



## WORKFORCE IMPLEMENTATION GUIDANCE (WIG) LETTER

**DATE:** November 3, 2021  
**NO:** PS-21-001  
**TO:** LOCAL WORKFORCE SYSTEM STAKEHOLDERS  
**FROM:** Kristin Laarhoven, OWD Executive Director  
**SUBJECT:** **Data Validation for Individuals with Barriers to Employment**

- 1. Purpose.** To provide guidance regarding the data validation process for individuals with barriers to employment. Specifically, this guidance elaborates on when to report the participant barrier and how to document (validate) the barrier versus when it is appropriate to utilize the barrier as part of the eligibility process and how to document (validate) the barrier for eligibility.
- 2. References.** [WIOA § 3](#)  
[TEGL 7-18](#)  
[TEGL 19-16](#)  
[TEGL 23-19](#)  
[TEGL 39-11](#)  
[TCSG OWD Policy Manual sec. 4.5.2](#)
- 3. Definitions.**  
WIOA – Workforce Innovation and Opportunity Act  
ETA – Employment and Training Administration  
TCSG – Technical College System  
OWD – Office of Workforce Development  
LWDA – Local Workforce Development Area  
ISY – In School Youth  
OSY – Out of School Youth  
HSE – High School Equivalency
- 4. Background.** Data validation is a series of internal controls or quality assurance techniques to verify the accuracy, validity, reliability, and quality of data before using, importing, or otherwise processing data. Data validation requires the person obtaining the data to verify the accuracy and reliability of the data being collected and reported. The Employment and Training Administration (ETA) requires for all WIOA Title I programs to validate the data collected in the various programs each program year. They emphasize the importance of complete information for program monitoring and



improving program results. The Local Workforce Development Area (LWDA) staff collecting and processing data needs to know:

- A. The data elements to collect;
- B. How to verify the source of the data; and,
- C. When in the WIOA Title I process this validation is needed.

The WIOA State Performance Report requires states to report on performance for participants who meet the definition of “individuals with barriers to employment”. “Individuals with barriers to employment” means individuals who are members of one or more WIOA specialty populations such as displaced homemakers, low-income individuals, etc. (for the complete list, please see pages 9-10). This guidance brings clarity to the data validation process for individuals with barriers to employment.

## 5. **Data Validation Process for Individuals with Barriers.**

### Reporting and Documenting Barriers to Employment

It is important to accurately identify, collect, and report the barrier(s) for all Title I participants from each of the three programs (youth, adults and dislocated workers). The identification of this information can happen in several ways, with participant self-disclosure and case manager observations as the most common.

Most barriers to employment can be **reported only** and validated by **self-attestation**. Let us define both terms:

- *What the term **reported only** means?* When a data element is used for reporting purposes only, it means that even though the participant discloses having a barrier, that participant barrier will not be taken into consideration to determine the eligibility for Title-I services because the participant has other barriers (e.g., low-income, basic skills deficient, veteran, etc.) more relevant to the eligibility purpose. All of the barriers that are not going to be utilized for eligibility need to be *identified* in the appropriate system and *reported* to ETA. **When a barrier is reported only, no additional documentation is needed beyond self-attestation.**
- *What is **self-attestation**?* Self-attestation occurs when a participant states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status (*TEGL 7-18*). A properly signed and dated application in which the participant has disclosed a barrier(s) is considered self-attestation.

For example, if an individual discloses having a disability for reporting purposes, an application (**signed, dated, and with the disability status box checked**) is considered self-attestation. The case manager in this situation has the necessary documentation to



report the participant’s barrier in the appropriate data collection system. For specific barrier reporting documentation, please review *Attachment A*, the “Individuals with Barriers to Employment Checklist”

When to utilize a barrier as part of the eligibility or priority process of a participant and how to document the barrier

WIOA Title-I participants are likely to have one or more barriers to employment, which can often make it challenging to determine which barrier(s) to consider for eligibility purposes vs. a priority of service determination. The best determination methodology is to consider the following three factors:

- Is the barrier within the **priority** of service category (e.g., recipient of public assistance, low-income individual, basic skills deficient, veterans)?
- Will the barrier make the participant **financially** eligible (e.g., low-income, recipient of SSI, TANF, or food stamps)?
- What **barrier**(s) could Title-I services help the participant overcome?

