

OVERSIGHT AND MONITORING

The DLR One-Stop Operator and One-Stop Career Center, or job service office, managers are responsible for ensuring compliance with federal laws, regulation, and guidance as well as state policies and procedures. Staff from the Workforce Development, Administrative Services, and Policy and Public Affairs Divisions are responsible for oversight and monitoring of the One-Stop Career Centers to ensure compliance with federal laws, regulation, and guidance, and state policies and procedures. Monitors ensure:

- DLR programs achieve intended results.
- Resources are utilized efficiently and effectively for authorized purposes and are protected from waste, fraud, and abuse.
- Accurate and timely information is reported to serve as the basis for improved decision-making and required reporting.

Selected employment specialists from the One-Stop Career Centers will assist labor program specialists with reviewing active files and data validation. This process will allow employment specialists to better understand the process and requirements to improve accuracy. Labor program specialists will provide training for employment specialists prior to conducting the review. An employment specialist will not validate files from their own One-Stop Center. Labor Program Specialists will work alongside the Employment Specialists at all times during the review.

ACTIVE FILE REVIEW

This policy establishes file review guidance for Wagner-Peyser Title II, Title I Adult, Dislocated Worker, and Youth, Senior Community Service Employment Program (SCSEP), Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T), Temporary Assistance for Needy Families (TANF), Jobs for Veterans State Grant (JVSG), Trade Adjustment Assistance (TAA), and Migrant Seasonal Farmworker (MSFW) programs.

Timeline

File review of active files will be completed quarterly. Files subject to review include participants active in the program during the year of review. Files will be randomly selected to ensure a variety of case managers and offices are represented.

Process

Labor program specialists will develop a review sheet for each of the areas below. This review sheet will analyze eligibility, provision of services, quality of case management, documentation, fiscal accountability, and inclusion of data validation elements. An Active File Review Report containing the results of the file review will be provided to the One-Stop Career Centers. These results shall identify the names of the files reviewed, errors, and promising practices identified.

SCSEP

One file per SCSEP case manager every quarter will be completed with the above timeline and process.

SNAP E&T

Twenty-Five percent of each SNAP E&T case manager's case files will be reviewed, with no more than 15 individual files being pull during any one quarter, every quarter with the above timeline and process. In addition, DLR Labor Program Specialist will also review completed Title III and Title I active file reviews for SNAP E&T data entry compliance. After the DLR Labor Program Specialist reviews are completed, the reviews will be provided to and reviewed by the DSS Program Specialist. TANF

TANF

Twenty-Five percent of each TANF case manager's case files will be reviewed every quarter with the above timeline and process.

MSFW

During the Migrant Seasonal Farmworker (MSFW) review conducted for the annual One Stop Certification, the State Monitor Advocate (SMA) will conduct a file review. The purpose of the participant file review is to ensure MSFW data is being accurately documented in SDWORKS, all the required data is collected, and to review if MSFW participants are provided services equally. Use the below reports to find participants with a high probability of being MSFW and review files to see if:

- Participants have the correct MSFW status (MSFW or non-MSFW)
- MSFWs are provided equal opportunity to WP and WIOA services
- All required data elements are collected (PIRL 413, 808, 941, and 912)

The file review will consist of randomly selecting files from the following, but not limited to, SDWORKS reports:

- MSFW Service Level Indicators
- Detailed Reports/Employer Reports/Job Orders (Filter by O*Net codes starting with 45)
- Detailed Reports/Enrolled Individuals/Desired Occupation (Filter by O*Net codes starting with 45)
- Detailed Reports/Enrolled Individuals/Working in Agricultural O*Net Code

DATA VALIDATION

This policy establishes data validation guidance for Wagner-Peyser, Title I Adult, Dislocated Worker, and Youth, SCSEP, and TAA programs.

Data validation is a series of internal controls and quality assurance techniques established to verify the accuracy, validity, and reliability of data. The purpose of validation procedures for required performance data are to:

1. Verify the performance data reported is valid, accurate, reliable, and comparable across programs;
2. Identify irregularities in the data and resolve issues that may cause inaccurate reporting;
3. Outline source documentation required for common data elements; and
4. Improve program performance accountability through the results of data validation efforts.

