

**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL
UNDER THE PAPERWORK REDUCTION ACT**

**PART B –
COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

1. Description of Universe and Selection Methods Used

As described in Part A of the Supporting Statement, the data validation methodology consists of two parts:

- 1) **Report validation.** ETA assures the validity of the Senior Community Service Employment Program (SCSEP) aggregate reports by using the SCSEP Performance and Reporting System to automatically generate the grantee-level aggregate reports based on the grantee’s individual record files entered into the system and the performance reporting specifications for the quarterly and final year-end report. Edits built into the system assure the validity of SCSEP’s performance reports.
- 2) **Data element validation** assesses the accuracy of participant data records. For SCSEP, the universe for data element validation comprises all SCSEP records submitted to ETA during the prior program year. SCSEP participants are comprised of unemployed low-income persons (particularly persons who have poor employment prospects) who are age 55 or older at the time of application. This information is drawn from national case management software and is not uploaded at the grantee or sub-grantee level. The universe from which the data is obtained for these programs is described in the People Served by Program report available at doleta.gov/Performance/results/pdf/DOL_Workforce_Rprt_Dec_2016.pdf. Data element validation is performed by reviewing samples of participant records against source documentation to ensure compliance with federal definitions and to verify the accuracy of the information contained in the system.

The data validation process results in an estimate of the error rates for each data element and each reported count. Error rates are estimated separately for each of the 77 grantees for SCSEP. The maximum sample size of a grantee’s eligibility or performance sample is 250 enrollments. Estimations of eligibility sample size are based on the customer flow of new participants in a given year, which varies by year but averaged 46 enrollments for Program Year (PY) 2019. Estimations of performance sample size are based on the customer flow of exited records, which also varies by year but averaged 77 enrollments for PY 2019. The following statistics provide additional detail on the estimated sample size for a given grantee based on PY 2019 data validation sampling.

TABLE 1: DATA VALIDATION SAMPLE STATISTICS

Sample	Avera	Minimu	Maximu	Standa
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Eligibility	46	0	141	34
Performan ce	77	0	250	66

The methodology for data element validation employs sampling to improve the efficiency of the validation process. The population frame for the eligibility sample is participants who have newly entered the SCSEP program during the program year. Participants transferring into another SCSEP project, defunct sub-grantees, and withdrawals are excluded from this population frame. The population frame for the performance sample is participants who exited an enrollment where the fourth quarter after the exit quarter is within the program year. Participants transferring into and out of a program, defunct sub-grantees and withdrawals are also excluded from this population frame. To minimize grantees’ burden in performing validation consistent with producing a reliable estimate of the error rates, the data element validation process is designed to compute a reliable error rate using the smallest possible sample size. To accomplish these objectives, two sampling techniques are used:

- Variable sampling rates among grantees are used to reduce the burden on small grantees as much as possible.
- Oversampling of high-risk and high-importance cases is used to provide a more accurate estimate of the error rate.

These sampling methods consider the numbers of records so that the overall burden is reduced as much as possible, while still achieving a reliable estimate of error. See the Methodology Details documentation below for more specific details.

To reduce the burden on grantees, the SCSEP Performance and Reporting System includes a validation system that calculates the validation values, imports the reported counts, draws the data element validation samples, produces online and paper validation worksheets, calculates error rates, and produces the validation reports.

Data validation relies on existing records from grantee data in the system and case files. Response rates are not an issue with the data validation process because the data are sampled from the entire participant file and so do not require survey responses.

2. Procedures for the Collection of Information

A. Statistical Methodology for Stratification and Sample Selection

As noted above, report validation does not require grantees to obtain information via surveys because the entire participant file is utilized during this validation procedure.

For data element validation, multistage samples of participant records are drawn. Two independent samples are selected for each grantee: eligibility and performance. Stratification is not employed within the samples in the selection of grantees or records. Records are randomly sampled directly for the eligibility sample, with no weighting. For the performance sample, each record has a probability of selection proportional to its weight.

