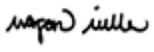


TEXAS WORKFORCE COMMISSION LETTER

ID/No:	WD 07-14
Date:	April 9, 2014
Keyword:	TAA; TWIST; WIA; WorkInTexas.com
Effective:	Immediately

To: Local Workforce Development Board Executive Directors
Commission Executive Offices
Integrated Service Area Managers


From: Reagan Miller, Director, Workforce Development Division

Subject: **State Data Validation Requirements—*Update***

PURPOSE:

To provide Local Workforce Development Boards (Boards) with information and guidance on the state data validation requirements for the Workforce Investment Act (WIA) and Trade Adjustment Assistance (TAA) programs.

This WD Letter provides updates to the Data Element Review for the following:

- ***Cross match* Data Elements**
- **Data Elements from WorkInTexas.com**
- **Youth Data Elements**

CHANGES TO WD LETTER 23-09, CHANGE 2:

New information in this WD Letter is indicated by **bold** typeface, which indicates new or clarifying language.

BACKGROUND:

US Department of Labor Employment and Training Administration (DOLETA) Training and Employment Guidance Letter (TEGL) 03-03, issued August 20, 2003, and entitled “Data Validation Policy for Employment and Training Programs”—and subsequent changes—provides guidance to states regarding what types of source documentation are acceptable to validate certain components of WIA eligibility, services, and outcomes. These data validation requirements are intended to be customized by states to fit local needs.

TEGL 31-09, issued June 11, 2010, and entitled “Program Year 2009/Fiscal Year 2010 Performance Reporting and Data Validation Timelines,” outlines Fiscal Year 2010 TAA data element validation requirements. To ensure that data

validation requirements fit Texas' needs and can be successfully implemented by Boards, the Texas Workforce Commission (TWC) issued the Data Element Review that:

- provides the definition and state documentation requirements for each data validation element; and
- indicates where Boards have local flexibility to apply local standards.

PROCEDURES:

Boards must ensure that Workforce Solutions Office staff follows the data validation requirements set forth in TWC's Data Element Review at www.twc.state.tx.us/boards/wia/dataelementreview.pdf. NLF

Boards may establish policies¹ that exceed the requirements set forth in the Data Element Review. LF

Boards adopting policies that exceed state requirements must be aware that compliance with data validation requirements is based on Board policy, not on state requirements. NLF

Boards must ensure that record retention time frames are based on the Common Measures exit date and not on the date the participant stops receiving WIA or TAA services. NLF

Cross match Data Elements

Boards must be aware of the following: NLF

- **Data elements that are populated by *Cross match* into The Workforce Information System of Texas (TWIST), i.e., information migrated from another state agency's automated system, cannot be validated due to the absence of source documentation.**
- **Boards are no longer required to validate *Cross match* information populated into TWIST from the following agencies:**
 - **Texas Health and Human Services Commission;**
 - **Texas Department of Criminal Justice; and**
 - **Texas Juvenile Justice Department.**

Data Elements from WorkInTexas.com

Boards must be aware that WorkInTexas.com participant data migrates automatically into TWIST when a participant begins receiving Wagner-Peyser-funded services or begins accessing services through WorkInTexas.com, but the data has not been validated by Workforce Solutions Office staff. NLF

¹ As required by Commission rule §802.1(f) and as detailed in WD Letter 10-07, Board members must take such actions in an open meeting.

Boards must ensure that Workforce Solutions Office staff:

NLF

- validates data element *Date of Birth* for all participants who receive WIA-funded, staff-assisted core, intensive, or training services, including those participants served under National Emergency Grants and TAA; and
- validates data element *Employment Status at Participation* for all participants who receive WIA-funded, staff-assisted core, intensive, or training services, and who confirm they are employed on the first day of their period of participation. The participant's employment status and supporting documents must confirm that the participant was employed on this date and not the date that the participant began receiving WIA-funded services.

Boards must be aware of the following:

NLF

- Data element *Veteran, Eligible Veteran Status*, when migrated into TWIST from WorkInTexas.com, has already met state data validation requirements.
- WorkInTexas.com requires participants seeking eligible veteran status to complete the *Self-attestation* screen to identify their eligible veteran status before saving their eligible veteran designation.
- Information entered by participants into WorkInTexas.com is authenticated through logon and password, which is considered to be the same as an electronic signature and meets the definition of self-attestation.

Youth Data Elements

Boards must be aware that the following youth data elements have been removed:

NLF

- Received Educational Achievement Services
- Received Employment Services
- Received Summer Employment Opportunities
- Received Additional Support for Youth Services
- Received Leadership Development Opportunities
- Received Follow-Up Services

Boards must be aware that the following new youth data elements will be validated at the state level:

NLF

- Most Recent Date Received Educational Achievement Services
- Most Recent Date Received Summer Employment Opportunities
- Most Recent Date Received Adult Mentoring Services
- Most Recent Date Received Career Guidance/Counseling Services
- Most Recent Date Received Leadership Development Opportunities
- Most Recent Date Received Follow-Up Services
- Most Recent Date Participated in Alternative School
- Most Recent Date Participated in Work Experience
- Most Recent Date Received Support Services

INQUIRIES:

Direct inquiries regarding this WD Letter to wfpolicy.clarifications@twc.state.tx.us.

RESCISSIONS:

WD Letter 23-09, Change 2

REFERENCE:

- Workforce Investment Act of 1998
- US Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter 03-03, issued August 20, 2003, and entitled "Data Validation Policy for Employment and Training Programs"
- US Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter 03-03, Change 1, issued August 20, 2004, and entitled "Data Validation Policy for Employment and Training Programs"
- US Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter 03-03, Change 2, issued October 20, 2004, and entitled "Data Validation Submission Instructions"
- US Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter 03-03, Change 3, issued July 15, 2005, and entitled "Revision to the Data Validation Policy for Employment and Training Programs for Program Year 2004"
- US Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter 31-09, issued June 11, 2010, and entitled "Program Year 2009/Fiscal Year 2010 Performance Reporting and Data Validation Timelines"
- US Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter 28-11, issued November 27, 2012, and entitled "Program Year 2011/Fiscal Year 2012 Performance Reporting and Data Validation Timelines"
- WD Letter 10-07, issued February 2, 2007, and entitled "Adoption of Local Workforce Development Board Policies in Open Meetings"

FLEXIBILITY RATINGS:

No Local Flexibility (NLF): This rating indicates that Boards must comply with the federal and state laws, rules, policies, and required procedures set forth in this WD Letter and have no local flexibility in determining whether and/or how to comply. All information with an NLF rating is indicated by "must" or "shall."

Local Flexibility (LF): This rating indicates that Boards have local flexibility in determining whether and/or how to implement guidance or recommended practices set forth in this WD Letter. All information with an LF rating is indicated by "may" or "recommend."