of Participant Information

There are three types of participant information that must be collected and validated to comply with federal reporting requirements. Not all participant information is subject to DEV.

- **Demographic Information** – Used to determine program eligibility and to report on participant characteristics/special populations.

Please note, two new demographic information data elements, *Homelessness Individual and Offender*, have been added for DEV for WIA Adult Program. Additional information on these elements can be found in Attachment B.

- **Services Information** – Used to report on the services received by a participant.
- **Outcome Information** – Used to calculate performance measures and to report on outcomes achieved by participants.

Demographic and service information is captured and recorded by NYS Career Center staff in NYOSOS, the State Management Information System (MIS). Each data element must be verified using one of a number of methods, the most common being self-attestation, case notes, State MIS, cross match and source documentation.

Note that any data element labeled “*At Participation*”, for example *Employment Status at Participation*, must be entered before entering first service in OSOS.

#### Demographic Information

Source documentation and validation requirements for demographic information will depend on the level of service received by the participant.

***Self-service or informational (SS/IO) services:*** For participants receiving SS/IO services only, there are no source documentation or DEV requirements. Individuals desiring access to SS/IO services should be directed to complete the NYOSOS/JobZone online registration.

***Staff assisted core services:*** For participants receiving staff assisted core services, there are DEV requirements for demographic information. Staff Verification can be used to satisfy DEV for the majority of demographic elements, excluding the DOB data element.

***Intensive or training services:*** For participants receiving intensive or training services, there are a number of additional demographic elements that *must* be collected from participants as outlined in WDS-TA #10-3. In addition, certain demographic data elements *must* be validated against specific source documents beyond self-identification.

### Services Information

Services Information must be recorded in NYOSOS within five (5) business days of service provision. Proper data entry and documentation of services in NYOSOS comply with DEV requirements.

### Outcome Information

Outcome information is generally populated administratively and does not normally require NYS Career Center staff to data enter any additional information. If outcome data is entered into NYOSOS by staff, the information must be validated against specific source documents beyond self-identification.

### **B. Staff Verification**

For the majority of data elements that would normally require retention of source documentation for verification, local Career Center- staff can use Staff Verification.

To do this, the staff person providing the service must ensure that participant information is being validated in accordance with the level of service being provided, and properly recorded in NYOSOS. This will allow information to be maintained electronically in NYOSOS, thereby replacing the need to keep copies (paper or electronic) of source documentation for Adults and DWs.

Staff Verification requires staff to:

1. Identify the information to be collected (relevant data element) using an allowable documentation source.
2. Ensure the information is accurately recorded in the appropriate NYOSOS data field(s).
3. Record in NYOSOS Comments:
  - a. The information (data element) that has been validated;
  - b. The source used to validate the information;
  - c. Pertinent data from the document source; and
  - d. The date of the Staff Verification if different from the date of data entry.

This method is intended to minimize the administrative burden associated with obtaining and retaining copies (paper or electronic) of the source documents used to validate participant information. It is not intended to **eliminate** paper, but **reduce** it. It will still be necessary to retain copies (paper or electronic) for certain data elements and/or levels of service, and Record Retention Standards for LWIAs, as stated in WDS-TA #01-27, must also be met. For example, copies of ITA/OJT contracts should continue to be kept on record.

### **C. DOB Validation**

The major exception to Staff Verification is the DOB data element. To comply with federal guidance, some situations will require staff to retain documentation (paper or electronic) for validation purposes. Staff Verification cannot be used for the DOB data element.

There are two methods to verify DOB in NYS:

1. Through the Unemployment Insurance (UI) System.

For any customer who is currently receiving UI, or has received UI in the past, DOB will be considered validated through the UI System. Therefore, any customer listed as a UI Claimant or Exhaustee for the current or any previous enrollment is considered validated for DOB.

No NYOSOS comment referencing the method of DOB validation is required for customers whose DOB is validated through the UI System.

2. Using a source document.

If an Adult/DW customer has never been part of the UI system, their DOB must be verified using a source document. According to new USDOL/ETA policy in Training and Employment Guidance Letter No. 27-10 (5/11/11), all that is necessary to validate DOB for customers receiving core level services only is a case note; and if an Adult/DW customer has been determined Job Search Ready via an Initial Assessment, it is unlikely they will receive more than Core Staff Assisted services. Therefore, for all Adult/DW customers determined Job Search Ready, record a case note stating the customer's DOB.

