Implementation Study of the Workforce Innovation and Opportunity Act (WIOA) Regarding Title I and Title III Core Programs

Performance Accountability, Eligible Training Providers, Labor Market Information, and Evaluation Requirements Under WIOA

Based on findings from 14 states and 28 local areas in 2019

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Reports in this series

- Operationalizing Changes to the Title I Youth Program Under WIOA
- State and Local Efforts to Strengthen Workforce System Governance and Planning Under WIOA
- New Requirements for American Job Center Systems Regarding One-Stop Operators, Partnership Agreements, and Certification
- Change and Continuity in the Title I Adult and Dislocated Worker Programs Under WIOA
- Performance Accountability, Eligible Training Providers, Labor Market Information, and Evaluation Requirements
- Early Insights from State Implementation of WIOA in 2017
- WIOA Implementation Study: Technical Appendix

CONTENTS

Exhibits

Executive Summary

The Workforce Innovation and Opportunity Act (WIOA) of 2014 included multiple provisions to strengthen service quality, access, accountability, and alignment across many programs (see Exhibit ES.1). This report focuses on implementation of WIOA's changes to various aspects of performance accountability and in other data-driven areas under the law, as related to the "core" workforce programs for Titles I and III, administered at the Federal level by the Employment and Training Administration (ETA) of the U.S. Department of Labor (USDOL). The report explores reactions to regulations and guidance related to not only performance accountability, but also on eligible training providers (ETPs), labor market information (LMI), and evaluation.

The Workforce Innovation and Opportunity Act

Signed into law on July 22, 2014, WIOA retained many provisions from the prior law, the Workforce Investment Act of 1998 (WIA), which created a system of service delivery at the local level through American Job Centers (AJCs), with guidance and oversight from local workforce development boards, all under the policy and oversight from state workforce agencies and boards. As did the prior law, WIOA authorized multiple workforce programs as well as two related programs administered by the U.S. Department of Education. Overall there are six "core" programs under the law for which coordination and integration were required to be strengthened at the state and local levels, along with multiple other programs required to be included in local partnerships.

The report is one in a series of five reports developed as part of a study of WIOA implementation, commissioned by USDOL and conducted by Mathematica and Social Policy Research Associates. The other reports address changes in the following:

- Governance and planning;
- American Job Center (AJC) systems;
- Services for adults, dislocated workers, and employers; and
- Services for youth.

Data for this report are drawn primarily from site visit interviews, conducted in early 2019, with administrators, board chairs and members, employer and agency partners, and frontline staff in 14 states and 28 local areas (see Exhibit ES.2). Other sources of information include administrative data and relevant state and local documents. The site visit locations were purposively selected to assure diversity geographically and in size, among other criteria. The findings here, based on those interviews, should therefore be viewed as suggestive of common experiences and not assumed to be nationally representative. Also, it should be noted that, subsequent to the site visits, ETA provided extensive additional guidance, including Training and Employment Guidance Letters (TEGLs) and Training and Employment Notices (TENs), as well technical assistance, including webinars, in-person national convenings, and online electronic tools, that covered many of the issues and concerns identified by study respondents. (See Appendix A for a list of this guidance and accompanying technical assistance.)

Exhibit ES.1 WIOA's six core programs and other required partner programs

WIOA Core Programs

U.S. Department of Labor (USDOL):

- Title I - 3 Programs: a) Adult, b) Dislocated Worker, and c) Youth Programs
- Title III - Wagner-Peyser Act - Employment Service (ES)

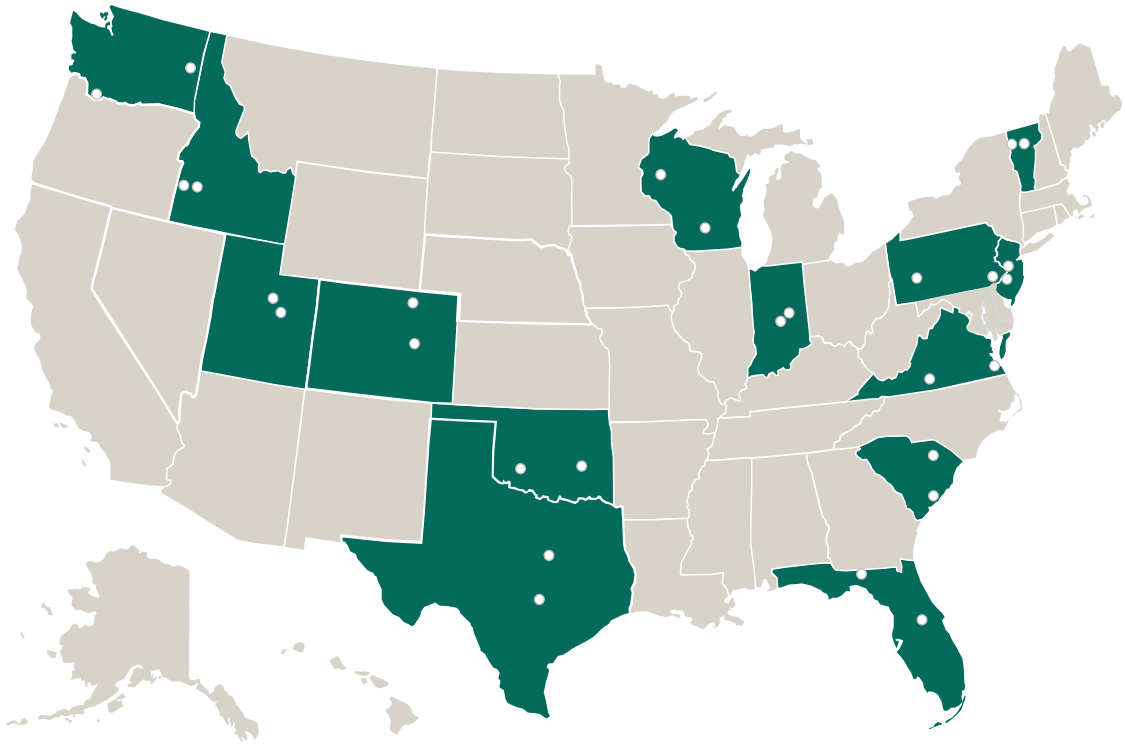
U.S. Department of Education:

- Title II - Adult Education and Family Literacy Act (AEFLA)
- Title IV – State Vocational Rehabilitation (VR) programs under the Rehabilitation Act of 1973

Other Required One-Stop Partner Programs:

- U.S. Department of Labor: Job Corps, YouthBuild, Indian and Native American programs, National Farmworker Jobs Program, Migrant and Seasonal Farmworker Programs, Senior Community Service Employment Program, Trade Adjustment Assistance, Unemployment Compensation programs, Jobs for Veterans State Grants, and Reentry Employment Opportunities
- U.S. Department of Education: Carl D. Perkins Career and Technical Education Act programs
- U.S. Department of Housing and Urban Development: Employment and Training programs
- U.S. Department of Health and Human Services: Community Services Block Grant employment and training programs and Temporary Assistance for Needy Families (TANF)

Exhibit ES.2. Site visit locations in 2019 (14 states and 28 local areas)



Note: White dots are local areas visited for the study. See Appendix B for a list of states and local sites included in the study. The list of sites as well as more detailed information on the visits, is also included in a separate Technical Appendix for the entire evaluation.

A. Changes to requirements for performance accountability, eligible training providers, labor market information, and state evaluations

WIOA introduced significant changes to requirements relating to performance accountability, ETPs, use of LMI, and state evaluations. Specifically, the law:

- Creates six new, common performance indicators for the six core programs, including a new indicator on programs' effectiveness in serving employers;
- Requires all six core programs to collect data using a standardized set of data elements;
- Requires the development of a statistical adjustment model (SAM) to be used for developing negotiated state and local performance goals;
- Requires eligible training providers (ETPs)—whose training programs have met state criteria to receive funds from Title I individual training accounts—to submit performance information for all of their participants, not just Title I participants;
- Requires states to submit annual reports on ETP program performance;
- Requires the use of labor market information to inform state and regional plans and identify in-demand occupations to support ETP eligibility determinations, and for LMI to be available for program participants;
- Emphasizes integrated reporting systems; and
- Strengthens requirements for states to conduct evaluations of activities under Title I core programs.

B. Key findings on performance accountability

WIOA primary indicators of performance

- Employment in the second quarter after exit
- Employment in the fourth quarter after exit
- Median earnings in the second quarter after exit
- Credential attainment
- Measurable skill gains
- Effectiveness in serving employers

Study respondents provided their perspectives on key changes to performance accountability, including WIOA's primary indicators of performance, performance targets using the statistical adjustment model, use of the Participant Individual Record Layout (PIRL), the Workforce Integrated Performance System (WIPS), and integrated reporting across core programs. State and local site visit responses pointed to some common implementation experiences, successes, and challenges related to implementing WIOA's changes to performance accountability. This section summarizes the common challenges and promising strategies for addressing them as described by respondents during site visits.

1. Primary indicators of performance for core programs

The six new primary indicators of performance that WIOA created were designed to align and strengthen performance accountability. Of the six, the three employment-specific indicators[1] were similar to those

[1] For Title I Youth program participants, a positive outcome on two of these three indicators (employment in the second quarter after exit and employment in the fourth quarter after exit) can be achieved through employment, as well as through enrollment in education or training activities. (Training and Employment Guidance Letter (TEGL) 10-16, Change 1)

under WIA, and Titles I and III respondents from four local areas and one state expressed concerns about them. There appeared to be some misunderstandings among respondents about how these indicators differed from those under WIA.

The indicators for credential attainment, measurable skill gains (MSGs), and effectiveness in serving employers represented more substantial changes.[2] Although Adult Education and Vocational Rehabilitation staff reported being less familiar with all of the indicators, they generally viewed the indicators as beneficial for the system.

> *"I think that the guidance is fine on the definitional side, it's just how do you operationalize it and the fact that … we have a challenged system from a technological standpoint doesn't help."*
>
> – State Title I administrator

- **Respondents from six states and four local areas reported that credential attainment was a familiar indicator and thus relatively easy to implement; respondents from five other states and 19 local areas described some challenges in implementing it.** The credential attainment indicator measures the percentage of participants enrolled in an education or training program who attain a postsecondary credential or a secondary school diploma (or equivalent) within one year after exit from the program. Respondents from six states and four local areas indicated that they viewed the credential attainment indicator as straightforward, in part because similar indicators were used in the past and were a critical focus in many programs. However, respondents from five other states and 19 local areas described initial challenges related to the credential attainment indicator including: which credentials were acceptable, which participants should be included, completion rates during periods of low unemployment, and collection of appropriate documentation.
- **States and local areas reported having many questions about the range of ways to assess and record MSGs.** The MSG indicator is an in-program rather than an exit-based metric that assesses "interim progress of participants who are enrolled in education or training services for a specified reporting period."[3] There are five primary means by which skill gains can be measured, depending on the type of education or training.[4] States explained that they were still learning the multiple ways to measure and assess skill gains. Local areas did not yet have negotiated targets to work towards, and local knowledge of the indicator was mixed. Respondents described challenges documenting MSG achievement, regular attendance, and completion of individual course modules. They also perceived that the measure provided a disincentive to enroll customers at the end of the program year.
- **Effectiveness in serving employers, a new indicator for all six core programs, was viewed by respondents as particularly challenging to measure fairly.** This indicator is unique among the six measures for two reasons: (1) it focuses on employers as customers, and (2) it is measured as a shared outcome across all six core partners within each state. To pilot test the new indicator, DOL gave states the option to choose two of three possible approaches for determining results: employer penetration rate, repeat business customer, or retention with the same employer. Respondents

