



November 24, 2010

Karen A. Staha  
U.S. Department of Labor  
Employment and Training Administration  
Office of Policy Development and Research  
200 Constitution Avenue, N.W. Room S-5206  
Washington, DC 20210  
VIA EMAIL: [Staha.Karen@dol.gov](mailto:Staha.Karen@dol.gov)

REF: Comment Request for Information Collection for the Data  
Validation Requirement for Employment and Training Programs  
(OMB Control No, 1205-0448): extension With No Changes

Dear Ms. Staha:

The National Council on Aging, Inc. (NCOA) would like to provide comments to the notice in the Federal Register dated September 27, 2010 concerning the Information Collection for the Data Validation Requirement for Employment and Training Programs. NCOA like many of the other SCSEP National sponsors has participated with the Employment and Training Administration's requirement to validate data since 2007. We also participated in the pilot program to test data validation for Program Years (PY) 2006, 2007 and 2008.

NCOA submitted written comment on July 12, 2010 regarding the SCSEP Data Collection System and the importance of data validation. As of today we still believe that data validation is necessary, however, the data validation requirements imposed on the SCSEP program have hindered performance and challenged those who are to be served as mandated in the Older American Act of 2006 and the subsequent Senior Community Service Employment Program Final Rule issued September 1, 2010. Therefore, NCOA strongly believe changes should be made to the data validation requirements.

There are three areas NCOA would like to offer comments based on the current data validation process:

- Data validation negatively impacts the ability to serve low-income most-in-need older adults because of the many validation requirements imposed.
- Data validation has become a burden on local program staff. The system currently used requires more program staff time that could otherwise be used to assist participants in reaching their employment goals and in gaining self sufficiency at a more rapid rate.

- The Data Validator is required to spend an inordinate amount of time conducting the validating process which may take away from other responsibilities affecting the SCSEP Program.
- Data elements for validation have changed since 2007 which impacts the information that is used for the current year and may be obsolete.

The Data Collection System (SPARQ) negatively impacts the ability to serve those eligible for the Program because data validation requires additional documentation which is not required under the SCSEP regulation and were not required in the past. In many cases SCSEP data validation requires the applicant/participants to produce documentation which are not available to them and in many cases, difficult to retrieve. Needless to say, we do not get the performance measure credit because of frustration with getting acceptable documentation. In other words, those needing the program the most cannot produce the documentation needed causing them to be turned away from the program or they give up out of frustration. Also, the time spent on collecting documentation takes away from staff time in serving our participants.

Per the "Supporting Statement for Request for OMB Approval under the Paperwork Reduction Act," provided as part of the ICR, ETA has determined that the annual burden to data validation per grantee at 162 hours or one hour per file, including supervisory time. Unfortunately, this is an underestimate of time spent for NCOA. This does not take into account the number of hours spent by staff requesting the sample information, the projects retrieving and forwarding that information to NCOA Headquarters and the Validator's time.

Finally, when comparing SCSEP to WIA, data collection requirements for SCSEP are more stringent. Greater under service of Hispanics by SCSEP and others with Limited English Proficiency (LEP) are evident because WIA does not require the levels of data validation that SCSEP requires. Many decide not to participate as a result.

In conclusion, NCOA recommends the following:

- 1) Data Validation requirements should include only age, income, and place residence.
- 2) An electronic submission of validated data through SPARQ would be a good solution in reducing the burden of hours and mistakes and ensure more accurate accounting of information.
- 3) The data validation process for the 2009 Program Year (PY2009) also be considered a "pilot" until all questions and concerns can be answered.

- 4) A meeting be convened with both National and State SCSEP sponsors to work with ETA to develop procedures to make the data validation process more efficient.
- 5) Revised the Data Validation Handbook to make the information easier to understand.

Thank you for allowing the National Council on Aging, Inc. (NCOA) to comment on a topic that is important to performance and affects all SCSEP participants.

Sincerely,

A handwritten signature in cursive script that reads "Sandra Y. Nathan". The signature is written in dark ink and is positioned above the printed name and title.

Sandra Y. Nathan, Senior Vice President  
Economic Security Group