

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION WIA/Performance Reporting
	CORRESPONDENCE SYMBOL OPDR
	DATE July 25, 2011

TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 27-10, CHANGE 1

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE ADMINISTRATORS
NATIONAL FARMWORKER JOBS PROGRAM GRANTEEES
INDIAN AND NATIVE AMERICAN PROGRAM GRANTEEES

FROM: JANE OATES /s/
Assistant Secretary

SUBJECT: Program Year 2010/Fiscal Year 2011 Performance Reporting and Data Validation Timelines

1. Purpose. To reissue Training and Employment Guidance Letter (TEGL) 27-10 and revise Attachment A, *Source Documentation Requirements for Program Year (PY) 2010 WIA Data Element Validation*. Additionally, language was added regarding reporting timelines and data element validation for the Trade Adjustment Act (TAA) program.

To inform and remind the workforce investment system of the performance reporting requirements and associated timelines for submitting quarterly and annual reports and data validation results for the Workforce Investment Act (WIA) title IB programs and National Emergency Grants (NEG); Wagner-Peyser Act Employment Service; activities authorized under chapter 41 of title 38 United States Code (Local Veterans' Employment Representative and Disabled Veterans' Outreach Programs); the TAA program, the Indian and Native American Program (INAP); and the National Farmworker Jobs Program (NFJP). This guidance also specifies that the 2011 American Recovery and Reinvestment Act (ARRA) supplemental reports requirements will be the final ARRA reports.

2. References.

- WIA of 1998, Sections 136 and 185
- 20 Code of Federal Regulations 667.300
- TEGL 3-03, Change 3, *Revision to the Data Validation Policy for Employment and Training Programs for Program Year 2004*
- TEGL 14-03, Change 1, *Performance Reporting Submission Procedures for the Workforce Investment Act Standardized Record Data (WIASRD), the Annual Report, and the Quarterly Reports under Title 1B of the Workforce Investment Act (WIA) for Program Year (PY) 2003 and 2004*

RESCISSIONS TEGL 31-09	EXPIRATION DATE Continuing
----------------------------------	--------------------------------------

- *TEGL 17-05 and TEGL 17-05, Change 2, Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues*
- *TEGL 9-07, Revised Incentive and Sanction Policy for Workforce Investment Act Title IB Programs*
- *Training and Employment Notice 8-09, Program Year 2008/Fiscal Year 2009 Performance Reporting and Data Validation Timeline*
- *TEGL 17-09, Quarterly Submission of Workforce Investment Act Standardized Record Data (WIASRD)*
- *TEGL 7-10, Workforce Investment Act and Wagner-Peyser Act Performance Accountability Reporting for the American Recovery and Reinvestment Act of 2009*
- *TEGL 9-10, Workforce Investment Act (WIA) Annual Report Narrative*

3. Performance Reporting and Data Validation for the WIA Title IB Programs. For PY 2010, each state is required to make the following submissions for WIA to the Employment and Training Administration (ETA):

A. A validated WIA Annual Report (ETA 9091 - OMB No. 1205-0420) - Due no later than October 3, 2011.

Please note that states are required to complete report validation prior to submitting the annual report Tables A-O (ETA 9091) to ETA through the Enterprise Business Support System (EBSS) on or before October 1, 2011. Submission of timely and accurate data is required in section 136 of WIA. Furthermore, a timely and validated annual report is one of the criteria for incentive eligibility. See TEGL 9-07 for further clarification.

Data element validation, using the file of exiters and participants reported on the ETA 9091, must be submitted by February 1, 2012. Please see Attachment A of this TEGL for the source documentation requirements for PY 2010 WIA data element validation.

States that are approved to report only the common performance measure outcomes for WIA programs for PY 2010 (Alabama, Alaska, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Idaho, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Utah, Virginia, Virgin Islands, Washington, West Virginia, Wisconsin, and Wyoming) do not have to report outcomes for the customer satisfaction measures, the credential measure for Adults and Dislocated Workers, or the Older and Younger Youth measures on the WIA Annual Report. These states,

along with all other states, are to report outcomes for the youth common performance measures.

States that are approved to report only the common performance measure outcomes should reference Attachment B of this TEGL, which contains the WIA Annual Report format with strikeouts to indicate the information that is **not** required as part of the state's annual report submission.

B. A WIA Annual Report Narrative – Due no later than October 3, 2011.

States should e-mail electronic copies of their narrative annual report to WIA.AR@dol.gov and their Regional Administrator. Guidance in TEGL 9-10, *Workforce Investment Act (WIA) Annual Report Narrative* specifically identifies those required portions that states must provide as well as those portions that states are encouraged to provide.

C. The WIA Standardized Record Data files – Due no later than September 15, 2011.

There are significant changes to the frequency and content of the WIASRD file submissions. In accordance with TEGL 7-10, grantees are now required to submit the WIASRD file for both participants and exiters on a quarterly basis.

