**WorkforceGPS**

**Transcript of Webinar**

**Best Practices: Data Validation of Required Performance Data Submitted by Title I and III Grantees**

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LAURA CASERTANO: All right. Again, I want to welcome everyone to the "Data Validation Of Required Performance Data Submitted By Title I And III Grantees" webinar. I'm going to turn things -- if you haven't done so already, please introduce yourself in the chat. If you're just joining us, please introduce yourself in the chat.

Now, I want to introduce and turn things over to today's moderator, Cesar Villaneuva, workforce analyst with the U.S. Department of Labor, Employment and Training Administration. Cesar, take it away.

CESAR VILLANUEVA: Great, thanks, Laura. And welcome, everyone. Thanks for joining us today for a webinar on data validation of required performance data. And I want to introduce today's speakers. We have Christine Eckenroth, Kellen Grode, and Evan Rosenberg, all workforce analysts with the Department of Labor.

So, Laura, can you pull up the poll question? So everyone can take some time to answer this question, I describe my state's WIOA data validation process as -- you have the option to select beginning, intermediate, advanced, or new to the scheme.

And just to to relay the message that Laura said, if you can, if you enjoy these events that we put together, we appreciate you can stick around at the end to provide us with feedback; that would be helpful for us.

So let's take a look at the poll and find out how most of you describe the data validation process in your state. So it seems like most of you say you're in the intermediate level. So we meet most of the compliance requirements, but maybe a little bit more training might be helpful. So thanks, Laura; thanks for pulling that up.

All right. So during today's session, we'll discuss some approaches from the data validation requirements for Title I, which include WIOA adult, dislocated worker and youth programs, as well as a Title III Wagner-Peyser.

So to get started, we'll touch on the requirements with a quick review of available tools. So we'll touch on various approaches that states shared through the annual performance narrative reports about their data validation processes. We'll address some frequently asked questions and at the end we'll get to as many of your questions as we can. For now, I'll turn it over to Christina to remind us about those data validation requirements.

CHRISTINE ECKENROTH: Thank you, Cesar, and welcome, everyone. So this may be very familiar to most of you, but to ensure that everyone is on the same page, we're going to quickly review the data validation requirements for Titles I, adult dislocated worker and youth and Title III programs, as well as what tools DOL has provided. So we are going to stick pretty close to the core programs. But if you're a non-core program, stick around; this might be a helpful review as well. So if you are an non-core program, I'm not going to get specifically into details for your program, but there'll probably some things you can take away.

So WIOA statute requires data to be valid and reliable; and based on that statutory requirement, the Departments of Labor Education developed joint guidance, which is for DOL, Training Employment Guidance Letter 7-18. That joint guidance outlines a common framework in their approach for our core program.

And DOL further elaborated on that guidance and expanded it to the non-core DOL programs in Training and Employment Guidance Letter 23-19. So Training and Employment Guidance Letter 7-18 provided the framework for Title I and III core programs, and Training and Employment Guidance Letter 23-19 provided more details as well as including our other DOL programs.

Training and Employment Guidance Letter five 18 asks that states outline their data validation approaches and processes in the state performance narrative.

And if these are indicated, we're going to talk about some highlights from those reports later in the session. And recently DOL piloted the quarterly report analysis -- QRA -- tool, which provides feedback regarding the data, submitted anomalies and outliers and other potential data quality issues for our Title I program, adult, dislocated worker, and youth.

The QRA is only the newest addition to the world's data integrity approach. So let's take a look at the ways that deal will support data integrity efforts. The data integrity supports under WIOA are multifaceted, so this holistic approach allows for multiple avenues to support data integrity. First, we have a reporting structure. Title I and III grantees submit performance reports through the Workforce Integrated Performance System -- WIPS -- and WIPS ensures that the calculations are standardized and accurate and all the reports are calculated the same way. The system has edit checks to catch invalid values and to ensure consistency across the PIRL elements.

