EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION Data Validation
	CORRESPONDENCE SYMBOL PRO
	DATE July 15, 2005

TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 3-03, Change 3

TO: ALL STATE WORKFORCE AGENCIES
ALL STATE WORKFORCE LIAISONS

FROM: EMILY STOVER DeROCCO
Assistant Secretary

SUBJECT: Revision to the Data Validation Policy for Employment and Training Programs for Program Year 2004

1. **Purpose.** To provide revisions and clarifications to policy guidance previously issued to states and national program grantees concerning the Employment and Training Administration's (ETA) data validation policy, for the following programs: Workforce Investment Act (WIA) Title IB; the Wagner-Peyser Act; activities authorized under chapter 41 of title 38, United States Code (Local Veterans Employment Representative and Disabled Veteran Outreach Service programs); and Trade Adjustment Assistance (TAA), National Farmworker Jobs (NFJP), Indian and Native American (INA), and Senior Community Service Employment (SCSEP) programs.

2. **References.** Training and Employment Notice (TEN) No. 14-02, "Data Validation Initiative;" TEN No. 8-02, "Implementation of Common Performance Measures for Job Training and Employment Programs;" Training and Employment Guidance Letter (TEGL) 3-03, Change 1, "Data Validation Policy for Employment and Training Programs;" and the President's Management Agenda (http://www.whitehouse.gov/omb/budget/fy2002/mgmt.pdf).

3. **Background.** In TEGL No. 3-03, Change 1, the Department issued policy guidance to states and national program grantees on the timeframes for implementing data validation requirements on program performance reports. This guidance outlines revisions to those implementation timeframes and updates information on data validation software. For Program Year (PY) 2004 (July 1, 2004 - June 30, 2005), report validation **must** be completed prior to submission of the annual report in accordance with the timetables specified below. The TET

4. **Implementation for State Programs.** Reporting instructions for data validation for state programs are available in revised handbooks on ETA's performance website at http://www.doleta.gov/performance/. The timeframes for implementation are as follows:

RESCISSIONS	EXPIRATION DATE
	Continuing

Workforce Investment Act Title IB. For PY 2004, each state is required to submit a validated annual report no later than October 1, 2005, and the appropriate WIA Standardized Record Data (WIASRD) files no later than October 15, 2005. **States are required to complete report validation prior to submitting the annual report (ETA 9091) due October 1, 2005, and data element validation using a file of exiters and participants reported on the ETA 9091 by February 1, 2006.** These data are consistent with last year's timetable. Data element validation is due 120 days after the submission of the annual report, not the submission of the WIASRD files.

Core Job Matching and Employment Service Activities. Each state is required to submit the ETA 9002 and VETS 200 reports on a quarterly basis no later than 45 days after the end of the report quarter. The Wagner-Peyser funded programs require report validation and minimal data element validation. **Report validation must be completed for the ETA 9002 and VETS 200 reports prior to submission on August 15, 2005.** This date reflects a change to the data validation policy for the Wagner-Peyser programs. This year, states are required to validate their fourth quarter report for Program Year 2004. **This change will allow states to complete data validation using current reporting requirements.** 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. States that use the ETA-provided software or DART software to prepare their ETA 9002 and VETS 200 quarterly reports do not need to conduct separate report validation.

Trade Adjustment Assistance. Each state is required to submit its fourth quarter Trade Act Participant Report (TAPR) for Fiscal Year (FY) 2005 by **November 15, 2005**. States administering TAA programs are not required to submit an annual report but are required to submit individual participant records; therefore, states are not required to conduct report validation. States are required to conduct data element validation on the cumulative file of four quarters of the FY 2005 TAPR (created by adding the four quarterly files together). **The data element validation for TAA programs must be completed by February 1, 2006.**

5. Implementation for National Programs. Reporting instructions for data validation for national grant programs will be issued separately. The timeframes for implementation are as follows:

National Farmworker Jobs Program. The NFJP grantees are not required to submit an annual report but are required to submit individual participant records; therefore, they are not required to conduct report validation. **The final NFJP participant data for PY 2004 is due February 15, 2006. Data element validation for PY 2004 must be completed by June 15, 2006.**

Indian and Native American Program. Grantees are required to submit their annual ETA 9084 Comprehensive Services Report by September 30 (90 days after the June 30 program year end date). Validation software for the INA program is still in development. Instructions, training, and timetables for data validation will be issued at a later date.

