**WorkforceGPS**

**Transcript of Webinar**

**Overview: Validating Required Performance Data Submitted by DOL Grantees**

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JON VEHLOW: Welcome to "Overview: Validating Required Performance Data Submitted by DOL Grantees." So without further ado, I'd like to kick things off for our moderator today, Cesar Villanueva, workforce analyst, U.S. Department of Labor Employment and Training Administration. Cesar, take it away.

CESAR VILLANUEVA: Thanks, Jon. Hello. Welcome everyone. Thanks for joining us today for this presentation on validating required performance data submitted by DOL grantees. So I'll be your moderator today. If you have any questions, please input them into the chat. We'll have some time to answer your questions at the end of the presentation, but let's go ahead and pull up the poll results, Jon.

The poll statement was we have some data validation strategies in place. So that's asking you if your team – your state has any strategies in place and it seems like most respondents selected – yes, we have efforts in place. It seems like over 50 percent of you selected that. And then in second it was somewhat, we have a few in place. So wherever you're at – wherever you selected, we hope that this presentation gets you a better sense of some data validation strategies that you can implement.

Thanks, Jon, and we can pull the presentation? So today's speakers are Toquir Ahmed, workforce analyst at the U.S. Department of Labor Employment and Training Administration, as well as Christina Eckenroth, also a workforce analyst with U.S. Department of Labor, and Robert Hoekstra, a program analyst also with U.S. Department of Labor.

So today's objective. In today's webinar, we will or we already – TEGL 23-19. We'll address the programs covered in the guidance, the guidance purpose, some of the data validation procedure requirements for core programs and trade adjustment assistance. We'll address how to find your program specific requirements, how programs are to report their data validation efforts, what source documentation to use, and what to expect from federal monitoring. So with that, I'll hand it over to our first presenter. Christina?

CHRISTINA ECKENROTH: Hi, Cesar. So today we'll provide you a broad overview of the data validation requirements for DOL grantees. And how do to use that TEGL to find what's required or recommended for your specific programs. A quick refresher on why are we focused on data validation?

So how does this even come up? Data validation is required in the law for the core program. So that's in WIOA Section 116. So that requires the states to establish their procedures consistent with the guidelines that are issued by the Department of Education and the Department of Labor to ensure that data recorded is valid and reliable. So that's the law section.

Now to make sure that all of the core programs were on the same page here, the Department of Education and the Department of Labor developed joint guidelines. And those apply to Employment and Training Administration to the Education's Office of Career Technical and Adult Education and to Education's Rehabilitation Services Administration.

And that framework is TEGL Training Employment Guidance Letter 7-18. And that was also issued officially through guidance education. Now DOL used the joint framework outline in 7-18 to develop a more in depth requirements for our DOL specific programs.

That leads us to the details in TEGL 23-19. So next, we're going to talk about some key takeaways from DOL specific guidance. And remember if you haven't yet read that guys – aren't sure where to find it, we have put it in the file share. So it's available to download right this second, if you want. So some general information that is the key for you to know.

As we talked about earlier, TEGL 23-19 expands upon within joint guidance, TEGL 7-18. And that's the one that was jointly with Education and Department of Labor. So it's the same framework, but it addresses DOL grantee program specifications. So at this point it should be pretty familiar – that framework should be pretty familiar to the Titles I and III, especially.

OK. What if they're sitting their home and saying, look, Christina, I'm not a Title I adult dislocated worker youth, or Title III Wagner-Peyser unemployment service grantee. I don't understand what this means for me. So while data validation might not be required by statute for your program specifically, we still encourage you to adopt the approaches that are outlined here.

And that's to ensure that the data you're reporting to DOL is reliable and valid; OK? So what programs are we talking about? The TEGL includes these programs in addition to Title I adult dislocated worker and youth and Title III Wagner-Peyser. So if you see your name up here, everyone from YouthBuild to H-1B, the TEGL has something for you.