[2] DOL conducted a study of pilot measures for the Effectiveness in Serving Employers indicator. This study—which took place from 2017 to 2020—included surveys and site visits to states and local areas to understand WIOA core program services to employers; approaches and performance metrics for measuring such services; employers' experiences with such services; and the experience of states in implementing DOL's three pilot measures.
[3] Note that for Title II programs, only two of these methods are allowable. TEGL 10-16, Change 1, p.18.
[4] Ibid.

expressed the following key concerns about the performance indicator on the effectiveness in serving employers:

- **The employer penetration rate prioritized working with large companies.** Some respondents were concerned that this measure rewarded programs for working with large employers rather than with small ones, failed to assess the quality of services provided to employers, and was calculated in a way that might misrepresent the effectiveness of employer services in rural areas due to the low density of employers in those areas.
- **The rate of retention with the same employer does not assess job quality or local economic conditions.** This was reported to be the least commonly used measure among the study states. State and local respondents expressed concerns that the measure did not assess job quality and was too dependent on local economic vagaries or other factors outside of the one-stop system's control.
- **Lack of clarity about how to handle certain reporting issues related to all three of the indicator's pilot measures.** For example, states reported confusion about how to handle the difference between a corporate office and individual local outlets of a company when reporting on these measures.
- **Difficulty aggregating data across partner systems.** States are required to submit one report for the indicator on effectiveness in serving employers that reflects data from all six core programs. Because none of the study states had a single data system across all six core programs or had systems that could be programmed to share data automatically, states described patchwork systems for aggregating data from each of the programs in order to submit a joint report.
- **Different processes for collecting data across the measures.** Retention with the same employer in the second quarter is calculated using data collected in WIPS. However, the other measures—employer penetration and repeat business customer—are not based on individual participant data and thus cannot be reported via the WIPS. States were working toward establishing processes and policies for collecting and validating data related to these approaches.

2. Negotiating performance targets for indicators using the statistical adjustment model

WIOA required the establishment of a statistical adjustment model (SAM) for use in developing state negotiated performance targets among Titles I and III programs. The SAM is used to adjust negotiated levels of performance by taking into account economic conditions and types of participants served at the end of the program year, with the intent of making the targets more equitable across states. The SAM is run before and after the program year to account for actual economic conditions and participant characteristics. Negotiated levels of performance are then adjusted accordingly. Respondents from three states appreciated that the SAM would adjust for conditions and characteristics. However, their experience was limited because targets had not yet been set for some measures and particular partners as baseline data were needed to establish benchmarks. Key issues expressed by state respondents included:

- **Concerns about perceived expectations for higher performance targets under WIOA versus WIA.** Ten local areas and one state perceived and expressed concern that performance expectations were higher under WIOA than they were under WIA.[5] These respondents were particularly concerned

[5] These state and local respondents perceived that there was an expectation for higher performance targets under WIOA even though TEGL 11-19 (p. 8) explicitly states: "The Department acknowledges that there are many ways (continued)

about the feasibility of achieving higher performance targets while also serving more people with multiple barriers to employment, as emphasized by WIOA.

- **States desired assistance from DOL with adapting the SAM for use with local area negotiations.** Federal guidance[6] explains that states "must make adjustments for the expected economic conditions and expected characteristics of participants to be served in the local area, using the statistical adjustment model developed at the Federal level as a tool." Yet about one-third of the states were struggling to do that, given that the federal model does not include adjustments for local area fixed effects.[7]

3. Use of the PIRL and WIPS by Titles I and III programs

Under WIOA, the PIRL, the individual participant record layout, provides a standardized set of more than 400 data elements and definitions, as well as reporting instructions, for states to use to describe the characteristics, activities, and outcomes of WIOA participants. The data collected on participants must be submitted using the WIPS reporting system, WIPS. During the site visits, state respondents accepted that data collection and reporting are necessary components of administering federally funded programs, but only about one-third of the states reported having a positive impression of the WIPS and almost all states articulated concerns about the PIRL. The key concerns were as follows:

- **Respondents described updating state administrative data systems to meet the requirements of the PIRL and the WIPS as challenging, especially given the timing of changes.** All states had to update their administrative data systems to comply with the requirement to report on all fields in the PIRL. States described this as an inevitable but burdensome process. Further, states mentioned that DOL has made additional changes to the PIRL and WIPS over the course of WIOA implementation, requiring states to respond each time. These changes required rounds of clarification with national and regional office staff and communication with state contractors or programming staff managing the data systems. It also required training data entry and reporting staff from states and local areas. Similarly, eight states (almost half) mentioned that the changes to the WIPS were sometimes announced within very short time periods prior to reporting deadlines, burdening reporting staff. However, respondents from five states reported that DOL regional and national office staff were responsive and helpful amid the many changes.[8]
- **Respondents from five states expressed concerns about the amount of new data required from some customers in order for the state to submit complete records, and four states made efforts to collect data via other sources.** The large number of new data fields in the PIRL was a concern to respondents in five states. New disability-related items were of particular concern to three states, and staff had trouble understanding the purpose of the items and how to collect those data appropriately. Four state workforce agencies connected with state education agencies, the National Student Clearinghouse, their state's Temporary Assistance for Needy Families program, or unemployment insurance (UI) systems to collect data that they would otherwise have to ask of each customer.

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to define continuous improvement. Continuous improvement may reflect an increase in the level of performance, a change in service strategy and delivery, or a change in the customers served."

[6] TEGL 9-17

[7] After data collection for this study was completed in early 2019, DOL began providing TA to states to assist in the development of local models.

[8] Since completion of the study's site visits, DOL staff members reported that only routine changes to the WIPS have been required and these changes are not made close to reporting deadlines.

4. Integrated reporting across WIOA core programs

To promote the vision for strengthened accountability, WIOA encourages—though it does not require—states to develop integrated data systems that allow for data sharing across core programs. The only requirement under WIOA regarding joint reporting is that states must submit collective results for performance on the indicator for effectiveness in serving employers. None of the study states used a single administrative data system across the six core programs, and developing integrated reporting appeared to be a major challenge for states. Other findings include:

- **Some core programs used shared management information systems (MISs).** Title III staff could share and enter data into the Title I MIS in all 14 study states. In six states, Titles II or IV (or both) staff members could view or enter data into the Title I MIS.
- **States initiated some efforts to start or increase data sharing across the core programs.** Respondents from the core programs in 10 states indicated a desire to share data with each other's programs. At least five states described state-level conversations with core program partners about developing a shared data system or using their state's longitudinal data system to share data.[9] Four states had data-sharing agreements between the core programs so that they could share some data, especially for reporting on the indicator on effectiveness in serving employers. Three states described alternative efforts to coordinate in the interest of shared reporting, in the form of state-level data groups comprised of representatives of the different core programs.

C. Key findings on ETP, LMI, and evaluations

Respondents shared their perspectives on WIOA's changes to ETP requirements, the collection and use of LMI, and the requirement for states to conduct evaluations of Title I core program activities. This section summarizes some of the key changes in those three data-related areas and respondents' views on common challenges related to implementing them.

1. ETP requirements

WIOA requires ETPs—whose programs are eligible for funds from Title I individual training accounts—to undergo initial and continuing eligibility determination, using processes developed and implemented by each state. The eligibility requirements are similar to those under WIA. However, under WIA, states were allowed to request a waiver of the requirement for providers to submit performance data on all individuals in a given program. WIOA eliminated this waiver. Thus, providers must submit performance information for all students in order to maintain continued eligibility for specific education or training programs.

Title I respondents from most of the states viewed WIOA's ETP-related changes as major shifts to the way they managed their ETP lists. Although respondents from ten states and nine local areas reported finding the changes challenging to implement, they also viewed the changes as positive because they perceived that those changes improved the quality of information available to staff and supported informed choice for customers. Other findings associated with the implementation of this requirement included the following:

[9] Note that a longitudinal data system is one that tracks the same type of information on the same subjects at multiple points in time. For example, such systems might track participant employment records or credential attainment over time.

- **Many respondents reported that, from their perspectives, training providers' inability to provide the required data caused the number of programs on their ETP lists to decrease.** Respondents from ten states said that providers could not, or would not, provide the required performance data, for a variety of reasons. They cited statutory privacy restrictions, lack of data, and the time burden required to prepare and submit data relative to the very small number of WIOA participants among their total student body[10]—especially when providers had to submit separate applications for each of their programs. For these reasons, respondents from five states and ten local areas reported that the number of programs on ETP lists decreased, potentially hampering customer choice. However, opinions were mixed; respondents from one state and two local areas believed that smaller lists were better because the programs that were dropped due to incomplete data were also likely to have had poor outcomes.
- **States pursued approaches to administering ETP requirements that limited burden on providers.** Eleven states reported that they sought waivers from USDOL that allowed providers to provide performance results only for Title I-funded participants[11]. Nine states persuaded providers of the value and feasibility of collecting participant Social Security numbers (SSNs) and matched those numbers with wage data to calculate performance results. Four states and 10 local areas worked closely with providers to assist them with filing applications and submitting performance results. And, four states coordinated with state and national higher education agencies to obtain performance data.

2. Collection and use of labor market information

Under WIOA, as under WIA, state LMI units conduct labor market surveys and produce data for the Bureau of Labor Statistics. They also receive funding to develop labor market products and services to support state workforce systems in making program, policy, and funding decisions. WIOA is however somewhat more specific than prior law about the purposes for which LMI must be used. These purposes include informing state and regional plans, populating the SAM used to set and adjust performance targets, and informing in-demand occupations to support eligibility determinations of ETPs. Under WIOA the use of LMI—specifically, providing information on in-demand industry sectors and occupations—is also considered a key career service that must be made available to customers of the public workforce system as well as a required Youth Program element. Key observations regarding these changes included the following:

- **Under WIOA, state and local access to and use of LMI expanded.** Respondents from eleven states and nine local areas reported that the quality and use of LMI had improved in some way. States and local areas invested in improving existing LMI tools (such as state LMI websites), purchased proprietary tools to augment state LMI resources, added staff positions (such as labor market analysts assigned to each workforce development board [WDB]), and increased staff capacity to interpret LMI through training and encouragement to use LMI with customers.

[10]Respondents from one state gave the following example of the small number of WIOA Title I participants versus all students. "You have colleges that have thousands and thousands of enrollments. Hundreds of thousands. And you're sending five people there [from Title I]. And you want data on that huge program [because of those five], I mean..."

[11]DOL is able to grant waivers using the Secretary of Labor's waiver authority under WIOA where the state can articulate in its waiver request how the proposed waiver will improve job seeker and employer outcomes, or otherwise achieve positive outcomes. For more information, see: https://www.dol.gov/agencies/eta/wioa/waivers.

- **Use of LMI by WIOA Titles II and IV increased somewhat under WIOA.** Core program respondents from Titles II and IV in six states described an increased use of LMI under WIOA. They asserted that this was due to the Act's greater emphasis on employment outcomes for their programs, which meant their staff needed to have a better understanding of the labor market so that they could more effectively direct their participants to in-demand careers.

3. Evaluation requirement

Under WIOA, states continue to be obligated to conduct evaluations of key workforce programs, but with some added requirements in line with the law's focus on data-driven decision making and the national emphasis on evidence-based policy.

- **States were still in the preliminary stages of meeting WIOA's evaluation requirement.** Five study states reported that they had started or were planning evaluations; eight were awaiting guidance or did not report current plans for evaluation; and one had received a waiver of the evaluation requirement. Of those with evaluations underway or in planning stages, two states built on previous evaluation efforts and one built on a long-time relationship with a university partner.
- **States reported several challenges in conducting evaluations.** They described challenges in three areas: lack of staff capacity to conduct evaluations; insufficient financial resources to conduct evaluations; and lack of clarity about, or awareness of, the evaluation requirement.

