CDO WORKFORCE INVESTMENT BOARD

POLICY # 06-02: Data Element Validation and Case File Maintenance

DATE: February 28, 2007

APPLIES TO: WIA Title I – Out-of-School Youth Program

History
In response to USDOL/ETA’s issuance of a revised policy for WIA data element validation (DEV), per USDOL/ETA Training and Employment Notice (TEN) No. 9-06 and USDOL/ETA Workforce Investment Act Data Reporting and Validation System (DRVS) User Handbook issued in November 2006, New York State Workforce Development System (WDS) issued Technical Advisory (TA) #06-19. TA #06-19 communicated New York State Department of Labor policy regarding data element validation (DEV) and the implementation of common measures for Workforce Investment Title I-B services, among others.

Purpose
The purpose of this policy is to
a. Communicate local policy regarding the expected One Stop Operating System (OSOS) data entry requirements for the CDO Workforce Out-of-School Youth Program and the required documentation that must be maintained in a hard-copy file for each individual enrolled in the Program; and
b. To rescind and replace, as it relates to WIA-enrolled Out-of-School Youth Program participants, POL #04-03, Maintenance of WIA-Enrolled Participant Files.

This policy and accompanying attachments will ensure that documentation of services provided to WIA-enrolled Out-of-School Youth Program participants is recorded and maintained accurately and uniformly by all CDO Workforce Youth Career Advisors. It is also expected to reduce the amount of source documentation that must be maintained in individual participant case files.

Provision
A. Data Element Validation
For every youth who has been determined eligible for the CDO Workforce Out-of-School Youth Program after July 1, 2006 and who receives a service funded in whole or in part by the CDO Workforce Out-of-School Youth Program, Youth Career Advisors will collect and validate information related to:

− Demographic information
− Services information
− Outcome information

Attachment A provides “CDO Workforce Out-of-School Youth Program – OSOS Data Entry Procedures for Data Element Validation Handbook” which addresses the specific data elements, as determined by WDS and the CDO Workforce Investment Board that must be validated for WIA-enrolled Out-of-School youth participants (demographic, services, and outcomes).
Attachment B provides “Youth Services Descriptions” which defines the specific services, as listed in OSOS that may be provided to WIA-enrolled Out-of-School youth participants.

B. Data Entry

All Youth Career Advisors responsible for providing services and recording data for WIA-enrolled Out-of-School youth participants will record services in OSOS utilizing CDO Workforce Career Centers-Youth as the Service Provider for ALL services except Occupational Skills Training.

NOTE: Occupational Skills Training services will be entered using the specific provider of training, e.g. SUNY Delhi.

To access the new Service Provider when entering a service for a youth participant:

Click Service Tab
Click New Service
Enter “CDO Workforce Career Centers-Youth” in Provider Name field

NOTE: The CDO Workforce Career Centers-Youth Service Provider has four (4) locations to reflect each of the One Stop Career Centers: Norwich, Sidney, Delhi, and Oneonta. To ensure that all of the Provider Offerings are listed, the search criteria should be set at 100.

While it is recognized that some services may be provided outside of the youth participant’s primary One Stop Career Center, services are to be entered based on the One Stop Career Center location the youth primarily accesses. Sorting the list of offerings by Provider Service Name will provide an alphabetical list of services. Staff should ensure that the service selected corresponds with the appropriate location.

Each of the CDO Workforce Out-of-School Youth Program elements are reflected in the list of offerings.

Based on WDS TA #06-16, case management is no longer a recordable service. Youth Career Advisors should record meetings with youth participants for the purposes of reviewing, updating, and/or modifying Individual Development Plans (IDP) and/or receiving progress updates from referred-to providers as Career Guidance.

Youth Career Advisors will document the delivery of Career Guidance services in the Comments Tab in OSOS. The content of comments should include information that accurately describes the services provided and the participants’ experiences in other referred-to activities.

The following are examples of appropriate areas of reference for comments (previously referred to as case notes):

a.) Participants Needs: The needs of each individual should be clearly explained in the Comments Tab. Information from intake, interviews, and the objective assessment can be woven together to discuss participant needs. This is not intended to repeat previous information but to elaborate on the documentation in order to give a clear
picture of the individual, his/her particular circumstances and needs, and the barriers he/she faces.

b.) **Services Provided:** Comments can be used to show clearly how the mix of services offered will address the needs of each individual. Documentation should explain the services provided within the CDO Workforce Out-of-School Youth Program and the rationale for those choices.

c.) **Tracking the IDP:** The participant’s movement through program services should be tracked to include changes in life situation, changes in training needs, accomplishments, and setbacks. To accomplish this, comments should coincide with and augment the information in the initial IDP and any subsequent revisions.

d.) **Meetings and Follow-ups:** Meetings and contacts should be noted in the Comments Tab. In addition, comments should be utilized to highlight follow-up activity for each individual.

**C. Case File Maintenance**

For each participant enrolled in the CDO Workforce Out-of-School Youth Program, a hard-copy file will be maintained that includes:

- A signed OSOS Registration form OR a signed CDO Workforce Youth Program application;
- A completed Individual Development Plan, updated as appropriate;
- Signed agreements for (as appropriate):
  - Occupational Skills Training – ITA,
  - On-the-Job Training, and or/
  - Work Experience
- Signed Self Attestation Form, if appropriate (Attachment C)

Because obtaining and maintaining back-up copies of the source documents used to validate participant information is no longer required, it is essential that the information is accurately recorded in the appropriate OSOS data fields and recorded in the Comments Tab. Attachment A of this policy provides guidance as to the appropriate method for documenting the validation of each element.

**Attachments:**

A. CDO Workforce Out-of-School Youth Program – OSOS Data Entry Procedures for Data Element Validation Handbook
B. Out-of-School Youth Services Descriptions
C. CDO Workforce Out-of-School Youth Program Self Attestation Form