

**TEXAS WORKFORCE COMMISSION**  
**Workforce Development Letter**

<b>ID/No:</b>	WD 27-19, Change 1
<b>Date:</b>	January 22, 2021
<b>Keyword:</b>	ES; TAA; TWIST; Veterans; WIOA; WorkInTexas.com
<b>Effective:</b>	30 days from issuance

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



**From:** Courtney Arbour, Director, Workforce Development Division

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

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**PURPOSE:**

The purpose of this WD Letter is to provide Local Workforce Development Boards (Boards) with information and guidance on the state data validation requirements for the Jobs for Veterans’ State Grants (JVSG), Wagner-Peyser (WP), Workforce Innovation and Opportunity Act (WIOA), and Trade Adjustment Assistance (TAA) programs.

**RESCISSIONS:**

WD 27-19

**BACKGROUND:**

US Department of Labor Employment and Training Administration (DOLETA) Training and Employment Guidance Letter (TEGL) 07-18, issued December 19, 2018, and titled “Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA),” provides guidance to states that they must use in developing procedures for ensuring that the data submitted is valid and reliable. States may customize these data validation requirements to fit local needs.

The guidance identifies 24 common data elements that states must validate. Furthermore, states have the flexibility to:

- maintain supporting documentation for program-specific data elements not included in the guidance;
- collect additional source documentation on more data elements; and
- require additional source documentation in their procedures.

TEGL 23-19, issued June 18, 2020, and titled “Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL)

Workforce Programs,” further enhances data element validation by adding additional key data elements.

With this latest guidance, the Texas Workforce Commission (TWC) incorporated all data elements for which documentation is required. To ensure that data validation requirements fit Texas’ needs and may be successfully implemented by Boards, TWC is issuing guidance that:

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

**PROCEDURES:**

**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.”

**NLF:** Boards must ensure that Workforce Solutions Office staff follows the data validation requirements set forth in TWC’s Data Element Review, found at <https://twc.texas.gov/files/twc/wia-taa-data-element-review-twc.xlsx>.

**LF:** Boards may establish policies<sup>1</sup> that exceed the requirements set forth in the Data Element Review.

**NLF:** Boards that adopt data validation policies that exceed state requirements must be aware that compliance will be reviewed for these locally set data validation requirements.

**NLF:** Boards must ensure that record retention time frames are based on the Primary Indicators of Performance exit date and not on the date that the participant stops receiving JVSG, WP, WIOA, or TAA services. For WIOA Youth, Boards must ensure that record retention time frames are based on the Youth follow-up end date.

**NLF: Crossmatch Data Elements**

Boards must be aware of the following:

- Data elements that are migrated via crossmatch from another state agency’s automated system into The Workforce Information System of Texas (TWIST) cannot be validated due to the absence of source documentation.

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<sup>1</sup> As required by TWC Chapter 802 Integrity of the Texas Workforce System rule §802.1(f) and as detailed in WD Letter 10-07, issued February 2, 2007, and titled “Adoption of Local Workforce Development Board Policies in Open Meetings,” Board members must take such actions in an open meeting.

- Boards are not required to validate crossmatch data populated into TWIST from the following agencies:
  - Texas Health and Human Services Commission
  - Texas Department of Criminal Justice

**NLF: Data Elements from WorkInTexas.com**

Boards must be aware that only WorkInTexas.com job seeker data migrates automatically into TWIST, but self-service-entered data may not have been validated by Workforce Solutions Office staff. See Attachment 2 (WorkInTexas.com Data Elements That Migrate to TWIST) for WorkInTexas.com data elements that migrate to TWIST.

**NLF: Boards must ensure that Workforce Solutions Office staff validates the following data elements:**

- Date of birth for all participants who receive WIOA-funded individualized career services, training, and follow-up services, including participants served under National Dislocated Worker Grants and TAA.
- Employment status at program entry for all participants who receive WIOA-funded services and who confirm that they are employed at program entry. The participant’s employment status and supporting documentation must confirm that the participant was employed on the date that he or she enrolled in WIOA-funded services.

**NLF: Boards must be aware of the following:**

- The Eligible Veteran Status data element, when migrated into TWIST from WorkInTexas.com, has already met state data validation requirements for only the WP and JVSG programs.
- Self-attestation is not acceptable for documenting veteran status for participation in WIOA or TAA. WorkInTexas.com requires individuals to self-identify as veterans and provide military service details during registration. Qualified spouses also self-identify during registration.
- Information entered by individuals in WorkInTexas.com is authenticated through unique access via username and password, which is considered to be the same as an electronic signature and meets the definition of “self-attestation.”

**Homeless Veterans’ Reintegration Program**

**NLF: DOL requires the capture of the grant numbers for homeless veterans referred by the grantees listed below. During the referral by the grantee, Boards must ensure that Workforce Solutions Office staff enters the appropriate grantee number based on the following Homeless Veterans’ Reintegration Program (HVRP) grant numbers:**

- Grant number 33835 (Houston MSA)
  - Adaptive Construction Solutions (ACS)
  - 6509 West Little York Road
  - Houston, Texas 77040
  - (832) 619-1175
- Grant number 35307 (Texas except Houston MSA)
  - Adaptive Construction Solutions (ACS)
  - 6509 West Little York Road

Houston, Texas 77040  
(832) 619-1175

- Grant number 33363  
Front Steps, Inc.  
2211 South IH-35, Suite 301  
Austin, Texas 78741  
(512) 305-4100
- Grant number 35322  
Houston Launch Pad  
2616 South Loop West, Suite 504  
Houston, Texas 77054  
(713) 661-8882
- Grant number 33362  
US Veterans Initiative  
7227 Fannin Street, Suite 200  
Houston, Texas 77030  
(832) 203-1626
- Grant number 33836  
Volunteers of America (VOA), Texas–DFW  
2401 Scott Avenue  
Fort Worth, Texas 76103  
(817) 369-8443
- Grant number 33837  
Volunteers of America (VOA), Texas–Houston  
4808 Yale Street  
Houston, Texas 77018  
(832) 493-7244
- Grant number 35287  
Castle Cares Community Ministry  
212 North 14th Street  
West Columbia, Texas 77486  
(979) 345-3800
- Grant number 35261  
Project Unity  
4001 East 29th Street, Suite 114  
Bryan, Texas 77802  
(979) 595-2900

HVRP DOL grant information may be found at [HVRP Information](#).

**INQUIRIES:**

Send inquiries regarding this WD Letter to [wfpolicy.clarifications@twc.state.tx.us](mailto:wfpolicy.clarifications@twc.state.tx.us).

**ATTACHMENTS:**

Attachment 1: WIOA Data Element Review

Attachment 2: WorkInTexas.com Data Elements That Migrate to TWIST

## **REFERENCES:**

- US Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter 23-19, issued June 18, 2020, and titled “Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs”
- US Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter 07-18, issued December 19, 2018, and titled “Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)”
- US Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter 1-19, issued July 1, 2019, and titled “Trade Adjustment Assistance Data Integrity (TAADI)”
- WD Letter 10-07, issued February 2, 2007, and titled “Adoption of Local Workforce Development Board Policies in Open Meetings”