D. Looking ahead

WIOA's establishment of the common performance indicators across the six core programs—including programs administered by federal agencies other than DOL—is groundbreaking for the public workforce system. The findings described above suggest key considerations for workforce system stakeholders as they continue their efforts to implement WIOA's vision and requirements. These include:

1. Developing a stronger understanding of Credential Attainment and MSG indicators.

Study respondents at both the state and local levels across all six core programs reported numerous challenges and concerns related to the implementation of WIOA's primary indicators. In particular, as noted above, respondents from five states and nineteen local areas reported confusion about what credentials are acceptable for attaining the Credential Attainment indicator, when those credentials can be earned, and which participants to include when calculating that indicator. Similarly, respondents from seven states and fifteen local areas reported not fully understanding how to correctly assess and document measurable skill gains.

Since the completion of the study's site visits, ETA has provided states and local areas with multiple technical assistance activities on the credential attainment indicator, including organization of a peer learning cohort, a decision tree tool, and two national convenings (see Appendix A). These TA efforts, as well as continued guidance and technical support addressing the credential attainment and MSG indicators, may help states and local areas develop a stronger understanding of these indicators and how to implement them.

2. Continued support in adapting the federal level SAM for negotiations with local workforce development boards (WDBs).

Respondents from 6 (of 11) multi-area states reported that they had experienced challenges in developing a SAM for use in negotiating performance standards with local boards. DOL has demonstrated a commitment to providing clarification on this aspect of the performance management system by holding a WIOA performance peer learning group webinar in October 2019 that educated states on various approaches for developing local-level SAMs. Hosting additional events related to this topic and disseminating material from such sessions afterward could be helpful to states.

DOL also provided additional guidance on this topic in Training and Employment Guidance Letter (TEGL) 11-19, issued on February 6, 2020. TEGL 11-19 further delineated the process for negotiating levels of performance and provided specifications on adjusted levels of performance and the SAM (see Appendix A).

3. Developing a stronger understanding of the importance, legality, and best practices for collecting and reporting on new PIRL data elements related to disability.

Respondents from more than one-third of states (five) raised concerns about the burden created by having to report on the large number of data elements in the PIRL, as well as the value and legality (due to privacy protections) of some of the new PIRL fields. In particular, respondents from three of these states raised concerns about the nine new disability-related fields and questioned the appropriateness of collecting such data.

Since completion of this study's site visits, DOL's Office of Disability Employment Policy has begun providing technical assistance to states and local WDBs related to the new disability-related data elements on the PIRL, including an online data visualization tool that includes easy to understand definitions and descriptions of the data.[12] Continued provision of this kind of assistance by DOL might help states and local boards better understand the importance and appropriateness of reporting data on these fields.

4. Leveraging effective strategies and best practices for sharing data across different systems.

Despite numerous efforts to share data on co-enrolled participants across WIOA core programs, respondents from more than three-quarters of study states (11) reported being unable to do so. In particular, they reported challenges in sharing data between the DOL-administered core programs (the Titles I and III programs) and the Titles II and IV core programs administered by the U.S. Department of Education (ED) due to a variety of impediments, including the lack of a unique identifier, statutory privacy restrictions, and widely differing data systems.

To overcome these data-sharing challenges, these states might benefit from learning more about strategies and best practices for enabling data sharing across different systems**.** Following the completion of the study's data collection, DOL provided technical assistance to states on sharing data on co-enrolled participants (among other topics) at a two-day, in-person performance trainings held in Dallas and Chicago in late April and May 2019. States might benefit from additional technical assistance on data sharing.

[12] See http://drivedisabilityemployment.org/wioareporting.

5. Leveraging effective strategies and best practices for collaborating with state or national higher education agencies to access performance data.

Respondents from ten states indicated that it had been difficult to obtain performance data from ETPs about their programs, due to impediments as restrictions related to the Federal Education Rights and Privacy Act (that prevented providers from sharing the data) and lack of provider capacity to collect and/or share the data.

State workforce agencies may benefit from opportunities to learn about best practices for collaborating with state or national higher education agencies to access performance data. Although DOL provided detailed guidance on how state workforce agencies can share unemployment compensation wage data with educational and training providers in TEGL 07-16, state workforce agencies may appreciate opportunities to learn more about how to best collaborate with their education counterparts. For example, information on successful state-level collaborations to help ETPs collect SSNs from all students or successful efforts to and states that have successfully established establish agreements with national higher education agencies, could provide valuable insights to other states.

DOL's additional guidance on this topic can be found in TEGL 08-19, issued on January 2, 2020; TEGL 08-19 identified actions that states can take to obtain performance data from training providers.

6. Developing a stronger understanding of WIOA's evaluation requirements.

Respondents from at least four states cited a variety of challenges to meeting the evaluation requirements, including lack of staff time to devote to conducting evaluations, limited resources to invest in evaluation efforts, and a lack of understanding of how to conduct high-quality evaluation. Respondents from eight states reported that they were waiting for additional guidance or had made no plans for conducting any evaluations.

Ongoing efforts to offer technical assistance, guidance, and tools related to conducting evaluations might help states in meeting WIOA's evaluation requirements. Since completion of the study's site visits, DOL has created the Evaluation Peer Learning Cohort initiative, which provides training on evaluation methods and opportunities for information-sharing among cross-agency representatives from 5 to 6 states, and the Evaluation and Research Hub community of practice on WorkforceGPS;[13] DOL has also provided multiple webinars on how to conduct successful evaluations.

[13] See: https://evalhub.workforcegps.org/about.

I. Introduction

The Workforce Innovation and Opportunity Act (WIOA) of 2014 included multiple provisions to strengthen service quality, access, accountability, and alignment across many programs (see Exhibit I.1). This report focuses on implementation of WIOA's changes to various aspects of performance accountability and in other data-driven areas under the law, as related to the "core" workforce programs for adults, dislocated workers, and youth found under Title I, administered at the Federal level by the Employment and Training Administration (ETA) of the U.S. Department of Labor (USDOL). The report explores early reactions to regulations and guidance related to not only performance accountability, but also on eligible training providers (ETP), labor market information (LMI), and evaluation.

A. Study overview

This report is one in a series of five papers developed as part of a study of WIOA implementation, commissioned by USDOL and conducted by Mathematica and Social Policy Research Associates. Data for this report are drawn primarily from site visit interviews, conducted in early 2019, with state and local administrators, board chairs and members, employer and agency partners, and frontline staff, in 14 states and 28 local areas. To learn about local implementation in all these states, two visits were conducted with staff in American Job Centers (AJCs), including in the three states in the study that had single workforce areas. This report also draws on information from relevant documents provided by states and local areas.

Exhibit I.1 WIOA's six core programs and other required partner programs

WIOA Core Programs

U.S. Department of Labor (USDOL):

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- Title III - Wagner-Peyser Act - Employment Service (ES)

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- Title II - Adult Education and Family Literacy Act (AEFLA)
- Title IV – State Vocational Rehabilitation (VR) programs under the Rehabilitation Act of 1973

Other Required One-Stop Partner Programs:

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- U.S. Department of Education: Carl D. Perkins Career and Technical Education Act programs
- U.S. Department of Housing and Urban Development: Employment and Training programs
- U.S. Department of Health and Human Services: Community Services Block Grant employment and training programs and Temporary Assistance for Needy Families (TANF)

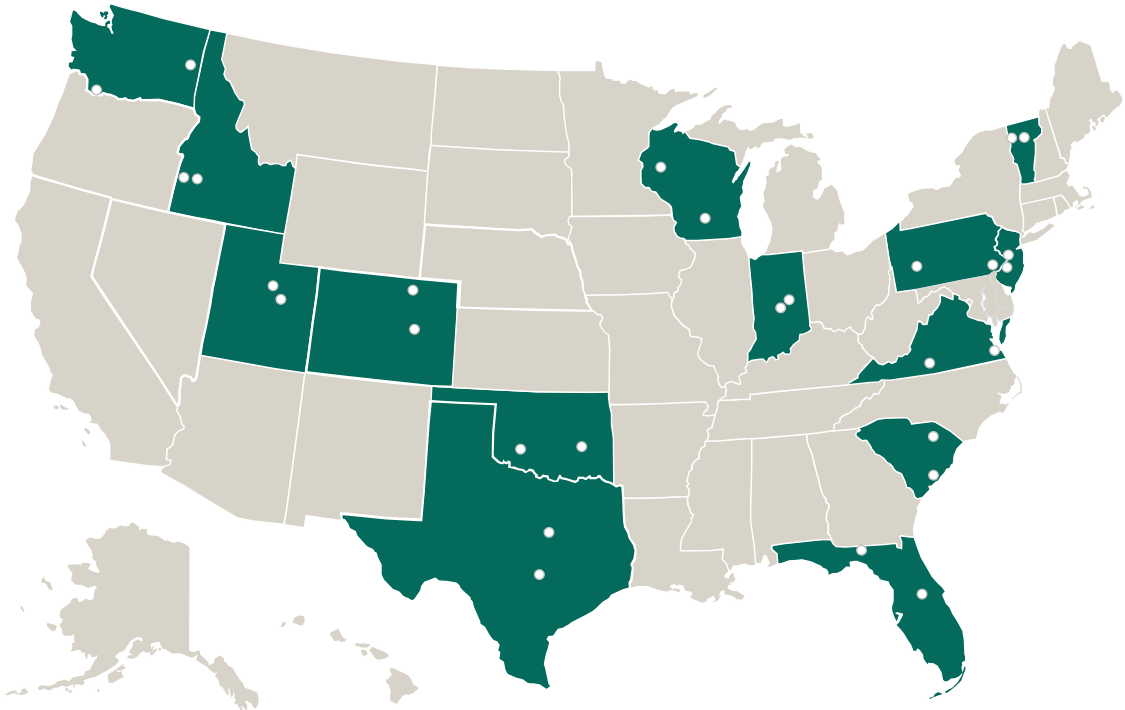
All locations were purposefully selected to assure diversity geographically and in size, among other criteria. Exhibit I.2 identifies the states and local areas visited; Exhibit I.3[14] identifies types of site visit respondents. More information about the site visits, site visit respondents, and other components of the WIOA Implementation Study is provided in a separate Technical Appendix for the entire evaluation. The

[14] Three of the 14 states were single-workforce area states, and the team visited two AJCs in each of those states. The report includes these AJCs when it refers to "local areas". The study team also conducted four site visits in late 2017 to capture WIOA implementation at an earlier stage. Technical information about the site visits can be found in the technical appendix.

findings in this report, based primarily on the site visit interviews, should therefore be viewed as suggestive of common experiences and not assumed to be nationally representative. The study overall also used information from other sources, including state plans and program data, to provide additional context for findings from the site visit interviews.

It should be noted that, at the time of the site visits, the Employment and Training Administration (ETA), the DOL agency responsible for administering WIOA Title I and Title III programs, had not yet provided relevant technical assistance on several key aspects of the performance accountability system. This report indicates where subsequent TA may have covered some of the issues and concerns identified by respondents at the time of data collection.

Exhibit I.2. States and local areas visited in 2019



Note: White dots are local areas visited for the study. See Appendix B for a list of states and local sites included in the study. The list, along with more detailed information on the site visits, is also available in the Technical Appendix for the entire evaluation.

