



WORKFORCE INNOVATION AND OPPORTUNITY ACT

VIRGINIA WORKFORCE LETTER (VWL) No. 19-12

TO: Local Workforce Development Boards

FROM: Nicole Overlay
Commissioner, Virginia Works

A handwritten signature in black ink that reads 'Nicole Overlay'.

SUBJECT: Supplemental Data

EFFECTIVE DATE: 2/15/2025

PURPOSE:

To provide guidance to local workforce development areas regarding the requirements for monitoring, oversight, and evaluation necessary to ensure compliance with the Workforce Innovation and Opportunity Act (WIOA) of 2014, applicable Federal laws and regulations, and state and local guidance.

REFERENCES:

Workforce Innovation and Opportunity Act (WIOA) Section 116 – Performance Accountability System;
Workforce Innovation and Opportunity Act (WIOA) Section 169 – Evaluation and Research;
Workforce innovation and Opportunity Act (WIOA) Section 185 – Reports, Recordkeeping, Investigations;
Workforce Innovation and Opportunity Act (WIOA) Section 189 – Secretarial administrative authorities and responsibilities;
20 CFR 677 – Performance Accountability under Title I of the Workforce Innovation and Opportunity Act;
Subpart C – 20 CFR 683 – Reporting Requirements;
OMB Control Number 1205-0526 – WIOA Participant Individual Record Layout (PIRL);
OMB Control Number 1205-0521 – WIOA DOL-only Participant Individual Record Layout (PIRL);
Training and Employment Guidance Letter 10-16, Change 3;
Training and Employment Guidance Letter 16-16;
Training and Employment Guidance Letter 17-16;

Training and Employment Guidance Letter 19-16;
Training and Employment Guidance Letter 21-16, Change 1;
Training and Employment Guidance Letter 26-16;
Training and Employment Notice – No. 08-16.

BACKGROUND:

Wage records are the primary source for tracking the employment related measures for adults, dislocated workers, and youth. For purposes of wage record detail files, Virginia unemployment insurance wage records and Wage Record Interchange System (WRIS) are considered wage files. In order for a wage match to occur, the participant must provide his/her Social Security Number (SSN) to the WIOA Title I service provider.

There are limitations on the use of wage records when a participant does not disclose his/her Social Security Number or when the individual's employment (for example self-employed) is not covered by state or federal unemployment insurance programs. In these two cases, supplemental data can be used to collect data on employment and earnings.

GUIDANCE:

Supplemental data can be used to collect information on the employment and earnings of individuals for performance reporting in the 2nd and 4th quarters after exit.

When using supplemental data:

- Staff must collect employment status in the 2nd and 4th quarter after exit, and the quarterly earnings in the 2nd quarter after exit;
- Staff must use only one method to verify employment and wages within a quarter, per participant, for data validity purposes;
- Outcomes will count negatively in the performance indicators if the agency opts not to use supplemental information and the individual is not included in WRIS;
- Staff must ensure that wages reported are earned within the quarter.

Supplemental Wage Information Methods and Procedures

The acceptable forms of supplemental wage information relevant to the employment-related indicators for core programs include, but are not limited to, the following:

Tax documents, payroll and employer records dated in the quarter for which you are verifying data, such as:

- Copies of quarterly tax payment forms to the Internal Revenue Service, such as a Form 941 (Employer's Quarterly Tax Return);

- Copies of pay stubs (minimum of two pay stubs);
- Signed letter or other information from employer on company letterhead attesting to an individual's employment status and earnings;
- Follow-up survey (self-reported) from program participants;
- Record of income earned from commission in sales or other similar positions;
- Telephone verification form with information verified by the employer and signed by the case manager, if appropriate to the program;
- Automated database systems for data matching with other partners with whom data-sharing agreements exist;
- Current records of eligibility for programs with income-based eligibility (e.g., Temporary Assistance for Needy Families (TANF) or Supplemental Nutrition Assistance Program (SNAP)); or
- Self-employment worksheets signed and attested to by program participants. *

*Note: Earnings (or net profit) can be calculated by subtracting total expenses from gross receipts. Not all self-employed individuals receive a salary, but the funds that represent income over expenses that are available to be invested back into the business are considered earnings.

Time Period for Collecting Supplemental Wage Information

The need for supplemental wage information for some individuals may not become apparent until it is determined that no match is found in Unemployment Insurance (UI) wage records.

When the provider determines that UI wage data will not be available for individuals (such as those participants who did not provide a SSN, or for participants not covered by UI wage data), the providers do not need to wait two quarters after the close of the second and fourth full quarters after exit to formally document that UI wage data are not available and begin collection of supplemental wage information. The optimal time to collect supplemental wage information is as soon as possible following the close of the second and fourth full quarters after exit. Participants should be reminded, before program exit, that they or their employers may be contacted to obtain confirmation of employment status and earnings, and to explain the expected timeframe for those follow-up contacts. While this reminder is applicable to all participants, it is especially important for those participants for whom UI wage data are not available.

