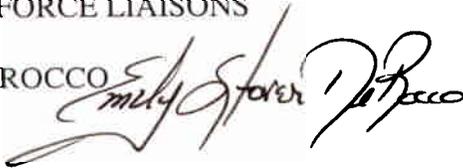


<b>EMPLOYMENT AND TRAINING ADMINISTRATION</b> <b>ADVISORY SYSTEM</b> <b>U.S. DEPARTMENT OF LABOR</b> <b>Washington, D.C. 20210</b>	CLASSIFICATION Data Validation
	CORRESPONDENCE SYMBOL PRO
	DATE August 20, 2004

**TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 3-03, Change 1**

**TO:** ALL STATE WORKFORCE AGENCIES  
ALL STATE WORKFORCE LIAISONS

**FROM:** EMILY STOVER DeROCCO  
Assistant Secretary



**SUBJECT:** Data Validation Policy for Employment and Training Programs

**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 data validation policy, for the following programs: Workforce Investment Act (WIA) Title IB, Wagner-Peyser Act / Employment Service (ES), Trade Adjustment Assistance (TAA), National Farmworker Jobs Program (NFJP), Indian and Native American (INA) Program and Senior Community Service Employment Program (SCSEP).

**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;" and President's Management Agenda (<http://www.whitehouse.gov/omb/budget/fy2002/mgmt.pdf>).

**3. Background.** In TEGL No. 3-03, the Department issued policy guidance to states and national program grantees on the timeframes for implementing data validation requirements on program performance reports. This change outlines revisions to those implementation timeframes and updates information given on data validation software. TEGL No. 3-03 provided exceptions for certain verified report deadlines which do not apply to Program Year (PY) 2003 annual reports. For PY 2003, report validation must be completed prior to submission of the annual report in accordance with the timetables specified below.

**4. Implementation for State Programs.** Reporting instructions for data validation for state programs will be issued separately in a revised handbook on the Performance Web site at <http://www.doleta.gov/performance/>. The timeframes for implementation are as follows:

RESCISSIONS	EXPIRATION DATE <i>Continuing</i>
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**Workforce Investment Act Title IB.** For PY 2003, each state is required to submit a validated annual report by October 1, 2004, and the appropriate WIA Standardized Record Data (WIASRD) records by October 15, 2004. States will be required to complete report validation prior to submitting the annual report (ETA 9091), and data element validation using a file of exiters and participants reported on the ETA 9091 by February 1, 2005. This date reflects a change from last year's timetable. Data element validation is now due 120 days after the submission of the annual report, not the submission of the WIASRD records.

**Employment Service.** Each state is required to submit the ETA 9002 and VETS 200 reports on a quarterly basis, 45 days after the end of the report quarter. The ES requires report validation and minimal data element validation. Report validation must be conducted for the ETA 9002 and VETS 200 reports due on November 15, 2004, prior to submission. 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 file Trade Act Participant Report (TAPR) for Fiscal Year (FY) 2004 by November 15, 2004. For TAA, ETA only requires the submission of individual participant records, and not a report containing aggregate performance information; thus, 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 2004 TAPR (created by adding the four quarterly files together). The data element validation for TAA must be completed by February 1, 2005.

**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. Instructions and training will be provided in November 2004. The final NFJP participant data for Program Year 2003 is due February 15, 2005. Data element validation for PY03 must be completed by June 15, 2005.

**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<sup>th</sup> program year end date). Validation software for INA programs 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 report and a new reporting system. The first SCSEP "annual report" will not be produced 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 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 is providing guidance detailing required source documents to validate eligibility, services, and outcomes. States and grantees should be prepared to start collecting and storing appropriate source documents for all current activities effective immediately. A list of approved source documents for each element is provided in Attachment A. States and grantees will not be required to obtain source documentation for activities that occurred prior to the issuance of this guidance.
- Version 3.0 of the data validation software will be released in August 2004. The updated version will be available in time for states and grantees to use it to validate the annual reports due by October 1, 2004.
- 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 Web site 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, and TAA programs are currently available and reflect the reduction in data elements; tools for the national grant programs 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 staff. To avoid unnecessary delays and problems in the implementation of data validation, regional staff is 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 Web site 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.
- Notify the appropriate regional office or the Office of National Programs if they intend to use a methodology to perform data validation other than the methodology developed by ETA.

States interested in alternative methodology for validation of WIA Title IB, ES, or TAA programs should notify the appropriate regional office by September 15, 2004.

- 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 regional office or to the Office of National Programs, as appropriate.

**Attachment A: Source Documentation Requirements**