

TEXAS WORKFORCE COMMISSION
Workforce Development Letter

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Effective:	Immediately

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



From: Mary York, Director, Workforce Development Division

Subject: State Data Validation Requirements—Update

PURPOSE:

The purpose of this WD Letter is to provide Local Workforce Development Boards (Boards) with updated information and guidance on the state data validation requirements for programs included in WorkInTexas.com.

This updated WD Letter clarifies the U.S. work authorization validation requirements for the Reemployment Services and Eligibility Assessment (RESEA) program for Boards and updates references to federal guidance.

RESCISSIONS:

WD Letter 27-19, Change 8

BACKGROUND:

U.S. Department of Labor Employment and Training Administration (DOLETA) Training and Employment Guidance Letter (TEGL) 07-18, Change 1, issued July 10, 2025, and titled “Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA),” provides guidance that states must use in developing procedures to ensure that the data submitted on participant outcomes is valid and reliable. States may customize these data validation requirements to fit local needs.

The guidance identifies 25 common data elements that states must validate.

Furthermore, states have the flexibility to:

- continue 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, Change 3, issued December 1, 2025, 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 aligning guidance with updates made to the Effectiveness in Serving Employers performance indicator.

With this guidance, 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, WorkInTexas.com requires data element verification by Workforce Solutions Office staff for the following programs:

- Wagner-Peyser (W-P) program registrations, including:
 - W-P;
 - Jobs for Veterans State Grant (JVSG);
 - RESEA; and
 - Migrant Seasonal Farmworker (MSFW)
- WIOA Title I, including:
 - Adult, Dislocated Worker, and Youth;
 - Statewide Initiatives; and
 - National Dislocated Worker Grants
- Temporary Assistance for Needy Families (Choices) employment and training
- Trade Adjustment Assistance (TAA) customers
- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)

TEGL 10-23, Change 2, issued July 10, 2025, and titled “Work Authorization Verification in Grant Programs Administered by the Employment and Training Administration,” required states to verify work authorization of all participants served by W-P, WIOA, and related programs before providing any participatory services.

On March 18, 2026, DOLETA issued TEGL 10-23, Change 3, rescinding TEGL 10-23, Change 2. U.S. work authorization is consistent with WIOA §188 protections, is aligned with the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), and generally supports the purpose of workforce development programs (identified in this guidance) to assist individuals in obtaining self-sufficient employment. As such, TWC has retained the work authorization requirements implemented through this guidance.

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.”

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 [TEGL 23-19, Change 3](#) and its attachments and this guidance as well as the requirements identified in verification selections for each program included in [WorkInTexas.com](#).

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 W-P, WIOA, or TAA services. For WIOA Youth, Boards must ensure that record retention time frames are based on the youth follow-up end date.

Crossmatch Data Elements

NLF: Boards must inform Workforce Solutions Office staff of the following:

- Data elements that are migrated via crossmatch from another agency’s automated system into WorkInTexas.com may meet validation requirements in the absence of other source documentation.
- Boards are not required to validate crossmatch data populated into WorkInTexas.com from:
 - Texas Health and Human Services Commission;
 - Texas Department of Criminal Justice; or
 - other sources when allowed for an element required by TEGL 23-19, Change 3.

Data Elements in WorkInTexas.com

NLF: Boards must inform Workforce Solutions Office staff that WorkInTexas.com self-service-entered data may not have been validated by Workforce Solutions Office staff.

NLF: Boards must ensure that Workforce Solutions Office staff validates data elements in a program that requires verification, including for all W-P participants.

NLF: Boards must ensure that Workforce Solutions Office staff includes validation of source documents in participant case files, or in another document management system, in alignment with state and local guidance.

LF: Boards may set local policies to use WorkInTexas.com as the case file or document management system for programs in their local workforce development areas.

Veteran Status

NLF: Boards must inform Workforce Solutions Office staff that WorkInTexas.com requires individuals to self-identify as veterans and provide military service details during registration. Qualified spouses also must self-identify during registration.

NLF: Boards must inform Workforce Solutions Office staff that the information entered by individuals in WorkInTexas.com is authenticated through unique access via username

and password, which is considered the same as an electronic signature and meets the definition of “self-attestation.”

NLF: Boards must inform Workforce Solutions Office staff that individual self-attestation in WorkInTexas.com for the eligible veteran status data element only meets data validation requirements for the W-P registrations, including JVSG programs.

Social Security Numbers

NLF: Boards must inform Workforce Solutions Office staff that **Social Security Number (SSN)** is a required field in WorkInTexas.com. If an individual does not provide a valid SSN during registration, WorkInTexas.com will attach a pseudo-SSN to the account.

