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STATE INSTRUCTION NUMBER 20-09, Change 1

To:	Local Workforce Area Signatory Officials
	Local Workforce Area Board Chairs
	Local Workforce Area Administrators
	DEW Area Directors
	DEW Regional Managers

Subject:	**Performance Data Validation for DOL Workforce Programs**

Issuance Date:	February 19, 2026

Effective Date:	April 1, 2026

Purpose: To provide performance data validation procedures for the Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser (WP), Jobs for Veterans' State Grants (JVSG), National Dislocated Worker Grants (DWG), and Migrant and Seasonal Farmworkers (MSFW) programs administered by the Department of Employment and Workforce (DEW). This guidance replaces State Instruction 20-09.

References:

- Workforce Innovation and Opportunity Act, Public Law 113-128, § 116
- 2 CFR §§ 200.328, 200.334
- 80 Final Rule (FR) 55792 (August 19, 2016); 89 FR 13184 (February 23, 2024)
- Training and Employment Guidance Letters (TEGLs) 39-11; 10-16, Change 3; 18-16, Change 2; 19-16; 26-16, Change 1; 07-18, Change 1; 11-19, Change 2; 23-19, Change 3
- State Instruction Letters (SILs) 08-05; 16-11, Change 1; 25-02; 25-06

Revision 1:

- The Trade Adjustment Assistance (TAA) program is no longer applicable to these data validation requirements and obligations
- The Migrant and Seasonal Farmworkers (MSFW) program has been added
- The 'Monitoring' section has been updated to align with the Office of Internal Audit's Charter Scope and Responsibilities

- The attachment *WIOA Required Source Documentation* has replaced TEGL 23-19, Change 3, Attachment II as a more user-friendly document to use in data validation efforts

Background: Data validation is a series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data. Establishing a shared data validation framework that requires a consistent approach across programs ensures that all program data consistently and accurately reflects the performance of all programs. To that end, the purposes of validation procedures are to:

- Verify that the performance data reported by grant recipients to the Department of Labor (DOL) are valid, accurate, reliable, and comparable across programs
- Identify anomalies in the data and resolve issues that may cause inaccurate reporting
- Improve program performance accountability through the results of data validation efforts
- Describe source documentation required for common data elements

Policy: The programs listed below must conduct data validation, which establish performance accountability indicators and performance reporting requirements to assess the effectiveness of the SC Works system in achieving positive outcomes for individuals. These programs include:

- WIOA Title I Adult, Dislocated Worker, and Youth
- WP Employment Services
- Jobs for Veterans' State Grant (JVSG)
- WIOA National Dislocated Worker Grants (DWGs)
- Migrant and Seasonal Farmworkers (MSFW)

Data Validation Procedures and Responsibilities

Program Staff

Appropriate program staff must conduct quarterly data validation reviews to verify that the performance data elements reported by South Carolina are valid, accurate, reliable, and comparable across programs. The reviews must be conducted on both active and exited records from the previous quarter after each quarter has been completed and performance has been submitted to DOL. The review is to identify data anomalies or missing data, to resolve issues that cause inaccurate reporting, and to improve program performance accountability through the results of data validation efforts.

PIRL. For definitions, instructions, program specific requirements, and source documentation needed to perform data validation on each data element, use the latest Participant Individual Record Layout (PIRL) document found here:
https://www.dol.gov/agencies/eta/performance/reporting#current-reporting-req.

Source Documentation. Using the attachment to this policy, *WIOA Required Source Documentation*, program staff must identify acceptable source documentation necessary to validate the required data elements.

NOTE: TEGL 23-19, Change 3, Attachment II, *Source Documentation for WIOA Core/Non-Core Programs DOL-only Data Element Validation* also identifies the data elements that require source documentation to validate for all DOL grantees. The document may be found here:
https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2025/TEGL%2023-19%2C%20Change%203/Attachment%20II%20%28Accessible%20PDF%29%280001%29.pdf.

Documentation of Eligibility. While the collection of source documentation for data validation often occurs at the same time as the determination of an individual's program eligibility, these actions serve different purposes. Eligibility determination only needs to confirm that an individual meets the requirements of the relevant program before becoming a program participant. The list of source documentation outlined in TEGL 23-19, Change 3, Attachment II describes the documents that could be used for determining program eligibility.

Self-Attestation. Self-attestation, or self-reported supplemental wage data information from participants through post-exit follow-up, may only be used when all efforts to collect other allowable source documentation have been exhausted. The use of self-attestation, or self-reported supplemental wage data information from participants through post-exit follow-up must be limited.