Timeline for Commencing Data Collection for Employment-Related Performance Indicator		
Performance Indicator	UI Wage Data Becomes Available	Collection of Supplemental Wage Information May Begin
Employment Rate-Second Quarter after Exit (including Title I Youth)	During third or fourth after exit	Beginning the third quarter after exit
Employment Rate –Fourth Quarter after Exit (including Title I Youth)	During the fifth or sixth quarter after exit (first or second quarter, next program year)	Beginning the fifth quarter after exit
Median Earnings – Second Quarter after Exit	During third or fourth quarter after exit	Beginning the third quarter after exit
Credential Attainment – within 1 Year after Exit**	During the second or third quarter after exit	Beginning second quarter after exit

**** Note:** For the credential rate: Credential attainment can occur while the participant is active in the program or within 1 year (365 days) from the date of exit. Employment related to the credential rate is based on the quarters after exit (Q1, Q2, Q3, and Q4).

After the two-quarter lag concludes, if the information is still not available, wages will be converted to \$0 permanently, and employment status will be reported as not employed. Wages reported as \$0 will indicate that the participant was unemployed in the second quarter after exit, counting as a negative outcome for purposes of calculating levels of performance for the Employment Rate Second Quarter after Exit indicator and excluding that participant from the calculations of levels of performance for the Median Earnings Second Quarter after Exit indicator. Likewise, if neither a wage record match nor supplemental wage information is available following a two-quarter lag after the end of the fourth quarter following program exit, then the participant will be reported as unemployed in the fourth quarter after exit.

The timeframes when employment-related information must be reported are shown in the following table.

Deadlines for Timely Collection of Data for Employment-Related Performance Indicators				
Exit Quarter	Report Employment Rate – 2 nd Quarter (including Title I Youth) by End of:	Report Employment Rate – 4 th Quarter (including Title I Youth) by End of:	Report Median Earnings by End of:	Report Credential Attainment (Employment) – within 1 Year after Exit by End of:
First Quarter (Q1) (July 1 – September 30)	Q1, Next Program Year (four quarters later)	Q3, Next Program Year (four quarters later)	Q1, Next Program Year (four quarters later)	Q3, Next Program Year (four quarters later)
Second Quarter (Q2) (October 1 – December 31)	Q2, Next Program Year (four quarters later)	Q4, Next Program Year (four quarters later)	Q2, Next Program Year (four quarters later)	Q4, Next Program Year (four quarters later)
Third Quarter (Q3) (January 1 – March 31)	Q3, Next Program Year (four quarters later)	Q1, Next Program Year (four quarters later)	Q3, Next Program Year (four quarters later)	Q1, Next Program Year (four quarters later)
Fourth Quarter (Q4) (April 1 – June 30)	Q4, Next Program Year (four quarters later)	Q2, Next Program Year (four quarters later)	Q4, Next Program Year (four quarters later)	Q2, Next Program Year (four quarters later)

To assist program staff conducting follow-up:

Summary of Supplemental Wage Information Follow-up Guidelines
1. Develop a method for identifying participants to contact for follow-up. <i>Best practice tip:</i> Have staff follow a uniform set of written procedures to collect data in a valid and reliable (i.e., accurate and repeatable) manner.
2. Ensure that the local area has a uniform way to conduct the follow-up.
3. Conduct follow-up as close to the reference period as possible.
4. Identify local resources available to conduct follow-up.
5. Implement procedures to improve the quantity and quality of participant responses. <i>Best practice tip:</i> Inform participants at program entry about the supplemental wage information follow-up process and collect extensive contact information about them, such as addresses and phone numbers of relatives or others who may know the participants' whereabouts over time and employment information, if applicable.

Performance Measure Type

Entered Employment Rate in the 2nd and 4th Quarters after Exit:

Wage detail files are the primary sources of information in the calculation of the entered employment rates and median earnings for the Adult and Dislocated Worker programs. However, other sources of information will be acceptable for calculating these measures when wage detail files are unavailable (e.g. uncovered employment, employment outside Virginia, incorrect or missing social security number, etc.). These sources include the same sources identified for quarterly wage data included above.

Regardless of the type of supplemental data obtained, the information is subject to monitoring, auditing, and data validation.

Title I Youth Education and Employment Rates – 2nd and 4th Quarters after Exit -

Wage detail files are also the primary sources of information in the calculation of the entered employment rates and median earnings for Youth programs. However, other sources of information will be acceptable for calculating these measures when wage detail files are unavailable (e.g. uncovered employment, employment outside Virginia, incorrect or missing social security number, etc.). These sources include:

For the education and training component of this measure, verify for the 2nd and 4th quarters after exit:

- Enrollment in secondary education; or
- Enrollment in postsecondary education; or
- Enrollment in occupational skills training (including advanced training)

Acceptable documentation for these items would be:

1. Cross-match with other agencies
2. Apprenticeship verification
3. Advanced training transcript or course enrollment documents
4. Occupational skills training transcripts or course enrollment documents
5. Transcripts
6. Registration documents/forms
7. Case notes that indicate the name of the training program, course enrollment(s), occupational title, and dates of courses/training.

