

## Response to Data Validation Policy Public Comments

### Training & Technical Assistance

1. **When outlining training requirements, is DEED referring to Local Workforce Development Association (LWDA) staff, subrecipient provider staff, or all the above who are managing LWDA programs and cases?**

**DEED's Response:** DEED will provide data validation training annually to all LWDAs and subrecipient staff. We will be scheduling a couple of Webinars and a few in-person sessions located in different parts of the state fall 2024. The webinar power point and a recording will be uploaded to DEED's website.

2. **Who is responsible for providing annual data validation training to all case managers and local area staff?**

**DEED's Response:** LWDA's are responsible for ensuring their local case managers and area staff either attend DEED's annual data validation training or use the recorded webinar and power point posted on DEED's website to train their staff.

3. **Will DEED offer annual train-the-trainer sessions to LWDA staff responsible for training case managers and other staff responsible for data entry?**

**DEED's Response:** DEED will offer data validation training to all LWDA staff. Train-the-trainer sessions will also be offered following the completion of PY23 and PY24 data validation.

4. **Will LWDA staff have the opportunity to participate in the same training provided to DEED staff, so everyone is on the same page?**

**DEED's Response:** Yes, both DEED and LWDA staff will be invited to participate in DEED's annual data validation training.

5. **Who is responsible for conducting the training of local and subrecipient provider staff—DEED or the LWDA staff? From the "State of MN" section, it seems that DEED only trains their own staff. Are LWDAs then responsible for training their LWDA staff and their subrecipient providers, using the procedures that DEED develops?**

**DEED's Response:** DEED will offer data validation training to all LWDA staff. LWDA's are responsible for subrecipient provider staff training and are welcome to use DEED's materials and recordings on DEED's website for training purposes.

We amended policy to clarify State of Minnesota responsibilities, which now reads, "(DEED will..) Provide annual data validation training for both DEED and LWDA staff."

We amended policy to clarify Local Workforce Development Area (LWDA) responsibilities, which now reads, "(LWDA will...) Train subrecipient provider staff on the importance of correct data entry and allowable source documentation on an annual basis, at a minimum."

- 6. For training provided by DEED, will there be attendance caps on the number of people from each agency who can attend? This is the case for WF1 training, and sometimes results in long waits before staff can access necessary training.**

**DEED's Response:** DEED will not cap attendance on the data validation webinar trainings, however, we may need to cap the number of individuals who attend in-person trainings depending on space limitations. More details will be shared fall 2024.

- 7. Under 'the State of Minnesota will' section: Bullet 1 – will local areas be provided these written procedures and processes?**

**DEED's Response:** Please refer to the *Data Validation Procedure* section of the Data Validation Policy, as well as *Attachment I: Data Element Validation Methodology and Process* and *Attachment III: Data Validation Tool User Guide*, which provides a description of DEED's current data validation process and procedures.

Per the data validation policy, DEED will conduct "An annual evaluation of DEED's data validation policy and procedures...(at) the end of the program year." Revisions will be made to both the policy and procedures per evaluation results on an annual basis.

- 8. Under the 'State of Minnesota will' section: Add 'provide technical assistance to local areas,' as this is an important role for DEED in helping providers comply with policies and expectations.**

**DEED's Response:** Agreed. We added a bullet under the "...State of Minnesota will... Provide technical assistance to local areas."

- 9. Under "Annual Data Validation Training" the policy states that data validation training will be provided "annually" – Just wondering if this is already planned for PY24. It would be a best practice to have this training before a new program year starts...so that we start off in the "right" direction with data validation each program year.**

**DEED's Response:** Agreed. Data Validation Training for PY24 will be scheduled fall 2024, more details to follow.

**10. Under Background, and the bullet points stating the purpose of data validation, it should mention providing technical assistance to local areas/providers as this is a key component of the work of data validation.**

*DEED's Response:* The background section of the policy specifically provides a summary of why data validation is important. To address your concern regarding technical assistance, we added a bullet under the responsibilities of the state to "...Provide technical assistance to local areas."

### Records Retention

**11. Records Retention.** The policy doesn't link Attachment V but Attachment I-IV are linked. Is this a typo and should be **Attachment IV**?

*DEED's Response:* Yes, this is a typo. We corrected the policy to read, "...Attachment IV...".

### Electronic Document Storage (EDS)

**12. For participants that are co-enrolled, the source documentation may be uploaded to EDS under a non-WIOA grant. Will the data validators look at documentation across all programs or would we be required to duplicate the documentation under the WIOA grant? It is important to avoid duplication of effort.**

*DEED's Response:* When a participant is enrolled into multiple programs, the expectation is that their enrollment and source documentation will be uploaded for each enrolled program.