Second is the data validation policy parameters. So DOL guidance sets the data validation requirements and the parameters, and that's to make sure that the data submissions conform with the required documentation that supports the reported data.

And lastly, as we noted, the QRA -- quarterly report analysis -- provides a systemwide view that alerts states to anomalies and outliers that may otherwise be difficult for an individual state to identify. So the QRA is an added tool that can help alert states to potential issues with their data for correction.

So what have we learned so far from states about their data validation strategy? So TEGL 5-18 requests information about the state data validation methodology be reported in the annual performance narrative report. Well, not all states included this information, but most did; and the key takeaways include clear state policies and procedures that align with DOL guidance, regular data analysis and processes to take corrective action for errors or issues; formal monitoring processes -- and they did that by establishing file reviews by train monitors to check resource documentation and compliance -- ongoing staff training on state policy data, validation requirements, best practices to correct issues; and some states have sophisticated dashboards or automated processes.

Many states did incorporate the DOL QRA into data validation procedures as recommended by Training and Employment Guidance Letter 23-19. And some states include their data validation and programmatic file reviews that are conducted by their monitoring arm. Others have incorporated peer reviews of local data; and then some states reported establishing training procedures more regularly than what DOL recommend. So we recommended training staff annually on data, validation, guidance and states reported -- some states reported incorporating staff training really regularly -- quarterly or annually or through their established meetings or sort of regular events.

And let's take a look at a few examples. There are some examples of data validation approaches that are outlined in the state annual performance report narrative for program year 2019. These snapshots provide illustrations of the typical methodology, policies and procedures, monitoring, and training approaches. And these are just a sample of the descriptions that were shared by states.

So some states are still developing their approaches; and if you are looking for ideas, the annual narrative reports are an excellent resource and you can access them on our performance website and we'll drop that link into the chat -- program year 2019, these reports are not yet up, but they will be posted shortly. So I do encourage you to check those out.

And now that you have some background and ideas about what's happening in the state, let's address some frequently asked questions. So in the following segment, Cesar will navigate some common questions about data validation for core programs in Titles I and III. Cesar?

MR. VILLANUEVA: Thank you, Christina. So during this portion, we'll address the Title I and Title III-related data validation questions that come up quite a bit.

So first up is the question about changing data. So Kellen, can PIRl elements that are designated at program entry be changed later on based on new information? Can they be changed later based on changes to a participant status?

KELLEN GRODE: Yeah, thanks, Cesar. So the short answer to this question is yes. There's a more nuanced version, though, to this question, so I just want to walk through that a little bit.

For one, it is acceptable to change information in an individual PIRL record based on new information, if that new information reflects their status and program entry. If the participant status changes during participation, however, these elements that are marked at program entry should not -- must not be updated to reflect such changes.

So, for example, if a participant discloses that they've been previously incarcerated but were uncomfortable discussing that when first entering the program, then PIRL data element 801, ex-offender status at program entry, can be changed to a one. But if a participant who was unemployed starts working a part time job after entering the program, then PIRL data element 400, which is employment status at program entry, cannot be changed.

Additionally, elements that are not specifically designated as taking place are program entry, such as PIRL data element 202, individual with a disability, can be updated at any time to reflect the most accurate information about the participant.

We want to make a special note with regard to co-enrolled participants as well. While ETA encourages the use of prior assessments when possible for determining participant eligibility needs, etc., it may be the case that a participant in one program may have to change -- may have a change in status that leads to them becoming eligible for services in another program. In such a scenario, it is acceptable to update the relevant at-program-entry elements in order to reflect the participant's status at entry into the subsequent program to better facilitate common reporting. Cesar?

MR. VILLANUEVA: Great. Thanks, Kellen. And what about kind of TANF eligibility verification? Does the TANF application satisfy the source documentation requirements?