Practical Scenarios and Application:

**Scenario 1** - The participant is a *veteran* that receives *food stamps* and has a *disability*. The combination of the first two barriers, (a) veteran status and (b) public assistance recipient, places this individual at the top of the priority list for WIOA Title-I services. On the other hand, the third barrier (the disability status), does not give the participant priority of service nor makes the participant financially eligible.

Application-

- a. What barriers are more relevant for the eligibility process of this participant?  
The first two barriers are the barriers most relevant in the eligibility process. The veteran status gives the participant priority of service and the public assistance makes the participant financially eligible.
- b. What barriers do I have to validate with supporting documentation?  
For eligibility purposes, the case manager would have to validate with supporting documentation the *veteran’s* status (e.g., DD 214 form) and the *public assistance* status (e.g., proof of food stamps).

Note: In this scenario, the *disability* barrier does not determine or influence the eligibility determination process. Therefore, the case manager should **report** the disability status **only** using self-attestation. The case manager should not collect any disability-related documentation



to validate this barrier because it is not necessary for eligibility. For addition information, see *TCSG OWD Policy Manual Section 4.5.2 Storage of Confidential Information*.

**Scenario 2** - The participant is attending 10<sup>th</sup> grade, she is 15-years-old, receives free lunch, and is pregnant. The participant would be considered an In-School Youth (ISY), who satisfies the financial eligibility because she receives free lunch. In addition, the participant has the barrier of being pregnant.

Application-

- a. What barriers are more relevant for the eligibility process of this participant?  
In this case, being pregnant and receiving free school lunch are the key barriers that makes this participant an eligible ISY.
- b. What barriers do I have to validate with supporting documentation?  
For eligibility purposes, the case manager would have to validate with supporting documentation the *free school lunch* status (e.g., free school lunch verification form) and the *pregnant* status (e.g., Self-attestation, case manager's note).

Note: All other data elements, such as age, social security number, etc., must be validated as well. However, for the purpose of this document, we are focusing on the data validation around barriers to employment.

**Scenario 3** - The participant is 16-years-old, not attending school, and has no high school diploma or recognized high school equivalency (HSE) credential. The participant would be considered Out-of-School Youth (OSY). The participant has the barrier of being a high school dropout and a youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent school year.

Application –

- a. What barriers are most relevant for the eligibility process of this participant?  
In this case, being a high school dropout and not attending school, despite being the compulsory school age, are the key barriers making this participant an eligible OSY.
- b. What barriers do I have to validate with supporting documentation?  
For eligibility purposes, the case manager would have to validate with supporting documentation the dropout status and/or that the participant



is within the age of compulsory attendance and not attending (e.g., self-attestation, school attendance records, school letter identifying truancy status, written verification with school/district officials confirming truancy or drop out status, written verification from other cognizant agency).

**Scenario 4** - The participant is an active military member expecting to transition out of military service within the next 12-18 months. The service member is seeking training services or training courses through the local WorkSource office. In this scenario, the participant would be considered a transitioning service member, and therefore be eligible for Dislocated Worker funding.

Application:

- a) What barriers are most relevant in the eligibility process for this participant?  
In this case, the barrier relevant to the eligibility process is the *transitioning service member status*.
- b) What barriers do I have to validate with supporting documentation?  
For eligibility purposes, the case manager would have to validate with supportive documentation the transitioning service member status. This status can be validated with the DD form 2648, DD form 2958 and/or DA form 3947.

Note: The forms mentioned above are sufficient to indicate “notice of termination or layoff” for dislocation as defined in WIOA; therefore, they satisfy this component.

**Scenario 5** - The participant is an Adult *justice-involved* individual (ex-offender) who is also *homeless* and *receives food stamps*. The third barrier of public assistance recipient places this individual in the priority list for WIOA services, as it fulfills the low-income criteria and makes him automatically financially eligible. The first barrier, being a *justice-involved individual*, does not give the participant priority of service. The second barrier, being a *homeless individual*, when supported with valid documentation would also serve as an indication of low-income status.

Application-

- a. What barriers are more relevant for the eligibility process of this participant?  
The third barrier is the most relevant in the eligibility process. The public



assistance makes the participant financially eligible.

- b. What barriers do I have to validate with supporting documentation?  
For eligibility purposes, the case manager would have to validate with supporting documentation the *public assistance* status (e.g., proof of food stamps, copy of public assistance check).