Senior Community Service Employment Program. The SCSEP is creating a new data collection and reporting system. The first SCSEP "annual report" will not be required until fall 2005. Data validation instructions, training, and timetables will be issued at a later date for this program.

6. **Data Validation Tools.** ETA has developed and updated instructional handbooks, standardized software, and user guides that states and grantees can use to perform data validation.

- Handbooks provide detailed information on the validation methodology, including sampling specifications and data element validation instructions for each data element to be validated. ETA provided guidance detailing source documentation requirements to validate eligibility, services, and outcomes for the WIA, TAA, and the NFJP in TEGL 3-03, Change 1 (see Attachment A).

- A maintenance release of the WIA data validation software (version 3.1) will be released in August 2005. The updated software will be available in time for states and grantees to use it to validate the annual reports due by October 1, 2005.

- States should use the current version (2.01) of the Wagner-Peyser program software available on the ETA performance website, http://www.doleta.gov/performance/, to validate the annual PY 2004 report due August 15, 2005. The minimal data element validation of 25 jobseekers must also be completed prior to the submission of the report.

- States should use the current TAA (1.3) data validation software available on the ETA performance website.

- States will use the current NFJP (1.2) data validation software available on the ETA performance website.

- User guides developed for each ETA validation software application guide states and grantees through the process of installing the application, building and loading a validation file, and completing report and data element validation.

ETA's validation handbooks, software applications, and user guides for each program can be found on ETA's website at http://www.doleta.gov/performance/. Click on the link for *Reporting Guidance and Data Evaluation* and go to the third bullet point, *Data Validation and more*. The validation tools for the WIA Title IB, ES, TAA, and NFJP programs are currently available and reflect the reduction in data elements; tools for the other national program grantees will be posted when finalized.

7. **Training and Technical Assistance.** States and grantees are encouraged to request technical assistance on validation procedures and the use of the validation tools by contacting regional and/or national office program staff. To avoid unnecessary delays and problems in the implementation of data validation, regional staff are available to facilitate the validation process and to address any difficulties states and grantees encounter. E-mail and phone contact

information is available on the ETA website listed above, in the Help menu of each software application, and in the user guides.

8. Monitoring. To ensure that states and grantees are able to successfully complete validation procedures and standards, ETA will monitor the validation effort on a regular schedule. The record retention requirement that will apply to records of all validation activities, including files, worksheets, reports, and source documentation, is three years.

9. Action Required. States and grantees are expected to:

- Distribute this advisory to the appropriate program staff.
- Complete data validation within the timeframes established in Section 5 of this guidance and provide the appropriate regional office with an update on the validation process.

10. Inquiries. Questions regarding the data validation initiative should be directed to the appropriate ETA regional office or to the Office of National Programs, as appropriate.

Attachment A: Source Documentation Requirements from TEGL 3-03, Change 1

ATTACHMENT A: SOURCE DOCUMENTATION

Revised Elements for Data Validation & Source Documentation Requirements For WIA Programs

This list is intended to provide guidance to states and grantees regarding what types of source documentation are acceptable to validate certain components of eligibility, services and outcomes as required on the reports. Please note:

- Only one document listed is required for each element. For example, for element #101 Individual Identifier, clients only need to present one of the listed documents such as a DD-214 **or** a passport **or** a Social Security card.
- Documentation is only required for clients who receive more than core services. Clients who enroll in training or other intensive services must provide the required source documents for validation purposes.

	DATA ELEMENT	ADULT	DISLOCATED WORKER	OLDER YOUTH	YOUNGER YOUTH	Source Documentation Requirements
1	Individual Identifier #101	Yes	Yes	Yes	Yes	Social Security Card DD-214 Passport Database Assigned number from the state management information system
2	Date of Birth #102	Yes	Yes	Yes	Yes	Copy of I.D., Baptismal record, birth certificate, DD-214, Report of Transfer or Discharge paper, driver's license, 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, tribal records