MR. GRODE: This is a good question, and it's one that we've gotten once or twice recently, and it's in particular, I think, relevant to PIRL data element 600, which is about whether or not someone's been receiving TANF in the last six months prior to participation in our programs.

And because it's about receiving assistance prior to participation in our programs, someone who has not yet been determined TANF-eligible program entry would be coded as a zero in that case. That said, once that TANF eligibility determination comes through and someone is determined eligible, that documentation could be used to designate someone as low-income in PIRL data element 802, since the TANF application would have reflected their income status at program entry.

MR. VILLANUEVA: Great. Thanks for that clarification. What about if I don't have, like, the source documentation in hand; can I still serve someone in the program?

MR. GRODE: Yeah. This is another really common question that we get. And while the source documentation often takes place at the same time that you're determining an individual's eligibility, we'd like to make the note that those actions serve two different purposes.

Eligibility determinations confirm that an individual meets the requirements of a program before becoming a participant in the program; whereas source documentation is validating that the data reported on a participant is accurate.

So that what that means essentially that there's no, quote-unquote, "documentation requirement to determine eligibility." For example, if you talking about like the Jobs for Veterans state grant program as an example, looking at PIRL data element 301, eligible veteran status, they wouldn't have to provide source documentation in order to be eligible.

The source documentation requirements come in when you start talking about the data validation reviews that might be taking place. And there are source documentation requirements that apply to certain elements, but those are separate from eligibility.

So to ensure that source documentation is being appropriately collected and reported and the information is accurate, we encourage the grantees and for the state grantees for that Title I and III programs, they're required to implement data validation framework. And then for those of you on the call that are representing grantees that are not in that realm, a lot of the program-specific stuff is included in TEGL 23-19, some of those programs have directed you to --- encourage you to also implement the same data validation frameworks that are outlined in Section 4B of that TEGL. Cesar?

MR. VILLANUEVA: Thank you, Kellen. So now send over to Evan. So Evan, participants can self-attest to many different elements. For states that switched to virtual services this year due to shut downs or public health restrictions, how do we document self-attestation? Can grantees use eligibility based on self-attestation of programs?

EVAN ROSENBERG: Good question. The short answer is yes. For the most part, there are multiple forms of acceptable source documentation for most of the WIOA eligibility requirements, but there are different WIOA eligibility requirements for different programs. And for the most part, the documents required to determine eligibility include self-attestation for -- as one of the allowable sources of source documentation.

So for the most part, you can use self-attestation for presumptive eligibility. We would note, however, that it should not be used as a first resort, and I'll talk more about that in the next few slides. But local areas and grantees should attempt to collect other source documentation to demonstrate eligibility when possible.

But during COVID in particular -- and even after COVID and I'll discuss this later as well -- if grantees don't have the ability to collect physical source documentation, the documentation can be accepted verbally as long as it's clearly documented in the case file and self-attestation can be part of that verbal documentation.

MR. VILLANUEVA: Thanks, Evan.

So what about after the pandemic; how do we document self-attestation? Can the case manager use a check box on the case management system, for example?

MR. ROSENBERG: Great question. So, no, a checkbox would not be sufficient, particularly once we get past the pandemic and we're back to more in-person. We would like for the individual to attest through a signature; whether -- it can be a digital signature, an electronic signature, so that even the ideal now when we're not sometimes doing face-to-face interaction.

But the individual, the participant, or the individual who is becoming a participant should or should sign an applicant's statement or somehow indicate what their signature that they are attesting to, whatever data element is we're talking about; whatever eligibility question we're discussing. So a checkbox would not be sufficient.

MR. VILLANUEVA: Thanks for clarifying that. So now let's talk about some myths and misunderstandings. So as we talked about earlier, self-attestation is allowable source documentation for many elements. So why not use it for all of them?

MR. ROSENBERG: Great question. So we don't want some statistician to be the default data source. While it is an acceptable data source for many of the data elements, it shouldn't be the go-to data source and it shouldn't be the the source documentation of first resort, so to speak. It's not the best documentation.