OK. If this is all new to you, don't worry. I'm going to pause and take a minute to review why we're doing data validation, what's data validation supposed to achieve here. So the purpose of data validation is to verify that the data of programs reported is reliable and valid. What do we mean? So we're talking about who you serve in your program, what services they received, and their outcomes.

So data validation are the processes that are going to help your program identify and resolve any issues or problems in the program data that you're reporting out. So that could be something as simple as reporting an element incorrectly.

This guidance provides that source documentation – which is what you should use to support the reporting data. So if you're program reported a credential, for example, I'm just going to use that as an example, how do you know that that credential was actually achieved and meets the requirements? You know, you say, I put this person in training, they got this credential with this type of credential; we've reported it.

And I can prove that that was right – that we did it right, because I look on the source documentation and say, I have this supporting documentation – copy of the credential, or I have electronic records from the institution, etc. So the source documentation provides the acceptable records to support that recording. OK. You reported this, it was done right, and I can trace it back.

So let's start with the expectations for Title I, III, and Trade. So even if it's not required by statute for your program, stay with me, follow along, because these are going to be – these processes – procedures are highly encouraged for you. So first off we recommend that grant recipients incorporate their data validation procedures and methodology into your internal controls – into your data quality assurance processes, into the required monitoring policies and procedures that you already have.

Write it down. Written procedures for conducting data validation that contain a description of what that is. And what's your process for identifying and correcting errors or missing data? And that might already include things you do already like electronic data checks, for example. Training of your staff, regular data validation training for appropriate program staff.

So DOL is going to make a recommendation that that's at least annually, just make sure everyone is on the same page. Monitor it. So ensure that the program staff are following the written data validation, policy and procedures, and that if something happens and they're not that you take appropriate corrective action to make sure that everyone is on the same page. Regular review.

Look at your data in the regular data integrity review of your program data. And now most of the programs report to us quarterly. So we're going to recommend DOL that you take a look at your data quarterly; right? And what are you looking for? Looking for errors and looking for missing data. You're looking for out of range variances in the value that you reported, meaning something looks like a whole lot of people got credentials in this period; was that right? Just checking.

You're looking for any other kind of anomaly, anything that looks a little off, you're going to want to keep a record of that; right? You're going to want documentation that the missing erroneous data that you identified during your review process – so that you have corrected it and how you corrected it.

Like, what did you do? And you're also going to want to document the processes you have for maintaining your records. Now, this should be something that's familiar. It's nothing outside of the records retention policy – the federal records retention policy on your results. But you're going to make sure that you keep a record of what you did.

So if you did – pull out worksheets to check on date elements, a case file reviews for data element validation, if you did records – the records you reviewed, what were they? What source documentation did you look at? Did you look at trends and accuracy issues? Did you have something that generated error rates? And then what corrective action efforts you did to fix anything that you found in those reviews?

And then of course, taking a look at that whole process on a regular basis. So your regular assessment of the effectiveness of your data validation process and that can just be in the same vein that you do when you take a look at all of your processes and procedures; right? But DOL is going to recommend that you do that at least annually. And make sure that you, of course, revise and update your policies as needed.

So we'll pause there quickly. That is the very general overview of why we do data validation, who is involved in this TEGL, the general kinds of things that we'll be looking for. If you have any questions, let us know in the chat.

But with that, I'm going to pass it on to Toquir, who's going to talk to you about the TEGL itself and more detail and how you look at each part of the TEGL to get information about your program specifically. Toquir?

TOQUIR AHMED: Great. Thank you so much, Christina. Hi everyone. So I'll be discussing the TEGL attachments and the reporting requirements. As you may have already noticed, this TEGL is heavily reliant on attachments. Attachment 1 provides programs, specific guidance with respect to the TEGL and source documentation. Attachment 2 provides program specific requirements for which elements each program should validate, in addition to the source documentation parameters. And Attachment 3 outlines the references.

Starting with Attachment 1 – so Attachment 1 will show you the specific instructions for each program. These sanctions were developed by the program officers and according to a template for the sake of consistency. And so you'll notice similar or identical instructions in several sections. In a nutshell, each section instructs the program to what extent the TEGL applies to them and any special notations; right?

