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February 20, 2014

Karen A. Staha
U.S. Department of Labor
Employment and Training Administration
Office of Policy Development and Research
200 Constitution Avenue, NW, Room N-5641
Washington, D.C. 20210

Dear Ms. Staha:

Thank you for the opportunity to comment on the U.S. Department of Labor's (U.S. DOL) collection of data validation information as published in the Federal Register on December 24, 2013. Staff from our Workforce Investment Act (WIA) Title 1 and Title 3, and Trade Adjustment Assistance (TAA) programs has reviewed the proposed requirements following the Review Focus criteria described in the announcement. Our comments and suggestions are provided below.

Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility.

We support the U.S. DOL's efforts to promote and refine the data validation requirements to provide greater reliability and accuracy of information. However, there are a few elements to be validated that we feel are not necessary and the information gathered does not have practical utility. For example, requiring identical date match for dates of training does not relate to program performance or have any practical utility. In most cases, it matters little to not at all if the dates are only a day or two off. For TAA, where there are times a specific date may be crucial to eligibility, such as training enrollment to meet Trade Readjustment Act (TRA) eligibility, the source for TRA determination is not the same source as the Trade Act Participant Report (TAPR) data for such fields. It might be more useful to validate whether or not training was attended and completed rather than dates. A lot of staff time is spent validating this element with no useful results. We suggest that DOL remove this data element from the validation process and if necessary replace the data element with an element related specifically to eligibility or performance, or that would provide more meaningful results.

Hiding the TAA "submitted value" data from view does not allow for any useful comparison of the data validated, and makes the validation effort a less practical management utility because there is no possibility to analyze how far off the data might be, and thereby gain some perspective as to the degree the data has "failed" and of what importance that indicates. If the submitted data on the spreadsheet were able to be viewed, we could engage in some analysis, and produce reports by area or data element. As it is, if we want to evaluate any data, we must re-type all the data ourselves on a separate spreadsheet and we see little value in taking the time required for that process. Lastly, we question whether the definition for the TAA "Type of Waiver from Training" element has been defined accurately by DOL for the TAPR since none of the participants in the sample had a value to verify.

Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used.

We do not concur with U.S. DOL's statement that states and grantees are able to conduct data validation with a "reasonable, but sustained, level of effort." The demands that are placed upon staff to conduct the data element validation activities are not, in our opinion, "reasonable". The exercise requires effort and resources that exceed the value of the benefits. Wisconsin, like most states, is enduring continuing budget cuts for U.S. DOL-funded programs while travel expenses are increasing. It is becoming less cost-effective for teams of validators to travel to and spend three or more days at local offices reviewing and validating participant case files. For the most recent Title 1 data element validation process (Program Year 2012), the estimated cost, including staff time, travel, and other expenses, was approximately \$58,000. This does not include the time spent by local staff in locating files, shipping the files to a central location, returning the files to local offices, and the disruption of their normal work routines.

In the past, Wisconsin requested a waiver to conduct data element validation at the State's administrative office rather than local offices, which was denied. Conducting the annual data element validation is not the only time State staff makes on-site visits to local areas. Staff visits local offices several times a year for the purposes of monitoring, technical assistance and program guidance. Roundtables and other training activities are scheduled each year to increase the opportunities for dialogue between state program managers and local staff and grantees about all facets of our programs. Therefore, we ask that U.S. DOL re-visit the data element validation process and afford states more flexibility in getting the job done efficiently and in a more cost-effective manner than the current process allows.

Enhance the quality, utility, and clarity of the information to be collected.

The software, user guides and report submission processes continue to be the weakest points in the data validation effort. The system does not appear to be designed with the user in mind or in a way to obtain useful information. Even after several years of data element validation, there are issues with the software. Problems from the previous year or version are fixed and then new problems are created. We encourage U.S. DOL to consider changing data validation to a biennial, rather than an annual activity. This would allow the software developers ample time to test their software and reduce the "bugs," create User Guides that are user-friendly, and give U.S. DOL time to analyze and publish results from previous years to determine if data validation is effective.

The following are events that occurred in the Program Year (PY) 2012 Title 1 data validation cycle, many of which are recurrences of previous program years:

- To our knowledge, states have never received any analysis of data element validation results - how other states are doing; common errors/error rates, etc. We have no way to measure our progress or compare our results to other states.
- Each year, the software is released in numerous versions and patches. As we have commented in previous program years, this development and repair cycle is difficult to contend with because of our own information technology security requirements and policies. A biennial process, as we suggested above, would likely improve the quality of the tools that are given to us to conduct data validation activities.
- The software-generated worksheets do not have identifying information on all pages (only first page). Worksheets have to be printed on paper and carried out into the field to conduct the data element validation. Since the worksheets range from one to four pages per participant, the lack of identifying information on each page (e.g., observation number, participant name) increases the risk of the worksheets being separated and mismatched or lost.