And there is documentation that would have a higher data integrity than self-attestation. So it shouldn't be the go-to, but it is certainly an acceptable source documentation. And if it's not possible to get more of the hard documentation, then self-attestation is allowable. But it's not the primary or source of first resort, so to speak.

MR. VILLANUEVA: Got it. Thank you. And another common myth or misunderstanding is that it's just too difficult to document youth WIOA eligibility because of all of the source documentation requirements. So can you shed some light on this for us?

MR. ROSENBERG: Yeah, definitely. So this is what I wanted to spend a little bit of time discussing, particularly since I work specifically on the WIOA youth program; and we've heard this myth for years, that the documentation requirement that we have in WIOA -- even going back to WIA -- make it too difficult to sometimes enroll participants because of how much documentation is required.

So this is kind of the other side of the coin to self-attestation shouldn't be the first resort documentation. But it also shouldn't be the case where documentation prevents an individual from being part of the program.

So you can see on this slide that we have listed all of the WIOA youth eligibility elements that allow self-attestation, and it includes the vast majority of them -- schools, that individual with a disability, pregnant or parenting, youth that needs additional assistance, foster youth, homeless, ex-offender, English language learner; and low income. All of those data elements, self-attestation is one of the allowable source documentation.

And so while you shouldn't automatically just go to self-attestation as the data source or documentation source, it is allowable. And so there should not ever be a case where the lack of documentation prevents you from enrolling an individual into the youth program. Because as you can see, for most of them, they're just maybe one or two WIOA youth data elements used for eligibility that aren't on the list where self-attestation is allowable. So this should prevent someone from being a part of the program just because the documents are hard to get for youth.

MR. VILLANUEVA: That's helpful, Evan. Thanks for providing us with that insight.

So let's go back to Kellen. Can you help us out with our next misunderstanding? So don't I have to get source documentation to prove that a participant lives in my area before I can serve them?

MR. GRODE: You know, it's a good question, Cesar, and I think that once again, it's one of those scenarios where we have a short answer and then a longer answer to follow it up.

So the short answer is no. There's no federal source documentation requirements regarding the participants address. However, there is some flexibility, particularly in the Title I programs, that states and locals have that allow them to establish certain residency requirements. And there may be scenarios where it is appropriate for them to establish some sort of policy to ensure that they have proper stewardship over their funds and they may localize service delivery to an extent. I would note that this is not the case for Title III since Wagner-Peyser is a universal access program.

Having said all that, I think it is worth noting that when states and locals decide that they want to implement a policy that does have some sort of residency documentation requirements, that we really want to strongly encourage those folks to make sure that they're really carefully designing what those requirements look like.

Because any of those requirements -- and the documentation requirements in particular -- if they're not carefully designed, can improve services to people experiencing homelessness and who may not have documented residence in the area. So we want to make sure that we emphasize that point; that while there is some flexibility to implement such requirements and policies, that they really should be carefully designed so that we're not inadvertently leaving out a key demographic that our programs can serve. Cesar?

MR. VILLANUEVA: Thank, Kellen. So I have another myth and misunderstanding, and it's, I thought that DOL was going to provide us with a statistical package that we have to use for data validation.

MR. GRODE: Yeah. And I think this may be related to the way that we did data validation under WIA. But to clarify, no, the Department of Labor doesn't prescribe or provide a specific statistical methodology. The guidance in TEGL 23-19 encourages states to use statistical model, so that part is accurate. But DOL doesn't prescribe one. We don't require one. We do think it's a best practice to use a statistical methodology, but it is not something that is required by our guidance.

MR. VILLANUEVA: Got it. And using supplemental wage data to confirm employment after exit can be a confusing topic for some states, but we do collect it. How do we validate it and what do we use? And do we have to collect it?

