

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION WIA/Performance Reporting
	CORRESPONDENCE SYMBOL OPDR
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ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 22-15

TO: STATE WORKFORCE AGENCIES
 STATE WORKFORCE ADMINISTRATORS
 NATIONAL FARMWORKER JOBS PROGRAM GRANTEES
 INDIAN AND NATIVE AMERICAN PROGRAM GRANTEES

FROM: PORTIA WU /s/
 Assistant Secretary

SUBJECT: Program Year (PY) 2015/Fiscal Year (FY) 2016 and PY 2014/FY 2015 Data Validation and Performance Reporting Requirements and Associated Timelines

1. **Purpose.** To remind the workforce investment system of data validation and performance reporting requirements and establish associated timelines for submitting reports for the following programs/activities:
- Quarterly participant records, annual reports, and data validation results for the Workforce Investment Act (WIA) title IB programs and National Emergency Grants (NEGs);
 - Quarterly participant records and data validation results for the Wagner-Peyser Act Employment Service;
 - Quarterly reports for activities authorized under 38 U.S.C. 4103A and 4104 (Disabled Veterans' Outreach Program (DVOP) and Local Veterans' Employment Representatives (LVER));
 - Quarterly reports, participant records, and data validation results for the Trade Adjustment Assistance (TAA) program;
 - Individual participant records for the National Farmworker Jobs Program (NFJP); and
 - Individual participant records for the Indian and Native American program (INA).

Additionally, this guidance serves to provide documentation for accountability purposes regarding the deadlines of the above activities and reports. While some of the associated due dates are now passed, they are still included here to provide proper documentation of statewide reporting and data validation requirements throughout the entire program year.

Finally, this guidance revises the due date for submission of Data Element Validation (DEV) for WIA and TAA results which must be submitted by March 15 for both PY 2014 and PY 2015.

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2. **References.**

- WIA of 1998, Sections 136 and 185;
- WIOA of 2014, Sections 116 and 506;
- TEGL 9-07, *Revised Incentive and Sanction Policy for Workforce Investment Act Title IB Programs*;
- TEGL 7-15, *Workforce Investment Act (WIA) Program Year (PY) 2014 Annual Report Narrative*.

3. **Background.** The Employment and Training Administration's (ETA) statutory and regulatory authority to administer job training and employment programs includes provisions requiring performance reporting from states and grantees. The Department uses this information to assess performance of states and grantees. All states and direct grantees administering Department of Labor (Department) employment and training programs must collect and report information on all participants.

Most provisions of the Workforce Innovation and Opportunity Act (WIOA) took effect on July 1, 2015 (see WIOA sec. 506(a)). However, section 116 of WIOA, which outlines WIOA's performance accountability requirements, does not take effect until July 1, 2016 (see WIOA sec. 506(b)(1)). This means that the performance reporting requirements in section 136 of WIA are still in effect and will remain in place until the WIOA performance requirements are fully implemented. To satisfy the performance reporting requirements, states must use the performance metrics in WIA section 136 to report on all participants (both participants receiving WIOA services and those who are continuing to receive WIA services). This means that WIA participants who transition to WIOA requirements after July 1, 2015, are being measured according to the WIA section 136 performance measures, as well as the data elements and source documentation currently in use for WIA Title I programs.

Because WIA performance measures are being used, the reports and reporting systems discussed in this TEGL are the same as those used under WIA. Each state that receives an allotment under WIA/WIOA Section 127 or Section 132 must submit an ETA Form 9090 (WIA Quarterly Report) to provide the Department with available performance information for WIA participants. The WIA Quarterly Report will cover the following formula funded programs:

- WIA Adult Program;
- WIA Dislocated Worker Program;
- WIA Youth Program; and
- NEG's.

Wagner-Peyser Act funded services are reported on ETA Form 9002 A for all participants and on ETA Form 9002 B for participants who are veterans, eligible spouses, or transitioning service members. The Veterans' Employment and Training Service (VETS) 200 Reports are a subset of the ETA Form 9002 data from forms 9002A through 9002D. The data reported on VETS 200 only apply to the activities of participants who received one or more services from

LVERs and DVOPs. This enables VETS to evaluate the outcomes of the more intensive services offered to participants under these two programs.

