

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION Trade Adjustment Assistance
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ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 01-19, CHANGE 1

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
AFFILIATE AMERICAN JOB CENTER MANAGERS
COMPREHENSIVE AMERICAN JOB CENTER MANAGERS
STATE WORKFORCE ADMINISTRATORS
STATE AND LOCAL WORKFORCE DEVELOPMENT BOARD CHAIRS
AND DIRECTORS
STATE LABOR COMMISSIONERS
TRADE ADJUSTMENT ASSISTANCE LEADS

FROM: BRENT PARTON /s/
Acting Assistant Secretary

SUBJECT: Trade Adjustment Assistance Data Integrity (TAADI)

1. **Purpose.** To update TAADI instructions, previously issued in Training and Employment Guidance Letter (TEGL) No. 01-19. TAADI is a required component of quarterly reporting submitted by State Workforce Agencies or agencies designated by Governors as “Cooperating State Agencies” (“states”) and established procedures for corrective action by the U.S. Department of Labor (Department) in the event of non-compliance. The updated guidance provides clarifying language and better captures how the TAADI process adapts over time.
2. **Action Requested.** States must inform all appropriate staff of the contents of these instructions as soon as this guidance is distributed.
3. **Summary and Background.**
 - a. Summary – This guidance updates instructions in TEGL 01-19, published July 1, 2019. It provides clarification on timelines and how TAADI measures are updated, recognizes a new category of measures (Data Consistency), and provides more details on the annual review process.
 - b. Background – Over the last ten years, the Department has committed substantial time and effort into transforming the format, submission process, and oversight of state reporting on activities and outcomes for the TAA Program. These changes were designed to produce the high quality data that is essential to evaluating the TAA Program’s

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effectiveness and monitoring service delivery to ensure that participants are served effectively.

Participant Individual Record Layout (PIRL) and Associated Data Integrity Mechanisms
Effective October 1, 2018, the PIRL became the reporting layout for states to report out quarterly on TAA activities and outcomes for program participants, joining other Department programs, including those authorized by the Workforce Innovation and Opportunity Act (WIOA). The PIRL, authorized under OMB control no. 1205-0521, expires June 30, 2024, is designed to create an integrated format to align data element specifications and ultimately integrate reporting on participants across programs. Reporting on TAA participants is required by Section 249B of the Trade Act, as amended. Section 239(c) of the Trade Act, as amended, requires states to provide the Department information and reports necessary for carrying out the purposes of the TAA Program. This mandate is incorporated in the TAA Governor-Secretary agreement, as well as the TAA Annual Funding Agreement Terms and Conditions, and applies to all versions of the TAA Program.

All reporting in PIRL is subject to two defined data integrity processes: (1) edit checks, and (2) data validation. These processes address data that is contained within each individual participant record. For the subset of PIRL elements specific to the TAA Program, a third data integrity process is applied, TAADI, which contains measures that look at aggregate state data, as well as data specific to each participant record.

Edit Checks

States submit TAA PIRL records into the Workforce Integrated Performance System (WIPS). The WIPS edit checks help ensure that the data submitted by the states administering TAA is an accurate reflection of participants, their program activities, and outcomes.

Automated WIPS edit checks provide a pre-screen within individual participant records of state data submissions before they are validated and accepted by the Department. Some of these edit checks are universal to programs reporting with the PIRL and others are TAA Program-specific. There are three categories of WIPS edit checks: (1) duplicate rules, (2) valid value checks, and (3) logical edit checks. These help ensure that each piece of data provided within a unique PIRL record is consistent with other data reported in the same record. Edit checks enforce mandatory data consistency requirements and structure. These act complementarily to TAADI Results which flag allowable data that deviates from reporting expectations.

Data Validation

Data validation (formally known as Data Element Validation or DEV) provides a standard for comparing data reported for a specific element in a participant record against Employment and Training Administration (ETA)-approved “source documentation.” Guidelines for state data validation and source documentation are provided in the joint WIOA data validation TEGL No. 07-18. Additional guidance was issued in TEGL No. 23-19 and its changes. For example, regarding validation, the PIRL element for Date of

Program Entry (PIRL 900) is validated by an Individual Plan for Employment, Electronic Records, or Program intake documents, such as eligibility determination documentation or program enrollment forms.

TAADI

The TAADI framework identifies a series of measures that target both potentially inaccurate data, as well as accurately reported data that reflect substandard program administration. Over time, measures may be dropped (as initially problematic areas are resolved in all states), and added (as new problem areas are identified or prioritized). Each measure has a target which may be based on the Department's expectations of optimal performance, but may also be qualified by national results; thus, targets may adjust upwards from year to year as more states are able to achieve modest targets.

One of the most important features of TAADI is that it provides states with the opportunity to submit feedback on TAADI Results. This feedback mechanism allows the Department to understand the data system and service delivery issues impacted by the areas targeted in TAADI Measures (see Section 4.c. "TAADI Quarterly Snapshot and Workbook" in this guidance). Another unique aspect of TAADI is that its focus is one of continuous improvement in data reporting which forms a component of the annual review process described in section 4.e. of this TEG. By assessing a state's progress across report quarters in addition to static results, TAADI emphasizes the importance of incremental improvements, even when the state may be unable to meet designated targets.