A number of states have used the Data Reporting and Validation System (DRVS) to prepare their annual WIASRD file for final submission to ETA. When a state uploads individual records into DRVS, the system not only validates the data by checking for data entry errors, missing values, and inconsistencies between fields, but also automatically selects and formats the data for uploading into EBSS. However, the export routine in DRVS removes and modifies the data before producing a WIASRD file for uploading into EBSS.

Since DRVS has not been modified to allow for the exporting of participant records, **states should not use DRVS to produce their quarterly WIASRD files.** Instead, ETA has modified EBSS to allow states to submit their individual records directly to the system based on the current specifications for uploading data into DRVS. EBSS has conducted edit checks based on updated specifications for the WIASRD edit checks and valid value requirements. All edit checks and valid value requirements are fully articulated in Attachments A through E of TEGL 17-09.

There are several ways in which the quarterly submission of WIASRD files will be unique. These modifications are explained in sections 4.A – 4.D of TEGL 17-09:

- The submission will include data fields previously not accepted by EBSS.

- The submission will include data on all participants who have not exited. To accommodate this participant data, some WIASRD fields have required values for participants without exit dates.
- There are changes to the technical process of uploading individual record files into EBSS.
- States will submit to ETA the individual record files for participants who receive “self and informational services only” (hereafter referred to as self-service only participants).

WIASRD quarterly submissions for the first, second, and third quarters of each program year are due **45** days following the end of the quarter. The due date for the fourth quarter of each program year is **75** days following the end of the quarter. This additional time provides states with the opportunity to better align their fourth quarter WIASRD data with their WIA Annual Report data due no later than October 1st of each year. States have an additional **15** days following the due date to address data errors; WIASRD files are locked from editing after this period. Should the due date fall on a Saturday or Sunday, the quarterly WIASRD file is due the following Monday.

Similar to the annual submission of individual records, the quarterly WIASRD submission will be used to compute certain performance measures. Therefore, the lagged cohorts to be included in the quarterly submission must correspond to the cohorts in the annual submission. In practical terms, states will be submitting an annual report on a quarterly basis. Therefore, states will no longer be required to submit an annual WIASRD file.

Please note the following items when generating and submitting WIASRD files:

- WIASRD item 309 (Incumbent Worker (Statewide 15 percent Activities)), has been updated to allow states to track Incumbent Workers who received local formula funds or Rapid Response funds. Please note the changes in the field description and valid value requirements for this item.
- WIASRD item 326 (Other Non-WIA Programs) includes new valid values to allow states to code American Recovery and Reinvestment Act of 2009 co-enrollments.
- Please ensure that WIASRD item 342 Occupational Skills Training Code is completed; O*NET codes are available at <http://online.onetcenter.org/>.
- Please ensure that WIASRD item 619, Type of Recognized Credential, is completed for each individual who has earned a credential, certificate, or degree.
- If the exiter was a Workforce Innovation in Regional Economic Development (WIRED) or Military Spouse Career Advancement Account (CAA) funded recipient, item 313c should contain the appropriate WIRED or CAA grant number.

- The most common WIASRD data problems are missing or incomplete information in the service items that were added in PY 2005 and on the occupation of the training program. The service items that were added in PY 2005 included the following:
 - Received disaster relief assistance
 - Received Core Self-Services and Informational Activities
 - Date of first staff assisted core service
 - Received workforce information services
 - Date completed or withdrew from training
 - Received prevocational activities
 - Enrolled in education
- The occupation of the job held in the quarter after exit is frequently missing. States are encouraged to collect this data when providing follow-up services, as it is not available in wage record data.

In addition to these items, ETA has developed Attachment C of this TEGL, which contains a list of common errors identified during the analysis of WIASRD submissions from previous years. States should contact ETA's National Office at ETAperforms@dol.gov, with the subject line of **WIASRD submission**, if they need additional assistance.

Please visit <http://www.doleta.gov/performance/reporting> for the most recent WIASRD file format.

Please note that in addition to the annual reporting requirements enumerated in sections A-C above, states must also submit Quarterly and Supplemental Monthly Reports to ETA through EBSS.

As described in TEGL 7-10, states are required to submit supplemental reports for WIA Adults, Dislocated Workers, and Youth programs, NEG, and Wagner-Peyser Employment Service and Reemployment Services Grants for reporting under the ARRA. States must continue to submit these reports through June 30, 2011. The final report for the ARRA will be August 15 (not the customary July 15) to provide states with extra time to make any final corrections to their ARRA data.

