

SUMMARY of TEGL 23-19, Change 3 for DOL YouthBuild Grantees

On December 1, 2025, DOL published [Training and Employment Guidance Letter \(TEGL\) 23-19, Change 3](#).

THIS DOCUMENT IS A SUMMARY.

For additional guidance and framework examples, please read the TEGL in full.

This summary provides information to grant recipients of DOL workforce programs, including YouthBuild, and guidelines to develop procedures for ensuring the data submitted for performance reporting are valid and reliable.

When YouthBuild grantees regularly maintain and confirm data, it can become a valuable tool to tailor services for participants. Strong data practices also ensure that DOL can customize technical assistance to support grantees.

YouthBuild grantees are encouraged to implement a *data validation* framework that includes:

- Written procedures for conducting data validation reviews that contain a description of the process for identifying and correcting errors or missing data, which may include electronic data checks;
- Regular data validation training for appropriate program staff (DOL recommends at least annually);
- *Internal monitoring protocols*;
- Regular *data integrity* review of program data (DOL recommends quarterly)
- Documentation that missing documentation and erroneous data identified during the review process have been corrected;
- Documentation processes for maintaining records per the Federal records retention policy, including corrective action and trends in common data accuracy issues;
- Regular assessments of the effectiveness of the data validation process (DOL recommends at least annually) and revisions to that policy and process as needed.

Additional points of note and a glossary can be found on the next page.

ADDITIONAL POINTS OF NOTE

- Where self-attestation is listed as an option, **highlighted in green in the documentation tables below, the lack of source documentation beyond self-attestation must not delay or prevent enrollment and receipt of services in a program.**
- Appropriate validation can be part of FPO monitoring, and grantees will receive feedback.
- Programs can still require documentation for other program-specific data elements and are encouraged to validate these as well.
- Grantees should use a random sampling method.
- DOL recommends that staff who collect and report data are independent of staff who validate data.

Check out a sample YouthBuild intake self-attestation form on the next page. Grantees may use this form to document self-attestation and to track which documents they should help participants secure.

Glossary for TEGL 23-19, Change 3

Cross-Match

Requires grantees to identify detailed evidence that confirms the data element in a secondary database. Grantees must also confirm supporting information, such as dates of participation and services rendered. Grantees must have data sharing agreements in place as appropriate.

Data Integrity

Maintained by searching for anomalies in data including errors, missing data, and out-of-range variances in values reported.

Data Validation

Verifying data is accurate and reliable in accordance with [TEGL 07-18 Change 1](#).

Internal Monitoring Protocol When a grantee ensures that program staff are following the written data validation policy and procedures and take appropriate corrective action if those procedures are not being followed.

Self-Attestation

A written or electronic/digital declaration of information for a particular data element, signed and dated by the participant. DOL broadly interprets what is considered an electronic/digital signature. Electronic signatures or a submission from the participant such as an email, text, or unique online survey response is considered an electronic signature or verification; it must be participant-generated and traceable to the participant. Grantees must retain documentation of the self-attestation.

YouthBuild Intake Self-Attestation

The self-attestation below documents the following intake elements (e.g., *Highest School Grade Completed at Program Entry*):

I, _____, am unable to produce approved source documentation for YouthBuild intake elements, and therefore, I attest that I meet the requirement(s) written above truthfully and accurately to the best of my knowledge. I attest that all information provided in this document is true and accurate to the best of my knowledge. I understand that providing false information could lead to my immediate removal from the YouthBuild program.

Signature of Prospective Participant¹

Date (mm/dd/yy)

Signature of Case Manager or
Other Staff Authorized Signatory

Date

Case Manager Notes:

¹ Note: some programs may also require parent/guardian signatures for participants under 18. This is not a DOL requirement.