Since 2012, when TAADI was launched, report quality has improved dramatically in states that identified and corrected problems, and all states showed improvement to reporting structure, consistency, data quality, and program oversight of areas related to report data. TAADI became crucial to the process of identifying broad reporting issues and targeting technical assistance to states to improve data quality and effective service delivery. By the end of FY 2021, 34 states were meeting at least 85 percent of measures. TAADI measures address data issues that merit continued oversight through the TAADI process.

4. **TAADI Policy and Description.** TAADI is required as a permanent component of reporting compliance for the TAA Program. TAADI is designed to produce high data quality that is essential to evaluating the program's effectiveness and monitoring service delivery to ensure that participants are served effectively.

Attachment I contains a glossary of terms specific to TAADI that clarifies terminology referenced in this guidance. This glossary includes specific uses of the terms "Measure" and "Target" that are unique to TAADI and that are displayed in the TAADI Snapshot.

- a. **TAADI Measures.** TAADI measures are divided into multiple sections. On an annual basis, the Department considers whether the measures or targets should change. Any change of measures or targets will be applied at the beginning of a fiscal year with

- b. notification to the states via formal channels such as the quarterly Snapshots (see Section 4.c.) and informal channels such as Ask Me Anything (AMA) sessions. The five major categories are listed below.
- i. Category 1: Cross Validation of Fiscal Data using Employment and Training Administration (ETA) 9130 Financial Reports¹ – The measures in this category compare state totals of quarterly expenditure data from the PIRL against corresponding state ETA-9130 Financial Report data. These measures assess the degree to which the state dollar values between these two (2) reports match within the relevant quarter. The target for these measures is provided as a range of deviance between the two (2) collections. In cases where states identify accounting issues that would cause larger discrepancies, states must report the reason for the discrepancy using the narrative field made available in the ETA-9130 financial report (Section 12). Attachment II of this guidance provides additional information on fiscal specifications.
 - ii. Category 2: Inaccurate Reporting or Reporting with Substandard Service Delivery Implications. The measures in this category result in a percentage which is compared to the target percentage. The denominator is the set or cohort of participants who are likely to or expected to have received or completed the benefit or service. The numerator is the count of participants who did receive or complete the benefit or service. Results below the target signify either one or both:
 - a. A reporting issue. This means the actual result is higher (i.e. more participants received or completed the benefit or service), but the state is not reporting the result accurately. For example, this may be due to states not reporting the data elements correctly, a system error, or an error with data migration.
 - b. Reporting with substandard service delivery. In this scenario, the data is correctly reported by the state but the state is not delivering services at the expected level.
 - iii. Category 3: Validating Standardized Codes – Some data reported in participant records are based on standardized code tables from outside data sources. These include the occupational skills codes for training participants and the industry sectors for those participants successfully employed after program exit. This category of measures ensures that states are reporting accurate codes.
 - iv. Category 4: Wage Data Outliers – Wage data are currently provided in seven wage fields, spanning three quarters before program participation and four quarters after program exit. Wages may be collected through unemployment insurance (UI) wage record matching or through the collection of supplemental information, per TEGL No. 26-16. This category isolates individuals with wages that are significant outliers or may indicate placeholder values are being reported.
 - v. Category 5: Data Consistency – States are expected to report on participants from the start of their participation through ten (10) quarters after exit. This allows the

¹ Training and Other Activities (TaOA) is reported on ETA-9130(M). Trade Readjustment Allowances (TRA) and Alternative/Reemployment TAA (A/RTAA) are reported on the ETA-9130(I).

Department to track participant duration, receipt of benefits and services, and their performance outcomes after exit, etc. Keeping records consistent across reporting quarters allows for accurate tracking and reporting by the Department.

- b. **Performance Expectations.** TAADI Targets for each TAADI Measure are provided in the results Snapshot each quarter. TAADI Targets are set on an annual basis and will not be changed during the four quarters of any fiscal year. They will be communicated to states no later than transmission of the first quarter (by December 31) TAADI Workbook. Targets will not change within a single fiscal year. However, some Targets may be adjusted upwards over time. Targets are established primarily by reviewing the average amount reported by states. The Target is then set for states to improve beyond that initial benchmark. Targets may also be set at 100 percent, primarily for measures that are part of the statutory reporting requirements and Annual Report for Congress (e.g., wage data reported).

Annually, the Department may choose to discontinue existing TAADI Measures and establish new TAADI Measures to better align with current data reporting deficiencies. States will be notified of discontinued and new measures no later than transmission of the first quarter (by December 31) TAADI Workbook.

- c. **TAADI Quarterly Snapshot and Workbook.** On a quarterly basis, the Department transmits to each of the ETA Regional Offices the TAADI Snapshot for further dissemination to each of the region's respective states. The Snapshots are formatted as a table to provide an easy understanding of the relationship between the following included components:
- i. the current TAADI Measures for the given period;
 - ii. targets for each TAADI Measure;
 - iii. state-specific results of the TAADI Results for the most recent report quarter;
 - iv. state-specific TAADI Results of previous quarters within the fiscal year, if applicable; and
 - v. sections of the state's narrative response(s) for those TAADI Targets that are not met.