4. Performance Reporting and Data Validation for Other State-Based Programs.

Wagner-Peyser Employment Service. States are required to submit the ETA 9002 and VETS 200 reports (Office of Management and Budget No. 1205-0240) on a quarterly basis. **States must submit their PY 2010 fourth quarter reports no later than August 31, 2011.**

The fourth quarter PY 2010 Wagner-Peyser Employment Service submission requires report validation and minimal data element validation. **Data element validation must be completed for the ETA 9002 and VETS 200 reports prior to submitting the final fourth quarter reports by the August 31, 2011, due date.** A minimal data element validation sample of 25 job seekers must be reviewed and compared to state-level data prior to submitting the ETA 9002 and VETS 200 reports to ensure that the files used to conduct report validation were properly constructed. Although DRVS is not being modified to export the modified WIASRD file, DRVS will still be able to conduct data element validation procedures. All states are still required to perform data element validation using the DRVS. Also, all states are required to submit their summary and analytical reports for data element validation through the EBSS.

Trade Adjustment Assistance. States are required to submit the Trade Act Participant Report (TAPR) on a quarterly basis, no later than 45 days after the end of the report quarter. The fourth quarter TAPR for Fiscal Year (FY) 2011 is due no later than **November 14, 2011.** States administering TAA programs are not required to submit an annual report; states are required to submit individual participant records only for TAA. Data element validation is an annual state requirement in the TAA program. However, as mentioned in TEGL 24-10, this element validation requirement was waived for FY 2010. Consequently, ETA is currently exploring feasible methods to conduct data element validation in FY 2011. Subsequent guidance on this manner will be forthcoming.

5. Data Validation for the National Farmworker Jobs Program. Grantees administering the NFJP are not required to submit a performance outcomes report. Grantees are required to submit individual participant records for the NFJP, which are used by ETA to calculate the performance outcomes for each grantee. Therefore, grantees are not required to conduct report validation, but must conduct data element validation.

The final NFJP participant data for PY 2009 (participants with exit dates between 7/1/2009 and 6/30/2010) were due to ETA's contractor (Social Policy Research Associates) on May 15, 2010. **Data element validation for PY 2009 must be submitted to ETA by November 2, 2011.** Please see Attachment D of this TEGL for the source documentation requirements for PY 2009 NFJP data element validation. NFJP grantees should use NFJP Data Validation Software Version 2.0.

6. Indian and Native American Program Reporting. Grantees administering the INAP are not required to submit a performance outcomes report. Grantees are required to submit individual participant records for the INAP, which are used by ETA to calculate the performance outcomes for each grantee.

7. Data Reporting and Validation Resources. ETA provides several resources to states in order to assist them in reporting timely and accurate data. As previously mentioned, one of the criteria for incentive eligibility is that the data used to compute the performance outcomes must be submitted on time and be accurate.

WIA Annual and Quarterly Report handbooks are available at:
<http://www.doleta.gov/performance/reporting>

Data validation software applications and User Guides for each program are at:
http://www.doleta.gov/performance/reporting/tools_datavalidation.cfm

8. Changes to Required Source Documentation for Data Validation. In 2010, there was a change to the source documentation requirements for DRVS Field #3, 'Date of Birth.' The allowable documents for 'Date of Birth' are now aligned with the level of service, such that a hard or electronic copy of the participant's identification (I.D.) will only be required for a participant who receives intensive and/or training services. The following source documentation requirements are also included in Attachment A of this document.

- For participants participating in self-service only activities, self-attestation is acceptable.
- For WIA Adult, Dislocated Worker, and NEG participants receiving staff-assisted core services only, the hard or electronic case notes should reflect that the client has shown proof of age. The notes should include, for example, the driver's license number or other uniquely identifiable information of the document.
- For all WIA Youth program participants and WIA Adult and Dislocated Worker/NEG participants receiving intensive and/or training services, a hard or electronic copy of the participant's I.D. must be kept in the case file. The I.D. should be one of the following: driver's license, baptismal record, birth certificate, DD-214, Report of Transfer or Discharge paper, Federal, state or local identification card, passport, hospital record of birth, public assistance/social service records, school records or ID cards, work permit, cross match with Department of Vital Statistics, or tribal records.

9. Training and Technical Assistance. States and grantees are encouraged to request technical assistance on validation procedures and the use of the reporting and validation tools by contacting Regional and/or National Office program staff.

10. Action Requested. States and grantees should: 1) distribute this guidance to the appropriate staff; 2) complete report and data validation activities within the timeframes established in Sections 3, 4 and 5 of this guidance; and 3) provide the appropriate Regional Office with updates on the reporting and validation process.

11. Inquiries. Questions regarding performance reporting should be directed to the appropriate ETA Regional Office, or to the Office of Policy Development and Research at ETAperforms@dol.gov.

12. Attachments.

Attachment A: Source Documentation Requirements for Program Year (PY) 2010 WIA Data Element Validation

Attachment B: Workforce Investment Act (WIA) Annual Report Requirements for States Approved to Report Against the Common Performance Measures Only

Attachment C: Common WIASRD Reporting Errors

Attachment D: Source Documentation Requirements for Program Year (PY) 2010 NFJP Data Element Validation