Each state also must prepare and submit an annual report of performance progress to the Secretary of Labor (Secretary) in accordance with WIA Sections 136 and 185. There are two components to the WIA Annual Report: (1) the required performance results, as specified in ETA Form 9091, “WIA title 1B Annual Report” (OMB No. 1205-0420) found at: <http://www.doleta.gov/performance/guidance/WIA/WIAAnnualReportSpecifications.pdf>, and (2) a narrative report. The Secretary utilizes the annual reports to fulfill the requirement of disseminating state-by-state comparisons of the information. This information also was used to determine whether the Secretary sanctioned a state based on performance failure. See TEGL 9-07 for further information. Please note that PY 2013 incentive grants were the last funded grants under WIA.

4. **Use of the Enterprise Data Reporting and Validation System (E-DRVS) for Program Reporting.** Submission of timely and accurate data is required in Section 136 of WIA. In 2003, ETA introduced data validation to help states and grantees ensure that their reported performance data accurately reflects their experiences. ETA provides software to states and grantees that analyzes participant records and ensures performance calculations are accurate. E-DRVS is the online integrated reporting and validation tool where states can upload individual record files, validate, and edit check the data; create quarterly/annual reports; and perform data element validation. E-DRVS eliminates the need to upload annual or quarterly records into the Enterprise Business Support System (EBSS).
5. **Performance Reporting and Data Validation for the WIA Title IB Programs.** For each program year, states are required to submit the following reports (when specified due dates are on a Saturday or Sunday, the report is due the following Monday):

A. Workforce Investment Act Standardized Record Data (WIASRD) files and Quarterly Performance Reports (ETA 9090)

WIASRD quarterly submissions for the first, second, third, and fourth quarters of each program year are due **45** days following the end of the quarter (November 14, February 14, and May 15, and August 14, respectively). Please see the appropriate attachment(s) in this guidance for the exact due date that falls on the Monday after the 45 days conclude.

Submit all quarterly WIASRD files using the revised layout. As additional revisions to the layout/edit check documents are made, they will be posted at the ETA performance site: <http://www.doleta.gov/performance/pro.cfm>. A notice will be sent to state performance reporting staff if/when further revisions are made.

B. Validated WIA Annual Report (ETA 9091) Tables A through Q – Due no later than September 15.

The fourth quarter WIASRD submission to E-DRVS will automatically generate *both* the ETA 9090 and ETA 9091 reports. **Consequently, any further WIASRD submissions through September 15 will overwrite a previously certified ETA 9090 fourth quarter report generating a revised ETA 9090 report with new numbers.** Therefore, it is important to remember to recertify any fourth quarter report created after August 14.

States and other jurisdictions approved to report only the Common Measures for WIA programs for the program year in question do not have to report outcomes for the customer satisfaction measure in Table A of the ETA 9091 report. However, regarding the customer satisfaction survey, methodologies and results should be addressed in the narrative portion of the WIA Annual report by ALL states. A separate TEGL addressed the narrative requirements (TEGL 7-15, *Workforce Investment Act (WIA) Program Year (PY) 2014 Annual Report Narrative*). All states are required to report outcomes for the youth common performance measures.

In addition to the customer satisfaction measure mentioned above, states that are approved to report only the Common Measures should reference Attachment B of this TEGL, which contains the WIA Annual Report format with shaded fields to indicate the information that is not required as part of the state's annual report submission.

Data Element Validation (DEV), using the file of exiters and participants reported on the ETA 9091, must be completed by March 15 following the due date of the WIA annual narrative for the program year being submitted. Please see Attachment A of this TEGL for the source documentation requirements for WIA data element validation.

6. Performance Reporting and Data Validation for Other State-Based Programs.

- A. Wagner-Peyser Employment Service.** States are required to submit the Wagner-Peyser individual record file (OMB No. 1205-0240) on a quarterly basis. Like WIA, quarterly reports are required to be submitted through E-DRVS and certified in EBSS no later than 45 days after the end of each quarter. **States must submit their fourth quarter reports no later than the first Friday after the Labor Day holiday.** This additional time, beyond the usual time allowed for Wagner-Peyser quarterly reports, is to allow for Data Element Validation to be performed and to provide extra review of the fourth quarter report. Please see the appropriate attachment(s) in this guidance for the exact due date.

In each program year, the Wagner-Peyser Employment Service submission requires data element validation. A minimal Data Element Validation sample of 25 job seekers must be reviewed and compared to state-level data prior to ETA 9002 and VETS 200 reports certification to ensure that the files used to conduct report validation were properly constructed. All states are required to perform data element validation, but are not required to use the E-DRVS to do so for PY 2015. As with the WIASRD, E-DRVS has served as the reporting mechanism for Wagner-Peyser.