**13. Under "Definitions" – Electronic/Digital Signatures – is this still allowed? I know we were doing this during COVID, where a participant could send an email stating they had read, understood, and agreed to all of the forms that required a signature (Tennessee Warning, Consent to Collect Wage..., etc.) but our understanding is that this was no longer allowed. Having this term in the definitions makes it appear that this is still an active and acceptable practice.**

*DEED's Response:* Electronic Signatures continue to be allowable and are defined within the data validation policy.

### Sanctions

**14. Are there any sanctions for Data Validation that cannot be corrected? If so, what are they (beyond Corrective Action)?**

*DEED's Response:* No. DEED will not be issuing sanctions related to data validation at this

time.

### Frequency of Data Validation

- 15. Under Frequency of Data Validation, please clarify whether data validation will be completed quarterly or annually in PY24, and whether it will be conducted in all local areas or just a select few.**

***DEED's Response:*** All local area data will be validated annually during PY24. The data validation schedule for PY24 will be released by the end of May 2024. To clarify, the policy was amended to read, "For PY 2024, DEED will conduct data validation of WIOA Adult, WIOA Dislocated Worker, WIOA Youth, Wagner-Peyser, National Dislocated Worker, and TAA participant files once during the program year for each LWDA."

### Notification of Files

- 16. Under Data Validation Procedures - #2 Providers should receive a 30-day notice (instead of 10) to allow adequate time to prepare.**

***DEED's Response:*** DOL advised DEED that the allowance of 30 days is excessive so our current process of notification will need to remain at 10 days. We recognize that this first full year of data validation will be challenging for DEED and the LWDAs.

### Data Validation Process

- 17. When the state conducts an annual review of program data for errors – what does this process look like? It should be provided in writing prior to implementing so that providers can review and adjust as needed.**

***DEED's Response:*** Data validators will use a data validation tool, which was created in Excel to compare the data between the Participant Individual Report Layout (PIRL), Workforce One (WF1), Minnesota Works, and source documentation. If the information in the file from the PIRL matches the participant information in Workforce One and the source documentation, the data element is verified. If the data does not match and the source documentation is missing, the element isn't verified. A reminder that DEED is currently testing the data validation procedures with the help of a subset of LWDAs to test our tools and process for PY23, which will inform any changes that may be needed before rolling out procedures in PY24.

In the meantime, our current process is outlined in the policy as well as within the four attached policy documents. Thank you for your patience as we work through and learn from the process.

### LWDA annual/quarterly review of data errors, missing data, anomalies, and missing documentation

18. The policy states that: LWDA's will review program data for errors, missing data, and other anomalies, including missing documentation, on a quarterly basis (recommended) . . .
- a. Will there be a reporting mechanism back to DEED? If so, who will review these? Are providers "on their honor" to complete reviews, etc.?

*DEED's Response:* LWDA's will be asked during monitoring how your organization reduces data errors, identifies missing data or documentation.

#### Data Corrections & Final Data Validation Report

19. Please clarify what the repercussions and/or procedures are including timeline to correct any errors after the final report is given.

*DEED's Response:* Per the data validation policy, "Local areas will have 30 calendar days to correct any data entry or source documentation errors and return their corrections to DEED data validators." The final data validation report will provide the number of files validated and an overview of the data elements that couldn't be validated. This data will help DEED and LWDA's identify where more training or procedures are needed to ensure future data accuracy.

20. What is DEED's process for communication back to the reviewed LWDA? Will there be a written report provided, with items that should be corrected – similar to the monitoring process? And will this be done separately or as part of monitoring?

*DEED's Response:* Data validation is a different process from monitoring. If a LWDA can correct identified data errors, this will occur prior to the final data validation report. "At the conclusion of the data validation review, a final report will be emailed to each local area and DEED WIOA program administrator. This report will contain a summary from the data validation review, including:

- a) The number of files reviewed, and
- b) A summary of error rates by data element."

#### Monitoring Protocols

21. Under Monitoring Protocols, the policy states: "DEED monitoring guides will include data validation questions, reviews, and observations as necessary to ensure local partner staff are following written data validation and source documentation procedures."
- a. Can we assume this is HOW the annual data validation will occur or is this in addition to a data validation process?

*DEED's Response:* During monitoring, program monitors will ask LWDA's to describe your process for how your organization regularly reviews program data for errors, missing data, and missing documentation.

The Monitoring Protocols section of the policy was amended to add more clarity, *“DEED monitoring guides will include data validation questions, such as the steps an LWDA regularly takes to review program data for errors, missing data, and missing documentation. Program monitors will also review whether local partner staff are following written data validation and source documentation procedures.”*