MR. GRODE: Yeah. So I think I think once again, these are good questions. I think there are a lot of -- there's a lot of information in some guidance that we have published regarding what types of supplemental wage information is acceptable.

In terms of the how do we validate it question and how do we use it question, so the guidance that you would want to look for, for that purpose, for the core programs under WIOA is TEGL 26-16; and those same documentation requirements that are laid out in 26-16 you will see are the same source documentation options that we've listed in the Attachment 2 for TEGL 23-19. So those are -- you'll see examples in there like, things like using the state new hires registry or copies of paycheck stubs or payroll slips or income tax records. And the guidance goes on to a lot more detail about what times it's appropriate to do to use these and recommendations on timing for collecting it. So folks are curious about that. I do encourage them to take a look at 26-16.

To the question of do we have to collect it? The short answer to that is no; right? There there's no requirement that you collect supplemental wage information. That being said, I think there is value, especially in particular circumstances, in collecting it. So one of the recommendations that's made in 2016 is to try to identify participants that are likely to not show up in a UI wage match recor; right? So that's going to be folks like self-employed folks or otherwise engaged in entrepreneurship.

There may be military records that may not show up in a UI wage match, for example. So trying to identify folks that fall into some of those categories, which, again, are described in the guidance, is definitely a good way to identify folks that you are helping and are getting good outcomes but may not show up in those UI wage records.

MR. VILLANUEVA: Great. Thanks, Kellen. And thanks, Evan and Christina. So we've covered a lot of the data validation requirements to common questions and addressed some of the myths and misunderstandings.

So now we want to welcome you to put your questions into the chat. So if you have any questions with data validation for Title I and III, please go ahead and answer those questions into the chat. I see that we've already received many questions and will address as many as we can today. And if we aren't able to get to your questions today or you need more information, please send us an email at ETAPerforms@DOL.gov. And that email is shown at the end of the presentation as well.

So I do see some questions here. We have one question, "Can Title V adhere to the same data validation guidelines?" And I believe, Christina, you have a response for that question.

MR. ROSENBERG: Hey, thanks. Cesar, I think, I hope the person meant Title IV. So if you're thinking about education partners, I just wanted to let you know that the joint guidance we referenced was Department of Labor 7-18, but it was issued separately by OCTAE and RSA under their own memorandum. It's the same guidance. So all the core programs should be having the same framework.

But I do understand that Education is not going to be issuing source documentation like DOL did, so I don't think there'll be any additional --I'm not aware of any additional guidance forthcoming from our Education partners, but they have the same data validation framework expectations as the Title I and III core programs.

MR. VILLANUEVA: Great. Thanks, Christina. And I see another question here. "Can the element itself be a checkbox for some canned option? For instance, I have a disability or I am homeless." Evan, can you provide a response for that one?

MR. ROSENBERG: Sure. So as long as there is an applicant signature that follows the checkbox, I think that would be acceptable. But the key here is that the participant needs to attest to it in some way. It couldn't just be, let's say, a case manager intake was just checking both boxes where the participant was answering questions. We actually need the participant to attest to it. But you could certainly have a form with checkboxes and there's a signature at the end and there's some language around the participant attesting that the above information is valid and true or something like that.

MR. VILLANUEVA: Thanks, Evan. I have another question for you. I see, "Can the registration form itself, including participants' signature, serve as self-attestation?"

MR. ROSENBERG: So kind of similar question to the one before, and so my answer is similar. Yes, if there's a signature that they're attesting to, the information on the registration form and it's clear that they're attesting to what is being provided in that registration form.

The one caution I would make is going back to what I said earlier about that should be the documentation of first resort. So I don't want to give the impression that, you know, particularly for the WIOA youth program you should just have checkboxes on a registration form and then the individual should check and just sign at the bottom to self-attest and then they're good to go on documentation.

You should still attempt to get the harder documentation, so to speak, and your go-to source should just be a registration form with the participant themselves attesting to everything. So, yes, that would be allowable. But again, caution that that shouldn't be the go-to way to get documentation.