- The software provides us with no ability to produce local-level reports or custom reports. This minimizes the software's utility to enable us to identify data quality issues and data reporting improvement strategies in individual workforce development areas.
- The software is sluggish and requires excessive amounts of system resources, even with personal computers that are built to the developer's specifications. If the PY 2013 WIA Title 1 data validation will be on the same platform as the TAA validation for PY 2012, please see the relevant issues identified in other sections of these comments. If the same problems are encountered next year in the WIA Title 1 data validation as with the TAA validation, it will be an unmanageable process since for Wisconsin the WIA Title 1 sample is approximately four times the size of the TAA sample.
- In earlier versions of the software, it was easier to "find" the records to enter data element validation results; the most recent version is a lot more time-consuming.
- Data for some elements does not print on worksheets, but appears on the computer screen. This creates problems for data entry staff and creates a greater risk for reporting errors which may invalidate the validation results.
- For Program Years 2011 and 2012, the WIA Summary/Analytical Reports have printed with 0% error rates even though there were failures for the data element. We had to request the DOL Regional Office to correct the report in order to have an accurate report of Wisconsin's results (rather than re-calculating the results and hand-writing them into the report). For Program Year 2012, there were more elements with incorrect error rates than for Program Year 2011.

Specific to the Trade Adjustment Assistance (TAA) and Wagner-Peyser programs, the software that was used did not produce worksheets formatted for ease of use. For example:

- For TAA, not enough identifying information was provided for the selected records. The requirement to review file documentation in the field offices requires that staff are able to identify which of the sampled participants are located in which Workforce Development Area (WDA) and/or specific office. The "name" of the participant would have been useful as not all sources of information are by the participant's PIN. The client characteristics data provided in the sample worksheets did not identify any of that important information. Identification of this data would have made it easier to sort the spreadsheet prior to printing, to sort it by WDA or office, or by any other data element.
- State staff had to do a lot of manipulation of the selected sample data to merge it with data from the relevant quarterly TAPR in order to get information to even inform the local areas which files would be validated.
- State staff also spent a lot of time and effort re-creating the worksheets in a format that better lent itself to the whole effort – from identifying participants and location, to document review, to ease of data entry. Even getting the TAA worksheets printed on one page was a timesaver and much more convenient to utilize.
- The fact that the TAA submitted value data itself was hidden from view made the validation efforts much more time consuming. We understand the value in asking an open-ended question about training start and end dates, but providing dates for the timeframe we are looking for would help immensely. With the possibility of more than one training service or multiple episodes of service, there are a variety of dates documented in the file that appear valid.

Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submissions of responses.

As noted above, multiple releases and software updates/patches are not available until the end of the program year. States cannot upload and install software as quickly as the various versions of each year's data validation application are published. However, given past experience, we do not believe it

is reasonable for U.S. DOL to remove the start-up burden from the Office of Management and Budget inventory if we are continuously installing new software and performing all of the tasks related to that start-up, in order to perform data validation. As stated previously, moving validation to a biennial activity would allow time to produce a more acceptable set of software for states' use.

In addition, staff has the following comments and suggestions regarding data element validation, some of which we have submitted to the Region V office and have not received a response:

- Data validation instructions states that acceptable documentation is a copy of the DD-214 or a cross match with veterans' data. DET has also included "other official documentation" as acceptable. TEGL 10-09 (Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in whole or in part by the U.S. Department of Labor) mentions a variety of official documents for verifying veteran status (for priority of service), including, but not limited to: DD214, official notice from Department of Veterans Affairs or Department of Defense and an official notice issued by a State veterans' service agency. We suggest that a letter, email or even phone verification from the local veterans representative be acceptable documentation of veteran status for data validation purposes. In addition, since the TAA program is an entitlement program, the validity of veteran status is irrelevant.
- The WIA Title 1 Adult program does not have income eligibility criteria unless priority of service due to limited funds is in effect. However, most local areas collect this information (e.g., low income, public assistance) and enter it into our reporting system. If selected for data validation, the file documentation is usually present for just one of the items since income eligibility is not required. Case managers report public assistance per information from the participant. Thus, there usually is no documentation in the file for public assistance since low income was documented, thus resulting in a failure for the public assistance data element.
- Typically the participant's FoodShare card (Electronic Benefits Transfer card) is photocopied and placed in the participant file as documentation of FoodShare receipt. However, the card does not have an expiration date so it is not clearly evident that the participant is currently receiving FoodShare. Wisconsin has asked DOL Region V for guidance on this issue and is suggesting that since applicants are attesting to the accuracy of the information they provide it can be assumed that the card is current. The participant could also sign and date the photocopy of the card attesting that it is current.
- With the emphasis on reducing paperwork and addressing identity theft issues, case managers should be able to verify that they viewed a document rather than photocopying documents. We have asked DOL for guidance on which documents can be copied. As of this date, we have not received a response.
- We believe the validation standards fail to fully consider how automated data systems are replacing and streamlining local participant data collection processes, particularly as those standards relate to individual identifiers, demographic and participant characteristics.

I hope you will find these comments and suggestions helpful and that they will help U.S. DOL continuously improve its product and evaluation processes. If you have any questions about this correspondence, please feel free to contact me.

Sincerely,



Linda Crane
Bureau Director

cc: Cathy Brooks, DOL Region V