Note: In this scenario, being a *justice-involved* individual (ex-offender) is not the barrier that determines or influences the eligibility determination process. Therefore, the case manager should **report only** the *justice-involved individual* status through self-attestation. For the second barrier, *homelessness*, the case manager does not have to collect additional documentation to deem the participant eligible because they have already collected sufficient documentation to establish low-income status. Therefore, the case manager should **report only** the homelessness status through self-attestation.

**Scenario 6** - The participant is a *veteran* with an honorable discharge and was recently released from probation. The barrier of *veteran* places this individual in the priority list for WIOA services. The second barrier, *justice-involved individual (ex-offender)*, does not give the participant priority of service nor makes the participant financially eligible.

Application-

- a. What barrier(s) are more relevant for the eligibility process of this participant?  
The first barrier of *veteran* status is the barrier most relevant in the eligibility process. The second barrier, *justice-involved individual*, does not prevent the participant from maintaining priority of service, unless the offense was committed during service and a dishonorable discharge was received for the offense as a consequence.
- b. What barriers do I have to validate with supporting documentation?  
For eligibility purposes, the case manager would have to validate with supporting documentation, the *veteran's status* (e.g., DD 214 form).

Note: In this scenario, the *justice-involved individual* status is a barrier that does not determine or influence the eligibility determination process; therefore, the case manager should **report only** the *justice-involved individual* status through self-attestation.

### Storing Documentation with Sensitive Information for Validation Purposes

Steps for an effective and secure process to store sensitive/confidential data:

1. **Understand** why the data is requested-



- a. In the WIOA Title-I system, sensitive data is only requested when this data is **necessary** to validate the participant’s eligibility for services.
  - b. A disclosure of a barrier(s) does not automatically mean the collection of additional information is necessary. The methodology provided in section III of this WIG, as well as the practical application section, provides key guidance to facilitate the determination of what barriers are required for eligibility versus what barriers need to be reported only.
  - Use self-attestation whenever possible. The use of self-attestation, as defined in this guidance, allows LWDA’s to report the participant barriers and eliminates the request, collection and storage of unnecessary data. Thus, making LWDA’s less susceptible to confidentiality breaches. *Attachment A* of this document provides detailed instructions of what data elements can be utilized to report a barrier as well as the data elements needed for documenting a barrier for eligibility purposes. For additional information, see *TCSG OWD Policy Manual Section 4.5.2 Storage of Confidential Information*.
2. Collect **only** the necessary data-
- a. When serving individuals with disabilities, collect disability-related documentation when:
    - i. The disability-related documentation is required for eligibility determination and/or for the provision of reasonable accommodations (*TCSG OWD Policy Manual Section 4.5.2 Storage of Confidential Information*).
      - 1. Eligibility Determination-
        - a. Youth- when serving youth, disability might be the only barrier available to determine eligibility for services. In this instance, it is necessary to collect additional documentation to validate the barrier for eligibility purposes. For more information on acceptable types of disability documentation, see *Attachment A* of this guidance.
        - b. Adults/Dislocated Workers- when serving adults/dislocated workers, if the participant has other barriers in addition to the disability that are more relevant to the eligibility process (e.g., low-income, basic-skills deficient, veterans, etc.) collect the necessary documentation to validate the barriers required to determine eligibility. Use self-attestation to report all other barriers. This eliminates the collection and storage of unnecessary information.
      - 2. Reasonable Accommodations-  
If a participant requests an accommodation that requires monetary investment from the LWDA, disability-related documentation can be requested to understand the type of accommodation needed. Not



everyone that self-discloses having a disability needs an accommodation. Accommodations for the most part are simple requests that would not require monetary investment or significant changes to the LWDAs process flow. However, it is strongly encouraged for all LWDAs to have local policy and procedures to guide their reasonable accommodation request and provision process.