Eligibility Documentation (1 of 2)

Data Element Name	Source Documentation	
Date of Birth	• Driver's License • Baptismal Record • Birth Certificate • DD-214 • Report of Transfer or Discharge Paper • Federal, State, Local or Tribal 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
Secondary School Drop-Out	• Letter/Documentation from the School Stating the Youth Has Dropped Out • School Attendance Record • Self-Attestation	
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	• 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
Foster Care Youth Status at Program Entry	• Written Confirmation from Social Services Agency • Case Notes • Foster Care Agency Referral Transmittal • Intake Application or Enrollment Form	• Needs Assessment • Individual Service Strategy • Self-Attestation
Offender	• Court Documentation • Resident of a Detention Facility, Group Home, or Restricted State-Run Facility	• Police or Justice Department Records • Self-Attestation • Letter of Parole/Probation Officer

Eligibility Documentation (2 of 2)

Data Element Name	Source Documentation
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 from a Reintegration Agency • Intake Application or Enrollment Form • Case Notes
Individual with a Disability	• School 504 Records Provided by Student • Assessment Test Results • School Individualized Education Program (IEP) record • Self-Attestation
Child of Incarcerated Parent or Legal Guardian	• Court Records • Self-Attestation
Migrant Youth	• Cross-Match with Public Assistance Records • NFJP Eligibility Documents • Cross-Match with State MIS Database • Cross-Match with H-1B Record • Signed Employer Statement or Letter on Business Letterhead • Wage Records/Family Wage Records • Work Permits • Case Notes • Self-Attestation
Basic Skills Deficient/Low Levels of Literacy at Program Entry	• Assessment Test Results • Applicable Records from Education Institution (Transcripts, Academic Assessments, or Other School Documentation) • Case Notes

Other Participant Information Documentation (1 of 3)

Data Element Name	Source Documentation
Social Security Number	- SSN Card - Other Federal or State ID with SSN - Self-Attestation
Highest School Grade or Educational Level Completed at Program Entry	- Applicable Records from Education Institution (GED Certificate, Diploma, Attendance Record, Transcripts, Drop Out Letter, School Documentation) - Intake Application or Enrollment Form - Electronic Records - Case Notes - Self-Attestation
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
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
Supplemental Nutrition Assistance Program (SNAP)	- SNAP Eligibility Verification - Documentation of SNAP Benefit Receipt - Referral Transmittal from SNAP - Cross-Match
Other Public Assistance Recipient	- 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
Pregnant or Parenting Youth	- Needs Assessment - WIC Eligibility Verification - TANF Single Parent Eligibility Verification - Intake Application or Enrollment Form - Individual Service Strategy - Case Notes - Self-Attestation

Other Participant Information Documentation (2 of 3)

Data Element Name	Source Documentation
Homeless Participant, Homeless Children and Youths, or Runaway Youth at Program Entry	• Intake Application or Enrollment Form • Written Statement or Referral Transmittal from a Shelter or Social Service Agency • Needs Assessment • Case Notes • Individual Service Strategy • Letter from Caseworker or Support Provider • Self-Attestation
English Language Learner at Program Entry	• Assessment Test Results • Applicable Records from Education Institution (Transcripts or Other School Documentation) • Intake Application or Enrollment Form • Individual Service Strategy • Case Notes • Self-Attestation
Single Parent at Program Entry	• Needs Assessment • TANF Single Parent Eligibility Verification • Intake Application or Enrollment Form • Individual Service Strategy or Employment Plan • Case Notes • Self-Attestation
Date Verified Selective Service Registration	• Verification from Selective Service Administration
Youth Who Needs Additional Assistance	See State Policy on Definition: • Intake Application or Enrollment Form • Case Notes • Needs Assessment • Individual Service Strategy (ISS) • Self-Attestation

Other Participant Information Documentation (3 of 3)

Data Element Name	Source Documentation
Long-term unemployed at Program Entry	Source documentation beyond Self Attestation for this element is only required at the point in which a decision is made to enroll a covered person over a non-covered person and commit financial resources, which does not include staff time. (Per TEGL 10-09, Section 9.) • DD-214 • Cross-Match with Department of Defense Records • Cross-Match with Veterans Service Database • A Letter from the Veterans' Administration • NGB-22 documenting Title 10 federal active duty service • Self-Attestation
Long-term unemployed at Program Entry	• Public Assistance Records • Refugee Assistance Records • Cross-Match with Public Assistance Database • Cross-Match with UI Database • Self-Attestation
Highest Educational Level Completed at Program Entry	• Applicable records from education institution) secondary school equivalency, diploma, attendance record, transcripts, drop-out letter, school documentation) Intake Application or Enrollment Form • Electronic Records • Case notes • Self-Attestation
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

