

|   |                                      |
|---|--------------------------------------|
| <b>EMPLOYMENT AND TRAINING ADMINISTRATION</b><br><b>ADVISORY SYSTEM</b><br><b>U.S. DEPARTMENT OF LABOR</b><br><b>Washington, D.C. 20210</b> | <b>CLASSIFICATION</b><br>WIOA        |
|   | <b>CORRESPONDENCE SYMBOL</b><br>OPDR |
|   | <b>DATE</b><br>October 25, 2022      |

**ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 23-19, Change 1**

**TO:** STATE AND LOCAL STAKEHOLDERS IN THE WORKFORCE  
INNOVATION AND OPPORTUNITY ACT  
STATE WORKFORCE AGENCIES  
STATE WORKFORCE ADMINISTRATORS  
STATE WORKFORCE LIAISONS  
H-1B SKILLS TRAINING GRANT PROGRAM RECIPIENTS  
INDIAN AND NATIVE AMERICAN PROGRAM (INAP) GRANT RECIPIENTS  
JOB CORPS CONTRACTORS  
JOBS FOR VETERANS STATE GRANTS (JVSG) GRANT RECIPIENTS  
STATE MONITOR ADVOCATES  
NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANT RECIPIENTS  
NATIONAL DISLOCATED WORKER GRANT RECIPIENTS (DWG)  
STATE APPRENTICESHIP AGENCIES  
OFFICE OF APPRENTICESHIP (OA) STATE DIRECTORS  
APPRENTICESHIP GRANT RECIPIENTS (OA-MANAGED)  
REENTRY EMPLOYMENT OPPORTUNITIES (REO) GRANT RECIPIENTS  
SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP) GRANT RECIPIENTS  
TRADE ADJUSTMENT ASSISTANCE (TAA) LEADS  
YOUTHBUILD GRANT RECIPIENTS

**FROM:** BRENT PARTON /s/  
Acting Assistant Secretary

**SUBJECT:** Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs

- Purpose.** This guidance provides information to grant recipients of the U.S. Department of Labor workforce programs, including states, and provides guidelines for grant recipients to use in developing procedures for ensuring the data submitted for performance reporting are valid and reliable.

|                                  |                                      |
|----------------------------------|--------------------------------------|
| <b>RESCISSIONS</b><br>TEGL 23-19 | <b>EXPIRATION DATE</b><br>Continuing |
|----------------------------------|--------------------------------------|

2. **Action Requested.** Grant recipients should distribute this information to the appropriate staff.

3. **Summary and Background.**

- a. Summary – This guidance updates Training and Employment Guidance Letter (TEGL) 23-19, *Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs*, published June 18, 2020. The updated guidance provides clarifying language and revisions to data validation requirements specific to grant recipients of DOL workforce programs. The guidance aligns with and expands on the DOL/Department of Education Joint Guidance in TEGL 07-18, *Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)* and provides specific data validation guidance for the WIOA core programs and other DOL-funded programs not addressed in TEGL 07-18.
- b. Background – Data validation is a series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data. Establishing a shared data validation framework across programs ensures all program data consistently and accurately reflect the performance of each grant recipient. To that end, the purposes of validation procedures for both DOL-only and jointly required performance data are to:
- Verify that the performance data reported by grant recipients to DOL are valid, accurate, reliable, and comparable across programs;
  - Identify anomalies in the data and resolve issues that may cause inaccurate reporting;
  - Improve program performance accountability through the results of data validation efforts; and
  - Outline source documentation required for common data elements.

This issuance provides additional DOL-specific guidance on data validation for DOL programs for both the DOL-administered WIOA core programs and those that are not WIOA core programs (referred to in this guidance as “non-core programs”). Non-core programs include programs authorized by WIOA, as well as programs authorized by other Federal legislation. Collectively, the non-core programs include:

- Indian and Native American (INA) Program, under WIOA section 166;
- Job Corps, under WIOA sections 141-162;
- National Farmworker Jobs Program (NFJP), under WIOA section 167;
- YouthBuild, under WIOA section 171;
- Reentry Employment Opportunities (REO), under WIOA section 169;
- National Dislocated Worker Grants (DWG), under WIOA section 170;
- H-1B Skills Training Grant Programs (grants awarded July 1, 2016, and later), authorized under section 414(c) of the American Competitiveness and Workforce Improvement Act of 1998 (29 U.S.C. 3224a);

- Senior Community Service Employment Program (SCSEP), authorized under title V of The Older Americans Act of 1965 (42 U.S.C. 3056 et seq.);
- Trade Adjustment Assistance (TAA), authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.);
- Apprenticeship Grants administered by the Office of Apprenticeship (OA), authorized by the National Apprenticeship Act of 1937 (29 U.S.C. 50); and
- Jobs for Veterans State Grants (JVSG), authorized under 38 U.S.C. chapter 41.