B. Trade Adjustment Assistance. Since the TAA program operates on a fiscal year basis, the Trade Act Participant Report (TAPR), OMB No. 1205-0392, is based on a year that begins on October 1 and ends on September 30. States are required to submit the TAPR on a quarterly basis, no later than 45 days after the end of the report quarter (see Attachments E or F for due dates). States administering TAA programs are not required to submit an annual report; states are required to submit individual participant records only for TAA.

To align with the WIA data element validation (DEV) due date, TAA DEV was due, via EBSS, on March 15 following the due date of the third quarter TAPR file for the program year being submitted. A user guide is available on the TAA Web site at www.doleta.gov/tradeact (locate the ‘TAA DEV User Guide’ under the “Research” drop down menu, found in the horizontal menu bar on the home page) to assist states in accessing and using the TAA DEV report application.

- 7. Data Validation for NFJP.** Under WIA, grantees administering NFJP are not required to submit a performance outcomes report. Grantees are required to submit individual participant records for NFJP, which ETA uses to calculate the performance outcomes for each grantee. Therefore, grantees are not required to conduct report validation, but must conduct data element validation.

The final NFJP participant data are due to ETA’s contractor (Social Policy Research Associates) by May 15 of the year following the end of the program year. **Data element validation for each program year must be submitted to ETA by November 1 in the year after the end of the program year.** Please see Attachments E and F for due dates and Attachment D for the source documentation requirements for NFJP data element validation. NFJP grantees should use NFJP Data Validation Software Version 2.0.

- 8. INA Reporting.** Under WIA, grantees administering INA programs are not required to submit a performance outcomes report. However, grantees are required to submit a Standard Participant Individual Record file for INA program participants each quarter, which ETA uses to calculate the performance outcomes for each grantee. The only performance outcomes for INA programs under WIA are Entered Employment, Employment Retention, and Average Earnings.
- 9. PY 2015 WIA Data Validation.** The public workforce system requires data validation in order to ensure quality standards of performance data are met. The reporting of performance data for validation is essential for accurate reflection of state and grantees’ experiences. However, ETA recognizes the additional burden that implementing WIOA performance accountability provisions will undoubtedly cause. In order to balance the need for accurate high quality data with the burden of WIOA implementation, states are still required to conduct data validation in PY 2015, but are not required to do so using EDRVS. While states must utilize a thorough data validation strategy, the specific methodology is left to the discretion of the state. This reporting method closely follows that of customer service

measures reporting in TEGL 9-14, *Workforce Investment Act (WIA) Program Year (PY) 2013 Annual Report Narrative*.

- 10. Data Reporting and Validation Resources.** Data used to compute the performance outcomes must be accurate and submitted on time. ETA provides the following resources to grantees in order to assist them in reporting timely and accurate data.
 - WIA Annual and Quarterly Report handbooks are available at:
<http://www.doleta.gov/performance/reporting>
 - Data validation software applications and User Guides for each program are at:
http://www.doleta.gov/performance/reporting/tools_datavalidation.cfm
 - For assistance with WIA Quarterly reporting timeframes for each measure based on both the year and quarter, an auto-populating spreadsheet is available at:
<http://www.doleta.gov/performance/guidance/WIA/WIAQuarterlyReportingTimeFrames.xls>. The annual report timeframes can be derived from this spreadsheet by selecting the year and the fourth quarter.
- 11. Training and Technical Assistance.** States and grantees are encouraged to request technical assistance on validation procedures and the use of the reporting and validation tools by contacting regional and/or national office program staff.
- 12. Action Requested.** States and grantees should: 1) distribute this guidance to appropriate staff; 2) complete report and data validation activities within the timeframes established in sections 5, 6, and 7 of this guidance; and 3) provide the appropriate regional office with updates on the reporting and validation process.
- 13. Inquiries.** Questions regarding performance reporting should be directed to the appropriate ETA regional office, or to the Office of Policy Development and Research at ETAperforms@dol.gov.
- 14. Attachments.**

Attachment A: Source Documentation Requirements for Program Year (PY) 2014 and PY 2015 Workforce Investment Act (WIA) Data Element Validation

Attachment B: Workforce Investment Act (WIA) Annual Report Requirements for States Approved to Report against the Common Performance Measures Only

Attachment C: Trade Adjustment Assistance (TAA) Data Element Validation for Program Year (PY) 2014 and PY 2015

Attachment D: Source Documentation Requirements for National Farmworker Job Program (NFJP) Data Element Validation

Attachment E: Program Year 2015/Fiscal Year 2016 Performance Reporting and Data Validation Timelines

Attachment F: Program Year 2014/Fiscal Year 2015 Performance Reporting and Data Validation Timelines