Policy #08142020: **Data Validation**

Date: August 14, 2020

Section I: Federal Mandates and Guidance
Data Validation Procedures

WIOA section 116 requires each State to have ensure the data contained in its reports be valid and reliable. Data validation helps ensure the accuracy of the annual statewide performance reports, safeguards data integrity, and promotes the timely resolution of data anomalies and inaccuracies. This document contains the procedures and guidelines Adult Education programs in Wyoming are to follow. The OCTAE guidance maybe found in the OCTAE Memorandum 19-1. The following link will take you to the memo. https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-19-1.pdf?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=

Joint Data Validation Framework
Data validation is a series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data. Establishing a joint data validation framework based on a consistent approach shared by the Departments will ensure that all program data are consistent and accurately reflect the performance of each core program in each State.
The purposes of validation procedures for jointly required performance data are to:
- Verify that the performance data reported by States to the US Departments of Labor and Education are valid, accurate, reliable, and comparable across programs;
- Identify anomalies in the data and resolve issues that may cause inaccurate reporting;
- Outline source documentation required for common data elements; and
- Improve program performance accountability through the results of data validation efforts.
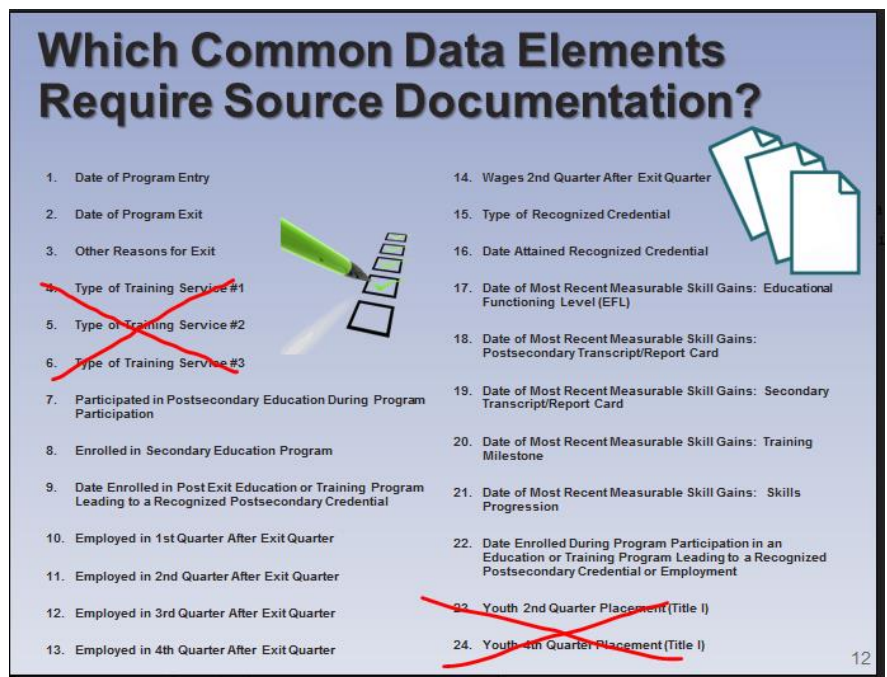
Source Documentation for Common Data Elements

Procedures developed by the States must include regular data element validation through core program monitoring on 24 common data elements. The Departments selected these elements based on their importance to reporting accurate performance outcomes and to ensure data consistency across core programs.

OCTAE sent States the list shown to the right which encompasses the 19 elements Adult Education must monitor.

The common data elements are described along with the allowable types of source documents programs may use to validate the data.

Written procedures for data validation contain a description of the process for identifying and correcting errors or missing data, which may include electronic data checks:

Which Common Data Elements Require Source Documentation?

1. Date of Program Entry
2. Date of Program Exit
3. Other Reasons for Exit
4. Type of Training Service #1
5. Type of Training Service #2
6. Type of Training Service #3
7. Participated in Postsecondary Education During Program Participation
8. Enrolled in Secondary Education Program
9. Date Enrolled in Post Exit Education or Training Program Leading to a Recognized Postsecondary Credential
10. Employed in 1st Quarter After Exit Quarter
11. Employed in 2nd Quarter After Exit Quarter
12. Employed in 3rd Quarter After Exit Quarter
13. Employed in 4th Quarter After Exit Quarter
14. Wages 2nd Quarter After Exit Quarter
15. Type of Recognized Credential
16. Date Attained Recognized Credential
17. Date of Most Recent Measurable Skill Gains: Educational Functioning Level (EFL)
18. Date of Most Recent Measurable Skill Gains: Postsecondary Transcript/Report Card
19. Date of Most Recent Measurable Skill Gains: Secondary Transcript/Report Card
20. Date of Most Recent Measurable Skill Gains: Training Milestone
21. Date of Most Recent Measurable Skill Gains: Skills Progression
22. Date Enrolled During Program Participation in an Education or Training Program Leading to a Recognized Postsecondary Credential or Employment
23. Youth 2nd Quarter Placement (Title I)
24. Youth 4th Quarter Placement (Title I)

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1. Regular data validation training for appropriate program staff (e.g., at least annually);
2. Monitoring protocols, consistent with 2 CFR §200.328, to ensure that program staff are following the written data validation procedures and take appropriate corrective action if those procedures are not being followed;
3. A regular review of program data (e.g., quarterly) for errors, missing data, out-of-range values, and anomalies;
4. Documentation that missing and erroneous data identified during the review process have been corrected; and
5. Regular assessment of the effectiveness of the data validation process (e.g., at least annually) and revisions to that process as needed.