In addition, the data validation requirements in this guidance also apply to the Monitor Advocate System. The Monitor Advocate System protects the standard of services provided to migrant and seasonal farmworkers (MSFW) under the Wagner-Peyser Act Employment Service program. Therefore, as part of a WIOA core program, all the requirements that apply to the Wagner-Peyser Act Employment Service for data validation will apply to the Monitor Advocate System.

DOL, jointly with the Department of Education, issued TEGL 07-18, *Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)*, which elaborated on the data validation guidelines for performance accountability required under WIOA section 116(d)(5). This DOL-only data validation guidance fits within the framework established in TEGL 07-18 and provides DOL grant recipients with additional details on the framework for data validation. Grant recipients must develop data validation policies and procedures consistent with the instructions in this guidance.

#### **4. DOL Data Validation Requirements.**

##### **a. Requirements for WIOA Core Programs and Non-Core Programs.**

- WIOA Core Programs and the TAA Program:** WIOA establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of states and local areas in achieving positive outcomes for individuals served by the workforce development system's six core programs. WIOA core programs, as well as the TAA Program (Sec. 239(j)(3) of the Trade Act of 1974), are required to follow the data validation framework outlined in section B as well as any program-specific guidance outlined in Attachment I.
- Non-Core Programs:** Non-core programs must follow the program-specific instructions guidance related to their programs as discussed in Attachment I.

- Data Validation Framework.** The WIOA core programs and the TAA Program must use a data validation strategy. However, these programs and the other non-core program grant recipients have the discretion to decide the specific design, implementation, and periodic evaluation of that strategy, so long as the strategy and procedures adhere to this guidance. All core and non-core programs must collect source documentation in compliance with Attachment II.

Data validation helps ensure the accuracy of quarterly and annual performance reports, safeguards data integrity, and promotes the timely resolution of data anomalies and inaccuracies. DOL recommends that grant recipients incorporate their data validation policies, procedures, and methodology into their data quality assurance process, internal controls, and the 2 CFR 200.328-required monitoring policies and procedures. DOL also recommends that grantees maintain independence between program or grant staff who collect and report data and those who validate reported data and source documentation.

WIOA core programs and the TAA Program must develop data validation procedures that include:

- Written procedures for conducting data validation reviews that contain a description of the process for identifying and correcting errors or missing data, which may include electronic data checks;
- Regular data validation training for appropriate program staff (DOL recommends at least annually);
- Monitoring protocols, consistent with 2 CFR 200.328, to ensure that program staff are following the written data validation policy and procedures and take appropriate corrective action if those procedures are not being followed;
- Regular data integrity review of program data (DOL recommends quarterly) for errors, missing data, out-of-range variances in values reported, and other anomalies;
- Documentation that missing documentation and erroneous data identified during the review process have been corrected;
- Documentation processes for maintaining records per the Federal records retention policy, which may include: copies of worksheets on data elements or records reviewed, frozen quarterly wage records for wage record matching used for reporting outcomes, trends in common data accuracy issues, error rates, and corrective action efforts made after data validation reviews; and
- Regular assessments of the effectiveness of the data validation process (DOL recommends at least annually) and revisions to that policy and process as needed.

On a quarterly basis, DOL will provide grant recipients with feedback regarding their performance reports to aid in data integrity efforts and support data accuracy (e.g., Quarterly Report Analysis, TAA Data Integrity analysis, etc.). The analysis will include, but is not limited to, a review of the data submitted, anomalies and outliers, and other potential data quality issues, which may indicate reporting inaccuracies. Grant recipients are encouraged to incorporate the DOL-provided analysis into their data validation processes.

