



**MARYLAND DEPARTMENT OF LABOR DIVISION OF
WORKFORCE DEVELOPMENT AND ADULT LEARNING**

DWDAL MONITORING & COMPLIANCE UNIT

JEANNIE SHEN, LEAD PROGRAM MONITOR

AREEBA FATIMA, PROGRAM MONITOR

JOSHUA TAYLOR, PROGRAM MONITOR

TANYA WASHINGTON, COMPLIANCE MANAGER


ERIN ROTH, ASST SECRETARY AND JOHN FEASTER, III, DEPUTY ASST.

SECRETARY

WES MOORE, GOVERNOR

• ARUNA MILLER, LT. GOVERNOR

PORTIA WU, SECRETARY



Have Questions? or Concerns?

Place them in the chat and a list of questions with answers will be sent to everyone in attendance.

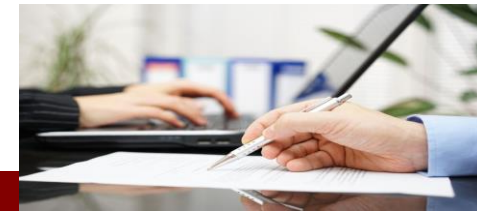


Agenda

- Welcome and Introduction of Local Areas
- What we Do?
- Data Element Validation Review PY22
- Best Practices at Local Level
- Future Monitoring

WHO ARE WE?

- The Monitoring & Compliance Unit is a team (6) that ensures the integrity of the Maryland Department of Labor funding system and assesses compliance with the federal, state and local policies and laws that govern each program under the department.
- In order to ensure the integrity of the MD LABOR programs, the Unit conducts annual Data Validation and Monitoring reviews of each local area's program activities. As part of the review, we analyze the information in the folder of each chosen participant to assess if the eligibility criteria were met, the documents match what was reported in MWE, and whether the case manager followed the rules, regulations, policies, and laws under WIOA.
- The Unit focuses on the quality of case files and the information that it contain.



Differences

Monitoring Review

- ★ The Monitoring Review is primarily responsible for the review of current Eligibility activities under the WIOA Title I programs. This review include verification of documentation to which made that individual eligible for WIOA services. It also includes compliance with Section 188, and local sub-recipient oversight of its vendor's activities and performance.



Data Validation

- ★ Data Element Validation is the review of individual records to ensure that appropriate documentation or system match exists for the answers provided in a person's record. It is used to determine whether the 24 elements have been efficiently documented based on the annual statewide performance report to USDOL. This means, is the data used in the calculations accurate?

- ★ Each program (TAA and JVSG) is given unique sets of elements in which to verify accuracy of information reported to US DOL ETA.



Monitoring Review Expectations

Monitoring: What you can expect from us

- Review files in a fair and unbiased manner
- On-site and remote reviews with technical assistance

Our Expectations of You:

- Provide the necessary files as required and present from the random sample.
- Make staff available to provide missing information.
- Documentation that will allow us to assess the accuracy of all participant data records.

Standards- What we are looking for?

1. Files for each participant in paper or electronic.
2. Valid documentation to support the data validation elements. Documentation must either Match or Support each data element.
3. Organized files that easily allow for thorough viewing.
4. Your assistance with missing information.
5. Is there allowable source documents used to verify each required data element?
6. Detailed Case Notes where applicable



DATA ELEMENT VALIDATION TEGL 23-19 CHANGE 2



Selection of Specified Data Elements

NOTE: Not all PIRL elements are subject to validation. The State reviewers will use DOL-selected specific data elements, which are selected for validation based on three factors:

- a) **Feasibility** – Data elements can be validated only when it is practical and efficient to locate and examine supporting evidence within the State records. Therefore, such items as race, ethnicity, and gender will not be validated because these data elements are self-reported by participants.
- b) **Risk** – The process for validating data elements is based partly on the likelihood that the data element may be inaccurate. Data elements involving human judgment are more prone to error than data elements that do not involve human judgment. For example, determination of employment based on supplemental sources is more likely to be in error than determination of employment from wage bank records.
- c) **Importance** – Data elements are selected for validation based primarily on their importance to the integrity of the Annual report.



CURRENT DATA VALIDATION REVIEW

WHAT WE FOUND?





