## **Program-Specific Instructions**

- 1. Adult, Dislocated Worker, Wagner-Peyser Act Employment Service, and Youth. Adult, Dislocated Worker, Wagner-Peyser Act Employment Service, and Youth programs are required to follow all data validation policies and procedures set forth in this guidance. This also includes validating all elements indicated by "X" (Required for Data Element Validation) with supporting documentation outlined in Attachment II, by program. States and outlying areas must summarize their data validation methodology, policies, and procedures in their annual narrative performance reports.
- 1.a. <u>Trade Adjustment Assistance (TAA)</u>. TAA Programs are required to follow all data validation policies and procedures set forth in this guidance. This also includes validating all elements indicated by "X" (Required for Data Element Validation) with supporting documentation outlined in Attachment II, by program. Section 239(j)(3) of the Trade Act of 1974, as amended, requires states to ensure that the data reported to DOL is valid and reliable, consistent with guidelines issued by DOL. In addition, section 239(i) requires states to establish control measures designed to ensure the accuracy and verifiability of reported data. Therefore, states are advised that additional review of state validation methodologies will be conducted by the Office of Trade Adjustment Assistance. For participants served by separate agent and liable states under 20 CFR 618.824, the state that collects the data must maintain the source documentation.
- 2. Indian and Native American Program (INAP). INAP grant recipients are encouraged to fully implement the data validation framework outlined in section 4.b of TEGL 23-19, Change 1. DOL recommends grant recipients administer quarterly reviews of their performance outcomes to compare them against expected outcomes, to ensure timely data entry, and to ensure reported outcomes are accurately reflected with supporting documentation. Additionally, grant recipients should work to develop a policy for periodic monitoring of source documentation. This may include random file selections scheduled on a quarterly basis to ensure the required source documentation reflects the outcomes reported. Grant recipients should implement policies that align with the goals of this TEGL, where possible, to ensure adequate documentation is collected, and maintained. These efforts will help protect grant recipients from incurring disallowed costs or being cited for other compliance findings by identifying and correcting potential issues prior to reporting. The case management system for the INAP program is consistent with and supports the data validation framework outlined in section 4.b of TEGL 23-19, Change 1.
- 3. <u>Job Corps.</u> Job Corps employs a source documentation validation process through its case management system. In its policy guidance, Job Corps establishes specific source documents required for all student-related data entry and publishes a Program Instruction Notice when changes are made to any measure definition and related documentation requirement. Job Corps' data portals list out all required documents in drop-down menus, and all the contractors are required to select the correct and specific documents in support of entering students' data during application, enrollment, center training, and post-separation placement phases. In the data entry portals, Job Corps uses edit check functions to protect data integrity; outliers or errors in data

entry are red flagged or rejected until corrected. In addition, Job Corps conducts routine data integrity audits to identify deviations and errors in documentation for student information and takes contractual and administrative actions to mitigate the damages and correct mistakes. The Job Corps' Data Center extracts, processes, and sends the Participant Individual Record Layout (PIRL) data to the Workforce Integrated Performance System (WIPS) following another quality review.

- **3.a.** <u>Job Corps Demonstration</u>. Job Corps Demonstration grant recipients engage in data validation activities on a quarterly basis to ensure data accuracy and correct errors so that data properly and accurately reflects the program participants, services, and outcomes. Before developing and uploading the Demonstration grant recipients' PIRL report in WIPS, Job Corps also conducts a quarterly quality review of their data for consistency and missing data.
- 4. National Farmworker Jobs Program (NFJP). NFJP grant recipients are required to develop and implement data validation policies and procedures using the data validation framework outlined in section 4.b of TEGL 23-19, Change 1. At a minimum, DOL recommends that grant recipients run periodic reviews of their performance outcomes to compare them against expected outcomes, ensure that timely data entry is being done, and to ensure reported outcomes are accurately reflected with supporting documentation. Additionally, grant recipients should work to develop a policy for periodic monitoring of source documentation. This may include random file selections scheduled on a quarterly basis to ensure the required source documentation reflects the outcomes reported. Please note the Federal sources listed in this TEGL are the generic, federally recommended source documentation. It is possible that an acceptable source document is not captured on the data validation source document list. Where that might be the case, NFJP grant recipients should submit requests to use other sources of eligibility documentation to their Federal Project Officer. Grant recipients should implement policies that align with the goals of this TEGL, where possible, to ensure adequate documentation is collected, and maintained.