For targets not met, states are asked to specify by when issues will be resolved, categorize the types of issues, and provide a plan for resolution. This information will allow the Department to provide appropriate technical assistance, as needed. The resolution section may also include additional context that can inform TAADI processes subject to Departmental review.

The TAADI Workbook includes the TAADI Snapshot and other tabs, including the "Descriptions" tab. See the Glossary (Attachment I) for additional information.

The Department maintains a tool called the TAADI Self-Check that mimics the quarterly Snapshots and allows states to review their unofficial quarterly TAADI Results. It may be used to identify reporting issues before submitting the quarterly PIRL files so that

proactive steps can be taken to submit clean data. It can be found in the [TAA Participant Reporting section](#) of the [TAA Program website](#).

- d. **TAADI Compliance Requirements and Quarterly Timetable.** The quarterly actions and quarterly timetable for the TAADI process are below. The deadlines are also in table form in Attachment III of this guidance. Following the dissemination of quarterly TAADI Snapshots, further action is required only if states fail to meet one or more targets.
- i. Department Transmission of Quarterly Snapshot
 - a. Deadline: The 10th of the month following the month of the respective quarter reporting deadline. For example, for the December 31st quarter (which has a February 15th reporting deadline), the Department due date for providing the snapshot is March 10th.
 - ii. State Response to Quarterly Snapshot
 - a. Deadline: For the December 31st, March 31st, and June 30th quarters the deadline is the date of the next quarter end date. For example, the deadline for state responses to the December 31st quarter TAADI is March 31st. For the September 30th quarter, the deadline is Jan. 7; this gives states additional time to provide feedback which will be incorporated in the annual review, as described in Section 4.e.
 - b. Information included:
 - i. The factor(s) responsible for failing to meet the TAADI Target in the designated TAADI Measure.
 - ii. If failure is equated to non-compliance with reporting expectations, a description of the corrective action that states will use to resolve the report failures.
 - iii. A specific date by which the state expects to resolve the report failures.
 - iii. Quarterly Department Feedback to States
 - a. Deadline: The 20th of the month following the state response deadline discussed in Section 4.d.ii.
 - b. Note: Not all states require feedback.
- e. **Annual Review and Corrective Actions.** An annual review of TAADI Results continues to be part of the process required by this guidance.

Following the receipt of state responses to the fourth quarter (by September 30) Snapshots, the Department will conduct an annual review of which states have not met expectations and have failed to make adequate progress to addressing issues throughout the fiscal year. If states fall short of these expectations, then a review will be conducted, based on all four quarters of the fiscal year TAADI Results, to be qualified by the following factors:

- i. Quality of state narratives (where state TAADI Results are not met):
 - a. Demonstrated that the state has examined the issue.
- ii. Timeline test (one must be true):
 - a. Included a date by which the issue will be resolved.
 - b. Measure requires 100 percent and state indicates why data is correct.

- iii. Resolution plan (one must be true):
 - a. Demonstrates that the issue is isolated.
 - b. Demonstrates a plan for resolution is in place to address a systematic issue.
- iv. State improvement:
 - a. Percentage of state improvement in TAADI Results over the four report quarters of the fiscal year meets the established expectations;
 - b. Percentage of state improvement in TAADI Results as compared to the previous year;
 - c. The extent to which the state TAADI Results fall short of the designated target is within the established margin, and;
 - d. The state's annual review result in the previous year.

Depending on the assessment that results from this review, the Department may determine the need for a corrective action plan to be put in place. Corrective action will not be recommended for TAADI Measures that have been initially established in that fiscal year in order to allow the state additional time to improve reporting.

In addition to the steps listed above, the Department may post state annual TAADI Results to the TAA website.

A visual of the annual review process is posted to the TAA Program website. The visual represents the general process. Individual years may have some modification to this process.

5. Inquiries. Please direct inquiries to the appropriate Regional Office.

6. References.

- Chapter 2 of Title II of the Trade Act of 1974, as amended (Pub. L. 93-618) (Trade Act);
- TEGL No. 18-20, *Trade Adjustment Assistance (TAA) Financial Reporting Alignment and Clarifications*;
- TEGL No. 20-19, *Revised ETA-9130 Financial Report, Instructions, and Additional Guidance*;
- TEGL No. 10-16, Change 1, *Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs*;
- TEGL No. 26-16, *Guidance on the use of Supplemental Wage Information to implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act*;
- TEGL No. 07-18, *Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)*;
- TEGL No. 14-18, *Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor (DOL)*;
- TEN No. 25-19, *Understanding Postsecondary Credentials in the Public Workforce System*; and

- *TEGL No. 19-16, Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules.*

7. Attachment(s).

- Attachment I: Glossary of TAADI Terms
- Attachment II: TAADI Fiscal Measure Specifications
- Attachment III: TAADI Action Steps and Timetable