Exhibit I.3. Types of site visit respondents at the state and local levels

Types of state-level respondents	Types of local-level respondents
State workforce board chair	Local workforce board chair
State workforce board staff	Local workforce board staff
State workforce agency director	AJC manager
State WIOA policy staff	AJC operator
Title I adult and dislocated worker program and performance staff	Title I adult and dislocated worker program manager
Title I youth program staff	Title I adult and dislocated worker frontline staff
Title III Employment Services program staff	Title I youth provider or program manager
Unemployment Insurance administrator	Title III Employment Services program manager
Title II Adult Education and Family Literacy Act administrator	Title III Employment Services frontline staff
Community college, career technical education, or K–12 partner staff	Title II Adult Education and Family Literacy Act program manager
Title IV vocational rehabilitation administrator (including services for the blind if separate)	Community college, career technical education, or K–12 partner manager
TANF staff	Title IV vocational rehabilitation program manager
	TANF area manager
	Other partner manager (YouthBuild, Senior Community Service Employment Program, National Farmworker Jobs Program, etc.), if applicable

B. Changes under WIOA to performance accountability, eligible training providers, labor market information, and state evaluation requirements

WIOA introduced significant changes to the performance accountability system for its six core programs, new requirements for ETPs, changes to the required use of LMI, and an evaluation requirement for Title I programs. More specifically, WIOA:

- Creates six new, common performance indicators for the six core programs, including a new indicator on programs' effectiveness in serving employers;
- Requires all six core programs to collect a data using a standardized set of data elements;
- Requires the development of a statistical adjustment model (SAM) to be used for developing negotiated state and local performance goals;
- Requires eligible training providers (ETPs)—whose training programs have met state criteria to receive funds from Title I individual training accounts—to submit performance information for all of their participants, not just Title I participants;
- Requires states to submit annual reports on ETP program performance;
- Requires the use of labor market information to inform state and regional plans and identify in-demand occupations to support ETP eligibility determinations, and for LMI to be available for program participants;
- Emphasizes integrated reporting systems; and
- Strengthens requirements for states to conduct evaluations of activities under Title I core programs.

C. Road map to the report

The remaining chapters in this report discuss the specific changes under WIOA to the performance accountability system and other data-driven activities, as well as state and local respondents' reactions to those changes. Discussed here are both the challenges encountered as well as promising practices that states and local areas described as they implemented new provisions under the law. Chapter II discusses implementation of the WIOA primary indicators of performance across the six core programs; Chapter III describes performance-related reporting, including implementation of the PIRL; and Chapter IV discusses ETP-related changes. Chapter V discusses changes to LMI and new provisions regarding state evaluations of Title I core programs. The report concludes with considerations for workforce system stakeholders as they look ahead to further implementation of these data-driven elements of WIOA.

II. Primary indicators of performance for core programs

WIOA created six new primary indicators of performance for the six core programs to align and strengthen performance accountability in the public workforce system. This chapter explores state and local perspectives on those primary indicators of performance. It looks also at the challenges states and local areas faced in defining and measuring the new indicators, and at state approaches to implementing the new indicators. In addition, the chapter looks at the process of negotiating state and local performance targets, including the use of the newly introduced SAM.

WIOA primary indicators of performance

- Employment in the second quarter after exit
- Employment in the fourth quarter after exit
- Median earnings in the second quarter after exit
- Credential attainment
- Measurable skill gains
- Effectiveness in serving employers

A. State and local perspectives on primary indicators of performance

Of the six performance indicators under WIOA, the three that focused on employment and earnings[15] were, in many ways, not a big change for Title I and Title III core programs as compared to prior law. The indicators for credential attainment, measurable skill gains (MSGs), and effectiveness in serving employers represented a more substantial change.[16] Although Adult Education and Vocational Rehabilitation staff reported being less familiar with all of the indicators, they generally viewed them as beneficial for the system.

1. Resemblance to existing measures

> *"[W]e really, strongly prefer the flexibility. That it should be, 'Hey, as long as you are either working or pursuing education that's going to help you better in the future,' – that's a good thing and we should be happy about it."*
>
> – State Title I performance administrator

For Title I and III programs, the three employment and earnings-specific indicators largely resemble the "common measures" under WIA, including two employment and one earnings measure. Although credential attainment was one of the core indicators of performance included in the original WIA legislation, by mid-2014, shortly before the passage of WIOA, 44 states and the District of Columbia had received waivers allowing them to use only the common measures and not the other WIA measures.[17] WIOA reinstated credential attainment as an outcome measure and added the measurable skill gains (MSG) indicator. MSG, which is applicable to all participants enrolled in education or training, is an intermediate measure of skills

[15] For Title I Youth program participants, a positive outcome on two of these three indicators (employment in the second quarter after exit and employment in the fourth quarter after exit) can be achieved not only through employment, but also through enrollment in education or training activities. (TEGL 10-16, Change 1)
[16] DOL conducted a study of pilot measures for the Effectiveness in Serving Employers indicator. This study—which took place from 2017 to 2020—included surveys and site visits to states and local areas to understand WIOA core program services to employers; approaches and performance metrics for measuring such services; employers' experiences with such services; and the experience of states in implementing DOL's three pilot measures.
[17] DOL's Employment and Training Administration (ETA) developed the common measures under WIA, based on input from the Office of Management and Budget, to consistently assess performance across multiple workforce development programs.

acquisition. State respondents reported that they were still struggling to assess the effectiveness in serving employers measures, which did not have a precedent in the WIA or the common measures.

2. Appropriateness of measures

Respondents from 10 states across the six core programs agreed that the WIOA primary indicators of performance were generally appropriate. They believed that the indicators tried to reach the two key customers of WIOA—jobseekers and employers. They also believed the indicators measured WIOA's goals to ensure that those job seekers are prepared to find employment and increase their earnings potential. However, states and local areas did express concerns related to the details of how the indicators are measured, including the timing of the indicators and the mechanisms for collecting and reporting on performance indicators.

3. Familiarity across core programs

Title I partners were the most familiar with the measures, having been held accountable to a similar set of indicators for many years. The biggest change for Title III, which is held accountable for the employment, earnings, and employer effectiveness indicators but not the credential attainment or MSG indicators, was the new distinction between participant and reportable individual.[18] Adult education (Title II) partners were new to the employment measures but felt well-grounded, in general, about measuring skill gains and documenting attainment of credentials, as these are consistent with their program's primary missions. Title IV partners were familiar with employment placement and other milestones that clients pass in the course of receiving services through vocational rehabilitation (VR). However, the particular data elements that needed to be collected to support performance reporting were new to many VR staff and to many VR reporting systems. Even then, both Title II and Title IV respondents suggested that implementing the primary indicators of performance was part of their status as core partners was beneficial to their programs, supporting a shift in their program cultures to emphasize helping participants prepare for or return to work.

B. Challenges and concerns related to defining and measuring primary indicators of performance

State and local area respondents from all six of the core programs reported concerns and challenges related to the indicators of performance. Key challenges they reported focused on determining which participants to include for each indicator, how to assess successful performance, and implications for service design, and data collection and reporting. This section presents findings on the challenges and concerns identified by respondents related to each indicator, as well as the negotiations concerning performance targets for the indicators.

1. Credential attainment

The WIOA credential attainment indicator measures the percentage of participants enrolled in an education or training program who attain a recognized postsecondary credential or a secondary school diploma (or its recognized equivalent) during participation in the program or within one year after

[18] A reportable individual is any person who has demonstrated an intent to use program services and meets certain criteria such as providing identifying information (Training & Employment Guidance Letter [TEGL] 10-16, Attachment 1). Participants are a subset of reportable individuals who have received a certain level of services beyond basic self-service or information-only services, with specific requirements by program.

completing it (also called program exit).[19] However, participants who attain a secondary school diploma or equivalent are counted toward positive performance (i.e., included in the numerator) only if they are also either employed or enrolled in a postsecondary education or training leading to a recognized credential (within one year after program exit).[20]

State and local perspectives on the credential attainment indicator. Title I, II, and IV respondents from six states and four local areas indicated that they perceived the credential attainment indicator to be straightforward, in part because they had had credential measures in the past or had always focused on supporting their customers in attaining credentials.[21] In addition, an evaluation of WIA (D'Amico et al. 2015) found that for many local areas, credential attainment was a requirement to receive Title I funding for training.

Title II partners reported that they were comfortable with the credential attainment indicator since, as they stated, their adult education programs have long been in the business of supporting people in achieving credentials, primarily the GED. In addition, Title II respondents in two local areas noted that they appreciated the measure because it was helping them expand their focus from GED attainment to career trajectories for participants.

Specific challenges with the credential indicator. Aside from the general perspectives discussed above, there was limited knowledge about this indicator at the time of the site visits. Even so, respondents from 5 states and 19 local areas across the core programs noted several concerns and challenges related to the credential measure:

a. **Confusion about acceptable credentials.** State and local area respondents expressed some confusion and concern about which credentials would be acceptable. Two local areas noted that their states could not or would not clarify what could be counted toward the measure. Another local area realized it needed to provide training to service providers to help them better understand acceptable credentials. At least two state respondents indicated a misunderstanding of credentials that are explicitly permitted as acceptable per federal guidance. One state believed that bachelor's degrees were not acceptable credentials because they were not relevant to the population being served; another believed that associate degrees were not acceptable.[22] However, the guidance notes that both degrees are acceptable. Respondents from one state and two local areas said that Occupational Safety and Health Administration (OSHA) 10 and ServSafe credentials were useful for populations with high barriers and not allowing them to be counted as acceptable credentials for the Credential Attainment indicator was counterproductive.

b. **Potential for noncompletion during periods of low unemployment.** Title I respondents from at least five local areas indicated that, in the then low unemployment economy, people were likely to drop out of training for a job or might even complete training but not take the licensure exam that would lead to the "countable" credential. This issue appeared to some respondents to be compounded by Title I programs serving more people with barriers to employment. Another related issue was that some local areas noted there were few good options nearby for short-term trainings that would count toward the indicator. In one local area, the community college—the primary training provider in the area—was the last in the state to start offering noncredit short-term certificate programs. Respondents

[19] Participants in on-the-job training or customized training are excluded from the calculation.
[20] TEGL 10-16, change 1, pp. 12–17.
[21] Title III programs are not held accountable to the credential attainment indicator.
[22] TEGL 10-16, change 1.

in another local area also pointed to limited choices for short-term credentialed training in the rural region.

c. **Issues documenting credential attainment.** States and local areas both raised concerns about how they were required to document credentials for the purpose of showing that participants had achieved success on the indicator. These concerns were twofold. First, local staff noted that often participants do not provide required documentation of an attained credential. Second, state respondents noted that their data systems did not capture credential documentation correctly; respondents described staff confusion about how to document correctly or system programming errors that missed people or documented credentials.

> *"I think that the guidance is fine on the definitional side, it's just how do you operationalize it and the fact that … we have a challenged system from a technological standpoint doesn't help."*
>
> – State Title I administrator

d. **Determining who to include in the indicator.** Respondents from four states and two local areas reported that they struggled to determine which participants to include in the credential attainment indicator. Respondents from one local area were under the impression that all people enrolled in Title I programs were to be included in the credential attainment indicator. Respondents from another state indicated challenges in keeping track of participant status to know whether to collect data about the credential attained. Respondents from two other local areas described case managers having difficulty both remembering that participants can achieve a qualifying credential for up to a year after they exit the program and keeping track of when to reach out to collect documentation of that credential.

2. Measurable skill gains

The MSG indicator is an in-program rather than an exit-based metric and it assesses "interim progress of participants who are enrolled in education or training services for a specified reporting period."[23] There are five primary means by which to measure skill gains, depending on the type of education or training: (1) gaining at least one educational functioning level, (2) attaining a secondary school diploma or its recognized equivalent, (3) achieving a sufficient number of credit hours on a secondary or postsecondary transcript or report card, (4) earning satisfactory progress reports toward established milestones, and (5) passing an exam.

