


TEXAS WORKFORCE COMMISSION
Workforce Development Letter

ID/No:	WD 27-19, Change 6
Date:	March 18, 2024
Keywords:	ES; TAA; Veterans; WIOA; WorkInTexas.com
Effective:	April 15, 2024

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


From: Courtney Arbour, Director, Workforce Development Division

Subject: **State Data Validation Requirements—Update**

PURPOSE:

The purpose of this WD Letter is to provide Local Workforce Development Boards (Boards) with updated information and guidance on the state data validation requirements for programs included in WorkInTexas.com.

This updated letter provides clarification relating to the implementation of WorkInTexas.com as the Texas Workforce Commission’s (TWC) workforce case management system.

RESCISSIONS:

WD Letter 27-19, Change 5

BACKGROUND:

US Department of Labor Employment and Training Administration (DOLETA) Training and Employment Guidance Letter (TEGL) 07-18, issued December 19, 2018, and titled “Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA),” provides guidance that states must use in developing procedures to ensure that the data submitted on participant outcomes is valid and reliable. States may customize these data validation requirements to fit local needs.

The guidance identifies 24 common data elements that states must validate. Furthermore, states have the flexibility to:

- continue supporting documentation for program-specific data elements not included in the guidance;
- collect additional source documentation on more data elements; and
- require additional source documentation in their procedures.

TEGL 23-19, Change 2, issued May 12, 2023, and titled “Revisions to Training and Employment Guidance Letter (TEGL) 23-19, Change 1, Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs,” further enhances data element validation by adding key data elements relating to status at program entry.

With this guidance, TWC incorporated all data elements for which documentation is required.

To ensure that data validation requirements fit Texas’ needs and may be successfully implemented by Boards, WorkInTexas.com requires data element verification by Workforce Solutions Office staff for the following programs:

- WIOA Title I, including
 - Adult, Dislocated Worker, and Youth;
 - Statewide initiatives; and
 - National Dislocated Worker Grants;
- Temporary Assistance for Needy Families Employment and Training (Choices);
- Trade Adjustment Assistance (TAA) customers; and
- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)

PROCEDURES:

No Local Flexibility (NLF): This rating indicates that Boards must comply with the federal and state laws, rules, policies, and required procedures set forth in this WD Letter and have no local flexibility in determining whether and/or how to comply. All information with an NLF rating is indicated by “must.”

Local Flexibility (LF): This rating indicates that Boards have local flexibility in determining whether and/or how to implement guidance or recommended practices set forth in this WD Letter. All information with an LF rating is indicated by “may” or “recommend.”

NLF: Boards must ensure that Workforce Solutions Office staff follows the data validation requirements set forth in TEGL 23-19 and its attachments, this guidance, and identified in verification selections for each program included in WorkInTexas.com.

NLF: Boards must ensure that record retention time frames are based on the Primary Indicators of Performance exit date and not on the date that the participant stops receiving Wagner-Peyser (W-P), WIOA, or TAA services. For WIOA Youth, Boards must ensure that record retention time frames are based on the Youth follow-up end date.

Crossmatch Data Elements

NLF: Boards must be aware of the following:

- Data elements that are migrated via crossmatch from another agency’s automated system into WorkInTexas.com may meet validation requirements in the absence of other source documentation.
- Boards are not required to validate crossmatch data populated into WorkInTexas.com from:

- Texas Health and Human Services Commission;
- Texas Department of Criminal Justice; or
- other sources when allowed for an element required by TEGL 23-19, Change 2.

Data Elements in WorkInTexas.com

- NLF**: Boards must be aware that WorkInTexas.com self-service-entered data may not have been validated by Workforce Solutions Office staff.
- NLF**: Boards must ensure that Workforce Solutions Office staff validates data elements in a program that requires verification.
- NLF**: Boards must ensure that Workforce Solutions Office staff includes validation on source documents in participant case files, or other document management system, in alignment with state and local guidance.
- LF**: Boards may set local policies to use WorkInTexas.com as the case file or document management system for a program in their local area.