MR. VILLANUEVA: Got it. Great, thanks. How about, "Does English language learners stand on its own as an eligibility criteria?"

MR. ROSENBERG: So I'm going to assume this is related to the WIOA youth program, so I can talk just for a moment about WIOA youth eligibility.

WIOA youth eligibility include a few things. One, you have to either be an in-school youth or an out-of-school youth.

Second is age, and in-school and out-of-school have different ages, 14 to 21 for in-school; 16 to 24 for out-of-school.

And then the next part of eligibility for WIOA youth is that you have to be one of a list of a number of barriers, so to speak. An English language learner is one of those barriers, and so it can serve as one of the parts of eligibility determination for WIOA youth for those specific barriers.

So I'm not quite sure I understand the question of does it stand on its own. You have to meet the other eligibility criteria, such as school status, age; and if we're talking about in-school, you have to be low income, and even for out-of-school if you're using the English language learner barrier, that also requires low income to be part of it.

So I think this is a bigger question about WIOA youth eligibility, but English language learner is one of those barriers that -- it can be a barrier that you check off that meets that barrier of criteria for eligibility for the WIOA youth program.

MR. VILLANUEVA: Great. Thanks for clarifying that, Evan. So now I have a question for Kellen here in the chat. "For eligibility, are programs required to verify criteria in order to enroll a participant?"

MR. GRODE: Yeah, it's a good question, and I think the short answer is yes.

Now, where it gets tricky, I think -- and this we've seen in the questions, in my description is that there is a difference between like what sort of source documentation you need to maintain. And so when we're talking about the source documentation that needs to be maintained, we're talking about specifically the elements that we've listed in TEGL 23-19.

So you still want to verify in some way that somebody is is eligible and that's going to vary a bit from program to program in terms of, like, the level of information that you need in order to verify something. But that doesn't mean that you have to necessarily have a huge level of source documentation at that moment in order to start serving somebody.

So, like I said, it will vary a little bit from program to program. But you do need to determine that somebody fits the eligibility criteria; and to a certain degree, that's going to vary state to state, maybe to and in terms of like what sort of documentation that they require to validate something.

But, yeah, you should be making sure that somebody fits the eligibility requirement of the program before serving them; which is why it can make sense to try to collect source documentation at that time of entry. But that doesn't mean that you have to or that you should be denying somebody services just because they maybe don't have a document when they -- say, self-attestation would suffice for getting them into the program.

MR. VILLANUEVA: Great. Thanks, Kellen. And I do have another question for you. "Are there suggestions on how to gather source documentation for the Title III program, as most individuals do not carry these documents, such as a DD-214 for Wagner-Peyser services, as the population is more open-ended and less eligibility-driven, such as Title I is? And so this also makes it less likely for the person to return to bring in those requested documents.

MR. GRODE: Yeah. So it's a good question and I think that's why we try to clarify that there is a difference between the eligibility and the source documentation. Like we want -- especially in the case of Wagner-Peyser, because it is universal access, like, we don't want to be denying services to somebody when they walk in the door just because they don't have a DD-214, for example.

But when we talk about the source documentation requirements where you need a DD-214 -- we're talking about data element 301, the eligible veteran status -- and you'll notice that we do have a note in the attachment number 2 for that one, and it's not the only element where we have this note -- that you're only required to do -- to collect the source documentation at the point when you provide somebody with individualized career services or training.

And so it's -- the higher, the more intensive level of services is when you have to start looking for some form of source documentation in instances like that. So that may be something that's also worth keeping in mind, is that you don't necessarily have to collect it for every single participant when a lot of them maybe are getting those light-touch services.

MR. VILLANUEVA: Thanks. So Evan, I have another youth-related question, and it's, "For youth under 15 with a disability, is it allowable to self-attest?"