State and local perspectives on the MSG indicator. At the time of the site visits, states and local areas did not yet have negotiated targets to achieve for this indicator. States were, however, required to collect and report data on MSG toward the future establishment of targets. Local knowledge of this indicator was mixed; some demonstrated little understanding of it and others were unaware they were supposed to have started collecting and inputting data.

States explained that they were still learning about the indicator and details on the multiple ways to measure and assess skill gains. Respondents from eight local areas described a struggle, both initially and on a continuing basis, to understand what counts as an MSG. In contrast, Title II respondents from three local areas reported that the measure was clear to them and they were not worried about reporting on it.

Two local areas noted that the state had worked with them and contractors to help staff understand the indicator and how to record it in the state's administrative data system. However, staff in another local

[23] TEGL 10-16, change 1.

area were still waiting for state guidance and training on how to implement the indicator and were still updating their own policies.

Specific challenges with the MSG indicator. Although it was still early in the process of implementation for many states, respondents noted a few other challenges with how the indicator affected their day-to-day work:

a. **Difficulty documenting achievement of MSG.** Respondents from two states and seven local areas reported that collecting proof of achievement of an MSG could be difficult for both participants and providers. Respondents from at least three local areas described the burden of undertaking a pre- and post-test, pointing out that the Test for Adult Basic Education (TABE), the most commonly used assessment of basic skills, had recently released an updated version that takes "three times as long" to administer. Respondent concerns included asking students to take pre- and post-tests in light of the test's length, particularly because many students were juggling full-time jobs and families on top of their education or training. However, respondents from one local area indicated that because there were numerous other ways to document a skills gain, the pre- and post-test issue was not significant. Even so, local respondents indicated ongoing concerns that programs were not accurately capturing participant skill gains, either because the staff did not understand where and how to document them, or because the state data system was not correctly programmed to capture the documentation.

> *"[F]or us, measurable skill gain is making sure we dot the Is and cross the Ts associated with [it]. Because in a lot of cases, we have the information coming back, we have good record of getting grades every semester or … a high school diploma, or that sort of thing. But our challenge has been to make sure that we … get credit for it in our system."*
>
> – Local Title I administrator

b. **Disincentive to enroll customers at the end of the program year.** As discussed above, MSG is an in-program indicator that is measured for each program year—July 1 through June 30—during which a person participates in education or training. Respondents from five states and local areas indicated that this timing creates a disincentive to enroll people at the end of a program year, even if that is when those people come to the program for assistance. Respondents from one state said that they would not let the timing of the indicator prevent them from enrolling people late in the program year because it would "all come out in the wash." But others indicated it was a concern, and at least two programs suggested they had decided not to enroll anyone in June of any given year because it is the end of the program year and there is no time for that person to achieve a skill gain. Title II partners pointed to an additional challenge of required periods of participation—that a person cannot be enrolled in the program until he or she receives at least 12 hours of instruction.

c. **Exclusion of other important intermediate outcomes.** States, local areas, and Title II partners in particular celebrated that the MSG indicator presented an opportunity to show skill gains in numerous ways. Yet even with MSG, a new intermediate outcome, respondents from two states and one local area noted that people made many other intermediate gains that are not counted. For example, creating the first resume is an important but uncounted milestone for customers with limited work history. Youth providers noted this issue more often, but adult and dislocated worker program staff also mentioned it. As one Title I respondent said, "There's a continuum of service that [service providers] provide for [customers], right? But, they're just being judged on the outcome."

> *"So it's a little game that you play, I feel like, to juggle really what's important, what's not important, and then what the student really wants."*
>
> – Title II partner, regarding MSG

3. Effectiveness in serving employers

WIOA established a new primary indicator of performance for effectiveness in serving employers. The indicator is unique among the six performance indicators for two reasons: (1) it focuses on employers as a customer, and (2) it is measured as a shared outcome across all six core partners within each state.[24] The fact that the outcome is shared across six core programs that are administered by different agencies was reported by states to have been particularly challenging.

To pilot test the new indicator on effectiveness in serving employers, DOL gave states the option to choose two of three possible approaches to assessing the indicator.[25] Four states visited for this study chose to collect data and report on all three possible measures. Thirteen chose to collect data and report on the employer penetration rate measure, 11 on the repeat business customer measure, and 8 on the retention with the same employer measure.

Exhibit II.1. State approaches to pilot testing the indicator on effectiveness in serving employers

Measure	Number of states piloting measure
Employer penetration rate	13
Repeat business customer	11
Retention with the same employer	8

All respondents agreed that employers are an important customer of the system, yet these states reported encountering some challenges. Some of these were concerns about specific measures included in the indicator and others related to reporting issues.

a. **Concerns about employer penetration rate.** Five states raised explicit concerns about the employer penetration rate, including a belief that the indicator would tend to reward large companies over small ones that might not use the state labor exchange at all, or would use it less frequently than larger firms. A similar concern was voiced in regard to the repeat business customer measure. Another concern was that penetration itself does not address the quality of the service. Further, there was concern that percentages can be misleading because penetration is also dependent on the density of employers in a particular local area. In addition, for low-density states, the penetration rate might not capture the value the business community receives from the public workforce system.

b. **Concerns about measure of retention with the same employer.** Retention with the same employer was the least popular measure among the study states. Eight of 14 states chose to pilot test it, and one state had already decided to drop it. Respondents identified several concerns with this measure:

   – Retention alone does not necessarily mean the person is in a good job.

   – The employer model might not be oriented to retaining employees over the long term, such as with staffing agencies.

   – The measure is too dependent on the economy and other factors outside of the workforce system's control.

c. **Difficulty aggregating data across partner systems.** As noted above, WIOA holds the six core partners jointly accountable for the indicator on effectiveness in serving employers. In addition, states are required to submit one report for the indicator on effectiveness in serving employers that reflects

[24] TEGL 10-16, change 1, pp. 24–30.
[25] DOL is conducting a separate study of states' experiences with the options they chose during this pilot to help determine which indicator might work best and to establish a baseline for future target negotiations.

data from all six core partners. Because so few partners share a data system or have systems that can be programmed to share data automatically, states described a patchwork system for aggregating data from each of the partners in order to submit a joint report. One state described a "nightmarish" process of compiling data from different partner agencies, each of which sent Excel spreadsheets with different levels of detail and different specifications for tracking the reported services, which made preparing the joint report to submit to DOL time-consuming and difficult. Another state also described the need for "lots of manual workarounds."

d. **Difficulty incorporating partner data.** Even when Titles I and III programs were already in the same system, incorporating partner data was difficult because the programs administered under these titles have more detail in their employer services data (including specific occupation codes and employer addresses) than do Titles II and IV partners, which might have only an employer's name. States also reported that they lacked internal data checks, so there was a great deal of duplication and messy data.

e. **Different processes for collecting data across the measures.** Two of the three employer measures are not based on individual participant data and thus cannot be reported via the new WIOA reporting system [that is, the Workforce Integrated Performance System (WIPS)]. One measure, retention with the same employer, is calculated using data collected in WIPS, but the other measures, employer penetration and repeat business customer, are not based on individual participant data. Therefore, states must establish processes and policies for collecting and validating data related to these approaches before reporting the outcomes in the Statewide Performance Reporting Template.[26]

f. **Questions about the indicator on effectiveness in serving employers.** States raised a few questions about the indicator, including what is meant by joint reporting.

- One state was unsure if simply reporting separately on the measures was enough, or whether partners were expected to submit one report across the board. (Partners are expected to submit one report, but the state was not aware of this.)
- Another state was confused by the instruction to report by WIOA title ("report by title," according to the respondent) and provide a single performance outcome number ("one number") per measure—that is, employer penetration rate, repeat business customer, and retention with the same employer.
- A third state had questions about how to define an employer unit, whether to use a Federal Employer Identification or an unemployment insurance (UI) account number, and how to manage the difference between a corporate office and individual local outlets of a particular company.

4. Employment-related indicators

WIOA introduced two employment indicators and an earnings indicator—employment in the second quarter after exit, employment in the fourth quarter after exit[27]—and median earnings in the second quarter after exit. Under WIA, there were two similar indicators of employment in the first quarter after exit and retention in the third quarter after exit. WIA also had an earnings indicator, but it was based on

[26] TEGL 10-16, change 1, p. 30

[27] For Title I Youth program participants, a positive outcome on two of these three indicators (employment in the second quarter after exit and employment in the fourth quarter after exit) can be achieved not only through employment, but also through enrollment in education or training activities. (TEGL 10-16, Change 1)

the mean (or average) earnings, rather than the median. The switch to the median was intended to mitigate the effect of outliers, that is, people with earnings much higher or much lower than average.

State and local perspectives on the indicators. WIOA's employment-related indicators are very similar in nature to the employment and retention measures under WIA and Titles I and III respondents did not express many concerns about them. However, as with the other indicators, there were some misunderstandings about how they differed from those under WIA. For example, two respondents suggested that the WIOA indicator of employment in the fourth quarter after exit was an improvement over the WIA indicator of retention in the third quarter because the person exiting the program does not have to be employed with the same employer from the first quarter. (However, WIA's retention measure also did not require employment with the same employer.)

There were also positive perspectives about the indicators. Respondents from four states agreed that, as intended, WIOA's median earnings measure is an improvement on WIA's average earnings indicator because, as intended, it neutralizes the effect of outliers.

One concern expressed about the indicators was that they were not useful for managing performance in real time. Respondents pointed out that was due to the indicators being measured using lagged UI wage data (available 12 to 15 months after program exit in regard to second quarter employment and earnings, for example). The data would have limited relevance to efforts to manage performance. (Similar concerns were expressed about WIA's employment-related measures when that program was active.)

Challenges for Titles II and IV program staff in adjusting to the less familiar employment measures. Title II partners reported struggling with the focus on employment and the need to match data with the state UI agency, which we discuss in more detail in the next chapter. In addition, some Title II programs questioned the feasibility of seeing positive employment and earnings outcomes so soon after working with the Title II agency on an education goal, especially with people with barriers to employment such as limited English language skills. Title IV partners also struggled with the employment indicators because their existing Title IV performance measures are not exit-based. In addition, both partners are now held to two sets of performance indicators—their own and the WIOA indicators.

5. Negotiating performance targets for indicators and using the statistical adjustment model

For Title I and Title III programs, WIOA established the SAM for negotiations between DOL and states. The model adjusts negotiated levels of performance by considering economic conditions and types of participants served at the end of the program year, with the intent of making the targets more equitable across states. The SAM is run before and after the program year to account for actual economic conditions and participant characteristics. Negotiated levels of performance are then adjusted accordingly.[28]

Site visits for the study were conducted during program year (PY) 2018, the same period during which states were required to collect and report initial performance data in order to establish a baseline on which to base future negotiated targets. The baseline indicators that each core program title was subject to were as follows:[29]

- Title I: MSGs and median earnings (median earnings is baseline for the youth program only)

[28] See TEGL 9-17, Negotiating Performance Goals for the WIOA Title I Programs and the Wagner-Peyser Act Employment Service as amended by Title III of WIOA, for program years 2018 and 2019.
[29] TEGL 9-17.