Service Documentation (1 of 6)

Data Element Name	Source Documentation
Date of Program Exit	• A Copy of the Letter Sent to the Individual Indicating That the Case Was Closed • WIOA Status/Exit Forms • Electronic Records • Attendance Records • Review Of Service Records Identifying the Last Qualifying Service (and Lack of a Planned Gap)
Other Reasons for Exit	• Information from Partner Services • WIOA or Program Status/Exit Forms • Electronic Records • Withdrawal Form with Explanation • Information From Institution or Facility • Case Notes
Type of Work Experience	• Case Notes • Signed Work Experience Agreement • Electronic Records
Received Training	• Cross-Match • Vendor/Training Provider Records • Signed Training Contract • Individual Training Account (ITA) • Electronic Records
Date Entered Training	• Individual Training Account (ITA) • Vendor Training Records • Electronic Records • Attendance Sheets or Records • Case Notes
Type of Training Service	• Copy of Enrollment Record • Case Notes • Cross-Match Between Dates of Service and Vendor Training Information • Vendor Training Documentation • Electronic Records • Individual Training (ITA) • Attendance Records

Service Documentation (2 of 6)

Data Element Name	Source Documentation
Occupational Skills Training Code	• Cross-Match • Case Notes • Signed Individual Employment Plan or Training Plan • Signed Training Contract • Individual Training Account (ITA)
Training #1-3 Completed	• Cross-Match • Vendor Training Records • Attendance Sheets or Records • Case Notes • Electronic Record • Individual Training Account (ITA)
Established Individual Training Account (ITA)	• Cross-Match • Case Notes • Individual Training Account (ITA) Approval, Allocation or Activation Records
Participated in Postsecondary Education During Program Participation	• Data Match with Postsecondary Data System • Copy of Enrollment Record • Case Notes • School Records • Transcript or Report Card
Most Recent Date Received Educational Achievement, Alternative Secondary School Services, Experience Opportunities, Education Offered Concurrently with Workforce Preparation, Leadership Development Opportunities, Supportive Services, Adult Mentoring Services, Comprehensive Guidance/Counseling Services, Services That Provide Labor Market Information and Employment Information, Postsecondary Transition and Preparatory Activities, or Youth Follow-Up Services	• Activity Sheets • Sign-In Sheets • Attendance Record • Vendor Contract • Electronic Records • Case Notes • Cross-Match

Service Documentation (3 of 6)

Data Element Name	Source Documentation
Received Needs-Related Payments	• Cross-Match • Activity Sheets • Sign-In Sheets • Attendance Record • Vendor Contract • Electronic Records • Case Notes
Date of Most Recent Measurable Skill Gains: Educational Functioning Level (EFL)	• Pre- And Post-Test Results Measuring EFL Gain • Adult High School Transcript Showing EFL Gain Through the Awarding of Credits or Carnegie Units • Postsecondary Education or Training Enrollment Determined Through Data Match, Survey Documentation, or Program Notes
Date of Most Recent Measurable Skill Gains: Postsecondary Transcript/Report Card or Secondary Transcript/Report Card	• Transcript • Report Card
Date of Most Recent Measurable Skill Gains: Training Milestone	• Documentation of a Skill Gained Through OJT or Registered Apprenticeship • Contract and/or Evaluation from Employer or Training Provider Documenting a Skill Gain • Progress Report from Employer Documenting a Skill Gain
Date of Most Recent Measurable Skill Gains: Skills Progression	• Results of Knowledge-Based Exam or Certification of Completion • Documentation Demonstrating Progress in Attaining Technical or Occupational Skills Through an Exam or Benchmark Attainment • Documentation from Training Provider or Employer • Copy of a Credential That Is Required For a Particular Occupation and Only Is Earned After the Passage of an Exam

Service Documentation (4 of 6)