	DATA ELEMENT	ADULT	DISLOCATED WORKER	OLDER YOUTH	YOUNGER YOUTH	Source Documentation Requirements
3	Individual with a Disability #104	Yes	Yes	Yes	Yes	Letter from Drug or Alcohol rehabilitation agency, medical records, case notes regarding observable conditions, physician's statement, psychologist's diagnosis, rehabilitation evaluation, Social Security Administration records, school records, sheltered workshop certification, social service records or referrals, disability records, Veteran's medical records, vocational rehabilitation letter, worker's compensation record, self attestation
4	Veteran's Status #111	Yes	Yes	Yes	No	DD-214, cross match with veterans data
5	Employment Status at Registration #115	Yes	No	Yes	Yes	Pay stub, case notes showing information collected from registrant
6	U.I. Compensation Programs #118	No	Yes	No	No	UI cross-match, UI notice of entitlement
7	Low Income #119	Yes	No	Yes	Yes	Alimony Agreement, applicant statement, award letter from veteran's administration, bank statements, compensation award letter, court award letter, pension statement, employer statement/contact, family or business financial records, housing authority verification, pay stubs, pension statement, social security benefits, public assistance records, quarterly estimated tax for self-employed persons, Social Security benefits, UI documents
8	TANF #120	Yes	Yes	Yes	Yes	Cross match with TANF public assistance records

	DATA ELEMENT	ADULT	DISLOCATED WORKER	OLDER YOUTH	YOUNGER YOUTH	Source Documentation Requirements
9	General Assistance #121	Yes	Yes	Yes	Yes	Copy of authorization to receive cash public assistance, copy of public assistance check, medical card showing cash grant status, public assistance, refugee assistance records, cross match with public assistance database
10	Displaced Homemaker #124	No	Yes	No	No	Public assistance records, court records, divorce papers, bank records, spouse's layoff notice, spouse's death record, self attestation
11	Date of Actual Qualifying dislocation #125	No	Yes	No	No	Verification from employer, rapid response list, notice of layoff, public announcement with follow-up cross-match with UI, self attestation
12	Homeless individual and/or runaway youth #126	No	No	Yes	Yes	Written statements from an individual providing residence, shelter or social service agency, WIA registration form, self attestation
13	Offender #127	No	No	Yes	Yes	Documentation from juvenile or adult criminal justice system, documentation phone call with court representatives, WIA registration form, self attestation
14	Pregnant or parenting youth #128	No	No	Yes	Yes	Copy of child's birth certificate, baptismal record, observation, doctor's note confirming pregnancy, self attestation
15	Youth who needs additional assistance #129	No	No	Yes	Yes	See state policy and state plan, individual service strategy, case notes, WIA registration form, state MIS, self attestation
16	Education status at time of registration #130	No	No	Yes	Yes	Applicable records from education institution (GED certificate, diploma, attendance record, transcripts, drop out letter, school documentation), WIA registration form, State MIS, self attestation

	DATA ELEMENT	ADULT	DISLOCATED WORKER	OLDER YOUTH	YOUNGER YOUTH	Source Documentation Requirements
17	Basic literacy skills deficiency (as defined in 664.205) #131	No	No	Yes	Yes	Standardized assessment test, school records, case notes
18	Date of WIA registration Title 1-B #302	Yes	Yes	Yes	Yes	Date of application and signature, date signed WIA status form, state MIS information
19	Date of WIA Exit #303	Yes	Yes	Yes	Yes	WIA status/exit forms, state MIS data, Case notes
20	Supportive Services #330	No	No	Yes	Yes	Case notes
21	Date of first intensive service #332	Yes	Yes	No	No	Cross match between dates of service and vendor training information, vendor training documentation, state MIS, case notes
22	Date of first training service #333	Yes	Yes	No	No	Cross match between dates of service and vendor training information, vendor training documentation, state MIS, case notes
23	Established ITA #334	Yes	Yes	No	No	Check ITA account activity, Asset database, State MIS, case notes
24	Adult education, basic skills and/or literacy activity #335	Yes	Yes	No	No	Vendor training documentation, certificates, state MIS data, case notes
25	On-the-job training #336	Yes	Yes	No	No	Vendor training documentation, OJT master contract, state MIS data, case notes
26	Occupational skills training or skills upgrading/ retraining and/or workplace training #337	Yes	Yes	No	No	Vendor training documentation, credentials, state MIS documents, school records, diploma, case notes
27	Educational achievement services #340	No	No	Yes	Yes	Activity sheets, sign-in sheets, attendance record, vendor contract, state MIS, case notes
28	Employment services #341	No	No	Yes	Yes	Activity sheets, vendor contract, attendance rosters, state MIS, case notes

