



February 24, 2014

Ms. 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, DC 20210

Dear Ms. Staha:

We appreciate the opportunity to respond to the Comment Request for Information Collection for the Data Validation Requirement for Employment and Training Programs: Extension without Revisions.

The following comments are from the staff at the Virginia Community College Systems' Workforce Development System office.

1) Will the revised Data Element Validation (DEV) process allow for a more streamlined process? Is there a way to make the DV process less manual. For example, can a way be created where there are no manual sheets to write on but a way to enter information right into a system that will store it? This will save on paper costs, be less of a time burden and there will be no chance information will be lost.

2) Is there a better way to analyze the data, for example pulling individual LWIA reports versus just an aggregate state error rate- this can further minimize risk and help state monitors align the process with state monitoring and help us drill down the issues. For example, if there is a high error rate for "veteran status" you cannot tell if that is because LWIAs said they were veterans and they really were not, high data entry errors were made or if there was something in the file that made sense they were a veteran but was not acceptable based on the documentation list.

3) The sampling methodology used in the Data Element Validation process give the Department a reasonable level of comfort that the data reviewed is accurate. Does the Department plan to develop acceptable error rates for the data elements reviewed? Will the Department develop a critical element process, this element is more important than this one for the inclusion of Why does the Data Validation process require that so many elements are validated per record? Could we just review and focus on the ones that directly affect performance? For example, for the exit date element, a lot of the time a Wagner Peyser activity is the result of the exit date not a date that the case manager closed a file so we are only verifying in that case the date from the system of record. What is the



value of validating the system against the system and if there is value, is there another way to test this or could we reduce the number of elements that rely on this validation and identify high priority ones? For example, if every record had an average of 3 like this and we have over 1200 files – did we really need to verify the system from itself over 3,600 times in one year? Could we consider a process where copies of employment verifications, credentials and other measurable performance data is sent to the monitoring team for a smaller sample from what was submitted in the reports?

4) What does the Department do with the Data Validation information? Most of the “fails” we see have already been corrected from previous monitoring efforts because the files are old so there is not that much that is discovered during the Data Validation process unless it is discovered that direct performance information was recorded in our system of record but is not supported and documented in the participant file. Can we identify high priority and high risk areas to reduce costs and time? Again, can states with proactive and strong monitoring units review smaller samples or more targeted elements?

5) Can the Data Element Validation process be used to replace or supplement an eligibility review conducted during annual monitoring conducted by the state or local workforce areas?

We appreciate the opportunity to comment on this critical function, especially in light of the recent Government Accountability Office’s report on data quality.

Sincerely,

A handwritten signature in black ink, appearing to be "Vanessa H. Rastberger", written over a horizontal line.

Vanessa H. Rastberger, MPA
Workforce Services Consultant