Grant recipients are encouraged to collect source documentation when it is available and practical. Self-attestation or case notes may be used for many of data elements as noted in this TEGL's Attachment II. To meet the needs of migrant and seasonal farmworkers and their dependents, grant recipients' policies and procedures should incorporate the use of self-attestation or case notes to meet their customers' needs and increase access to program services. For the definitions of self-attestation and case notes refer to Attachment II.

Though NFJP grantees are required to request participants' SSNs, participants cannot be denied services if they choose to not disclose their SSN. Grantees should refer to TEGL 14-18, *Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor (DOL)*, Attachment 7 on using Supplemental Wage Records.

Additionally, grant recipients are encouraged to incorporate the use of self-certification in their NFJP applications. Per 20 CFR 685.110, self-certification means an eligible MSFW's signed attestation that the information they submit to demonstrate eligibility for the NFJP is true and accurate. These efforts will help protect grant recipients from incurring disallowed costs or being cited for other compliance findings by identifying and correcting potential issues prior to reporting.

- 5. YouthBuild. YouthBuild grant recipients are encouraged to fully implement the data validation framework outlined in section 4.b of TEGL 23-19, Change 1. DOL recommends grant recipients administer quarterly reviews of their performance outcomes to compare them against expected outcomes, ensure that timely data entry is being done, and to ensure reported outcomes are accurately reflected with supporting documentation. Additionally, grant recipients should work to develop a policy for periodic monitoring of source documentation. This may include random file selections scheduled on a monthly or quarterly basis to ensure the required source documentation contained in this TEGL's Attachment II are provided for each participant file to which the data elements pertain. Grant recipients should implement policies that align with the goals of this TEGL, where possible, to ensure adequate documentation is collected and maintained. These efforts will help protect grant recipients from incurring disallowed costs or being cited for other compliance findings. The case management system for the YouthBuild program is consistent with and supports the data validation framework outlined in section 4.b of TEGL 23-19, Change 1.
- implement the data validation framework outlined in section 4.b of TEGL 23-19, Change 1. DOL recommends grant recipients administer periodic reviews of their performance outcomes to compare against expected outcomes and ensure that timely data entry is being done and to ensure reported outcomes are accurately reflected with supporting documentation. Additionally, grant recipients should work to develop a policy for periodic monitoring of source documentation. This may include random file selections scheduled on a quarterly basis to ensure the required source documentation reflects the outcomes reported. Grant recipients should implement policies that align with the goals of this TEGL, where possible, to ensure adequate documentation is provided. These efforts will help protect grant recipients from incurring disallowed costs or being cited for other compliance findings. The case management systems for the REO program are consistent with and support the data validation framework outlined in section 4.b of TEGL 23-19, Change 1.

To meet the needs of individuals who are incarcerated or otherwise justice involved, grant recipients' policies and procedures should incorporate the use of self-attestation or case notes to meet their customers' needs and increase access to program services. For the definitions of self-attestation and case notes refer to Attachment II.