So just looking at the screen with a screenshot – number one covers the Title I and III programs. For those you'll notice that the programs are required to follow all of the data validation policies and procedures outlined in this guidance. This also includes validating all of the elements required in the source documentation.

And then moving on to number two, which covers the TAA programs and hopefully you get the idea of how this attachment is structured. I'll pause here before moving on to the next attachment to allow Robert from TAA to discuss the TAA section.

ROBERT HOEKSTRA: Yes. And the only quick note is that TAA follows the Title I and III methodology. The validation methodologies will be separately reviewed by TAA through monitoring. The elements are required to be validated under TAA focus on TAA specific elements and therefore generally differ from Title I in three programs, although procedures are the same.

MR. AHMED: Thank you, Robert. Moving on to Attachment 2 source documentation. So Attachment 2 first displays the instructions on how to use that attachment. There are directions for how the attachment is laid out and the definition for the types of source documentation. The first part of the instructions describe how to read the columns and I'll go into more detail in the next couple of slides.

But I did want to make one important note, because this attachment and the source documentation, more specifically, does look a lot like the PERL, we do want to caution you when referring to the latest iteration of the PERL, and that is to go online and find it on our website. These elements included in this template are not the latest. So please follow the link in the instructions to access the latest PERL.

The second part of the instructions define types of source documentation. These were primarily included to ensure program offices and grantees were on the same page when referring to electronic records, case notes, cross-matching self-adaptation. I won't go into the detail regarding the definitions, but just note that they are here in the event you want clarity on what exactly is meant by certain types of source documentation.

All right. Moving on to the source documentation portion of the attachment. I'll discuss the columns here beginning with the program requirements. So you'll notice RDEV and certain cells for some programs. This is here to – this is here because those elements are required for data element validation for those programs; right?

In other words, if there is RDEV in a cell for data element in your programs column, you are required to validate that element accordingly. The next column represents source documentation that program may choose from. There's not much to say here, but you are permitted to choose one of the following from the list for each element.

And then the last column, outline any program specific parameters that the program office may have established. You'll notice that not every element may have content populated into cell, but in the event there is, the program should determine if the parameters are applicable to them.

The parameters in this column supersede those in the previous column for source documentation. The reason is – the reason for this is because in many instances, the program may have narrowed the list of acceptable source documentation for their program, or there may be special circumstances for when this element should be validated for programs.

So just as a recap, looking at the larger picture here, when looking at this attachment – or using this attachment rather, you should first determine which elements you are required to validate then jump to this column that I just discussed for programs specific parameters to see if there's anything there that's applicable to your program. And then finally move on to the WIOA source documentation column if appropriate. That concludes that attachment.

Moving on to reporting requirements. So grant recipients must describe their data integrity, data validation, methodology, policies, and procedures as required by their individual program guidance in Attachment 1. For the WIOA core program, they are to submit this information through the annual report narrative as done in the previous year. Grantees, again, should contact their appropriate regional or program office for technical assistance.

And with that, I will turn it over to Christina to discuss monitoring.

MS. ECKENROTH: Thanks, Toquir. OK. So expect federal monitoring of how your program is incorporating data validation and that's especially for the programs where data validation is required. So what does that mean? What should you expect?

Some of the things that you might see are checking for the data validation policy, processes and procedures, are they there? Do you have them? Verifying that staff are being trained and that – remember DOL is recommended annually. And that any corrective action needed is taken or implemented. So if folks aren't exactly on the right page with your policy that you have a way of correcting that.

During the monitoring, it's likely that your federal monitor will review files and source documentation to make sure that the right source documentation is being maintained. They might look at the data validation results that you had from previous monitoring that you did. So remember that I said about retaining your federal records retention policy. They might want to say, hey, show me what you've already done. I'd like to see the results of the past monitoring.

And they're probably going to analyze data integrity reports that DOL generates. So we do look at the data that you provide us on required reporting on a quarterly basis. So they might – they're probably going to take a look at that. And they're also likely to request some grantee generated reports.