To increase the efficiency of the process, records in the performance sample receive a risk weight of 1, 2, or 3 based upon two factors: whether the record is a success for calculating performance (i.e., whether the SCSEP participant was employed in the second quarter after exit), and the risk that the data used to calculate performance are in error.

SCSEP Methodological Details

The SCSEP sampling algorithms draw a weighted performance sample from those participants who exited during the Employment Rate – 4th quarter after exit time period. Each record in this cohort is assigned a weight of 1, 2, or 3. Records are sampled with a probability proportional to their size. Thus, instead of selecting records directly as is done with the eligibility sample, records are selected based upon their weight. The details below explain how to draw the SCSEP validation sample. It provides methodological details on the sample frame (i.e. the universe of records from which the sample will be drawn), the sample size, the weighting scheme, and the selection process.

TABLE 2: VARIABLE DEFINITIONS

Variable	Definition
SUB_GRANTEE_CODE	A field on the enrollment. Value indicates the Sub-Grantee the enrollment is associated with.
PROJECT_TRANSFER_IND	A field on the enrollment record populated by the case management system when the enrollment record is involved as the donor record in a transfer.
PRIOR_GRANTEE_CODE	A field on the enrollment record populated by the case management system when the enrollment record is involved as the recipient record in a transfer. Indicates the grantee from which the enrollment was transferred from
TRANSFERRED_DATE	A field on the enrollment record populated by the case management system when the enrollment record is involved as the recipient record in a transfer. Indicates the date on which the transfer occurred.
NON_EXIT_REASON	A field on the enrollment record used to close the record when the applicant or participant has left your project but has not truly exited SCSEP, or when you are resolving a dual enrollment. Case management system generates a value for records closed as a result of

	transfer
TRANSFERRED_GRANTEE_CODE	A field on the enrollment record populated by the case management system when the enrollment record is involved as the donor record in a transfer. Indicates the grantee to which the enrollment is being transferred.
PY18_FU_1_WAGES_TEXT	A field on the placement record associated with an enrollment in the sample. Field indicates whether the participant received any wages in the second quarter after the quarter of exit.
PY18_FU_2_WAGES_AMT	A field on the placement record associated with an enrollment in the sample. Field indicates the amount of earnings for the participant in the second quarter after the quarter of exit.
PY18_FU_3_WAGES_TEXT	A field on the placement record associated with an enrollment in the sample. Field indicates whether the participant received any wages in the fourth quarter after the quarter of exit.

IMPORTANT NOTE: Several of the variables developed during the sampling process are necessary to calculate the error rates for data element validation. The following fields are particularly important for the calculation: each record’s weight (whether or not the record was sampled), each record R_Sel_i value, n (the calculated samples size), and n_Non_Cert. In addition, other variables are needed to test the sampling algorithm.

Calculate the number of enrollments where the participant exited in the Employment Rate – 4th quarter after exit cohort:

N = Count of enrollments where the 4th quarter after the exit quarter is within the report period **and** (PROJECT_TRANSFER_IND <> “Y” **or** PROJECT_TRANSFER_IND is null) **and** PRIOR_GRANTEE_CODE is null **and** TRANSFERRED_DATE is null **and** NON_EXIT_REASON <> ii_Transferred_grantee” **and** TRANSFERRED_GRANTEE_CODE is null **and** SUB_GRANTEE_CODE <> “RG999” **and** have zero reject errors on the DQR associated with it, its participant record, or any of its CSA or UE records.

Note: The cohort for Employment Rate – 4th quarter after exit includes any enrollment where the 4th quarter after the exit quarter is within the report period.

Calculate the Sample Size:

$$n = \left(\frac{HL^2}{deff \times t^2 \times P(1 - P)} + \frac{1}{N} \right)^{-1}$$

Where n = sample size, HL is the half-length of the confidence interval, N is the number or records, $t = 1.96$, $deff = 2$ and $P = 0.95$. If n is not an integer the number is rounded up to the nearest integer $> n$.

If $N_{fs} \geq 500$, then $CI = 0.035$, Else $CI = 0.04$

If $n > 250$, set the sample size = 250.