Element 900 & 901 - Date of Program Entry and Date of Program Exit

Common issues found:

- ❖ Sampled files either did not have proper documentation to verify that the program entry date and exit date matched
- ❖ Documentation to match the reported dates were not available/ valid. Areas should ensure that source documentation matched the date of program entry (i.e. program dates in MWE, IEPs, intake documents)

Element 900 & 901

- Individual Plan for Employment
- Electronic Records
- Program intake documents, such as eligibility determination documentation or program enrollment forms
- A copy of the letter sent to the individual indicating that the case was closed
- WIOA status/exit forms
- Electronic Records
- Attendance records
- Review of service records identifying the last qualifying service (and lack of a planned gap)

Element 1800 & 1801– Type of Recognized Credential & Date Attained Recognized Credential

Common issues found:

- ❖ Sampled files either did not have proper documentation to support credential or had Measurable Skills Gain (MSG) documentation reported as a credential.
- ❖ Documentation to match the reported dates were not available/ valid. Areas should ensure when entering the date the participant attained their degree/ certificate, the date entered is the actual date the certificate or degree was received, NOT the date the case manager received documentation.

Note: While Case notes documenting information obtained from education or training provider is a valid source document for Element 1800 & 1801, it is NOT valid concerning Data Elements 1809 & 1810 Date of Most Recent Measurable Skill Gains: Training Milestone & Skills progression.

Element 1800 & 1801 Source Documentation (at least one of the following)

- Cross-Match
- Copy of credential
- Copy of school record
- Follow-up survey from program participants
- Case notes documenting information obtained from education or training provider

Source documents for Data Elements 1809 & 1810 Date of Most Recent Measurable Skill Gains: Training Milestone & Skills progression

Data Element 1809, Date of Most Recent Measurable Skill Gains: Training Milestone

- Documentation of a skill gained through OJT or Registered Apprenticeship
- Contract and/or evaluation from employer or training provider documenting a skill gain
- Progress report from employer documenting a skill gain

Data Element 1810, Date of Most Recent Measurable Skill Gains: Skills Progression

- Results of knowledge-based exam or certification of completion
- Documentation demonstrating progress in attaining technical or occupational skills through an exam or benchmark attainment
- Documentation from training provider or employer
- Copy of a credential that is required for a particular occupation and only is earned after the passage of an exam



Element 1810 – Date of Most Recent Measurable Skills Gains: Skills Progression

FROM DROPDOWN

1810 - Date of Most Recent Measurable Skill Gains: Skills Progression	20200311	Pass	Documentation demonstrating progress in
1811 - Date Enrolled During Program an Education or Training Program Recognized Credential or Employment			
1900 - Youth 2nd Quarter Placement		Not Applicable	None Selected

None Selected

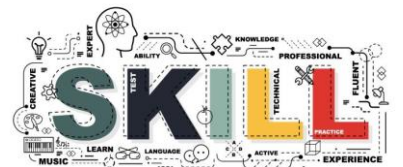
Copy of a credential that is required for a particular occupation and only is earned after the passage of an exam

Documentation demonstrating progress in attaining technical or occupational skills through an exam or benchmark attainment

Documentation from training provider or employer

Results of knowledge-based exam or certification of completion

Other - Not Listed in TEG-23-19





Element 1600, 1602, 1604, 1606- Employed in 1st-4th Quarter After Exit

1600 - Employed in 1st Quarter After Exit Quarter	1 - Yes	Pass	Other - Not Listed in TEGE-23-19
1602 - Employed in 2nd Quarter After Exit Quarter	1 - Yes	Pass	None Selected Detailed case notes verified by employer and signed by the counselor Document from employer on company letterhead attesting to an individual's employment status and earnings Follow-up survey from program participants
1604 - Employed in 3rd Quarter After Exit Quarter	1 - Yes	Pass	Pay check stubs, tax records, W2 form Quarterly Tax Payment Forms (such as IRS Form 941)
1606 - Employed in 4th Quarter After Exit Quarter	0 - No	Pass	Self-Employment or Sales Commission Worksheets Signed and Attested to by Program Participants UI wage data match/administrative wage match, such as the National Directory of New Hires
			Other - Not Listed in TEGE-23-19



Element 1600, 1602, 1604, 1606- Employed in 1st-4th Quarter After Exit

Follow-up Employment Information

Employer Name:

Employer Contact and Phone:

* Worked in Quarter 7/1/2020 - 9/30/2020? Yes No

Use primary employer from previous quarter? Yes

MWEJobs - Case Notes - Google Chrome

mwejobs.maryland.gov/vosnet/casenotes/casenotedetailspopup.aspx?enc=6V/4fG6IMp2e...

Subject: 4th Quarter Follow-Up Verified

Contact Type: Telephone

*** Case Note Description:**
Some HTML tags such as embedded videos are not allowed in this text box and will not be saved.

Writer of these notes spoke with Mr [redacted] and he confirmed that he is still actively employed.