So if you have a system where you have electronic data checks, or you have built in processes and generate your own reports, then monitors are likely to look at that too. Now, remember, especially in areas where it's required, reviews might result in findings or requirements for corrective action or just suggestions and encouragement to adopt some best practices.

So where can you go for more information? Attachment 3 is a big list of references. The entire list is in Attachment 3 – of all of your programs. If you're looking for your specific program information, be sure to reference Attachment 3 for more information. But some key pieces of guidance to get you started, especially if you are in a core program, are TEGL 10-16, Change 1, TEGL 14-18.

And that's what the adult programs – these are the performance metrics for the DOL grantees, so very similar to the setup we have right now. And TEGL 7-18, that's the joint guidance that we – the Department of Education and the Department of Labor developed for the framework of data validation.

That will give you a good background as to what's going on in this arena. But if you need – find all of the information for references, it's – that's a comprehensive list and that's covered in Attachment 3. So that I'm going to stop and say that we walked through the TEGL and how to use it. So now it's probably the – your favorite part. I'm going to pass it back to Caesar for some updates, and we can start taking some questions. Cesar?

MR. VILLANUEVA: Yeah. Thanks, Christina. And thanks everyone for all of your questions. So we'll be taking your questions shortly. I just want to remind everyone of a related event. So on August 18th at 1:00 p.m. Eastern, we'll be introducing the quarterly report analysis technical assistance tool.

So to support Title I and Title III grantees data validation efforts, ETA developed the quarterly report analysis technical assistance tool to identify any anomalies and outliers and other potential data quality issues, which may indicate that there's other reporting inaccuracies. So Title I and III programs can use this tool to identify issues that may require additional attention or correction.

So with that, I'll go ahead and take your questions. So if you haven't been able to ask a question, please go ahead and enter that into the chat or if you're dialed in, you can press \*6 and ask also. So I'm taking a look at some of the questions here.

And the first question is, "Has the Department of Education issued similarly more detailed guidance for?" And I believe Christina, you have a response? (inaudible) Yeah. Go ahead, Christina.

MS. ECKENROTH: Yep. Sure. I'll take that. So for our education partners, the joint guidance, I don't – the joint framework should be where you reference. I'm not aware of any additional guidance on the data validation, processes, or procedures, anything more elaborate that'll be coming from Titles II and IV. I think they're going to rely on the joint framework that we developed between education and labor, but we'll certainly keep you updated if we learn anything new, but that's – I don't think that they plan to issue any additional policy.

And I think there's another question that I'm going to take is – was COVID-19 – folks are asking, "OK, well, Christina, we can't travel to do our data validation at the local level. You know, the states that already have these processes in place. And so will we be able to receive waivers? What should we do?" So they're required to type some – are we required to do some kind of data validation? So number one, we really just issued this guidance, the DOL grantee level guidance. So at this level, we never go backwards.

So for this TEGL – anything that's in this TEGL – this one, don't worry about going backwards, just go forward. This would be for the coming up – this would be for going forward. So you could implement that forward. It's not going to be retroactive. But if you – it sounds like the folks from Texas are Title I or Title III folks. And so you will probably be already, good for you, doing the data validation framework that was outlined in 7-18.

And so I would say, even if you can't do your regular process, I would recommend that you do what you can in terms of data validation, remotely using some of your other tools. So even if you can't go to the locals, like you normally would, if you're still running some electronic matches and that kind of thing, to check your data integrity, then that's what you would would say to us, hey, we just couldn't go out and site, but we did the following thing.

So I would say what this is all the takeaway to say, don't abandon your data integrity efforts full chop. Go ahead and do what you can and what makes sense for you in this period of time and feel free to elaborate on that in your annual report narrative. Whereas the Title I and III folks with let us know what happened. And I –

MR. VILLANUEVA: All right. Christina – and I see we have other questions coming in as well? And Robert, I believe we're going to take the next question. Do you want me to read it or do you want to go ahead and take that?

MR. HOEKSTRA: So the next – I can read it. So the next question was, "Can API validations be used for elements where cross-match as not listed as an option, for example, date of birth validation through an API with the DMV?"