Assigning Risk Weights to Each Record:

For each Employment Rate – 4th quarter exiter:

Set Risk weight = 3 if this enrollment has a UE record with
PY18_FU_1_WAGES_TEXT= “i_Yes_supplemental” **AND**
This exiter has a UE record with PY18_FU_2_WAGES_AMT > 0
AND This exiter has a UE record with PY18_FU_3_WAGES_TEXT =
“i_Yes_supplemental”

Else set Risk weight = 2 if this exiter has a UE record with PY18_FU_1_WAGES_TEXT=
“i_Yes_supplemental”

Else set Risk weight = 1

Set key variables for record selection algorithm:

Total_Weight = Sum of the Risk weight for all the Employment Rate – 4th quarter exiters.
Sampling_Interval = Total_Weight/n.

R_Sel_i is used to identify records that have been selected for the sample, default and initial value = null.

Select first round of records with certainty:

Select all records where weight of record \geq Sampling_Interval. If this would result in selecting more than n records, randomly select n records where weight of record \geq Sampling_Interval. Set R_Sel_i = “Certainty” for all records selected in this step. Select all records where weight of record \geq Sampling_Interval. If this would result in selecting more than n records, randomly select n records where weight of record \geq Sampling_Interval. Set R_Sel_i = “Certainty” for all records selected in this step.

Calculate variables related to the second round of sampling:

Total_Weight_Non_Cert = Sum of the Risk Weight for all of Employment Rate – 4th quarter exiters whose weight is less than Sampling_Interval.

$n_{Non_Cert} = n - (\text{number of records with weight } \geq \text{Sampling_Interval})$.

$\text{Sampling_Interval_Non_Cert} = \text{Total_Weight_Non_Cert} / n_{Non_Cert}$.

Select second round of records with certainty:

Select all records where (risk weight \geq Sampling_Interval_Non_Cert and R_Seli is null). If this would result in selecting more than n_Non_Cert records, randomly select records with weight 2 until n_Non_Cert records are selected. For all records selected in this step, set R_Seli = "Certainty".

If certainty records are selected, update and recalculate variables.

If (number of records with weight \geq Sampling_Interval_Non_Cert **and** weight $<$ Sampling_Interval) = 0, skip step 13. If not, set: Total_Weight_Non_Cert = Sum of the Risk Weight for all of the Employment Rate – 4th quarter exiters whose weight is less than Sampling_Interval_Non_Cert, n_Non_Cert = n – number of records already selected
Sampling_Interval_Non_Cert = Total_Weight_Non_Cert / n_Non_Cert.

Set random variable (needed to sample records):

Random number (R) = Random number between 0 and Sampling_Interval_Non_Cert.

Set variables used to sample records with non-certainty:

Counter = 0, which is used to track the sum of the weight of records.

I_Select = R, to track the weight interval used to select records.

i = 1, a subscript to identify the record(s) under consideration.

Num_Sampled = 0, to count the number of records that have been sampled.

w_i, to identify the weight for the ith record.

If all records are to be sampled, select all records

If n_Non_Cert \geq number of records not sampled, select all records, and set R_Seli = "Certainty" for all records.

If the number of records sampled is less than the number of records to be sampled with non-certainty

Do while Num_Sampled $<$ n_Non_Cert

a. If the current record has already been selected for sampling, go to the next record:

If (R_Seli is not null) then

 i = i + 1

EndIf

b. If the current record contains the I_Select weighted unit, select the record, up the number of records sampled, up the I_Select weighted unit, up the weight counter and go to the next record.

Else If $I_Select \geq Counter$ and $I_Select < (Counter + w_i)$ then

$R_Sel_i = \text{“Random”}$

$Num_Sampled = Num_Sampled + 1$

$I_Select = I_Select + Sampling_Interval_Non_Cert$

$Counter = Counter + w_i$

$i = i + 1$

EndIf

c. If the I_Select weighted unit is less than the counter, then update the I_Select .

