

TEXAS WORKFORCE COMMISSION LETTER

ID/No:	WD 23-09, Change 2
Date:	February 15, 2011
Keyword:	TAA; WIA
Effective:	Immediately

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



From: Laurence M. Jones, 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.

Information was inadvertently deleted from the Data Element Review issued by WD Letter 23-09, Change 1, dated November 16, 2010, and entitled “State Data Validation Requirements—*Update*.”

This WD Letter updates the Data Element Review by reinserting the information, which is located on:

- **pg. 7, *Data Element #102, State Source Documentation Requirements* column, 2(g)–(m) and 3; and**
- **pg. 7–8, *Data Element #115, all columns.***

CHANGES TO WD LETTER 23-09, CHANGE 1:

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

BACKGROUND:

U.S. Department of Labor Employment and Training Administration (DOLETA) Training and Employment Guidance Letter (TEGL) 03-03—and any 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’s needs and can be successfully implemented by Boards, the Texas Workforce Commission (Commission) 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 the Data Element Review available at www.twc.state.tx.us/boards/wia/dataelementreview.pdf. **NLF**

Boards must be aware that the Data Element Review has been updated with the 17 TAA data elements subject to validation. Thirteen of the elements are common to both TAA and WIA, while four are specific to TAA. TAA-specific elements are identified in the Data Element Review. **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**

INQUIRIES:

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

RESCISSIONS:

WD Letter 23-09, Change 1

REFERENCE:

Workforce Investment Act of 1998

U.S. 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”

U.S. 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”

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.

- U.S. 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”
- U.S. 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”
- U.S. 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”
- 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.”