Effectiveness of Data Validation. All programs listed at the outset of this policy must perform annual assessments of the data validation process and procedures for effectiveness.

WIOA Title I Programs

Local Workforce Development Boards (LWDBs) must develop their own data integrity review policy that aligns with all federal and state laws, regulations, and guidance.

Workforce Reporting and Compliance (WRC)

DEW's WRC is responsible for the following data validation efforts:

- Addressing edit checks on quarterly and annual performance data
- Correctly formatting and submitting performance data into DOL's Workforce Integrated Performance System (WIPS)
- Providing technical assistance related to data validation tools available to programs in SC Works Online Services (SCWOS)

Monitoring

DEW's Office of Internal Audit must develop a flexible examination plan using an appropriate risk-based methodology to address strategic, financial, operation, compliance, and reputation risk and exposures. They assist in data validation efforts through the following:

- Conducting annual examinations that comply with Federal and state laws and regulations and includes agency goals, objectives, and management concerns
- Performing examinations that:
  - Evaluate internal controls and determine compliance with Federal and state laws, regulations, and policies
  - Assess the reliability of data
  - Evaluate the efficiency and effectiveness of operations
  - Examine the means of safeguarding assets
- Examining program areas which intend to add value and improve governance, risk management, and control processes without assuming management responsibility
- Providing a summary of examination results to applicable workforce programs to include technical assistance, when needed
- Receiving and following up on corrective action plans from applicable workforce programs to address noted deficiencies

NOTE: When requested, program staff are expected to provide their examination documentation to the Office of Internal Audit, <u>at least annually</u>.

Training

Program leadership must ensure that training is provided on the importance of correct data entry as it relates to obtaining positive performance outcomes, as well as on the allowable source documentation requirements contained in TEGL 23-19, Change 3, Attachment II, and any other relevant state policies. The appropriate program staff must receive training <u>on an annual basis, at minimum</u>.

NOTE: If an LWDA data integrity review policy provides additional restrictions to Federal and state laws, regulations, and guidance, the local guidance and training must cover that as well.

Correcting Missing or Erroneous Data

If missing or erroneous data is discovered during the validation process, staff must take appropriate actions to correct it. These corrective actions may include, but are not limited to:

- Submitting detailed change requests to correct inaccurate data
- Working with WRC to resolve out-of-range variances or large quantities of data anomalies
- Providing additional training or technical assistance to workforce staff responsible for the erroneous data entry, if applicable

- Collecting missing documentation to verify required data elements, if applicable

Personally Identifiable Information and Record Retention

All documentation must be stored in compliance with State Instruction 25-02, *Electronic and Physical Redactions of PII and Other Sensitive Information*. Staff must also maintain and store participant information in a manner that ensures confidentiality in accordance with 29 CFR 38.41 and State Instruction 16-11, Change 1, *Confidentiality of Equal Opportunity Records*.

All records must be retained for three years from the date of submission of the Final Expenditure Report. Generally, the records to be retained are:

- Financial Records
- Supporting Documents
- Statistical Records

- Participant Files
- All other non-federal entity records pertinent to a federal award

Exceptions to this rule may apply. Refer to 2 CFR § 200.334 for further guidance.

Note: Records related to Equal Opportunity (EO) complaints must be kept for <u>three years</u> following the complaint resolution, or if the complaint resolution is appealed to DOL, records must be retained for three years following the resolution of the appeal.

<u>**Action**</u>: Please ensure that all appropriate staff receive this policy and understand their responsibilities for performance data validation.

<u>**Inquiries**</u>: Questions may be directed to WorkforcePolicy@dew.sc.gov.

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Attachment

- WIOA Required Source Documentation

WIOA Required Source Documentation

Data Element	Acceptable Source Documentation	Wagner-Peyser	WIOA Adult	WIOA DW	WIOA Youth	DWG
Date of Birth	- Driver's License - Baptismal Record - Birth Certificate - DD-214 - Report of Transfer or Discharge Paper - Federal, State, or Local Identification Card - Passport - Hospital Record of Birth - Public Assistance/Social Service Records - School Records or ID Cards - Work Permit - Family Bible - Cross-Match with State Agency Records - Justice System Records - Selective Service Registration - Signed Letter from a parent or guardian - Medical Records	X	X	X	X	X
Individual with a Disability	- School 504 Records Provided by Student - Assessment Test Results - School Individualized Education Program (IEP) Record - Self-Attestation	X	X	X	X	X
Eligible Veteran Status	- DD-214 - Cross-Match with Department of Defense Records - Cross-Match with Veterans Service Database - Letter from the Veterans' Administration - NGB-22 documenting Title 10 federal active duty service - Self-Attestation – source documentation beyond self-attestation is only required when a decision is made to commit outside resources to one individual over another, not including staff effort. (Per TEGL 10-09, Section 9)	X	X	X		X