- Title II: All primary indicators of performance except MSGs
- Title III: None (Title III programs are not required to report on the credential attainment rate and MSG indicators)
- Title IV: All primary indicators of performance
- All WIOA Title programs: Effectiveness in serving employers

The year the measure will go into effect, and the years for which each of the core programs will be assessed for either succeeding in or failing each of the six measures, varies by indicator.[30,31] PY 2020 is the first year of instituting the following measures: employment in the second quarter after exit, median earnings in the second quarter after exit, and MSGs. PY 2022 is the first year of instituting the measures of employment in the fourth quarter after exit and credential attainment.

State and local perspectives on the negotiation process. Respondents from three states expressed appreciation that the SAM would adjust for economic conditions and the types of participants served. However, other states and local areas did express a few concerns about the SAM and the use of it as one of the four factors DOL required to be used in negotiation of performance targets under WIOA.[32]

a. **Use of older performance data in the SAM.** The initial SAM was developed based on historical data that states reported against the WIA performance measures.[33] At least four states expressed concern that the Title I and Title III negotiated targets were based on participant data from the WIA era, which was a different time, with different populations, and different measures of performance. One of these states commented that DOL did not provide an updated version of the model during the most recent negotiation but told the state to use the one from the previous program year, which the state did not feel was accurate.[34] In addition, in light of all of the revisions to state data systems, other states expressed a lack of good, clean data to inform the model accurately.

b. **Use of inaccurate data in the SAM.** Respondents from two states asserted that data collection issues impacted their experience with the SAM. Their use of a "leading record"—which is commonly used when Title I and Title III partners share a data system—creates a problem in the SAM when customer information is missing. The "leading record" is typically the first record of service, in which customers self-report characteristics and might skip certain fields that they cannot or do not want to answer. Some local area respondents echoed this concern. Further, because the indicators are new, no longitudinal data existed on which to base appropriate targets for the new measures.

   On the other hand, some states were less concerned about the model. Some felt the new indicators were close enough to the WIA indicators for the existing data to be considered valid. States were also collecting baseline information in order to establish new data specific to the current indicators. One state did express a concern, noting that even though the federal SAM includes data from all over the country, and a bigger data set leads to better models, the numerous waivers granted to states during WIA for performance reporting could limit the data in the national model.

c. **The SAM developed for use with states was challenging to adapt for use in negotiating with local areas.** States "must negotiate and reach agreement on local levels of performance based on the

[30] Excluding the indicator of effectiveness in serving employers, which is still being pilot tested.
[31] TEGL 11-19.
[32] Per TEGL 9-17.
[33] TEGL 9-17, p. 6
[34] DOL staff explained that they were unable to update the model due to a lack of WIOA performance data.

State negotiated levels of performance."[35] Further, in negotiating the local levels of performance, the state "must make adjustments for the expected economic conditions and expected characteristics of participants to be served in the local area, using the statistical adjustment model developed at the Federal level as a tool."[36] Although this federal guidance clearly explains that states "must use [the federal SAM] and adapt it to their needs at the local level,"[37] some states noted that having help from DOL to adapt the SAM for use with their local areas would be extremely useful. One local area mentioned that DOL provided a local-level SAM in the first year that was very helpful when negotiating with local areas and wished that DOL had continued to do so in subsequent years.

d. **Apprehension about the ability to continuously improve performance.** One state and 10 local areas expressed a concern about continuous improvement and the generally higher expectations around performance under WIOA as compared to WIA. As one local Title I administrator said, "So when you do a good job, what happens is, they want you to do more of a good job. Some of [the targets] just aren't realistic." This was especially true in light of stronger language in WIOA about serving people with multiple barriers to employment. Under WIA, a performance target was set and the state had to meet at least 80 percent of the target to be considered "meeting" the target. That provision has gone away under WIOA, making targets harder to meet. Further, under WIOA, in order to be considered successful, states cannot fall below a 90 percent score across all of the indicators for a single core program or below a 90 percent score for a single indicator across all core programs.[38] One local area wondered whether the SAM could really be useful if the expectation at the state level was for continuous improvement and not falling below 90 percent average on its indicators and across core programs. Others indicated that the drive toward ever-higher performance was influencing their willingness to enroll people with multiple barriers to employment because they endangered the area's likelihood of achieving its performance targets.[39]

C. State approaches to overcoming challenges associated with the WIOA performance indicators

States took a variety of steps to address the challenges and concerns associated with the WIOA indicators of performance, including providing training and technical assistance and designing tools that would facilitate reporting and managing performance.

a. **Statewide, on-site training on performance reporting.** At least six states offered training events to local areas to introduce the new indicators. At these events, state staff have typically discussed each of the six indicators of performance, defined the indicator, and explained where to enter data into the state system. State staff also typically shared how to pull the data out of the state data system for the purposes of performance reporting.

b. **Statewide, virtual training on an ongoing basis.** At least two states hold frequent phone- or web-based meetings for local staff—in one case, for local staff responsible for performance reporting to discuss MSG and credential attainment, and in another on a wide array of topics, including the

[35] TEGL 9-17, p. 7
[36] TEGL 9-17, p. 7
[37] Ibid.
[38] TEGL 11-19, p. 12
[39] These state and local respondents perceived that there was an expectation for higher performance targets under WIOA even though TEGL 11-19 (p. 8) explicitly states: "The Department acknowledges that there are many ways to define continuous improvement. Continuous improvement may reflect an increase in the level of performance, a change in service strategy and delivery, or a change in the customers served."

performance indicators. State administrators in one state noted, "We've kind of mapped it out—what service they should be putting in [State MIS] and then which measurable skill gain it would be tied to."

c. **Ad-hoc technical assistance by state staff.** Two other states described providing general technical assistance to their local areas. One state said it had "made good strides" in helping local staff understand how and where to enter data to justify performance indicators for MSG and credential attainment.

d. **Creating state policy guidance or tools about the indicators.** Close to two-thirds of multi-area states described creating specific policy, guidance, or tools to help local areas understand and fulfill the requirements of the performance indicators.

   – **MSG and credential attainment.** One state created for local staff a desk aid on the indicators. Another designed a report that locals could run to help them determine whether administering the TABE to an adult with basic skills deficiency to set them up to attain an MSG was worth the effort. One state developed guidance in partnership with Title II and Title IV programs on the new indicators and supplemental data. One state deliberately did *not* create a policy of what counts and what does not in terms of credentials, especially for industry-recognized credentials, because the state felt that what employers would accept varied by local area. Another state was considering using the state board's list of recognized credentials as guidance. In two states, state guidance was still being drafted at the time of the visit.

   – **Employment and earnings measures.** One state addressed the issue of not being able to use the performance indicators to manage real-time performance by offering other strategies for doing so. These included providing reports on what the state described as "records that staff closed the previous month" and "how many participants completed particular services."

   – **Indicator on effectiveness in serving employers.** In one state, Title I and Title III partners developed a template spreadsheet for partners to fill out, submit, and then "feed it into a database and query it that way." Another had begun to use the Titles I and III data system for all partner reporting of the measure, transitioning some partners away from Salesforce and Excel spreadsheets. This state had also developed joint guidance with the core partners on the indicator on effectiveness in serving employers, as well as on credential attainment, MSG, and using supplemental data.

e. **Building tools to facilitate local negotiations of performance targets.** In light of challenges related to using the SAM for local negotiation, at least four states described other approaches to working with their local areas to set targets. One state used a version of the model that it had used with DOL to negotiate state targets for negotiating targets with the local areas. One of these states explained that negotiating with local areas is more complicated now with the SAM but that the model provides a good platform for negotiation conversations.

f. **Working with other partners**. Part of the intent of the performance indicators was to more closely align the six core partners, and to some degree this occurred. In addition to the collaborative effort of joint policymaking described just above, several states described working with partners to support the workforce system's capacity to design services, collect data, and report on performance indicators. More communication occurred across partners, either via partner representation on state and local workforce boards or through performance- or data-oriented statewide groups, and as a way for states to prepare a joint report for the indicator on effectiveness in serving employers. For example, one state formed a performance advisory committee that includes partners. In another state, Title I formed

a work group on credential attainment and MSG, of which Title II and Title IV programs are members. Any time someone in the field asks a question about those measures—such as whether a credential is countable or what documentation to use to support an MSG—the group considers it and agrees on an answer. In another state, the Title I and Title II partners share a list of countable credentials.

State approaches to negotiating with local boards

In Colorado, a state staff person created a tool, an online calculator, to use in local negotiations. The state held a meeting with representatives from all 10 local areas. Using the tool, the group tested different targets for each local area that would allow the state to reach its federally negotiated targets and eventually reached agreement.

In Texas, the state built a version of the federal model using six years of data for each local board. This enabled the local boards to see how their actual performance compared to what the model predicted. The state then proposed what it thought the target should be for the new year in each instance. Local areas were allowed to make a case for why the baseline data were not normal.

III. WIOA requirements affecting the workforce performance reporting system

WIOA introduced new requirements for reporting on demographics, services, and outcomes for people enrolled in WIOA's core programs. In addition, to fulfill the vision for strengthened accountability, WIOA encourages states to develop integrated data systems that allow for data sharing across core programs. To implement WIOA's new reporting and accountability requirements, DOL and the U.S. Department of Education (ED) jointly developed a new record layout, called the PIRL and a new reporting system, the WIPS. This chapter first considers use of the PIRL and WIPS by Titles I and III programs—the only titles required to use these reporting mechanisms. It next considers states' reported challenges with and approaches to integrated reporting, in response to WIOA's encouragement to states to create strong and aligned partnerships across core partner programs.

A. Titles I and III programs' use of the PIRL and WIPS

Under WIOA, the PIRL is the data-reporting layout that provides a standardized set of data elements, definitions, and reporting instructions that states use to describe the characteristics, activities, and outcomes of WIOA core program participants. It is new under WIOA[40] and exists in two forms: (1) the DOL-only PIRL, applicable to DOL-administered programs including both the Title I and Title III core programs and all other DOL-administered workforce programs, and (2) the joint PIRL, a subset of elements in the DOL-only PIRL.[41] Titles I and III programs are required to submit PIRL data using WIPS.[42] States also must submit an Annual Statewide Performance Report narrative,[43] which serves as a complement to the WIOA Annual Statewide Performance Report.[44]

1. State perspectives on the PIRL and WIPS

On the whole, Title I and III respondents were neutral about the new record layout and positive about the new system through which they submit records. Six states noted that the WIPS is more user-friendly and much faster than its predecessor under WIA.

2. Challenges to using the PIRL and WIPS

Although perspectives were mostly positive, states still reported facing a number of challenges with the new requirements and described some concerns about the PIRL and WIPS.

> *We've been doing this, working on WIOA implementation full time, for the last two years. Three years, probably."*
>
> – State data system manager

- **Challenges in updating state administrative data systems to meet the requirements of the PIRL.** All states had to change their administrative data systems to comply with the requirement to report on all fields in the PIRL. Nearly all (13 of 14) also indicated that doing so was an inevitable but burdensome process of adding modules, pages, or fields on the front end of their systems (the data entry side) and

[40] Although the PIRL is new under WIOA, the three Title I core programs did use a different standard data reporting layout called the WIA Standardized Record Data (WIASRD) under WIA.
[41] Non-DOL-administered AJC partners are not required to use the PIRL.
[42] Title II programs submit aggregate data to ED's Office of Career and Technical Education via the National Reporting System, and Title IV program submit individual-level data to ED's Rehabilitation Services Agency.
[43] Guidance provided in TEGL 5-18.
[44] OMB Control No. 1205-0526.

reprogramming or rebuilding on the backend. This was often accompanied by the added complication of working with their data system contractors to make those needed changes. Thirteen states also described the process of updating data systems as time-consuming and challenging, particularly because of the large number of new data fields in the PIRL, and stated that it often involved multiple rounds of communication with staff from DOL national or regional office and contractors to clarify how systems needed to change. In addition, states had to train state and local staff to use their updated systems, especially on how and where to enter data appropriately so that those data can be pulled correctly when submitting the PIRL.