NLF: Boards must inform Workforce Solutions Office staff that WorkInTexas.com may require verification of SSN on program eligibility screens.

NLF: Boards must ensure that Workforce Solutions Office staff do not deny services to an applicant who declines to provide their SSN, but whose work authorization is documented and verified through another form of allowable documentation.

U.S. Work Authorization

NLF: Boards must inform Workforce Solutions Office staff that U.S. work authorization is required for DOLETA programs, including W-P programs, and is addressed through the **Citizenship** fields in WorkInTexas.com.

NLF: Boards must ensure that prior to delivering staff-assisted participant-level services, Workforce Solutions Office staff verifies U.S. work authorization through the collection and validation of allowable documentation for all participants in the following programs:

- W-P program registration, including:
 - W-P;
 - JVSG; and
 - MSFW
- WIOA Title I, including:
 - Adult, Dislocated Worker, and Youth;
 - Statewide Initiatives; and
 - National Dislocated Worker Grants
- TAA

NLF: Boards must ensure that, at least once every three months, Workforce Solutions Office staff reverifies the continuing U.S. work authorization of all participants with temporary work authorization status.

NLF: Boards must ensure that Workforce Solutions Office staff update temporary work authorization status information in W-P and WIOA program applications, and document such actions in detailed case notes, following scheduled reverification or at any other time updated information becomes available, as practicable.

NLF: Boards must ensure that Workforce Solutions Office staff immediately discontinues the provision of services and closes affected program applications for any individual who loses U.S. work authorization following program enrollment.

RESEA Work Authorization

NLF: Boards must inform Workforce Solutions Office staff that the following procedures are only applied to those individuals engaged through the RESEA program.

NLF: Boards must inform appropriate Workforce Solutions Office staff that, because RESEA program claimants must provide work authorization documentation when submitting unemployment insurance (UI) claims, these individuals are not required to submit such documents prior to W-P program application completion in WorkInTexas.com.

NLF: Boards must ensure that Workforce Solutions Office staff complete the W-P program application in WorkInTexas.com for RESEA program claimants by selecting the following options:

- Authorized to work in the U.S.
 - Yes
- U.S. Citizenship Status
 - Citizen of the U.S. or U.S. Territory
- Citizenship/Alien Status Verification
 - RESEA - Work Authorization completed by TWC UI

NLF: Boards must ensure that Workforce Solutions Office staff do not select **RESEA - Work Authorization completed by TWC UI** as the verification type for any individuals other than RESEA claimants, including other UI claimants.

NLF: Boards must inform Workforce Solutions Office staff that ID verification is a required element of every RESEA appointment. A claimant's availability for work depends on having the necessary work authorization.

NLF: Boards must inform appropriate Workforce Solutions Office staff that verification of availability for work is a required component of the RESEA eligibility assessment, documented through WorkInTexas.com **Service 257 – UI Eligibility Assessment**, following completion of the W-P program applications.

NLF: Boards must ensure that Workforce Solutions Office staff report any potential employment authorization issues related to required documents using Form WF-42, Potential Unemployment Benefits Eligibility Issue—Reporting Template, as directed in the RESEA Program Guide.

INQUIRIES:

Send inquiries regarding this WD Letter to wfpolicy.clarifications@twc.texas.gov.

ATTACHMENTS:

Attachment 1: Revisions to WD Letter 27-19, Change 8, Shown in Track Changes

REFERENCES:

[Training and Employment Guidance Letter 10-23, Change 3, issued March 18, 2026,](#)

[and titled “Rescission of Training and Employment Guidance Letter No. 10-23, Change 2: Work Authorization Verification in Grant Programs Administered by the Employment and Training Administration”](#)
[Training and Employment Guidance Letter 23-19, Change 3, issued December 1, 2025, and titled “Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor \(DOL\) Workforce Programs”](#)
[Training and Employment Guidance Letter 07-18, Change 1, issued July 10, 2025, and titled “Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act \(WIOA\)”](#)
[Workforce Innovation and Opportunity Act §188\(a\)\(5\)](#)
[Title 40, Texas Administrative Code, Part 20, Chapter §802.1\(f\), Integrity of the Texas Workforce System](#)
[Reemployment Services and Eligibility Assessment \(RESEA\) Program Guide](#)
[WorkInTexas.com WIOA Title I and Wagner-Peyser Eligibility Documentation Log](#)
[Workforce Development Letter 06-13, Change 2, issued March 18, 2024, and titled “Documenting Services and Participant Contact in WorkInTexas.com Case Notes—Update”](#)