Else If $I_Select < Counter$ then

$I_Select = I_Select + Sampling_Interval_Non_Cert$

EndIf

d. If the I_select unit is greater than or equal to the counter plus the next record, up the counter and the record.

Else If $I_Select \geq Counter + w_i$ then

$Counter = Counter + w_i$

$i = i + 1$

EndIf

B. Estimation Procedure

Estimation encompasses computing sample weights and error rates. Validators compare the data from the samples to source documentation. Once all the data have been evaluated, error rates are calculated for each data element. These error rates are estimated using data weighted to account for differences in probability of selection. The validation software computes the sampling errors for each grantee, taking into account the multistage design and the use of unequal weights.

SCSEP Error Rate Calculation

The first step to calculating the weight is to determine the probability of selection for each record. This is used to calculate the record's error weight, which determines how it impacts the error rate calculations. To calculate the error rates, the weights of the records that are in error are divided by the weights of all records validated, or all records sampled depending on the type of error rate calculation. Error rates are calculated for each data element.

For each record, set $Error_w(j) = 1/p_selection_i$, $p_selection_i = 1$ if ($R_sel_i = Certainty$), else

$$\frac{\text{Risk weight of record} * n_{\text{non_cert}}}{\sum \text{risk weight for all records where } R_{\text{sel}} = \text{Random or } R_{\text{sel}} \text{ is null}}$$

Two error rates must be calculated for each data element validated. The numerator is the same for both – the sum of the error weights for those records for which the appropriate data element failed. The denominators differ. For the reported data error rate, the denominator equals the sum of the error weights for all records sampled for the funding stream that should be validated. On the other hand, the overall error rate denominator equals the sum of the error weights for all records sampled for the funding stream. Because users can constantly change their validation results, the results need to be calculated when opened.

REPORTED DATA ERROR RATE = $\sum (\text{Error}_w(j) * P_{\text{FDE}})$ for each record sampled / $\sum (\text{Error}_w(j) * \text{VAL}(j))$ for each record sampled, where $P_{\text{FDE}} = 1$ if the element failed the validation and $P_{\text{FDE}} = 0$ if the element passed the validation or if the grantee was not required to validate the element for this record.

$\text{VAL}(j) = 1$ if the grantee was required to validate the element for the record. $\text{VAL}(j) = 0$ if the grantee was not required to validate the element for the record.

OVERALL ERROR RATE = $\sum (\text{Error}_w(j) * P_{\text{FDE}})$ for each record sampled for the / $\sum \text{Error}_w(j)$ for each record sampled, where $P_{\text{FDE}} = 1$ if the element failed the validation and $P_{\text{FDE}} = 0$ if the element passed the validation or if the grantee was not required to validate the element for this record.

Note that each data element gets its own error rate calculation.

C. Degree of Accuracy Needed for Purpose Described in the Justification

Error rates for each data element have confidence intervals varying with the size of the sample, from 3.5 percent to 4 percent.

D. Unusual Problems Requiring Specialized Sampling Procedures

The discussion above indicates that the methodology uses specialized sampling procedures. The rationale for using these procedures rather than pure stochastic methods is to minimize the burden that data element validation imposes upon the grantees.

3. Response Rates

As mentioned in Part 1, response rate issues do not arise in the data validation program. Data validation relies on existing records from the SCSEP Performance and Reporting System and case files. Through the use of valid sampling techniques, the validation process results in estimates of data accuracy that can be generalized to the universe of data reported to ETA on program performance and activities.

4. Tests of Procedures or Methods

SCSEP has been conducting validation for ten years. The grantees received training prior to beginning validation and receive ongoing training and technical assistance from ETA’s data validation contractor and national office staff throughout the validation process. Results of these data validation activities indicate that the methodology has functioned as intended and has enabled states to identify and address reporting errors.

5. Individuals Consulted on Statistical Aspects of the Design

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Sheldon Bond directs the generation of the performance and eligibility samples, reviews them for data quality and compares them against historical trends. He also directs the testing team that implements the samples into the SCSEP case management system.