ADVISORY:  TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 24-10

TO:  STATE WORKFORCE AGENCIES
     STATE WORKFORCE LIAISONS

FROM:  JANE OATES
        Assistant Secretary

SUBJECT:  Trade Adjustment Assistance (TAA) Data Element Validation for Fiscal Year (FY) 2010

1. **Purpose.** To provide states with notice that TAA data element validation is not required for FY 2010.

2. **References.**
   - Training and Employment Guidance Letter (TEGL) 31-09, *Program Year 2009/Fiscal Year 2010 Performance Reporting and Data Validation Timelines*
   - TEGL 6-09, *Instructions for Implementing the Revised 2010 Trade Adjustment Assistance Trade Activity Participant Report (TAPR)*

3. **Background.** TAA data element validation was first initiated several years ago as part of a unified Employment and Training Administration (ETA) response to a report published by the Office of the Inspector General. This report raised doubts about the reliability and consistency with which each state calculated the aggregate Workforce Investment Act (WIA) outcome data used to report on the program’s outcomes to the Secretary of Labor and Congress. Unlike WIA, states do not perform their own outcome calculations for TAA, but report individual records that are used by ETA to calculate aggregate outcomes, which ensures consistency of aggregate calculations. Therefore, the emphasis in TAA has been on the reliability of the individual data elements reported. Between FY 2005 and FY 2009, states performed TAA data element validation on 17 data elements that were reported under the old Trade Activity Participant Report reporting format, matching the reported data to source documentation.

   In FY 2010 and continuing into FY 2011, states have undergone an intensive effort to implement the new TAPR. In addition to the reengineering required to respond to the consolidation of three TAA reports into the single streamlined TAPR format, states have been making significant efforts to improve the reliability of their data by complying with 250 edit checks that have been implemented, with approximately 80 edit checks planned for implementation on July 1, 2011. Some states are still working on cleaning up and automating systems to coordinate data and improve their ability to comply with the existing regulations.

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report level logic-based cross-validation checks. In addition, the reversion of the program to the Trade Adjustment Assistance Reform Act of 2002 on February 15, 2011, requires additional reprogramming at the state level and devotion of resources to implementation activities. Shifting resources to data validation at this time would reduce the resources available to implement program reversion.

4. **Action Requested.** States should notify all relevant personnel within their states that data element validation will not be required for FY 2010, so that limited state resources can be focused on program reversion efforts. However, states should know that this is a partial waiver of Data Element Validation requirements; it does not apply to the collection of appropriate source documentation. Data collection is still mandatory.

5. **Inquiries.** Contact your ETA Regional Office Performance Specialist or Trade Specialist for further information.