- b. When collecting information for all barriers-
  - i. Collect the data for the barrier(s) needed to determine eligibility. Utilize self-attestation to report all other barrier(s) as much as possible. This minimizes the amount of data needed to be collected and reduces security concerns.
3. Storage of sensitive data-
  - a. Physical Records:
    - i. All sensitive data obtained should be stored in an area that is physically safe (i.e., locked) from access by unauthorized persons at all times.
    - ii. Access to any sensitive data must be restricted to only LWDAs staff who need access to this information as part of their official job duties.
    - iii. LWDAs and representatives must not leave confidential information lying out in the open and unattended.
    - iv. When not directly working with records that contains sensitive information, these documents must be properly stored in locked cabinets.
    - v. LWDAs and representatives should retain sensitive information only for the period required for assessments or performance purposes.
  - b. Electronic Records:
    - i. Any electronic files containing sensitive information that are open on a computer should be closed and computer logged off when unattended to reduce inadvertent security risks.
    - ii. The only sensitive data to be uploaded in the electronic records should be the data approved by ETA to validate the required element. For example, in order to validate disability status there are three types of acceptable documents: self-attestation, school 504 records, and/or assessments test results [TEGL 23-19; TCSG OWD Policy Manual Section 4.5.2 Storage of Confidential Information]. For more information, see Attachment A of this guidance.
4. Discard unnecessary data-
  - i. When a participant provides unnecessary sensitive information-
    1. Return unnecessary data to participant without making a hard copy or uploading it into the participant electronic file.



2. If unable to return the documents to the participant, shred the documentation following the local guidelines established by the LWDA.
- ii. When a referral partner provides unnecessary sensitive information-
  1. Return unnecessary data to referring partner without making a hard copy or uploading it into the participant electronic file.
  2. If unable to return the documents to the referring partner, shred the documentation following the guideline established by the LWDA.

When the sensitive data is no longer necessary, the data in paper files should be securely destroyed (e.g., shredding) or securely deleted from the electronic records, in accordance with record retention requirements. LWDA's should develop local policies and procedures to guide this process (*TEGL 39-11*).

#### Populations considered as having Barriers to Employment

Local areas must consider the following populations with barriers to employment when creating their policies and procedures [*WIOA § 3(24)*; *TEGL 19-16*]:

- **Displaced homemakers**, as defined in *WIOA § 3(24)*;
- **Low-income individuals**, as defined in *WIOA § 3(36)*;
- **Indians, Alaska Natives, and Native Hawaiians** (as defined in *WIOA sec. 166(b)*);
- **Individuals with disabilities**, including **youth** who are individuals with disabilities, as defined in *WIOA § 3(25)* and including individuals who are in receipt of Social Security Disability Insurance [*TEGL 19-16*];
- **Older individuals**, defined as age 55 or older [*WIOA § 3(39)*];
- **Ex-offenders or offenders/justice-involved individuals** [*TEGL 19-16*], as defined in *WIOA § 3(38)*;
- **Homeless individuals**, including runaways and homeless children and youth, as defined in *TEGL 19-16*;
- **Youth** who are in or have aged out of the foster care system;
- Individuals who are **English language learners**, as defined in *WIOA § 203(7)*;
- Individuals who have **low levels of literacy** (i.e. basic skills deficient [*TEGL 19-16*]);
- Individuals facing **substantial cultural barriers** to employment;
- Eligible **migrant** and **seasonal farmworkers**, as defined in *WIOA § 167(i)(1-3)*;
- Individuals within 2 years exhausting lifetime eligibility under **TANF**;



- **Single parents** (custodial and noncustodial, mothers and fathers) and **single pregnant individuals** [TEGLs 19-16 & 21-16];
- **Long-term unemployed** individuals (unemployed for 27 or more consecutive weeks) [TEGL 19-16]
- **Other groups** as the LWDB determines to have barriers to employment.

6. **Action Requested.** ETA requires for all WIOA Title-I programs to validate the data collected in their various programs each program year. ETA has emphasized the importance of complete information for program monitoring and improving program results. Therefore, LWDA's have an obligation to effectively validate all required data elements, including participants' barriers to employment. LWDA's must implement and follow the guidance provided in this document to properly identify and validate the barriers to employment for all participants. The implementation of this guidance will be evaluated as part of the OWD's annual programmatic review.

7. **Inquiries.** Inquiries regarding this guidance should be directed to OWD's Data & Information Director or Strategic Populations Manager.

8. **Attachment.**

*Attachment A* – Checklist for Individuals with Barriers to Employment

*Attachment B* – Checklist for Low-Income Determination

*Attachment C* – Frequently Asked Questions for Individuals with Barriers to Employment

9. **Expiration.** Continuing.

10. **Authorization.**