7. H-1B Skills Training Grants. H-1B grant recipients are encouraged to fully implement the data validation framework outlined in section 4.b of TEGL 23-19, Change 1 and use the supporting documentation indicated in Attachment II to validate H-1B-specific data elements in consultation with their assigned Federal Project Officer. DOL recommends that grant recipients conduct periodic reviews of their performance outcomes to compare them against expected outcomes, and to ensure reported outcomes are accurately reflected with supporting documentation and timely data entry. Additionally, grant recipients should work to develop a policy for periodic monitoring of source documentation. This may include random file selections scheduled on a quarterly basis to ensure the required source documentation reflects the outcomes reported. Grant recipients should implement policies that align with the goals of this TEGL to ensure adequate documentation is collected and maintained. These efforts will help protect grant recipients from incurring disallowed costs or being cited for other compliance findings by identifying and correcting potential issues prior to reporting.

- 8. The Senior Community Services Employment Program (SCSEP). SCSEP grant recipients have been and continue to be required to use the application incorporated into the SCSEP data collection system to validate data elements that relate to the performance measures, eligibility and essential program requirements. The SCSEP data validation application currently provides online validation worksheets, scoring, and reports for each grant recipient. For PY 2021, this application contains 46 data elements, 30 in the eligibility sample and 16 in the performance sample. In PY 2022, there will be 17 data elements in the performance sample due to the reinstatement of a data element that was inadvertently deleted in the PY 2020 data validation. SCSEP grant recipients are required to continue using this data validation application. SCSEP grant recipients must also continue to apply the source documentation requirements in Section IV of the latest SCSEP Data Validation Handbook instead of the Source Documentation Validation document attached to this TEGL (Attachment II). Section II of the SCSEP Data Validation Handbook contains a detailed explanation of the sampling procedure employed by the application.
- 9. Apprenticeship Grants (OA-Managed). Apprenticeship grant recipients are required to fully implement the data validation framework outlined in section 4.b of TEGL 23-19, Change 1. At a minimum, DOL recommends that grant recipients conduct quarterly reviews of their performance outcomes to compare them against expected outcomes, to ensure data entry is timely, and to ensure reported activities and outcomes are accurately reflected with appropriate source documentation. Additionally, grant recipients should develop a policy for periodic monitoring of source documentation. This may include random file selections on a quarterly or more frequent basis to ensure the required source documentation reflects the activities and outcomes reported. Grant recipients should implement policies and procedures that align with the goals of this TEGL to ensure adequate documentation is collected and maintained. These efforts will help protect grant recipients from incurring disallowed costs or being cited for other compliance findings by identifying and correcting potential issues prior to reporting.
- 10. <u>Jobs for Veterans State Grants (JVSG)</u>. JVSG grant recipients are encouraged to implement the data validation framework outlined in section 4.b of TEGL 23-19, Change 1. A participant's self-attestation of eligibility is sufficient to receive Disabled Veterans' Outreach Program services. Establishing quarterly data reviews can help with identifying and correcting errors to improve performance reporting, as well as ensuring the data accurately reflects the program participants, services, and outcomes.
- 11. National Dislocated Worker Grants (DWG). DWG grant recipients are encouraged to fully implement the data validation policies and procedures set forth in section 4.b of TEGL 23-19, Change 1. Grant recipients should implement a data validation policy; DOL recommends aligning the data validation policy with the policy established for the WIOA core programs. Establishing quarterly data reviews is a promising practice for identifying and correcting errors to improve performance reporting, as well as ensuring the data accurately reflects the program participants, services, and outcomes.

The Common Reporting Information System (CRIS) provides DOL grantees a mechanism for verifying employment-based performance outcomes by conducting wage matching using Social Security Numbers (SSN). DWG recipients that use CRIS for employment-based outcomes must

report participant SSNs in the Participant Individual Record Layout (PIRL) data element 2700. To receive outcomes from CRIS, non-state DWG grant recipients must report participant SSNs.

State DWG recipients may collect participant SSNs to capture the employment-based outcomes, however, participant SSNs must not be included in files submitted to ETA in PIRL data element 2700 files.

DWG participants are not required to provide an SSN to receive services. All grantees may use supplemental data for employment-based outcomes if a participant does not provide an SSN.