Qtr	Employer Name	Primary Employer	Job Title	Start Date	En
3	[redacted]	Yes	Contract Specialist/Series 110	08/19/2019	
2	[redacted]	Yes	Contract Specialist/Series 110	08/19/2019	
1	[redacted]	Yes	Contract Specialist/Series 110	08/19/2019	

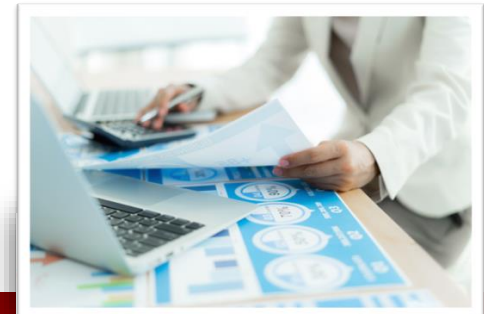


What is Required to ensure consistency?

Written procedures: Process for identifying and correcting errors or missing data.

Train Staff: At least once a year.

Monitoring protocols: Ensure staff are following the written data validation procedures and take appropriate corrective action as needed.



WIOA Monitoring Discussion

- Team Best Practices
- Montgomery County's Local Area Leadership Best Practices
- Managing Case Notes – Reminder about detail
- Monitoring Process
- Tentative Schedule for WIOA Monitoring 2024
- Questions and Concerns



Best Practices

Share!





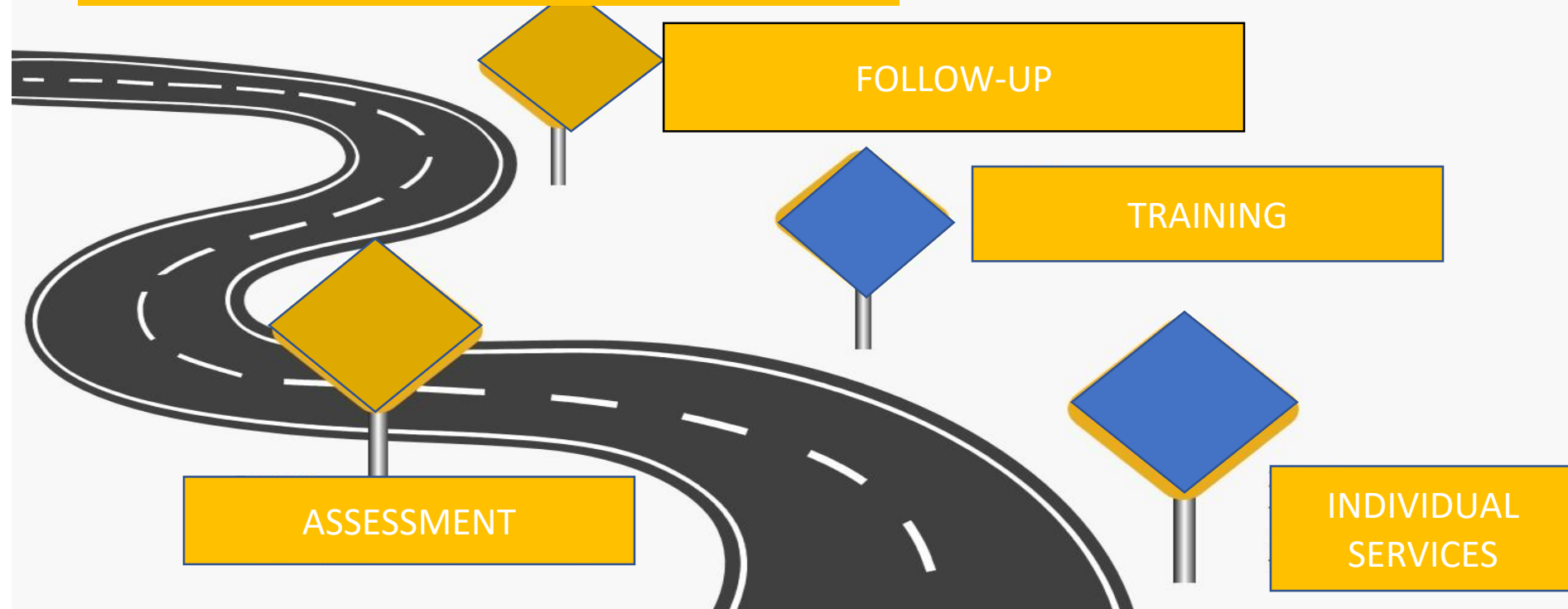
Montgomery County's Local Area Leadership Team