Veteran Status

- NLF**: Boards must be aware that WorkInTexas.com requires individuals to self-identify as veterans and provide military service details during registration. Qualified spouses also self-identify during registration.
- NLF**: Boards must be aware that the information entered by individuals in WorkInTexas.com is authenticated through unique access via username and password, which is considered the same as an electronic signature and meets the definition of “self-attestation.”
- NLF**: Boards must be aware that individual self-attestation in WorkInTexas.com for the eligible veteran status data element only meets data validation requirements for the W-P and Jobs for Veterans State Grant programs.

Social Security Numbers

- NLF**: Boards must be aware that Social Security Number (SSN) is a required field in WorkInTexas.com. If an individual does not provide a valid SSN during registration, WorkInTexas.com will attach a pseudo-SSN to the account.
- NLF**: Boards must be aware that WorkInTexas.com may require verification of SSN on program eligibility screens.
- NLF**: Boards must ensure that Workforce Solutions Office staff members do not require applicants to provide SSN validation unless explicitly required by federal program guidance, including TEGL 23-19, Change 2.
- NLF**: Boards must ensure that Workforce Solutions Office staff members are aware that US Work Authorization is required for DOLETA programs and is addressed through Citizenship fields in WorkInTexas.com.

Homeless Veterans’ Reintegration Program

- NLF**: DOL requires the capture of the grant numbers for homeless veterans referred by the grantees listed below. During the referral by the grantee, Boards must ensure that Workforce Solutions Office staff enters the appropriate grantee number based

on Program Year 2023 (July 1, 2023–June 30, 2024) HVRP grant numbers, as follows:

- Grant number 00016
Adaptive Construction Solutions
6509 West Little York Road
Houston, Texas 77040
(832) 619-1175
- Grant number 00017 (Texas except Houston Metropolitan Statistical Area (MSA))
Adaptive Construction Solutions
6509 West Little York Road
Houston, Texas 77040
(832) 619-1175
- Grant number 00022
Castle Cares Community Ministries (The Warriors Refuge)
212 North 14th Street
West Columbia, Texas 77486
(979) 345-1607
- Grant number 00024
U&I Spread the Light
8800 Ambassador Row
Dallas, Texas 75247-462
(214) 637-2911
- Grant number 00039
The Houston Launch Pad
2616 South Loop West, Suite 504
Houston, Texas 77054
(713) 637-4174
- Grant number 00051
Unity Partners
4001 East 29th Street, Suite 114
Bryan, Texas 77802
(979) 595-2900
- Grant number 00069
American GI Forum—Austin
2700 South I-35 Frontage Road, Suite 100
Austin, Texas 78704
(512) 363-5978
- Grant number 00070
American GI Forum—DFW
8700 North Stemmons Freeway
Dallas, Texas 75247
(214) 379-7377
- Grant number 36530
United States Veterans Initiative
7227 Fannin Street, Suite 200

Houston, Texas 77030
(713) 229-8122

- Grant number 36563 (Lubbock and Amarillo)
Star Care Lubbock
3804 I-27 Frontage Road
Lubbock, Texas 79412
(806) 470-9317
- Grant number 38366
Volunteers of America—Texas
2401 Scott Avenue
Fort Worth, Texas 76103
(817) 369-8857
- Grant number 38375
American GI Forum—San Antonio
611 North Flores Street, Suite 200
San Antonio, Texas 78205
(210) 354-4892
- Grant number 38385 (Houston MSA)
SER Jobs for Progress
1710 Telephone Road
Houston, Texas 77023
(713) 773-6000 x107

HVRP DOL grant information may be found at [HVRP Information](#).

INQUIRIES:

Send inquiries regarding this WD Letter to wfpolicy.clarifications@twc.texas.gov.

ATTACHMENTS:

Attachment 1: Revisions to WD Letter 27-19, Change 5, Shown in Track Changes

REFERENCES:

WIOA §188(a)(5)

US Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter 23-19, Change 2, issued May 12, 2023, and titled “Guidance for Validating Required Performance Data Submitted by Grant Recipients of US Department of Labor (DOL) Workforce Programs”

US Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter 07-18, issued December 19, 2018, and titled “Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)”

TWC Chapter 802 Integrity of the Texas Workforce System Rule §802.1(f)