Data Element	Acceptable Source Documentation	Wagner-Peyser	WIOA Adult	WIOA DW	WIOA Youth	DWG

Unemployment Compensation (UC) Eligibility Status	• Cross-Match to State UI Database
	• Cross-Match with State management information system (MIS) Database
	• Referral Transmittal by RESEA or WPRS
	• Self-Attestation – only *allowable* for:
	    ○ claimant not referred to services by Worker Profiling and Reemployment Services (WPRS) or did not receive a Reemployment Services and Eligibility Assessment (RESEA) staff service,
	    ○ claimant who has exhausted all UC benefit rights for which they have been determined eligible, including extended supplemental benefit rights
		X	X	X		X

Long-Term Unemployed at Program Entry	• Public Assistance Records • Refugee Assistance Records • Cross-Match with Public Assistance Database • Cross-Match to State UI Database • Self-Attestation	X	X	X		X

School Status at Program Entry	• Cross-Match with Postsecondary Education Database
	• Copy of Educational Institution Enrollment Record
	• Applicable Records from Education Institution
	    ○ GED Certificate
	    ○ Diploma
	    ○ Attendance record
	    ○ Transcripts
	    ○ Drop Out Letter
	    ○ Other School Documentation
	• Signed Intake Application or Enrollment Form
	• Electronic Records
	• Case Notes
	• Self-Attestation
		X	X	X	X	X

Date of Actual Dislocation	• Verification from Employer • Rapid Response List	X	X	X		X

Data Element	Acceptable Source Documentation	Wagner-Peyser	WIOA Adult	WIOA DW	WIOA Youth	DWG
	• Notice of Layoff • Public Announcement with Follow-Up Cross-Match with UI Database • Self-Attestation					
Migrant and Seasonal Farmworker Status	• Cross-Match with Public Assistance Records • NFJP Eligibility Documents used to determine low-income status • Employer Contract/Letter • Program Application • Cross-Match with State MIS Database • Cross-Match with H-1B Records • Case Notes • Self-Attestation	X	X	X		X
Migrant and Seasonal Farmworker Designation (20 CFR 651.10)	• Cross-Match with Public Assistance Records • Cross-Match with State MIS Database • Employment Records • Case Notes • Self-Attestation	X				
Temporary Assistance to Needy Families (TANF)	• TANF Eligibility Verification • TANF Period of Benefit Receipt Verification • Referral Transmittal from TANF • Cross-Match with TANF Public Assistance Records	X	X	X		X
Exhausting TANF Within 2 Years at Program Entry	• TANF Eligibility Verification • TANF Period of Benefit Receipt Verification • Referral Transmittal from TANF • Cross-Match with TANF Public Assistance Records	X	X	X		X
Supplemental Security Income (SSI)/ Social Security Disability Insurance (SSDI)	• SSI/SSDI Receipt of Benefits Verification • Referral Transmittal from SSA • SSI/SSDI Eligibility Verification • Cross-Match with SSA Database	X	X	X		

Data Element	Acceptable Source Documentation	Wagner-Peyser	WIOA Adult	WIOA DW	WIOA Youth	DWG

Supplemental Nutrition Assistance Program (SNAP)	• SNAP Eligibility Verification
	• Documentation of SNAP Benefit Receipt
	• Referral Transmittal from SNAP
	• Cross-Match with SNAP Public Assistance Records
	    ○ SNAP Public Assistance Records
	    ○ Other Relevant Records
		X	X	X		

Other Public Assistance Recipient
- General Assistance (GA) (State/Local Government)
- Refugee Cash Assistance (RCA)
	• Copy of Authorization to Receive Cash Public Assistance
	• Copy of Public Assistance Check
	• Medical Card Showing Cash Grant Status
	• Public Assistance Eligibility Verification
	• Cross-Match
	    ○ Refugee Assistance Records
	    ○ Public Assistance Records
	    ○ State MIS Database
	    ○ Other Relevant Records
			X	X		

