Program Specific Instructions

1. Adult, Dislocated Worker, Wagner-Peyser, and Youth. Adult, Dislocated Worker, Wagner-Peyser, and Youth programs are required to follow all of the data validation policies and procedures set forth in this guidance. This also includes validating all of the elements indicated by R^{DEV} (Required for Data Element Validation) with supporting documentation outlined in Attachment II, by program.

   a. **Trade Adjustment Assistance (TAA).** TAA programs are required to follow all of the data validation policies and procedures set forth in this guidance. This also includes validating all of the elements indicated by R^{DEV} (Required for Data Element Validation) with supporting documentation outlined in Attachment II by program. Section 239(j)(3) of Trade Act of 1974, as amended, requires states to ensure that the data reported to the 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.

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 this TEGL. Grant recipients should implement a data validation policy. 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. To the extent that non-core program grant recipients are using case management systems provided by DOL, the Department will provide data validation framework(s) and parameters to be used in those systems.

3. Job Corps. 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 required. 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 will be 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 WIPS following another quality review.

4. National Farmworker Jobs Program (NFJP). NFJP grant recipients are encouraged to fully implement the data validation framework outlined in section 4.B of this TEGL. At a minimum,

the 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 provided. 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 this TEGL. DOL recommends grant recipients administer 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 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 provided. These efforts will help protect grant recipients from incurring disallowed costs or being cited for other compliance findings. To the extent that non-core program grant recipients are using case management systems provided by DOL, the Department will provide data validation framework(s) and parameters to be used in those systems.

6. Reentry Employment Opportunities (REO). REO grant recipients are encouraged to fully implement the data validation framework outlined in section 4.B of this TEGL. 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. To the extent that non-core program grant recipients are using case management systems provided by DOL, the Department will provide data validation framework(s) and parameters to be used in those systems.

7. <u>H-1B Technical Skills Training Grants</u>. H-1B grant recipients are encouraged to fully implement the data validation framework outlined in section 4.B of this TEGL, 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, 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 to ensure adequate documentation is provided. 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. <u>The Senior Community Services Employment Program (SCSEP)</u>. 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 2019, this application contains 49 data elements, including separate elements for the pre- and post-July 1, 2018 employment outcome measures and exits; five of these elements will no longer be applicable starting in PY 2020 because they relate to the employment outcome measures that were eliminated by the Older Americans Act Reauthorization Act of 2016 (OAA). SCSEP grant recipients are required to continue using this data validation application. SCSEP grant recipients will 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.

In addition, to meet the objectives of accurate, valid, and reliable program data, SCSEP must enhance its data validation system by incorporating those procedures listed in Section 4.B of the TEGL that are not included in the current system. DOL will engage the grantee community in designing and implementing these enhancements. To the extent that non-core program grant recipients are using case management systems provided by DOL, the Department will provide data validation framework(s) and parameters to be used in those systems.

9. <u>Apprenticeship Program Grants</u>. Apprenticeship grant recipients are encouraged to fully implement the data validation framework outlined in section 4.B of this TEGL when establishing programmatic practices and participant-level data tracking systems. Grant recipients may anticipate DOL actively incorporating this requirement once the Apprenticeship PIRL data elements and quarterly performance report are approved for collection. DOL will also issue requirements for source documentation at that time.

10. <u>Jobs for Veterans State Grant (JVSG)</u>. JVSG grant recipients are encouraged to fully implement the data validation framework outlined in section 4.B of this TEGL. Grant recipients

should implement a data validation policy. 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.

11. National Dislocated Worker Grants (DWG). DWG grant recipients are encouraged to fully implement the data validation framework outlined in section 4.B of this TEGL. Grant recipients should implement a data validation policy; DOL recommends aligning with the policy established for the 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.