Note that if Job Search Ready Adult/DW customers do receive more than Core Staff Assisted Services, additional DOB DEV will be required.

Alternatively, if it is determined the Adult/DW customer is in need of Career Development Services upon completion of their Initial Assessment, it is likely they will receive more than Core Staff Assisted services. Therefore, for all Adult/DW customers referred to Career Development Services AND all Youth participants, staff must verify DOB:

a. Through a record of cross match with NYS Department of Motor Vehicles (DMV).

NYSDOL has implemented a DOB validation policy using the "Record of cross match" with NYS DMV for WIA participants who are not UI customers. Therefore, any customer who has a valid ID issued by the NYS DMV (NYS driver's license, driver's permit or non-driver identification) will be considered validated for DOB.

In order for this cross match to take place, local staff must input NYS DMV ID numbers in the DEV tab in NYOSOS. Please see the Quick Guide for Data Element Validation Custom Tab for data entry procedures (link below).

<http://www.labor.ny.gov/workforcenypartners/osos/OSOSDeskGuideDEVTab.pdf>

No NYOSOS comment referencing the method of DOB validation is required for customers whose DOB is validated by this method.

- OR -

b. Through an alternative source other than a NYS DMV issued ID. If this method is required, a copy of the source document (paper or electronic) must be retained. Staff must also record an NYOSOS comment referencing the method DOB of validation.

**Attachment A** summarizes eligibility criteria for participation in WIA Adult/DW, W-P, VETS and TAA/TGAA programs. **Attachment B** addresses the specific data elements, which must be validated for participants in the WIA Adult/DW, W-P, VETS and TAA/TGAA programs (demographic, services and outcomes).

## **II. Eligibility and DEV for WIA Youth Programs**

Eligibility for youth enrolled in the WIA Youth program remains unchanged.

*At Participation* data elements, for example *Employment Status at Participation*, must be entered before entering first Youth service in OSOS.

DEV requirements for youth enrolled in the WIA Youth program have been updated. Self-Attestation is no longer an allowable documentation source for the *School Status at Participation* data element. Staff may use an Applicant Statement to verify the *Low Income* data element, but only as a last resort after all other avenues of verification for the data element have been exhausted. Also, *Received Employment Services* and *Additional Support Services for Youth* are no longer required data elements. Complete records (paper or electronic) must continue to be kept on all youth participants.

Note that Staff Verification is not considered a valid method of DEV for youth participants.

**Attachment C** summarizes the eligibility criteria for participation in the WIA Youth program. **Attachment D** addresses the specific data elements that must be validated for youth participants (demographic, services and outcomes). Attachment D includes the updates to allowable documentation sources with *School Status at Participation* and *Low Income Status* data elements and does not include the *Received Employment Services* and *Additional Support Services for Youth* data elements.

## **References**

USDOL/ETA Training and Employment Guidance Letter No. 06-14, Program Year (PY) 2013/Fiscal Year (FY) 2014 Data Validation and Performance Reporting Requirements and Associated Timelines

USDOL/ETA, Training and Employment Guidance Letter (TEGL) No. 17-05, Common Measures Policy for the Employment and Training Administration's Performance Accountability System and Related Performance Issues, February 17, 2006

WDS-TA #08-08, REISSUED: State Policy Guidelines on Data Element Validation (DEV) under the U.S. Department of Labor Employment and Training Administration's (USDOL/ETA) Common Measures Policy and Functional Alignment November 11, 2008

WDS-TA #10-3 Requirements for the Collection of Additional Participant Demographic Information upon Receipt of Intensive or Training Services under Title 1-B of the Workforce Investment Act of 1998 April 15, 2010

## **INQUIRIES**

Questions regarding this TA may be directed to: Your State Representative

## **ATTACHMENTS**

- A. [WIA Adult/DW, VETS and TAA/TGAA Program Eligibility Handbook](#)
- B. [Data Element Validation Handbook – WIA Adult/DW, W-P, VETS and TAA/TGAA Programs](#)
- C. [WIA Youth Program Eligibility Handbook](#)

D. [Data Element Validation Handbook – WIA Youth Program](#)