

### IB # 22-01 Effective Immediately Upon Release

# **INFORMATION BULLETIN**

- TO: All Workforce Innovation and Opportunity Act (WIOA) Title I Funded Adult, Dislocated Worker, Youth, and National Dislocated Worker Grant (NDWG) Service Providers
- **DATE**: 12/02/2022

SUBJ:California Employment Development Department (EDD) Data Element<br/>Validation (DEV) Audit and Quarterly Report Analysis (QRA) Processes

### **PURPOSE OF BULLETIN:**

The purpose of this bulletin is to provide information regarding the new DEV Audit and QRA evaluation processes that have been initiated by the EDD as mandated in EDD's Workforce Services Directives (WSD):

- <u>WSD22-03</u> WIOA Data Validation Source Documentation issued on August 12, 2022; and
- <u>WSD22-04 WIOA Data Validation</u> issued on September 1, 2022

### **BACKGROUND**:

As the administrator of WIOA Title I Adult, Dislocated Worker, Youth, and National Dislocated Worker Grant (NDWG) programs for Alameda County, the Alameda County Workforce Development Board (ACWDB) is required to provide participant data to the EDD through accurate and timely entry into the CalJOBS<sup>SM</sup> system.

To comply with WIOA regulations, the EDD is required to conduct Data Element Validation (DEV) on program participant files annually and monitor data integrity quarterly through the QRA review process.

### **DATA ELEMENT VALIDATION (DEV):**

The purposes of DEV process are as follows:

- To ensure the accuracy of data reported into the CalJOBS<sup>SM</sup> system.
- To identify anomalies in the data and resolve issues that may cause inaccurate reporting.
- To improve program performance accountability.

Due to the large number of Local Areas and WIOA program participants within the State of California, the state EDD has determined that DEV audits will be performed on a rotating schedule based on the three EDD Workforce Services Branch Divisions (Northern, LA Coastal, and Southern).

Local Area members of the East Bay Regional Planning Unit (Alameda County WDB, Contra Costa County WDB, city of Oakland WDB, and city of Richmond WDB) were part of the first phase of DEV audits.

In August of 2022, participant records from Program Year (PY) 2021/2022 were randomly selected for review. Therefore, based on the schedule published in WSD22-04, Alameda County will not be due for another DEV audit until PY 2024/2025 which should commence in or around August of 2025.

The DEV process includes a thorough review of all data elements that are entered into the CalJOBS<sup>SM</sup> system. The list below represents a small sampling of the approximately 135 data elements that are reviewed during the DEV audit:

DE #	DE Description	Compared Against
200	Date of Birth	- Date entered into the WIOA application
		- Date reflected on official documentation
401	Unemployment Insurance (UI) Status	- Status entered into the WIOA Application
		- Documentation provided to verify UI status
		- Data provided by EDD's UI Division
409	School Status at Program Entry	- Data Reported in CalJOBS on the WIOA
		Application
		- Data recorded on the paper WIOA application
802	Low-Income Status at Program Entry	- Data reported in CalJOBS on the WIOA
		Application
		- Data reported on the paper WIOA application
		- Documentation collected to verify status
1302	Date Entered Training	- Enrollment Date of Training Activities in
		CalJOBS
		- Individual Training Account (ITA) documents
1306	Occupational Skills Training Code	- Occupational code (O'Net) of training entered
		into CalJOBS
		- O'Net code included on ITA paperwork
1614	Industry Code (*NAICS) of Employment in 1 <sup>st</sup> quarter after exit	- Data entered in the "Follow Up" section of
		CalJOBS
		- EDD generated Base-Wage Record Data
		- Employer records that verify NAICS code
1811	Date Enrolled, during participation, in Education or Training Program	- Date entered into CalJOBS Enrollment
		Activity
		- Date on transcripts or school records
		- Transcripts or Report Cards
2700	Social Security Number (SSN)	- Data entered into CalJOBS in the WIOA
		Application
		- Official Documentation collected to verify
		SSN

\*NAICS – North American Industry Classification System

Review EDD's WSD22-03 for a full list of reviewable data elements.

## **QUARTERLY REPORT ANALYSIS (QRA):**

The QRA process will allow EDD's Program Data and Reporting Group an opportunity to review program data quarterly for errors, missing information, out-of-range values, and anomalies. Discovery of challenges or low scores in any of these areas will prompt notifications to Local Areas so that efforts can be made to correct errors and advise service providers of recurring data entry errors or omissions.

The QRA process will be triggered quarterly to review and correct data prior to EDD's deadline for providing quarterly data to the Department of Labor (DOL).