So while we do encourage getting systems to work with other systems, unless it's listed as validation mechanism, it's not valid according to the TEGL. So while we would love to hear feedback on other places where we can expand that, as of right now, you do have to follow what the listed methodologies are.

On number four – so the next question was, "Is there a template that could be shared for states looking for monitoring data validation? Is there one being worked on to be prepared?" We're not going to be providing a specific template. We do encourage states to talk to peer states and see if there's some collaboration that could be worked, but DOL is not going to be providing any templates. And to Christina.

MR. VILLANUEVA: Hey, thanks, Robert. So we have another question says, new to data validation here, the records we keep for quarterly data validation review – are they just kept in a single agency wide program or wide file, or should there be individualized reports and corrective action steps or results for each file reviewed? Christina, I believe you can take this question?

MS. ECKENROTH: Sure. That's a nice policy and procedures question. And I would say that is something that you can outline – that approach you can outline in your policies and procedures. Generally speaking, if you're doing it at a file level; right? You're looking at a particular file – you probably want to have some mechanism for documenting what might have been an issue in that file.

And then another mechanism for aggravating up all of those different files that you reviewed so you can identify trends. So did someone just make a mistake or misunderstand the instructions with their case manager level? And so you've got a few files that aren't exactly right. Is it just that one-off kind of situation, or do you have a broader misunderstanding happening at the intake level where people are clicking box A when really your intention was that they clicked box B for a certain element. That's a good one.

So I would recommend that you do keep records of all of those things and that you are able to – for the purposes of understanding what corrective action you need to take. That's sort of overall best practice, but when you have a record of what happened and you can identify what kind of actions you took there, but are we going to mandate a certain process for you to use? No. I think you have the flexibility there, you might do it a number of different ways, but I would recommend that you do keep a record of everything you reviewed.

MR. VILLANUEVA: Great. Thanks, Christina. We have another question asking, "Is there an Excel document for the source documentation?" Toquir, can you answer that question?

MR. AHMED: Sure thing. So I had a feeling this would come up. If you have the latest version of Adobe, you should be able to export the entire TEGL into an Excel version. And then of course clean it up and keep what you want. If not, please just reach out to your regional contact and we'll work with them to get you an Excel version.

MR. HOEKSTRA: And just to add onto that, a couple of people have asked whether there were – or if you can see the rest of the data element definition where it's cut off in the TEGL, that is just based on the PERL format. So if you have your PERL format off the performance page, you can see the full description of those data elements. The relevant part for the TEGL is the validation mechanisms. And those are fully visible.

MR. VILLANUEVA: Great. Thanks, Robert. We have another question asking, "Why wasn't apprenticeship listed in the document as a separate column?" Just curious. Toquir, I believe you can answer that question?

MR. AHMED: Sure. I saw a few questions about apprenticeship, but for this one – so when we were developing the source documentation, apprenticeship was not approved at the time to collect data under the PERL. So we technically couldn't include them in the source documentation, but from what I understand, because they did include a program specific section in Attachment 1, they are planning something for data validation. And – but I – again, I'd reach out to your contacts in the apprenticeship program for more details.

MR. VILLANUEVA: Awesome. Great. Thanks, Toquir. Another question coming in, "Is there any priority of source documentation?" Christina, can you answer that question?

MS. ECKENROTH: Sure. That's a good question. So we have a lot of different options in the source documentation, and depending upon your program, some may be a little bit more restrictive and others a little bit more broad. So what did you do if you have – if we can get any of those things and some of it might be self – (inaudible). So like at the bottom it might say, well, we'd also take cases of self – (inaudible).

So the general rule – so while any of those things are going to be acceptable, the general preference is the more firm documentation is the preferred documentation. So let me – what does that mean? So someone says, hey, I'm a TANF recipient and that's an element that needs to be documented for your program and may bring in a printed out copy of their benefit statement that's recent, or you have an ability to do a cross-match with the benefits system.