States must validate the information in annual reports for WIOA core programs each program year *before* submitting the reports to DOL. As noted above, DOL recommends that all grant recipients engage in data validation activities on a quarterly basis to ensure their data are accurate. Establishing quarterly data reviews is a best practice for identifying and correcting errors to improve performance

reporting and ensuring that the data reflects the program participants, services, and outcomes.

- c. **Data Validation Parameters.** Policies and procedures developed by the WIOA core programs, as well as the TAA Program, must include regular data element validation conducted at least annually. States and grantees must verify the specific data provided and its source documentation, as required in TEGL 07-18, and Attachment II of this TEGL. DOL selected the elements in Attachment II because they are necessary for reporting accurate performance outcomes and ensuring consistency across the programs mentioned above in section 3.B.

DOL will not provide a specific statistical validation sampling methodology or specific data validation software but encourages grant recipients to incorporate a comprehensive random sampling methodology and procedure for reviewing the source documentation of participant files (including exiters) into their data validation processes. Grant recipients should use a random sampling methodology, provide a sufficient representation of records from each program, and for each of the required elements as described in Attachment II.<sup>1</sup> Grant recipients should also consider mechanisms for ensuring that zeros, blanks or null values, and negative responses are accurate. Approaches could include incorporating internal edit checks, outlier reports, and processes for resolving any issues resulting in unreported or missing elements identified through participant file reviews.

- d. **Source Documentation.** In Attachment II of this guidance, programs mentioned above in section 3.B identify acceptable source documentation necessary to validate these selected data elements. Grant recipients may:
- (1) require source documentation for additional program-specific data elements not included in this guidance;
  - (2) maintain supporting source documentation for data elements not included in this guidance; and/or
  - (3) conduct validation on additional data elements not included in this guidance.

DOL recommends that grant recipients identify similar data elements that are required for validation, such as for eligibility documentation, and use those requirements as a basis for developing source documentation requirements for any additional elements beyond the requirements set forth in Attachment II.

DOL encourages grant recipients to consider the impacts on equity and accessibility when developing their source documentation policies and procedures. For example, grantees considering restrictions on the use of self-attestation should consider that while other documentation sources are preferred when practical, self-attestation is an important option for populations with barriers to obtaining eligibility and reporting documents (such as disconnected youth, American Indian and Alaska Native populations, individuals experiencing homelessness, justice involved individuals,

---

<sup>1</sup> Grant recipients may use publicly available calculators and tools for determining sample size based on total records.

refugees, disaster impacted individuals, and others) and help ensure such populations are able to equitably access services.

- e. **Documentation of Eligibility.** While the collection of source documentation for data validation will often take place at the same time as the determination of an individual's program eligibility, these actions serve different purposes. Eligibility determination only needs to confirm that an individual meets the requirements of a program before becoming a participant in the program.

The list of source documentation outlined in Attachment II describes documents that could be used for eligibility determination. Where self-attestation is listed as an option for source documentation in Attachment II, the lack of source documentation beyond self-attestation must not delay or prevent enrollment and receipt of services in a program.

- f. **Reporting Requirements.** Grant recipients must describe their data integrity measures, data validation methodology, policies, and procedures as required by their individual program guidance in Attachment I. Grant recipients should contact their appropriate regional or program offices for technical assistance.
- g. **Monitoring.** DOL will conduct monitoring of these requirements through the appropriate regional or program office. During these reviews, grant recipients can expect Federal staff to conduct monitoring activities that include, but are not limited to:
- (1) checking for data validation policies, processes, and procedures;
  - (2) verifying the grantee's compliance with its established policies, processes, and procedures;
  - (3) verifying if grantees are training staff, and if any corrective action is needed or implemented;
  - (4) reviewing files and source documentation;
  - (5) reviewing data validation results maintained per Federal records retention policy per 2 CFR § 200.334; and
  - (6) analyzing data integrity reports generated by DOL. Reviews may result in findings or requirements for corrective action.

5. **Inquiries.** Please direct inquiries to the appropriate regional or program office.

6. **Reference(s).**

- Please see Attachment III.

7. **Attachment(s).**

- Attachment I – Program Specific Instructions
- Attachment II – Source Documentation for WIOA Core/Non-Core Programs
- Attachment III – References