	DATA ELEMENT	ADULT	DISLOCATED WORKER	OLDER YOUTH	YOUNGER YOUTH	Source Documentation Requirements
29	Received summer youth employment opportunities #342	No	No	Yes	Yes	Activity sheets, work agreement, sign-in sheets, attendance roster, state MIS system, case notes
30	Additional support for youth services #343	No	No	Yes	Yes	Activity sheets, pay stub, sign-in sheets, attendance rosters, state MIS, vendor contract, case notes
31	Leadership development opportunities #344	No	No	Yes	Yes	Activity sheets, vendor contract, attendance roster, state MIS, case notes
32	Received follow-up services #345	No	No	Yes	Yes	Activity sheets, attendance rosters, receipt for follow-up support services, state MIS, case notes
33	Post Program Employment #601	Yes	Yes	Yes	No	UI Wage records, WRIS, supplemental data sources defined by TEGL 7-99 State management information system
34	Source of Supplemental Data #602	Yes	Yes	Yes	No	Follow up services, surveys, record sharing and/or automated record matching with other employment and administrative databases, other out of state wage record systems, case notes
35	Entered training related employment #605	Yes	Yes	No	No	Employer contacts, state MIS, WIA exit or status form, cross match between occupational training code and occupation code
36	Employed in third quarter after exit #608	Yes	Yes	Yes	No	UI wage records, WRIS, supplemental data sources as defined in TEGL 7-99
37	Source of supplemental data #609	Yes	Yes	Yes	No	Follow-up services, surveys, record sharing and/or automated record matching with other employment and administrative databases, other out of state wage record systems, case notes
38	Third quarter prior to registration #612	Yes	Yes	Yes	No	UI wage records, WRIS, other state wage records, federal wage databases
39	Third quarter prior to dislocation #613	No	Yes	No	No	UI wage records, WRIS, other state wage records, federal wage databases

	DATA ELEMENT	ADULT	DISLOCATED WORKER	OLDER YOUTH	YOUNGER YOUTH	Source Documentation Requirements
40	Second quarter prior to registration #614	Yes	Yes	Yes	No	UI wage records, WRIS, other state wage records, federal wage databases
41	Second quarter prior to dislocation #615	No	Yes	No	No	UI wage records, WRIS, other state wage records, federal wage databases
42	First quarter following the exit quarter #616	Yes	Yes	Yes	No	UI wage records, WRIS, other state wage records, federal wage databases
43	Second quarter following the exit #617	Yes	Yes	Yes	No	UI wage records, WRIS, other state wage records, federal wage databases
44	Third quarter following the exit quarter #618	Yes	Yes	Yes	No	UI wage records, WRIS, other state wage records, federal wage databases
45	Type of recognized educational/ occupational certificate/creden tial/diploma/ degree attained #621	Yes	Yes	Yes	No	Transcripts, certificates, diploma, surveys, case notes
46	Other reasons for exit #622	Yes	Yes	Yes	Yes	State MIS, waiver form, doctor's records, hospital records, contact with the penal system, case notes
47	In post-secondary education or advanced training gin quarter after exit #623	No	No	Yes	No	Record sharing with state board of governing community colleges, state board of governing universities, state education associations, integrated post secondary education reporting unit, higher education planning unit, training certificates, diploma, survey enrollment form, case notes

	DATA ELEMENT	ADULT	DISLOCATED WORKER	OLDER YOUTH	YOUNGER YOUTH	Source Documentation Requirements
48	In post-secondary education or advanced training in the third quarter after exit #624	No	No	Yes	No	Record sharing with state board of governing community colleges, state board of governing universities, state education associations, integrated post secondary education reporting unit, higher education planning unit, training certificates, diploma, survey enrollment form, case notes
49	Skill attainment goals Elements #625-672	No	No	No	Yes	Test Records, Transcripts, School/Employer Notification, State MIS, Case notes
50	Attained secondary school diploma #673	No	No	No	Yes	Transcripts, diploma, notice from school
51	Date of High School diploma or GED #674	No	No	No	Yes	Transcripts, diploma, notice from school
52	Youth placement and retention information #675 & 676	No	No	No	Yes	Cross match with other agencies, apprenticeship verification, military service, advanced training, post secondary education, transcripts, registration forms, comm.college info, employer contacts, U.I. wage records, WRIS, Case notes

Revised Elements for NFJP Data Validation & Source Documentation Requirements

	DATA ELEMENT	Source Documentation Requirements
1	Date of Enrollment #004	IEP Certification, self attestation, case manager/counselor intake application with signature
2	Date of Birth #005	Copy of I.D., Baptismal record, birth certificate, driver's license, 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, tribal records