- **Burden of multiple changes to the PIRL.** A further challenge most state workforce agencies noted was that, although states were updating their state data systems, DOL made additional changes to the PIRL as well.[45] "Everything is changing at once," said one state workforce agency administrator. As a result, states reported that they also had to keep making changes, a challenge magnified for the many states that use a proprietary data system programmed by a contractor, because they had to communicate changes to contractors and contracts often had to be updated, a time-consuming process. Thirteen states described these additional changes to the PIRL as a challenge. Some respondents from these states said the challenges associated with changes had to do with the changes being presented individually, making "automation"—system-wide programming—impossible and thus system management even more burdensome.

> *"[W]e want to figure out how to automate this stuff and when [DOL is] writing the rules, write some of those towards automated systems because otherwise all you're doing is having states spend five years trying to figure out how to automate it."*
>
> – State data system administrator

- **Negative impact on relationships with local areas.** Two states attested that the changes to the PIRL (and the WIPS, described in more detail below) contributed to a strained relationship between the state and local areas. They asserted that their local areas were struggling to collect a much lengthier set of data, often with limited understanding for why it was being required and how to enter it into the state system.
- **Difficulty adhering to changes implemented close to due dates of quarterly and annual reports.** Eight states specifically mentioned that changes to the WIPS, particularly new edit checks, were sometimes announced within very short windows related to when quarterly or annual reports were due, including within days of those reports being due. The timing of these changes put added strain on states' reporting. In one case, state workforce agency staff described having to remove several thousand participant records and submit their state's report without them because they could not figure out how to fix those records in response to a new edit check by the report's due date.
- **Burdensome amount of data the PIRL requires for customers.** At least five states raised concerns about the amount of data the PIRL requires to be collected from job-seeking customers. One state explained that it has to be "judicious" in asking about all the different data elements required of the PIRL because if AJC staff asked about everything the PIRL required, customers would leave before receiving services. Three of those five states raised particular concerns about the items on disability in the PIRL. These included concerns about the legality of asking the

> *"The amount of information being asked for is incredibly off-putting for customers..."*
>
> – State Title I administrator

[45] Note that each of DOL's substantive changes to the PIRL were only made following approval of an official Information Collection Request (ICR) made to the Federal Office of Management and Budget. As part of the ICR approval process, states were also afforded an opportunity to comment on any proposed changes.

questions, whether asking those questions was an invasion of customer privacy, and that their own staff did not feel comfortable asking them. Local area respondents concurred with these concerns, from the perspectives of both customers and the case managers and other staff who complete the data entry.

3. State approaches to PIRL and WIPS-related challenges

In light of these challenges, states reported approaches that helped in implementing the PIRL's and WIPS' required changes to their administrative data reporting systems.

> *"Our regional office – I have become very familiar with them. They were very responsive outside of regular technical assistance. If something came up I could give them a call, and they were very helpful."*
>
> – Title I state staff

- **Consulting with DOL regional or national office staff.** Respondents from five states reported that staff from DOL's regional and national offices were helpful, both in providing forums for regular communication about the transition to the PIRL and WIPS and for being responsive to ad hoc phone calls and emails from states asking specific questions.
- **Getting data from partners and supplementary sources.** As a way for states to overcome the challenge of overburdening customers with the length of the PIRL, some states tried to collect data on customers from other sources. States mentioned several sources of data that could be helpful for filling out individual-level records without having to collect the information directly from customers. For example, a few states' Title I programs collect data from educational agencies or the National Student Clearing House. One state explained that its state data system allows it to connect to a number of other programs, including Temporary Assistance for Needy Families (TANF) and UI, so the state does not have to ask the customer for as much data as it would without access to these sources.

B. Integrated reporting across WIOA core programs

Although WIOA promotes "the development of integrated…reporting systems"[46] across core and required partner programs, the legislation does not require states to have such systems. Further, federal agencies that administer WIOA's core programs—ED and DOL—require the core programs to report via separate systems: as discussed above, the Titles I and III programs report via the WIPS to DOL, while the other two core programs (Titles II and IV) report via separate systems to different offices and agencies in ED. The only requirement under WIOA for joint reporting is that states must submit a joint report of their results for the performance indicator on the effectiveness in serving employers.

[46] WIOA Final Rule Executive Summary. *Federal Register,* vol. 81, no. 161; August 19, 2016; Rules and Regulations. P. 55794.

1. Prevalence of shared data systems among study states

Among the 14 study states, none used a single administrative data system across all six core programs, although all used a single system for the four DOL-administered core programs. State respondents attributed their use of different data systems to the fact that the Titles II and IV programs were typically administered by different state agencies and had radically different service delivery structures and requirements from the DOL-administered programs. In fact, respondents from one state that was looking to purchase a new administrative data system for use by all six core programs stated that it did not think a system existed that could adequately meet the different reporting and administrative requirements of all six programs. These respondents reported that VR's requirements for multiple types of vendors, in particular, made developing a cross-program system that includes Title IV as well as the other five core programs exceptionally complex.

Exhibit III.1. Access to Title I systems across core partners

Type of access	Title III (Employment Services)	Title II (Adult Education)	Title IV (Vocational Rehabilitation)
 No access	Not applicable	11 states	10 states
 View data	Not applicable	1 state	1 state
 Enter data	14 states	2 states	3 states

As Table III.1 shows, states varied in the access provided to the Title II and IV partners. Title III could share and enter data into the Title I MIS in all 14 states. Titles II and IV typically maintained their own data systems and rarely had viewing or entry access to the Title I MIS. In a few cases, Title II or IV staff could view and/or enter data into the Title I MIS. In two states that provided read and enter access for Title II or IV staff, partner staff did not always exercise the option because it involved going through MIS training.

2. State strategies for sharing data across core partner systems

To meet WIOA's requirement for joint reporting on the indicator on effectiveness in serving employers as well as to achieve WIOA's aim of improving "coordination among the six core programs,"[47] especially as it relates to identifying customers who are receiving services from multiple programs, core program administrators typically articulated a desire to be able to share data with each other's programs and described strategies to do so.

a. **Establishing memoranda of understanding (MOUs) for data sharing.** At least five states described state-level conversations with core program partners about developing a shared data system or using their state's longitudinal data system to share data. In most cases, these conversations appeared to be at the theoretical stage. However, in one state, through the efforts of the state health and human services agency, work was underway to create state-level MOUs between that agency, the state workforce agency, and the state's education agency to allow data sharing among particular programs. Other states had MOUs or data-sharing agreements between the state workforce agency

[47] Ibid. P. 55792.

that administered the Titles I and III programs and the agencies administering the other core programs so that they could at least report on the indicator on effectiveness in serving employers.

b. **Cross-partner coordination.** Five states described state-level efforts to coordinate with partners, even if integrated reporting was not possible. One state convened a joint committee with core partners, where partners discuss and troubleshoot respective challenges on reporting. Another state held an MIS forum, a group of the biggest data users in each region, during which partners discussed issues about MIS design, data collection, and performance reporting. A third state formed a data group for the four agencies that administered the core programs and created a process, via the state labor exchange system, to collect some shared data. However, not all of these partners used the process; at the time of the site visits, Title I staff had to manually combine Excel spreadsheets. Because not all partners were participating, this particular effort was considered only partially successful.

3. Challenges reported by states and local areas in sharing data across core partner systems

Despite efforts to share data across their systems, respondents from 11 of the 14 states noted that their capacity to do so—especially between the four DOL-administered programs and Titles II and IV programs—was limited. These respondents explained this lack of capacity was due to a variety of impediments. These included:

- **Structural challenges.** Structural impediments included a lack of unique data identifiers that all programs share, statutory privacy strictures, different data systems, and data systems not programmed to "talk to each other."
- **Impediments to progress.** Respondents also described factors that stymied progress in sharing data, including data-sharing agreements being stuck in partners' respective legal departments, the high cost of building system-sharing capacities, and a "silo mentality" that, in spite of an articulated intent to share data, influences willingness to share or overcome obstacles to data sharing.
- **Lack of alignment.** One state Title I respondent described the challenge of aligning participant enrollment processes (and thus, later, reporting), noting that the point at which people become participants in the various programs differs depending on criteria specific to each program. As a result, this respondent noted that shared reporting on people served by different programs was complex to manage.

> *"[E]ven if [customers] all applied on the exact same day, you would have different "at entry time" parameters for things…for DOL, the [WIOA] programs, it is as of the day they're really applying, that they're enrolling. For DVR [Division of Vocational Rehabilitation], it's as of the day you're writing the IEP [individual employment plan]. For DVR, that could actually be 60 days for eligibility plus 90 days for the IEP. So you're talking about things that could drastically change [enrollment dates] even if we did align them."*
>
> –State Title I administrator

IV. Changes to eligible training provider requirements

Program performance and cost information that ETPs must report every two years

- Outcomes for the WIOA primary indicators of performance
- Program completion information
- Information on the recognized postsecondary credentials Title I participants receive
- Program cost information, including tuition and fees, for Title I participants
- Other additional performance information determined appropriate by the governor

As part of its emphasis on informed customer choice, the primary way that WIOA—like WIA—funds classroom-based occupational under Title I adult, dislocated worker, and out-of-school youth programs is through voucher-like individual training accounts (ITAs). However, Title I participants can only use an ITA to pay for specific training programs that are, along with the service provider, determined to be eligible and included on the state's list of eligible training providers (ETPs). Programs and providers must go through a process to be determined initially eligible. However, after one year of initial eligibility, such programs and their providers must undergo a process to maintain their eligibility (that is, continued eligibility process) and must repeat that process at least every two years to stay on the ETP list. States must take the lead on developing procedures and criteria for these eligibility processes, but the criteria for continued eligibility must be based on a series of factors laid out by WIOA.[48] In addition, providers must submit accurate and timely performance data and cost information at least every two years, as established by state governors.[49]

In general, WIOA's ETP requirements are similar to those under WIA, with a few exceptions. The most important of these differences is that under WIA, DOL could waive the requirement that states develop processes and criteria—including performance information—for training programs to remain on ETP lists. Under WIA, 39 states requested and were granted such waivers (including 8 of the 14 visited for this study), primarily because they were concerned about the quality of available performance data on training programs. They were also concerned that the criteria would drastically limit consumer choice by reducing the number of available training programs on state ETP lists (Selzer and Eyster 2015). However, WIOA eliminates this waiver, meaning that all of the states that did not have to develop processes and criteria for programs to maintain eligibility under WIA have to do so under WIOA.

"Looking at the eligible training provider list prior to WIOA, anybody could get on there and have terrible outcomes, and they could remain on the list. With WIOA, there's a higher standard of accountability for those training providers…for outcomes."

– Local Title I staff member

Another key ETP-related difference between WIA and WIOA is that under WIOA, beginning October 1, 2019, states had to submit performance-related information about all ETPs to DOL via the WIPS. This information must include WIOA primary indicators of performance for all program participants—whether or not they are WIOA Title I program participants—as well as additional information on the barriers, demographics, and costs for Title I participants.[50]

[48] WIOA Sec. 122(b)(1)(A).
[49] TEGL 8-19, attachments I and II.
[50] Another change under WIOA to ETP list processes relates to apprenticeship programs; however, those changes were covered in a companion report, entitled "Changes to the Title I Adult and Dislocated Worker Programs under WIOA" and are not covered here.