II. State Mandates & Guidance
Wyoming's multi-level approach to data validation

A. <u>Monthly Desk Monitoring</u> - provides an approach for reviewing and tracking program performance by using quantitative data that serves as a supplement to on-site monitoring. Local programs provide data regularly (e.g., monthly) to the state office where state staff can review them to guide program review activities, inform technical assistance plans, and promote program improvement. Desk monitoring relies primarily on data that programs already collect and report.

There are three components to the "Desk Monitoring" instrument:

1) Data from LACES – includes enrollment numbers, MSG, post-test rate, and progress toward meeting the negotiated performance goals. Diagnostic checks are also reported.
2) Financial draws – this includes the amount of the grant, the monthly draws and balances, and the cost per student.
3) Comments – Directors explain events that may be influencing their data and requests for technical assistance.

This monthly report provides local program staff an opportunity to regularly review data and validate demographic information, regularly review their program data (including assessments, attendance, and high school dropout paperwork), and progress toward continuous improvement goals or performance and allows tracking for both local and state staff.

B. <u>Program Improvement Goals</u> – Local Programs are required to write goals with measurable objectives for program improvement. These goals are to be based on program data which is both qualitative and/or quantitative and an analysis of the cause and effect of strategies implemented within the program. There is a semi-annual report to the state on their progress. Goal(s) may be amended or changed if, by no fault of the program, the goal cannot be met. An example would include if a goal was to offer classes at a business and the business closed.

C. <u>LACES Training</u> – Each year the AE program contracts for professional development training from LACES staff. There are three online webinars and one face-to-face training. The training includes beginner and advanced training and covers data input, tables and updates to NRS Tales, error checks and corrections, and data analyses. Written transcripts of the webinars are sent to participants and posted to the WCCC website for future reference. Annually there is a program by program review with special attention paid to local program error patterns, corrections of those errors, and direct and specific remediation for that site.

D. <u>Data Dashboards</u> – There are two data dashboards:

1) There is a data dashboard in the LACES system. The state and local programs use it to help programs track their performance. The information is also a part of the Comparison of data for the required "Monthly report" which is a review for fiscal and NRS data.

2) Data from the NRS and from High School Equivalency testing results are combined in the Data Hub on the Wyoming Community College Commission (WCCC) website. Data from LACES is entered into tableau software and are used to create tables. These tables are used in the annual "Adult Education Profile" report

which is distributed to the Workforce Development Council, State Legislature, Wyoming Community College Commissioners, college presidents, and other stakeholders. It is also stored in the State Archives.

E. Onsite/virtual monitoring visits - Program Monitoring visits review performance data in order to evaluate the effectiveness of programs and to identify areas with potential for improvement.

The Protocol is sent in advance of the visit. A notebook is developed by the local director with supporting documentation for each of the sixteen (16) sections to be reviewed. Some sections require comparing original source documents such as Student Intake forms and attendance rosters to the electronic files in LACES.

The State conducts a random sample review of five student files and reviews local file information to data found on LACES on the following topics:

1) Intake form are completed & signed
2) A career assessment is in student files
3) Age waiver documentation is completed and a copy of the 'School District Withdrawal Verification' form has been uploaded into LACES
4) Assessment results are evident in both the local file and in LACES
5) Computer prescriptive assessment results are in the student file
6) Release of information form is signed and dated
7) Attendance records match LACES
8) Disclosed disability documentation is in file
9) Assignments and work samples are evident
10) Documentation of student progress and referral notes are in the file and noted in LACES
11) HSEC Choice of Tests form is evident in student file.
12) Earned credentials/transcripts are in the file and have been uploaded into LACES
13) Enrollments in postsecondary are recorded in LACES
14) Co-enrollments with DWS/DVR are noted in student file and in LACES
15) Evidence of 'progress' towards milestones is included in the local file for IET students.

Technical assistance is given during the visit or planned for a specific date if more training is required than time allows during the visit.

A letter of compliance is sent within 30 days. Any recommendations or findings are addressed in the letter. The program has 30 days to return their steps for corrections of any findings for approval.

F. State data reviews: Quarterly the State conducts a comprehensive review of:
1)   Assessments: where validation checks certify that:
        a) local programs are using NRS approved assessments
        b) State assessment policy is being followed
2)   Credentials earned: where validation verifies that evidence of the credential is placed into student online LACES files
3)   Postsecondary enrollments: where evidence is provided in the student file of enrollments
4)   Employment data: is being tracked in accordance with federal mandates
5)   Performance data: where validation measures to-date progress of local performance
6)   Entry/exit data is being tracked in accordance with federal mandates and that reason for exiting the program is provided for all exited students.

G. Year end reports-At the end of each fiscal year local providers submit a comprehensive narrative report which reviews various aspects of their program. This may include, but is not exclusively limited to:

1)   *performance data analysis*: providers succinctly describe how program performance was measured against federal negotiated targets for measurable skill gain and outcome measures as well as towards meeting the State requirement of post testing 60% of all eligible participants.

2) *successes/challenges:* providers are given the opportunity to briefly discuss successes/challenges to local programming throughout the year

3) *program evaluation and monitoring:* providers describe the tools used to evaluate and monitor the local Adult Education program and how evaluation results are used to improve program performance.

4) *professional development:* providers describe activities/training AE staff participated in to create and support higher accountability and teacher quality. This includes targeted professional development, program goal setting, and LACES data collection trainings.

5) *College & Career Readiness Standards*: providers discuss how these standards are used in the local program.

6) *Essential Components of Reading:* providers explain how the Essential Components of Reading are embedded into instructional methodologies and used in the local AE classroom.

7) *Other* topics, as identified by the State.