MR. ROSENBERG: So we don't have any federal guidance that relates to self-attestation based on age. So I would point you to the data source we've been talking about throughout the webinar, which is TEGL 23-19, and the Attachment 2, the source documentation attachment. So if you look at that, that says that self-attestation is allowable for attesting to the individual with the disability data element. So from our perspective, you can follow our guidance.

Now, if your state has additional guidance beyond that, that is based on age and what an individual can attest to based on age, then you would have to go with what your state says. But I can answer that from a federal perspective. We don't have any additional requirements beyond what you see at that source documentation attachment where individual with a disability, you can self-attest to that.

MR. VILLANUEVA: Thanks, Evan. And another question, "But will this there be a follow-up on attestation" --

MR. ROSENBERG: It cut out there for a minute. Can you continue to read that one again?

MS. CASERTANO: It looks like we might have some technical problems, so I'm going to jump in and play the role of Cesar for a moment. So the question is self-attestation, can we --

MR. GRODE: I can jump in. I see a lot of questions. Great. So the question is, "But will or should there be a follow-up on self-attestation? And if so, what will happen if determined ineligible?"

So, again, the requirements for us in that source documentation attachment, the elements that we list self-attestation as an allowable source documentation, there's no requirement that you have to go back and get hard documentation later.

Again, for this very reason pointed out in the question, self-attestation shouldn't be the go-to first resort documentation because the question notes, like, maybe there is incorrect information given. Hopefully the participant is being truthful. But if you figure it out on your own that the participant was really not eligible when you thought they were eligible, then you should follow your typical procedures of what you do when that happened.

But there's no requirement for you to go back and double-check that the self-attestation was accurate if it says that's an allowable source document and you end up using that as the source document, then that's what you're using as the source document. But of course, if you find out later on through some means that they weren't eligible, then you have to make the necessary actions that you would ordinarily do if you found out an individual wasn't eligible for the program.

MS. CASERTANO: Thanks, Evan. So while we have you on the line, can we ask you one more youth related question? This has to do with COVID and folks having difficulty getting documents from department that were impacted by COVID, such as the birth certificate, Social Security card, state I.D., etc. So can you refresh us on the guidance around this, as it's sort of causing confusion and programs are not able to enroll youth for several weeks because they are again having difficulty getting what they perceive as required documentation.

MR. ROSENBERG: Yes. And I like how you phrase that is the document they perceive as required documentation, because I think some of these documents are listed are perceived requirements, at least at the federal level. And again, keep in mind, different states have different requirements. So I don't want anyone to perceive what I say from a federal perspective to override any additional state requirements that you have in your state.

But from a federal perspective, the WIOA youth eligibility items are the only thing you need to document. And so, for example, age is one of the WIOA youth eligibility requirements. But birth certificate is not the only source documentation to document age. There are lots of different source documents you could use for birth date beyond that -- beyond a birth certificate. And so on the list is driver's license; federal, state or local ID card; passport; work permits; school records or school ID cards. There are lots of ways to document date of birth.

So I don't want folks to think that some of these items listed here, like birth certificates, Social Security card, are things that you have to use for welfare eligibility from a federal perspective. Perhaps at the state level, they do have different requirements, so that's kind of the first point I wanted to make around that.

And then the second point is our COVID Q&A did talk about we don't want documentation requirements to get in the way of enrolling young people in the program during the pandemic. Arguably, this is even more important for us to be able to provide services to eligible youth because of everything that's happening during the pandemic. So we we don't want documentation to be a barrier to getting youth enrolled and served in our program.

So my guidance here is to do the best you can during the pandemic, and if you have to go back and get documents at a later date, that's OK during the pandemic. That's different than after the pandemic where you're going to need all of the documentation to enroll.

But again, as I said on that earlier slide, that in most of the WIOA youth eligibility requirements allow for self-attestation; that is not going to change after the pandemic. Our TEGL 23-19, Attachment 2, is not just during COVID. That is our data validation source documentation guidance; has nothing to do with COVID and those self-attestation data elements are still the case post-COVID as well.