Pregnant/Parenting	• Needs Assessment • Women, Infants, and Children (WIC) Eligibility Verification • TANF Single Parent Eligibility Verification • Signed Intake Application or Enrollment Form • Individual Service Strategy • Case Notes • Self-Attestation				X	
Youth Who Needs Additional Assistance	• Signed Intake Application or Enrollment Form • Needs Assessment • Individual Service Strategy • Case Notes • Self-Attestation				X	
Foster Care Youth Status at Program Entry	• Written Confirmation from Social Services Agency • Foster Care Agency Referral Transmittal • Signed Intake Application or Enrollment Form • Needs Assessment	X	X	X	X	X

Data Element	Acceptable Source Documentation	Wagner-Peyser	WIOA Adult	WIOA DW	WIOA Youth	DWG
	• Individual Service Strategy (ISS) • Case Notes • Self-Attestation					
Homeless Participant, Homeless Children and Youths, or Runaway Youth at Program Entry	• Signed Intake Application or Enrollment Form • Written Statement or Referral Transmittal from a Shelter or Social Service Agency • Needs Assessment • Letter from Caseworker or Support Provider • Individual Service Strategy • Case Notes • Self-Attestation	X	X	X	X	X
Ex-Offender Status at Program Entry	• Documentation from the Juvenile or Adult Criminal Justice System • Written Statement or Referral Document from a Court or Probation Officer • Referral Transmittal form a Reintegration Agency • Signed Intake Application or Enrollment Form • Case Notes • Needs Assessment • Individual Service Strategy • Federal Bonding Program Application • Self-Attestation	X	X	X	X	X
Low Income Status at Program Entry	• Award Letter from Veteran's Administration • Bank Statements • Pay Stubs • Compensation Award Letter • Court Award Letter • Pension Statement • Employer Statement/Contact • Family or Business Financial Records • Housing Authority Verification • Quarterly Estimated Tax for Self-Employed Persons	X	X	X	X	X

Data Element	Acceptable Source Documentation	Wagner-Peyser	WIOA Adult	WIOA DW	WIOA Youth	DWG
	• Social Security Benefits • UI Claim Documents • Copy of Authorization to Receive Cash Public Assistance • Copy of Public Assistance Check • Public Assistance Eligibility Verification • Cross-Match with Refugee Assistance Records • Cross-Match with Public Assistance Records • Cross-Match with UI Wage Records					

English Language Learner at Program Entry	• Assessment Test Results
	• Applicable Records from Education Institution
	    ○ Transcripts
	    ○ Other School Documentation
	• Signed Intake Application or Enrollment Form
	• Individual Service Strategy
	• Case Notes
	• Self-Attestation
		X	X	X	X	X

Basic Skills Deficient/Low Levels of Literacy at Program Entry	• Assessment Test Results
	• Applicable Records from Education Institution
	    ○ Transcripts
	    ○ Academic Assessments
	    ○ Other School Documentation
	• Case Notes
		X	X	X	X	X

Single Parent at Program Entry	• Needs Assessment • TANF Single Parent eligibility Verification • Signed Intake Application or Enrollment Form • Individual Service Strategy or Employment Plan • Case Notes • Self-Attestation	X	X	X	X	X
Displaced Homemaker at Program Entry	• Signed Intake Application or Enrollment Form • Cross-Match with Public Assistance Records • Copy of Spouse's Layoff Notice • Copy of Spouse's Death Record	X	X	X		X

Data Element	Acceptable Source Documentation	Wagner-Peyser	WIOA Adult	WIOA DW	WIOA Youth	DWG
	• Copy of Spouse's Permanent Change of Station (PCS) Orders (for a military move or assignment) • Copy of Divorce Records • Copy of Applicable Court Records • Copy of Bank Records (showing financial dependence on spouse, no separate individual income support, or no employment income earned) • Needs Assessment • Individual Employment Plan (IEP) • Self-Attestation					

Date of Program Entry	• Individual Plan for Employment (IPE)
	• Electronic Records
	• Program Intake Documents
	    o Eligibility Determination Documentation
	    o Program Enrollment Forms
	• Other Relevant Documentation
		X	X	X	X	X

Social Security Number The SSN must NOT be included unless specified under program or funding stream reporting requirements.	• Social Security Card • Passport • Military ID • Other Federal or State ID with SSN					X
Eligibility to Work	Acceptable documentation needed to demonstrate authorization to work in the US can be found at https://www.uscis.gov/i-9-central/form-i-9-acceptable-documents. • **NOTE:** Self-attestation is NOT an acceptable means to verify work authorization. • WIOA § 188 prohibits discrimination against individuals on the basis of citizenship status.	X	X	X	X	X