Labor program specialists will review the data validation process, requirements, and plan for completion with the Workforce Development Division Directors annually to ensure staff are prepared for performing data validation of selected files.

Timeline

Data validation will be completed on a quarterly bases for the active program year. Data Validation information will be pulled from South Dakota's management information system, SDWORKS, no earlier than 45 days after the end of a quarter.

Sample Size

Files that are subject to data validation include participants who exited and are subject to reporting during the given program year. At least .5 % of Title III Wagner-Peyser files and 2% of each of the WIOA Title I Adult and Dislocated Worker, TAA, Title I Youth, National Dislocated Worker Grant (NDWG), and Apprenticeship files will be randomly selected for data validation.

Process

The file review team will validate the Authorization to Work and Selective Service registration requirements for Title I program participants, the common data elements outlined in TEGL 7-18, and the data elements outlined in TEGL 23-19. For each validated individual data element, a pass or fail grade will be assessed.

The random sampling tool within SDWORKS will be utilized to generate a sufficient representation of records from each program. A Data Validation Report containing the results of the data validation shall be provided to the One-Stop Career Centers. These results shall identify the names of the files reviewed, missing and/or erroneous data.

Source Documentation for Common Data Elements

For most data elements, the validation guidelines provide multiple forms of acceptable source documentation. If the State collects multiple sources for the same data element and the sources conflict, the most objective source should be used to determine if the data element is valid and accurate.

These source documentation types include:

- **Cross-Match:** a cross-match requires validators to find detailed supporting evidence for the data element in a database. An indicator or presence of a Social Security Number (SSN) in an administrative non-WIOA database, i.e., a database not maintained by a WIOA core program such as data from the State’s Department of Motor Vehicles, is not sufficient evidence for a cross-match. State validators must also confirm supporting information, such as dates of participation (i.e. date of last SNAP/TANF payment, date of last RA benefit, etc..) and services rendered. DLR will have data sharing agreements in place as appropriate. The use of computer screenshots from a database system for documentation of cross-match is prohibited. Rather, a case note must be used to document the cross-match and must include an explanation of the source database utilized.
- **Self-Attestation:** Self-attestation (also referred to as a participant statement) occurs when a participant states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status. The key elements for self-attestation are: (a) the participant identifying his or her status for permitted elements, and (b) signing and dating a form attesting to this self-identification. The form and signature can be on paper and uploaded electronically into SDWORKS or in SDWORKS with an electronic signature.
- **Case notes:** Case notes refer to electronic statements by the case manager that identify, at a minimum, the following: (a) a participant’s status for a specific data element, (b) the date on which the information was obtained, and (c) the case manager who obtained the information.
- **Electronic Records:** Electronic records are participant records created, stored or transferred in a form that only a computer can process and maintained in the DLR’s management information system. Records can be numeric, graphic, or text. They can also include magnetic storage media such as tapes or disks.

Source documentation for data validation items must be uploaded into SDWORKS. Hard copies are not acceptable as outlined in policy and will not be considered for data validation purposes.

CORRECTIVE ACTION

Results of the annual active file review and data validation review will be incorporated into the [One-Stop Career Center Certification](#) Policy 3.3 process. Findings, areas of concern, and promising practices that remain consistent through the annual reviews will be included in the One-Stop Career Center Certification monitoring report.

For SNAP E&T, findings, areas of concern, and promising practices may be submitted to the One-Stop center on a more frequent basis than the One-Stop Career Center Certification timeline. After the active file reviews are completed as outlined above, the reviews are provided to DSS for further review. Once DSS completes the file reviews, the Employment Specialist and Job Service manager will be notified of any corrective action needed. All identified corrective action must be addressed and completed within 25 days of the notification. Upon completion, the Employment Specialist or DLR Job Service manager must notify the DLR Labor Program Specialist who will then inform DSS.

*WIOA §107, §116, §129, §134
20 CFR §677.150, §679.370, §683.400-440
WIOA Participant Individual Record Layout*