Introduction

Training and Employment Guidance Letter (TEGL) 23-19 is the U.S. Department of Labor’s (DOL) guidance for validating required performance data submitted by grant recipients of DOL workforce programs. TEGL 23-19 provides guidance for grant recipients to use in developing procedures for ensuring the data submitted for performance reporting are valid and reliable. This TEGL not only discusses the requirements and recommendations with respect to procedures for data validation reviews, staff training, and monitoring protocols, but in Attachment II it defines which data elements from the Participant Individual Record Layout (PIRL) have source documentation requirements for each program, in addition to what the acceptable types of documentation are for each element. States should first determine whether source documentation is needed, and are strongly encouraged to share source documentation that they obtain across partner programs to eliminate duplicative requests for documentation from participants.

ELIGIBILITY VS. SOURCE DOCUMENTATION

While the collection of source documentation will often take place at the same time as the determination of an individual’s eligibility, these actions serve two different purposes. Eligibility determinations confirm that an individual meets the requirements of a program before becoming a participant in the program, while source documentation validates that the data reported regarding a participant is accurate. This means that lack of source documentation must not prevent enrollment and receipt of services in a program, unless otherwise required by that program’s eligibility requirements.

DOES VETERAN’S PRIORITY OF SERVICE IMPACT WHAT DOCUMENTATION I NEED TO COLLECT?

Veterans and eligible spouses are required to receive priority of service for all DOL-funded job training programs, including WIOA programs. Priority of service only impacts the documentation requirement at the point when a decision is made to enroll the veteran instead of another person who is not eligible for priority of service.

The Veteran’s Priority of Service requirement does not change or add to pre-existing program requirements regarding verification of the eligibility of a veteran or eligible spouse. It is neither necessary nor appropriate for program operators to require verification of the status of a veteran or eligible spouse at the point of entry, unless the individual who self-identifies as a veteran or eligible spouse:

a) is to immediately undergo eligibility determination and be registered or enrolled in a program ahead of a person not covered by Priority of Service; and,
b) the applicable federal program rules require verification of veteran or eligible spouse status at that time.

Even in those instances in which eligibility determination and enrollment occur at the point of entry, a veteran or eligible spouse should be enrolled and provided immediate priority and then be permitted to follow-up subsequently with any required verification of his or her status as a veteran or eligible spouse. For programs or services where such documentation is needed to confirm eligibility, verification only needs to occur at the point at which a decision is made to commit financial resources for such programs/services to one individual over another. In contrast, the commitment of program staff effort does not require verification of status by a veteran or eligible spouse. For example, if a veteran or eligible spouse self-identifies, program staff should be permitted to deliver any appropriate services, while permitting the veteran or eligible spouse to follow-up subsequently with verification of his or her status.

Jobs for Veterans State Grants (JVSG)

CAN I SERVE A VETERAN IF I DO NOT HAVE A COPY OF THEIR DD-214?

Yes! Once a veteran has received an initial assessment for eligibility from American Job Center (AJC) staff, the veteran can begin receiving Disabled Veteran's Outreach Program (DVOP) services. No documentation of veteran status is necessary to prove eligibility for JVSG. Participants do not need to provide documentation of veteran’s status to begin receiving services under Wagner-Peyser or WIOA title I programs.

DATA VALIDATION IN THE JVSG PROGRAM

While there is no documentation requirement to determine eligibility for the JVSG program, there are source documentation requirements that apply to certain elements under certain conditions, including PIRL data element #301 “Eligible Veteran Status.” For most programs (including Wagner Peyser and WIOA title I programs), source documentation is only required for PIRL data element #301 at the point when Veteran’s Priority of Service is being applied, and therefore self-attestation for Eligible Veteran Status is sufficient when referring participants to JVSG. In accordance with TEGL 23-19, Attachment II, source documentation for self-attestation may include a signature and date (hardcopy, MIS, or electronic) for the self-identification. Note that a single signature (whether on paper, in the state MIS, or electronic) attesting to the accuracy of information provided on an enrollment form may be used for all included elements for which self-attestation is allowable. No other documentation is required to start serving JVSG participants unless they are referred to another program/service where documentation is required. Other applicable data element requirements per TEGL 23-19, such as source documentation for date of birth, are still relevant for JVSG.

To ensure that this source documentation is being appropriately collected and that the reported information is accurate, JVSG grant recipients are encouraged to fully implement the data validation framework outlined in section 4.B of TEGL 23-19. Grant recipients should implement a data validation policy. Establishing quarterly data reviews is a recommended practice for identifying and correcting
errors to improve performance reporting, as well as ensuring that the data accurately reflects the program participants, services, and outcomes.

**REPORTING AND DOCUMENTING PIRL 301**

While states are merely encouraged to establish and implement a data validation framework with a quarterly review to ensure that accurate data is being submitted through the PIRL, the source documentation requirements in TEGL 23-19 are not optional, unless otherwise noted. Source documentation is needed to verify the accuracy of reporting and is fundamental to performance accountability. While source documentation is not optional, for many elements—including PIRL #301—the requirement only applies under certain conditions for some programs. For example, most programs only require source documentation for PIRL #301 when providing Veteran’s priority of service for services that require a financial commitment, such as classroom training (WIOA Training Services).

For all programs, in order to avoid inappropriately delaying services or denying services, self-attestation of the criteria outlined in data element #301 should be initially presumed accurate and documented in the state’s MIS. For most programs other than JVSG, if the participant is provided services that constitute a financial commitment, consistent with the Veteran’s Priority of Service requirements, source documentation is required. Source documentation for PIRL data element 301 may include a DD-214, Cross-Match with Department of Defense Records, Cross-Match with Veterans Service Database, or a Letter from the Department of Veterans’ Affairs.

**Additional Resources**

- WIOA Desk Reference – Veterans and Spouses, [https://ion.workforcegps.org/resources/2017/03/19/19/34/Veterans_and_Spouses_-_WIOA_Desk_Reference](https://ion.workforcegps.org/resources/2017/03/19/19/34/Veterans_and_Spouses_-_WIOA_Desk_Reference)