Then that would be preferred over someone's saying, well, yeah, I got TANF. I'm self-reporting it and I haven't – so that's just a general, general example. If someone comes in with the documentation or it's easy to get, it's not going to be a huge hurdle, then I would take the harder documentation versus the softer documentation. There are instances where the softer documentation makes a lot of sense.

If a youth participant comes in and says they're homeless, how exactly is a homeless person going to prove they're homeless? I mean, what documentation do you want that the person's homeless. Well, I mean, maybe someone can write them a letter saying, yes, this person is temporarily staying with me. And you might take a look at that. If an adult comes in and says, well, I live in the corner, OK, what am I – what documentation do you want from that person that they're homeless?

So there might be instances in which hard documentation is either nonexistent or extremely difficult to come by and you might want to go with the softer documentation, but there probably – if you have the harder documentation go with that, that's always the preferred because people forget, that's the thing, like, what's your dislocation date? That the classic one. Oh, you know, well, my last day of work was act- – but HR gave me this letter that says my final day of employment was why.

HR probably has a better date; right? Then your memory of a really traumatic experience. So take that one. So while any of those pieces of documentation in the source documentation are going to be acceptable, keep in mind that the more reliable piece of information is always generally preferred.

MR. VILLANUEVA: Awesome. Great. Thanks for that, Christina. We have a lot of great questions coming in. I see one that says, "Is the H-1B Scaling Apprenticeship program one that requires data validation?" Toquir, I believe you can answer that question.

MR. AHMED: Yeah. Just again, this is a question that should be directed to the apprenticeship office. It's not something that we can't really speak to but we encourage you to reach out to your apprenticeship contacts for more information as to which programs they require data validation for.

MR. VILLANUEVA: Great. Thanks, Toquir. I see another question asking does DOL – "So DOL expects states to set their own acceptable error rate and policy beyond which corrective action would be necessary?" And I see that Robert can take this question.

MR. HOEKSTRA: Yeah. So yes, DOL expects that you will set your own policies as far as what you consider acceptable and have a policy to address any errors that you do see. So yes, that is expected for states to set that threshold.

MR. VILLANUEVA: Thanks, Robert. And another question for you. "I know that data validation does not validate unique IP or Social Security numbers, but we would use the Social Security number to get wages. So why was it omitted from data validation?"

MR. HOEKSTRA: So you have to remember that the guidance is just the minimum requirement for what we need to have validated. And since that is not submitted to DOL, there's no reason for us to require you to validate it. That does not mean that states cannot set policies to validate useful elements across a whole variety of other measures that you guys collect and do not report to us. So we do encourage states to make sure that your policies make sense for your state.

MR. VILLANUEVA: Thanks, Robert. And another question for you. "What is the expected sample size of files that should be reviewed to satisfy the requirements?"

MR. HOEKSTRA: Yeah. So there's a footnote on page five of the TEGL that indicates that you can use publicly available calculators and tools to determine your sample size based on your total number of records. So we recommend that you do with consult something to determine the appropriate sample size, but we don't set a particular threshold for you.

MR. VILLANUEVA: Great. Thank you. All right. So we continue to have a lot of great questions. The next question is, "Can you explain the difference between some elements that allow WIOA registration form, but other elements mentioned signed in seek application or enrollment form, what's the different between these options?" Christina, are you able to answer that?

MS. ECKENROTH: Sure. I can take the question. So remember that this is – this TEGL is referencing a whole lot of different programs and not all programs are going to have something called a WIOA registration form. They might instead have a general applicant intake application form or an enrollment form.

So that's sort of what we're talking about here. Look at your program specific course documentation, and that's what you should focus on. Not all the programs that we have in the TEGL have the same type of requirements for participation and the same types of intake or entrance requirements. So we're just trying to be broad there.

MR. VILLANUEVA: Great. And another question for you. "Is there a required date when you have to start the data validation process for Title I?"

MS. ECKENROTH: My Title I friends, you should have already been doing data validation. I'll turn it back to an earlier question we had. So Title I folks got the information about the general parameters for data validation in TEGL 7-18.