Data Element Name	Source Documentation
Date Completed, During Program Participation, an Education or Training Program Leading to a Recognized Postsecondary Credential or Employment	• Cross-Match • Copy of Diploma, Credential or Degree Awarded by Education Institution • Applicable Records from Education Institution (GED Certificate, Transcripts, Report Card, Enrollment Record or Other School Documentation) • Signed File Documentation with Information Obtained from Education or Training Provider • Case Notes • Self-Attestation
Date Enrolled During Program Participation in an Education or Training Program Leading to a Recognized Postsecondary Credential or Employment	• Copy Of Enrollment Record • Case Notes • School Records • Transcript Or Report Card • Cross-Match
Date of Postsecondary Education or Training Placement	• Copy of School or Training Provider Enrollment Record • Case Notes
Earnings 2nd Quarter After Exit Quarter	• UI Wage Data Match/Administrative Wage Match Such as the National Directory of New Hires • Follow-Up Survey from Program Participants • Pay Check Stubs, Tax Records, W2 Form • Quarterly Tax Payment Forms, Such as IRS Form 941 • Document from Employer on Company Letterhead Attesting to an Individual's Employment Status and Earnings • Self-Employment Worksheets Signed and Attested to by Program Participants • Detailed Case Notes Verified by Employer and Signed by the Counselor
Type of Recognized Credential or Date Attained Recognized Credential	• Cross-Match • Copy of Credential • Copy of School Record • Follow-Up Survey from Program Participants • Case Notes Documenting Information Obtained from Education or Training Provider

Service Documentation (5 of 6)

Data Element Name	Source Documentation
Youth 2nd or 4th Quarter Placement	• Cross-Match • Copy of Registration Record • Case Notes • School Records • Transcript Or Report Card • Vendor/Training Provider Training Documentation
Employment Related to Training (2nd Quarter After Exit) and Entered Non-Traditional Employment	• UI Wage Records • Supplemental Data Sources Defined by TEGL 26-16 Follow-Up Services • Surveys • Record Sharing and/or Automated Record Matching with Other Federal Employment and Administrative Databases • Other Out-of-State Federal Wage Record Systems • Case Notes
Type of Employment Match 1st-4th Quarter After Exit Quarter, Earnings 1st, 3rd, and 4th Quarter After Exit Quarter, and Retention with the Same Employer in the 2nd Quarter and the 4th Quarter	Consistent with TEGL 26-16: • Cross-Match with State and Out-of-State UI Quarterly Wage Records (Intrastate and Interstate) • Federal Government Employment Records (Such as Military Employment, Department of Defense, Office of Personnel Management, and US Postal Service) • Cross-Match with Federal Administrative Wage Record Databases (Such as the National Directory of New Hires) • State New Hires Registry • Signed Follow-Up Survey Response from Program Participants • Copy of Pay Check Stubs, Payroll Slip, or Leave and Earnings Statements (Minimum of Two Per TEGL 26-16)

Service Documentation (6 of 6)

Data Element Name	Source Documentation
Date of Program Entry	• Individual Plan for Employment • Electronic Records • Program intake documents, such as eligibility determination documentation or program enrollment forms
Date Enrolled in Post-Exit Education or Training Program Leading to a Recognized Postsecondary Credential	• Case notes • School records or verification of enrollment • Transcript or report card • Cross-Match • Post-Exit survey from program participants
Most Recent Date Youth Received Entrepreneurial Skills Training	• Cross-Match • Activity sheets • Sign-in sheets • Attendance record • Vendor contract • Electronic Records • Case notes
Employed in 1st – 4 th Quarter After Exit Quarter	• UI wage data match/administrative wage match, such as the National Directory of New Hires • Post-Exit survey (self-reported) from program participants • Paycheck stubs, and tax records (i.e., W2 form, Quarterly tax payment forms, such as an IRS form 941, etc.) • Signed letter or other information from employer on company letterhead attesting to an individual's employment status and earnings • Self-employment worksheets signed and attested to by program participants • Detailed case notes verified by employer and program staff
Date Entered Degree of Certificate Program	• Copy of School or Training Provider Enrollment Record • Case notes