Listed below are a few of the data elements highlighted through the QRA process:

- Individual Employment Plan (IEP)
  - Enrollment activity has been entered into the CalJOBS<sup>SM</sup> system
  - Enrollment date precedes any training enrollment date
  - $\circ~$  Enrollment date matches the date applied to any paper IEP form or to the IEP completed within CalJOBS^{SM}
- Successful Training Completion
  - Have Career Coaches allowed training enrollment activities to "System-Close" by not entering actual outcomes for these activities?
- Employment Related to Training in 2<sup>nd</sup> Quarter Post Exit
  - Has there been an accurate representation of whether post-exit employment is held in an occupation that is related to training activities provided during participation?
- O'Net Codes in 2<sup>nd</sup> Quarter Post Exit
  - Have Career Coaches reported the correct O'Net codes for participants employed during the 2<sup>nd</sup> quarter post-exit?

In general, the impressions are that the QRA will identify those data elements that are easily reviewable through CalJOBS<sup>SM</sup> data entry; while the data elements reviewed through the DEV audits will require a deeper dive into hard-copy documentation, case notes, and case file reviews.

#### **PROCEDURE**:

As ACWDB staff become aware of missing or incorrect data through the DEV and/or QRA processes, outreach to service providers will commence – and continue until all errors have been resolved or until any deadlines established by the state have lapsed.

During the review period, it is vital that service providers swiftly respond to requests for information and/or documentation. Local Areas are offered some flexibility in:

• securing edits in the CalJOBS<sup>SM</sup> system through the Data Change Request (DCR) process; and

• providing documentation or information to resolve findings that have been identified through the DEV and/or QRA process.

In alignment with the state, WIOA service providers should use the Document Management Module to aid in preventing or minimizing the rush to provide documentation and information. ACWDB highly recommends ongoing, regular usage of the Document Management Module within the CalJOBS<sup>SM</sup> system.

# <u>CALJOBS<sup>SM</sup> DOCUMENT MANAGEMENT MODULE:</u>

The Document Management and Scanning Module will allow scanned documents to be captured and reviewed online and stored securely in the central database. This module will support WIOA, NDWG, and any generic programs being tracked through use of the CalJOBS<sup>SM</sup> system.

The Document Management and Scanning Module can store participant documentation as well as other forms and documents that may be part of the participation process (intake and eligibility determination, case management, training and credential attainment, case closure and outcomes, follow up, etc.)

Special attention should be given to the documents that are being uploaded to the CalJOBS<sup>SM</sup> system. Data elements must match information that is being reported through other forms of tracking within CalJOBS<sup>SM</sup>. For example:

- The date of birth recorded on official records should match the birthdate that has been reported on the WIOA application.
- The date of a participant-signed, paper IEP/Individual Services Strategy (ISS) document should match the actual begin date of the IEP/ISS enrollment activity.
- The Education Status on the WIOA application should match the education status as reported in the CalJOBS<sup>SM</sup> system on the date of application.
- Low-Income status reported in CalJOBS<sup>SM</sup> should match the paper version of the WIOA application and hard-copy documentation should be present to verify that status.
- The Actual Dislocation Date reported in the WIOA application should exactly match the Dislocated Worker Affidavit and any other documentation submitted to verify that layoff status.
- The application date should match the applicant's signature date on the paper WIOA application which should also match the application date as reported in CalJOBS<sup>SM</sup>.

Staff users of the CalJOBS<sup>SM</sup> system should ensure that uploaded documents and/or forms are accurate, complete, and legible.

At this time, ACWDB is discouraging uploading documents related to the Individual Training Account (ITA) process. There are so many ITA modifications and cancellations that are filed, that the existence of multiple versions of forms may contribute to confusion about the details of participant training. Internally, ACWDB staff will determine whether ITA documents need to be uploaded once a training program has been successfully completed and the participant has attained certifications/credentials from the program.

Staff users of the CalJOBS<sup>SM</sup> system may consult <u>Workforce Services Information Notice</u> (<u>WSIN</u>) 15-7 for further information about the CalJOBS<sup>SM</sup> Document Management and Scanning Module.

Any discrepancies arising between this Information Bulletin and federal or state notifications (due to future revisions) will default to the current minimum federal and state information and guidance available. This bulletin represents the most current information available at the time it was published. As policies or regulations are updated, the most current versions of bulletins will appear on our website at www.acwdb.org.

#### For information and inquiries please contact:

Michele G. Garcia Workforce Board Systems Administrator 24100 Amador Street, 6th Floor Hayward, CA 94544-1203 (510) 259-3802 mggarcia@acgov.org