So for TEGL 23-19, we're going forward. So I would say no later than next program year, you should have incorporated any additional requirements, but for Title Is and IIIs, there are some more specific information, but in this TEGL, but you should have already had some basic data integrity processes established as required through TEGL 7-18, and also WIOA. I mean, WIOA – most – for also required data validation, although it was very different.

MR. VILLANUEVA: Thanks, Christina. So I see a similar question, and that's – as long as we have, for that WIOA registration form, as long as we have the signed document, it would be necessary to also have them restate those same items and then applicant's statement; correct?

MS. ECKENROTH: So I think that this is a great broader question. And I think what the questionnaire is asking is like, how many times do I have to get some information from somebody? You only need to really get – satisfy one of the elements in the source documentation, you don't need to collect all of them. So let me be clear, especially if you're new to data validation or your program is new to doing that. You don't need everything on the list.

You need one thing on the list. So if you have that one thing and it satisfies that data element, you don't need to pursue getting additional data elements, necessarily. And, again, remember my preference here was the harder the documentation, the better; but if you've got a piece of documentation that confirmed a person was multiple things on one piece of documentation and it satisfied the source documentation, do you have to then collect more pieces of information?

Nope. You can use that same piece of source documentation for multiple elements. If it's permissible by your program, then it matches the source documentation. So good questions. You only need to get that one time.

MR. VILLANUEVA: Great. Thanks, Christina. And Toquir, I have a question for you. We have one question coming in and so, "Is TEGL says data validation is encouraged for YouthBuild and REO grantees, how is that different from required?"

MR. AHMED: Sure. Thank you. So in Attachment 1, you'll notice that some programs in their sections have encouraged programs to conduct data validation, according to the TEGL in section 4B or some like the core programs have required their programs to conduct data validation.

At the end of the day, it's – there are various reasons, but one reason I do know if – if there was no statutory requirements for programs to conduct data validation programs, generally leaned towards encouraging their programs to conduct data validation versus required. So the difference is really just – it's literally the difference between encouraging programs to do something versus requiring them.

MR. VILLANUEVA: Awesome. Thanks, Toquir. So I'm looking through these questions. We have another question, "How will the SWIS Agreement affect wage validation?" Christina, are you able to answer that question?

MS. ECKENROTH: I think I can generally speak to it; right? So it's the – I'm not sure what the intent of the question was about getting wage matches, but there are some restrictions with SWIS. If folks are not familiar with that, that's the State Wage Interchange System and states sign agreements and get wage matches. And there are lots of privacy concerns around that. So very limited number of people get to see wage data.

So if you are not one of the people who gets to see wage data and you are conducting data validation, I would work with your state on figuring out ways to ensure that the data match was accurate and that's all working fine. If the question is – so if that's that question was like, hey, I don't get to see that data. So what am I supposed to do there? I'd say talk to the folks who are involved in SWIS about checking the wage match data and how you should go about doing that.

If the question is about – there's a broader question about like, well, what if a person isn't even in the wage match? They're not in our state wage match and they're not in a SWIS wage match. Am I just out of luck for validating there – that information? Not necessarily. Please check the source documentation because the Title I is folks know that we allow supplemental data and there's a whole TEGL on supplemental data and how to collect it.

And so the source documentation would sort of list how you handle folks that you're collecting supplemental ways data on and what would be acceptable documentation to support that. So hopefully that addresses your question, but I definitely understand that the folks who are viewing the data at the monitoring level might not be the same folks who have access to the SWIS records – it definitely adds that part of your data validation. Go ahead, Cesar?

MR. VILLANUEVA: Great. Thanks, Christina. I really appreciate it. So if you have any other questions, please keep putting them into the chat. It looks like – let's take a look here. So it looks like we're getting low on time, so I just want to be mindful of everybody's time. And I like to thank everyone for participating and for all of these great questions that have been coming in.

If we were not able to get to your question today, or you think of something later, please send us an email at ETAperforms@dol.gov. And we'll get back to you with answering your question. There's that email there.

Again, I want to thank everyone for your time. And I'll now turn it over back to Jon to close us out for your feedback.

(END)