
Washington envisions a nationally recognized fully integrated One-Stop system with enhanced customer access to program services, improved long-term employment outcomes for job seekers and consistent, high quality services to business customers. In order to achieve this vision, the WorkSource Standards & Integration Division sets a common direction and standards for Washington's WorkSource system through the development of WorkSource system policies, information memoranda, and technical assistance.

WorkSource Advisory Bulletin 10-10

**TO: Workforce Development Councils
WorkSource Area Directors
Workforce Training and Education Coordinating Board**

FROM: Amy Smith-Rubeck, Deputy Assistant Commissioner

DATE: June 23, 2011

SUBJECT: Training and Employment Guidance Letters 24-10 and 27-10

TEGL 24-10: Trade Adjustment Assistance (TAA) Data Element Validation for Fiscal Year (FY) 2010

TEGL 27-10: Program Year 2010/Fiscal Year 2011 Performance Reporting and Data Validation Timelines

1. Purpose:

The purpose of this bulletin is to summarize TEGL 24-10, which waives TAA data validation for a second year, and TEGL 27-10, which makes minor changes to last year's performance reporting and data validation procedures.

2. Action:

Relating to TEGL 27-10, local Workforce Development Councils (WDCs) will be asked to prepare a one-page summary of Workforce Investment Act (WIA)-related achievements during the current program year for the PY 2010 WIA Title I-B Annual Report. The report work team will convene at the end of this month.

3. Background:

The Department of Labor (DOL) annually releases a TEGL on performance reporting and data validation to reflect changes to the content, timeframe, or other information. The two TEGLs discussed are very similar to last year with the few exceptions noted below.

TEGL 24-10 notifies states that TAA data element validation is not required (waived) for FY 2010 due in large part to three factors: (1) ongoing efforts to implement the new Trade Act Performance

Report (TAPR) that consolidates three TAA reports into one, (2) significant state efforts to improve reliability through edit checks being implemented with approximately 80 additional edit checks being planned for implementation on July 1, 2011, and (3) reversion of the program to the TAA Reform Act of 2002 that requires additional reprogramming at the state level and devotion of resources to implementation activities.

TEGL 27-10 applies to the following programs: WIA Title I-B Adult, Dislocated Worker, and Youth; WIA National Emergency Grants (NEG); Wagner-Peyser Act (W-P) Employment Service; Local Veterans a Employment Representative and Disabled Outreach (under chapter 41 of the title 38 United States Code); TAA; Indian and Native American Program; and the National Farm Worker Jobs Program.

Note: The Indian and Native American Program and National Farm Worker Jobs Program are federal grantee programs for which the state does not have performance reporting or data validation responsibility. For purposes of this bulletin, they are not addressed.

TEGL 27-10 addresses reporting requirements and associated timelines for submitting quarterly and annual reports and data validation results for the applicable state programs.

Washington has a waiver of the Title I B WIA measures and only reports the Common Measures. While the data elements will not be subject to validation, they must still be reported in the WIASRD, and appropriate documentation is still required.

4. Information:

A few changes were made to performance and data validation reporting requirements:

- Timelines have been changed to adjust calendar dates. The deadline for the WIA Title I-B Annual Report is October 1, 2011. The deadline for WIA/NEG Data Element Validation is February 1, 2012.
- A special notation is added that the states' 2011 American Recovery and Reinvestment Act (ARRA) supplemental reports will be the final ARRA reports.
- Additional elements may show up on the list of data validation elements to be reviewed:
 - Element 102, Type of Recognized Credential, reported for Adult, Dislocated Worker and Older Youth.
 - Element 155, Youth Retention Information, reported for Older Youth and Younger Youth.
 - Elements 103-150, Youth Skill Attainment Goal Elements for Younger Youth
- Elements 95, 96 and 99 for Older Youth only – wages are validated at the state level and there is no change in the process for wages for field staff.

Data Element Validation in Washington

Data element validation (DEV) is annually performed in Washington by Employment Security (ES) staff. The largest piece of DEV is the WIA and NEG program, which begins in fall. Last fall, 1,387

records were identified by DOL's Data Reporting Validation Software (DVRS) for state review in Washington. Files are reviewed in each WDA. Additionally, SKIES and Unemployment Insurance (UI) wage records are used to validate some elements.

DEV for TAA involves a small sample of records, but DOL waived TAA data element validation last year and has waived it again this year per TEGL 24-10. Appropriate data entry and collection, however, are still required.

W-P data record validation occurs annually in August and involves 25 individual records of individuals who received labor exchange services at a local WorkSource facility or through www.Go2WorkSource.com. This, too, is performed by ES staff.

Observations/Lessons from Data Element Validation in Washington

Some common reasons that data elements do not pass in Washington include the following:

Specific Documentation Requirements. Elements that require specific documentation tend to have high failure rates. One example is participants reporting receipt of cash assistance (TANF), Element 21, for which the source documentation requirement is a "cross match with TANF public assistance records" such as DSHS award letters, benefit history payment records, ACES screen prints, and e-JAS printouts. Telephone verification forms are accepted if they contain enough information, including the participant's name, ID number, type of assistance received, who the information is coming from, and the dates received. Dates are reviewed because the definition specifies that the participant "has received cash assistance or other support service from the TANF agency in the last six months prior to participant in the program."

Element 12, Veteran's Status, has a high failure rate in a number of areas because the acceptable documentation for validating this element is very specific: a copy of the DD-214, cross match with veterans data, or a letter from the Veterans Administration.

Older Youth and Younger Youth Programs. Several elements for the Older Youth and Younger Youth programs tend to have high failure rates. This typically occurs when initial service plans for Youth participants result in the entry of services into SKIES (which gets reported to DOL), but subsequent review of files cannot confirm receipt of those services. Evidence that participants received a service or services is generally found in the Notes section of a case file or in SKIES. Services entered into SKIES on the Service Plan should be deleted if not received.

Documented Service Does Not Meet Data Validation Definition. Some elements fail because the documented service does not meet the data element definition. One example is Element 78, Received Educational Achievement Services. According to the definition, this service is only for Youth who are working toward their secondary degree. For Youth attending a traditional high school, there must be evidence they received tutoring and study skills training or assistance. Youth attending alternative schools and programs to earn their high school diploma, high school completion, or GED meet the definition. Dropout prevention strategies, generally the payment of incentives for completing, also meet the definition of Received Educational Achievement Services.

5. References:

U.S. Department of Labor, Employment and Training Administration; Training and Employment Guidance Letter No. 26-10; Workforce Investment Act (WIA) Adult, Dislocated Worker and Youth Activities Program Allotments for Program Year (PY) 2011; Final PY 2011 Allotments for the Wagner-Peyser Act Employment Service Program Allotments; and Workforce Information Grants to States Allotments for PY 2011; May 10, 2011.

U.S. Department of Labor, Employment and Training Administration; Training and Employment Guidance Letter No. 27-10; Program Year 2010/Fiscal Year 2011 Performance Reporting and Data Validation Timelines; May 11, 2011.

6. Website:

http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3021

http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3022

Direct Inquiries To:

*Leslye Miller, Program Coordinator
Compliance, Assistance, Research and Grant Origination Unit
WorkSource Standards & Integration Division
Employment Security Department
PO Box 9046
Olympia, WA 98507
(360) 725-9524
lmiller@esd.wa.gov*

*Susan Haerling, Data Validation Coordinator
System Performance Unit
WorkSource Standards & Integration Division
Employment Security Department
PO Box 9046
Olympia, WA 98507
(360) 725-9496
shaerling@esd.wa.gov*