	DATA ELEMENT	Source Documentation Requirements
3	Qualifies for Sec. 167 Program as a Farmworker or dependent or spouse of a Farmworker #009	Pay stubs, W-2 forms, IRS 1040 forms, case manager/counselor intake notes, self attestation
4	Farmworker Status #011	Pay stubs, W-2 forms, IRS 1040 forms, case manager/counselor intake notes, self attestation
5	Number of individuals in the Family #013 b	Birth certificate, family bible, IRS 1040 forms
6	Total Preprogram earnings during the 12-Month eligibility determination period #017	Pay stubs, W-2 forms, employer payroll records, IRS 1040 forms, Administrative wage records
7	Long-term Agricultural employment #020 f	IRS 1040 forms, pay stubs, intake application, case manager/counselor progress notes, self-attestation
8	Date of First Intensive Services #024	Case manager/counselor progress notes with signature, IEP assessment and diagnostic testing
9	Date of First Training Service #025	Case manager/counselor certification signature, employer signed document, attendance records from institution or instructor
10	Enrolled in a program or activity leading to an educational or occupational credential or license #028	Case manager/counselor progress notes with signature; employer signed document; attendance records from institution or instructor; intake application
11	Date of Exit #035	Case manager/counselor termination notice; case manager/counselor progress tracking report
12	Category of Exit #036	Grantee Administrative Records
13	Other reasons for Exit #037	Grantee Administrative Records
14	Date Entered Unsubsidized Employment #038	Case manager/counselor progress notes; letter from employer
15	Attainment of state recognized educational or occupational certificate, credential, diploma or degree #042	Copy of diploma/degree; record from Department of Education; school sign-in sheet and certification completed by instructor
16	Total earnings during 6 months since placement #044 a	Pay stubs; employer payroll records; IRS tax forms, administrative/UI wage records, case manager/counselor progress notes with signature
17	Has participant been employed at any time during the 4th, 5th or 6th months after placement? #044 b	Pay stubs, employer payroll records, IRS 1040 forms, case manager/counselor progress notes, self attestation

Revised Elements for Trade Data Validation & Source Documentation Requirements

	DATA ELEMENT	Source Documentation Requirements
1	Veteran Status I.8	DD-214, cross match with Veterans Data, cross match with Wagner-Peyser State MIS
2	Most Recent Qualifying Separation I.13	Layoff or rapid response list, determination of eligibility, notice of termination, letter from employer

	DATA ELEMENT	Source Documentation Requirements
3	Date of Application I.15	Application in case file, State MIS, WIA registration form, Designation of Eligibility form
4	Petition Number I.16	Worker group certification in case file, State MIS, UI records, DOLETA website, Determination of Eligibility form
5	Date Entered Training II.1a	Vendor training documentation in case file, case notes, State MIS, attendance lists, UI records, WIA status forms
6	Date completed, or withdrew from, training II.1b	Vendor training documentation in case file, WIA status form, training plan
7	Training Completed II.1c	Vendor training documentation in case file, WIA status form, state MIS, case notes about communications with program, applicant statement, UI records
8	Trade Readjustment Allowance (TAA) II.2	State UI records of TRA checks issued, request for allowance, state MIS
9	Waiver from training requirement II.3	Case file documentation that includes initial approval and renewals at 30 day intervals, State UI records of TRA checks issued, form from employment counselor
10	Date of Exit III.1	Documentation in case file, State MIS, WIA exit form
11	Employed in first full quarter after exit III.2	UI Wage records, WRIS, supplemental data sources as defined in TEGL 7-99, state MIS
12	Employed in third full quarter after exit III.5	UI Wage records, WRIS, supplemental data sources as defined in TEGL 7-99, state MIS
13	Three quarters prior to most recent qualifying separation III.6	UI Wage records, WRIS, other state wage records, Federal Wages Database
14	Two quarters prior to most recent qualifying separation III.7	UI Wage records, WRIS, other state wage records, Federal Wages Database
15	First quarter following exit III.8	UI Wage records, WRIS, other state wage records, Federal Wages Database
16	Second quarter following exit III.9	UI Wage records, WRIS, other state wage records, Federal Wages Database
17	Third quarter following exit III.10	UI Wage records, WRIS, other state wage records, Federal Wages Database