Regardless of the type of supplemental data obtained, the information is subject to monitoring, auditing, and data validation.

Median Earnings:

Under WIOA supplemental data can be used to obtain information of wage related measures. The wages collected in the second quarter must reflect earnings for the entire quarter. See Attachment A WIOA Wage Conversion Chart – this guide will assist in converting various wage and earning inputs to a quarterly wage as required by Participant Information Record Layout for the following PIRL data elements:

PIRL Element # 1703 – Wages 1st Quarter after Exit Quarter

PIRL Element # 1704 – Wages 2nd Quarter after Exit Quarter

PIRL Element # 1705 – Wages 3rd Quarter after Exit Quarter

PIRL Element # 1706 – Wages 4th Quarter after Exit Quarter

LWDAs, their service providers, and Community Colleges (when providing participant services funded under WIOA Title I) should note that median earnings should reflect the earnings for the entire second quarter after exit.

Credentials:

Local Workforce Development Areas (LWDAs) have a number of sources that can be used to collect data needed to calculate the credential attainment standards. Credentials include the following:

1. Secondary School Diploma/or equivalency
2. AA or AS Diploma/Degree
3. BA or BS Diploma/Degree
4. Occupational Licensure
5. Occupational Certificate

6. Occupational Certification
7. Other Recognized Diploma, Degree, or Certificate

Recognized Credential Information is collected in the following PIRL Elements:

1800 – Type of Recognized Credential (WIOA)

1802 – Type of Recognized Credential #2

1804 – Type of Recognized Credential #3

The following items can be used to document credential attainment:

1. Actual evidence of the credential
2. The databases of the community college system or four-year state institutions (e.g. a computer printout documenting the award of the certification)
3. The database of private training providers (e.g. a computer printout documenting the awarding of the certification)
4. The databases of State licensing boards (e.g. a computer printout documenting the awarding of the certificate)
5. School districts (e.g. a computer printout documenting the awarding of the certificate)
6. Copy of the high school diploma (if the date of award is present)
7. Copy of results of General Educational Development (H.S. Diploma equivalency) examinations with passing scores or the GED certificate (with date of attainment)
8. Copy of high school transcript with date of graduation
9. School letter indicating date of high school graduation
10. Copy of graduation program if participant's name is included along with date of graduation
11. In the event that none of the aforementioned sources can be obtained, an attestation from the former participant can be accepted that denotes that he/she has obtained a certification during the period(s) called for by the measure. This attestation preferably should be in writing from the participant, indicate the certification, the date it was received, the awarding authority's name and address and phone number, and must be signed by the participant. However, information obtained from telephone conversations is acceptable in the form of a Telephone Verification Form. This should be used as a last resort and other attempts should be documented prior to utilizing this method.

For those who attained a high school diploma or the recognized equivalent, employment, or is enrolled in an education or training program leading to a postsecondary credential, the following are acceptable documentation sources:

1. Copy of the high school diploma (if the date of award is present)

2. Copy of results of General Educational Development (H.S. Diploma equivalency) examinations with passing scores or the GED certificate (with date of attainment)
3. Copy of high school transcript with date of graduation
4. High School letter indicating date of graduation
5. Copy of graduation program, if participant's name is included along with date of graduation

The following are acceptable documentation sources for employment:

1. A copy of at least two pay stub(s) covering the period(s) called for by the pertinent measure(s)
2. An employer written statement or telephone conversation indicating that the individual was employed during the period(s) called for by the pertinent measure(s)
3. In the event that neither of the aforementioned sources can be obtained, an attestation from the former participant can be accepted that denotes that (he/she) has been employed during the period(s) called for by the pertinent measure(s). This attestation preferably should be in writing, indicate the dates of employment and the employer's name and telephone number, and must be signed by the participant. However, information obtained from telephone conversations should be recorded using the Telephone/Document Inspection Verification form (included in Attachment G – Self-Certification and Telephone/Document Verification – Eligibility Guidance).

The following are acceptable documentation for enrollment in an education or training program leading to a postsecondary credential:

1. Cross-match with other agencies
2. Apprenticeship verification
3. Advanced training transcript or course enrollment documents
4. Occupational skills training transcripts or course enrollment documents
5. Transcripts
6. Registration documents/forms
7. Telephone verification form verifying enrollment by education or training program provider and signed by the case manager.

Regardless of the source used to collect the data, the information must be documented on the appropriate forms and is subject to monitoring, auditing, and data validation.

The Virginia Workforce Connection (VaWC) provides data fields where credentials/certificates/diploma can be captured for performance outcomes. Case managers

should ensure that the supporting documentation is included in the participant file and the attainment status is updated in VaWC.

INQUIRIES:

Please submit inquiries regarding this VWL to:

Virginia Works

WIOA Title I Administrator

2221 Edward Holland Drive,

Suite 500

Richmond, VA 23230

LWDBinquiries@viriniaworks.gov