MR. VILLANUEVA: Thanks, Evan. That's really helpful clarity for the youth programs.

So I do have another question for Kellen, and it's, "Can you self-attest to basic skills deficient?"

MR. GRODE: Thanks, Cesar. So when you look at the Attachment 2 for our TEGL, when you look at the basic skills deficient we have that as not having self-attestation as something that can be used to document that somebody has basic skills deficient. What I will say that we do have case notes listed, as well as assessment test results or applicable records from educational institution such as transcripts, academic assessments, or other school documentation. So in terms of documenting basic skills deficiency, it has to be someone other than the participant that's making that documentation.

The other thing that I would note is, much like I was talking about with the veterans example for some of our programs, which include the adult dislocated worker and Wagner-Peyser, we only require this documentation if the participant has received individualized career services or training.

MR. ROSENBERG: And just if you don't mind, one thing to add to that. The data element basic skills deficient, it has two parts to it, Part A and Part B. Part A is the one related to the generally accepted standardized tests. And so for that one that we'd be looking for the actual assessment test results, the documentation.

But for Part B, that's probably where the case notes come into it, which is the individual's unable to computer-solve problems necessary to function on the job or in society. That's kind of a looser part of the basic skills definition, so to speak. And so that's probably where the case notes would come into play as an acceptable documentation source.

But again, self-attestation, it's not allowable for that particular date on the.

MR. VILLANUEVA: Thanks, Evan. So it seems like we're running a little bit out of time, so we can take probably two more questions and I do have one more, Evan, for you.

"I understand that we should be collecting documentation instead of using self-attestation as our go-to means; but post-COVID, will the guidance to not allow self-attestation for these data elements?"

MR. ROSENBERG: Yeah, and that's what I was speaking to that a little bit in an earlier answer. The self-attestation data elements are not changing. So if you look at TEGL 23-19 Attachment 2, anywhere where you see self-attestation as an allowable documentation, that is true post-COVID as well and nothing is changing about that. So it's not -- that TEGL was not written for the pandemic, but that is what our guidance is on documentation moving forward.

MR. VILLANUEVA: Great things, Evan. Thanks for clarifying that. And I'll leave that final question for Christina. "So what does TEGL 7-18 require of DOL-funded programs that TEGL 23-19 does not, given that all of the data elements for -- (inaudible) -- in the former are reflected in the latter? If there is no difference, does 23-19 supersede 7-18, even though the latter remains active?"

MS. ECKENROTH: Thanks, Cesar. So this is a question about the layers of the guidance.

So 7-18 is our joint guidance with our core program, so that one sets up the framework; the fact you got it, you have to do that validation and what we want that to look like and sort of your policies and procedures, what the framework is, so that's everybody. But that doesn't really answer all of the questions for our Department of Labor Title I and Title III programs. And we wanted the opportunity to go a little bit deeper with our non-core programs.

So 23-19 is the same -- surprise -- the same 24 elements with a little bit more information and details that were specific to DOL programs that really were not specific to our core programs. So there's nothing-- so 23-19 comes after 7-18 but they're both active and they served slightly different purposes.

And if that doesn't help, you can send us an email and we will clarify it for you.

MR. VILLANUEVA: Awesome, thanks, Christina, and thanks to all of our presenters for answering those questions.

I do want to remind everyone that there's relevant resources here. So on this slide you can find resources that are useful when developing data integrity processes and working with the QRA. So please reference both data validation TEGLs listed here and visit our performance website for details about using the QRA.

And again, if you have any other questions or we couldn't get to your questions today, we apologize. Please contact us at ETAPerforms@DOL.gov.

And with that, I want to thank everyone for joining us today and we hope that you found today's presentation helpful.

And now I'll turn it back over to Laura to close us out.

(END)