Policy Development

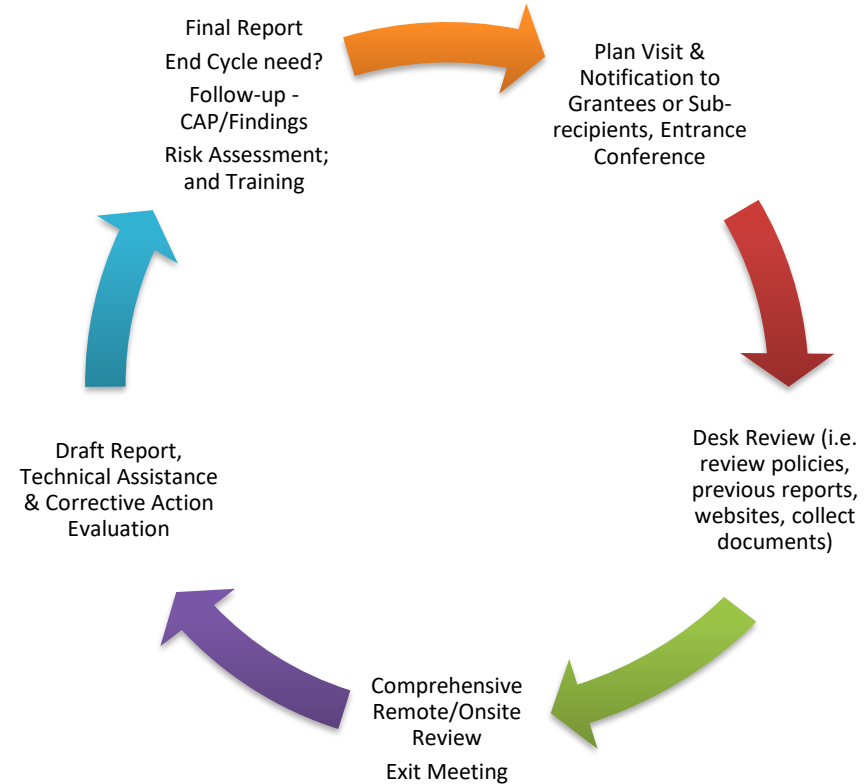


Managing Case Notes-Tell His/Her Story

CLEAR, CONCISE, UPDATED AND MIRROR FILE



Our Review Process



WIOA Source Documentation-Reminder

- Documentation is necessary to support WIOA Title I Eligibility and other services.
- Local Areas must verify and confirm that individuals are eligible to participate in WIOA services through an examination of documents.
- **Documentation may be stored electronically, however documentation must be available to program, fiscal monitors, and auditors for monitoring purposes.**
- Local Areas must retain records for a period of at least three (3) years after the submittal of the final closeout expenditure report for that funding period.
- Whether scanned, paper, or system cross-match, the purpose of source documentation is to have an auditable trail that documents the participant, services delivered and outcomes received.

Tentative Monitoring Schedule-2024 PY23

February	Frederick			
March	Baltimore City	Baltimore County		
April	Lower Shore	Carroll County		
May	Southern	Montgomery	Howard	Upper Shore
June	Susquehanna			
July	Anne Arundel	Western MD		
August	Prince George's			
September	*Data Validation *			

Some of the Resources Used

- TEGL 23-19 Change 2 Guidance for Validating Required Performance Data
- TEGL 10-16, Change 2 Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs
- TEGL 19-16, Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES)
- TEGL 7-18 Joint Guidance for Data Validation
- MPI 2021-14 Workforce Innovation and Opportunity Act Title I Youth Program
- MPI 2021-13 Workforce Innovation and Opportunity Act Title I Adult and Dislocated Worker Program Elig.
- MPI 2023-03 WIOA Title I Training and Maryland ETPL
- PI-FO-2014-03 Individual Employment Plans (IEP)
- MPI 2022-01 Data Validation
- MPI 2019-04 Privacy and Data Security
- MPI 2019-07 Monitoring
- PI 2023-02, Basic Education Skills and English Language Assessments
- PI 2022-03, DWDAL Workforce Program's Enrollment and Exit



Helpful Websites

➤ Credential & Certification finder:

<https://www.careeronestop.org/Credentials/Toolkit/find-certifications.aspx?newsearch=true>

➤ Helpful tool to determine if training was a credential: <https://www.dol.gov/agencies/eta/performance/resources/credentialtool>

➤ <http://www.labor.maryland.gov/employment/mpi/>



Thank You

We are always looking for new ways to improve our work.

Thank you so much for all of your continued support and patience as we were monitoring during these unprecedented times.

Please do not hesitate to contact us if you have any further questions or concerns regarding monitoring and the upcoming year.

We are here to make Maryland better and we look forward to working with you in the future!

For More Information, please contact any program monitor under the unit.

Jeannie Shen, Joshua Taylor, or Areeba Fatima