A. State and local perspectives on WIOA's ETP-related changes

Title I respondents from the majority of states (11 of 14) that participated in the site visits viewed WIOA's ETP-related changes as a major shift from how they managed their ETP lists under WIA. Respondents attributed this shift to WIOA's requirement that they collect performance information from training providers and the elimination of the waiver option. Further, respondents from 9 of these 11 states noted that this change was even more dramatic because of WIOA's requirement that they collect these performance results from all individuals enrolled in the training program, not just Title I participants.

Because states bear the responsibility of so many of WIOA's ETP requirements, respondents from less than half of the local areas and offices (11 of 28) that participated in the site visits perceived WIOA's ETP-related changes as major. Like states, the local areas and offices that perceived the changes to be major did so primarily because of the challenges they reported facing in implementing WIOA's performance reporting requirements.

Although many states and local areas found implementing these changes to be challenging, Title I respondents from multiple local areas and offices also commented that they viewed these changes as positive. They stated that they liked the ETP requirement because it gave their career coaches and participants valuable information that helped them make better-informed choices about the training programs that would best help participants meet their career goals.

> *"They [the state] have all of the new statistical information that is available there [on the ETP list], which I think is great because when you're providing someone with the menu...of the different options that exist for them ...[for]training, you definitely want to be able to help them make the best decision with the place that meets their needs, but also provides the best outcomes."*
>
> – Local Title I staff member

B. Challenges states reported facing in implementing WIOA's ETP-related changes

A majority of state Title I respondents reported that implementing WIOA's new ETP requirements was challenging, particularly (1) the requirement that all training providers report performance information and (2) the new annual reporting requirement on their ETP programs' performance.

1. Training providers were unable—or refused—to provide the required data

> *"The sticking point with eligible training providers is the federal mandate to collect all participant data."*
>
> – State workforce agency staff member

Title I respondents from two-thirds of states said that providers either could not or would not provide them with the required performance data—or the data needed to pull performance data—for multiple reasons. Numerous providers stated that confidentiality requirements of the Federal Education Rights and Privacy Act (FERPA) prevented them from providing any personally identifiable information to the state workforce agency, especially for non-Title I program students who had not consented to having their information shared.

> *"A lot of the pushback that we've received [regarding the ETP list] is from education providers, primarily those of technical colleges, four-year colleges. Their big thing is FERPA and releasing information."*
>
> – State workforce agency staff member

In addition, Title I respondents from a few states and local areas said that training providers could not provide the required performance data because those providers did not collect either Social Security numbers (which are needed to obtain those data from state UI wage data systems) or

allowable supplemental data on employment and earnings. Respondents also noted that many providers did not have the capacity or legal authority to collect those data.

A related concern was that large public training providers were unwilling to provide these data because they did not perceive the effort to be worth their time due to the small number of Title I programs that participated in their training programs. Title I respondents from multiple states and local areas reported this concern. Title I respondents and those from community colleges also stated that providers often did not have the capacity to collect and report on these data for their thousands of students, even if they did decide that being on the ETP list was important.

> *"I understand the theory of why that was put in place. But in the reality of...getting that information from the training providers is...going to be tough. It's a lot of work on them. So now is it worth it [to them] if 1 percent of their participants come from WIOA-funded things? Am I going to spend all this money on getting all of this required data to then lose money?"*
>
> – State workforce agency staff member

2. States struggled to prepare the new annual ETP report and revise or create new state ETP data systems and websites

Five states faced challenges in revising or implementing new ETP data systems so that they could meet WIOA's new requirements, particularly related to collecting performance data and preparing and submitting the ETP annual report. Respondents from these states asserted that part of the challenge of implementing these new systems was that state, local, and provider staff all needed to learn the new procedures and processes. These states also criticized the lateness of DOL guidance on ETP reporting. Respondents from one state reported that this late guidance forced them to make changes to their system multiple times. Further, almost inevitably, these new systems experienced glitches. In one state, when staff from one local area called and emailed providers asking them to get on the new list, providers would often respond that they were already on the list. These providers did not realize that because of their state's new ETP system under WIOA, they had been dropped from the list.

> *"It was just really murky, switching to a new [ETP list] platform… There were system challenges from a technical perspective in the beginning, and then, there's just also communication challenges."*
>
> – Local WDB staff member

In another state, as part of these changes, the state shifted responsibility for the ETP list to the state's higher education agency. State respondents asserted that this shift created communication challenges between the two agencies, as the state workforce agency needed to make sure the higher education agency understood the WIOA regulations and the steps that were necessary to comply with the regulations.

3. Requiring providers to submit separate applications for each of their programs was burdensome

Respondents from four states reported that the change requiring providers to submit separate applications for each of their programs was burdensome. In these states, under WIA, large providers could submit a single application for all of their programs to receive approval for the ETP list. They asserted that because of WIOA's change, respondents reported that large providers such as community colleges and universities had become more resistant to submitting applications for all their programs to be on the ETP list.

> *"Well, I know when WIOA, at first, took hold, there was some frustration because of the change where, say, [the] state university was on the ETP [list] previously, we covered the whole institution."*
>
> – Local Title I staff member

4. The number of programs on state and local ETP lists reportedly decreased

Given the specific challenges stated above, about one-third (five) of the states and ten local areas reported the broader challenge of their ETP lists having fewer programs, especially during the first year of implementation. Respondents in two of these states and in four local areas and offices said that these changes resulted in a permanent large decrease in the number of providers. Respondents in another one-third of the states and about one-fifth of local areas and offices stated it was too early to know how WIOA's ETP-related changes would affect the number of available programs. They worried that many more programs would drop off the ETP list after all aspects of the law were implemented.

Erosion of customer choice in selecting a training provider was a key concern that some state and local staff expressed about these decreases in the number of ETPs. One of these local staff members explained that although these decreases had not typically affected all programs, training requirements established by state universities and community colleges could vary dramatically. One local area respondent noted that, given these differences, "You want to giv[e] options to people...you want to make sure that you have that variety to fit what the customer's skill level is."

> *"It's made it so much more secure that we have good, solid vendors. So that's kind of a double-edged sword, but I think in the long run, at least for us, the benefit is well worth it.... Some of those [programs that dropped off] maybe shouldn't be on it anyway, so that's the good news."*
>
> – State workforce agency staff member

As noted above, one-third of states and local areas reported losing programs from their ETP lists. Respondents from four of these states and eight of these local areas were very concerned about those reductions, respondents from the other states and local areas viewed them as positive. These respondents noted that the dropped programs were often not as strong or appropriate for their participants. Respondents from one of these local areas even criticized that their state had not been aggressive enough in removing providers that had not been meeting performance standards. And even some training providers thought that giving their workforce providers performance information was a good thing because they wanted WDBs to know how well their programs were working. As one training provider stated, "I will provide statistics if they ask for it on a particular program. I think it's good that [the WDB] knows."

C. Reported strategies and promising practices for implementing WIOA's new ETP requirements

> *"They los[t] a lot of those on the provider list. Because the providers just didn't understand…or because they weren't notified...but then they slowly started getting back on [the list]."*
>
> – Local Title I manager

States and local areas implemented several strategies and promising practices to prevent providers from dropping off their ETP lists or to bring back many of those that were initially dropped, and thus:

- Sought waivers that allowed providers to provide performance results only for Title I-funded participants;
- Assisted providers with collecting participant SSNs and matching those numbers with wage data to calculate performance results;
- Worked closely with providers to assist them with filing applications and submitting performance results; and

- Coordinated with state higher education agencies to obtain performance data.

The following sections discuss these strategies and promising practices in greater detail.

1. Requesting a waiver for the requirement that ETPs must report performance results for all participants

> *"I think the minute that we start to ask them [training providers] to report performance, many of them are going to say, 'You know, we're not interested anymore.' And that's because it's performance for all of the students. Yeah, so we will be seeking a waiver."*
> – State workforce agency staff member

One of the most common strategies, which 11 states adopted, was to request a waiver from DOL for the requirement that providers report performance results for all of their participants rather than just their Title I participants.[51] Respondents from these states reported that without these waivers, they could lose many programs from their ETP lists.

Respondents from two states pointed out one challenge related to such a waiver. This reported challenge had to do with the traditionally small number of Title I participants taking part in a given training program. These respondents noted that even if providers report performance results, the small numbers of participants would prevent states from releasing results publicly because of the risk of compromising the confidentiality of training program participants. As a Title I respondent from one of these states said, "We'll be seeking the waiver to report any non-WIOA participants, but…then the whole utility of the list is kind of in question…[there would] just not be enough data points to publish results by program because [whether] they completed, the median wages would be personally identifiable information."

2. Developing agreements with training providers

> *"It's still labor intensive [to do ETP reporting, but] having the Social Security numbers, that's helping with the reporting. And we don't have to report on placement anymore because the state's doing it."*
> – Local community college staff member

State workforce agency staff in nine states reported that they had developed or were in the process of developing agreements with training providers to obtain participant SSNs. They would then match the SSNs with wage data to calculate the employment and earnings–related primary indicators of performance. Although some states reported great success establishing such agreements—in some cases even persuading providers regarding the value and feasibility of collecting SSNs—other states were less successful. As one state workforce agency staff member said, "Currently we are [about to have] a signed agreement with one community college to measure [employment outcomes]. The invitation to do the same has been made to all [colleges in the state], but then it comes down to individual institutions' decisions…to do it."

3. Working closely with training providers to make ETP reporting as easy as possible

Another strategy adopted by four states and 10 local areas was to work closely with training providers to simplify the process of completing ETP-related reporting forms and paperwork. For example, in one local area, the ETP contact at the local WDB said she simplified the process of submitting applications and

[51] Idaho, New Jersey, Pennsylvania, South Carolina, Texas, Virginia, and Wisconsin all had approved waivers, per "Approved WIOA Waivers by Waiver Type," available from https://www.doleta.gov/wioa/waivers/#Approved-Wioa-Waivers; another four states reported to the study team that they planned to seek such a waiver in the future.

performance information for providers: "I have a form and I fill in their programs we're looking for, even for the college's pages of it, so all…they have to do is basically sign [and] put the numbers in."

> *"She [local WDB staff] has to go out, meet with every single educational entity, whether it's a college, whether it's a career tech. …We have tried to call them all in a group, but it's just easier if she goes out and works with them one-on-one."*
>
> – Local WDB manager

One challenge these states and local areas reported with this approach was that it required significant time from state or local staff. In fact, after realizing the amount of time state staff spent working with training providers to encourage them to submit the information to get on the ETP list, one state pushed the responsibility down to the local level because it did not have enough state-level staff. However, local staff in that same state complained that they also did not have enough staff to help training providers with ETP-related reporting.

4. Collaborating with the state or national higher education agencies to administer ETP requirements

Four states developed partnerships with their state's higher education agency or the National Student Clearinghouse to more efficiently carry out WIOA's ETP requirements. For example, in Colorado, the state workforce agency—the Colorado Department of Labor and Employment (CDLE)— developed an agreement with the state's Department of Higher Education (CDHE) to administer the state's ETP list. State workforce agency respondents in two other states reported they were working with their own state higher education agencies to obtain ETP-related data such as completion rates and credential information for their member institutions. However, respondents from one of those states cautioned that that approach—although useful for obtaining data from public providers more efficiently—would not eliminate the need for proprietary training providers to report their outcomes directly to the state workforce agency. Another state reported that it was planning to access data, such as on credential attainment, from the National Student Clearinghouse.

Benefits of Colorado's higher education agency (CDHE) administering the state's ETP list

This arrangement allowed the state workforce agency, CDLE, to side-step any FERPA-related issues by enabling training providers to report to CDHE for all ETP-related reporting. CDLE simply provides wage data to CDHE, and CDHE matches those data with the participant data from training providers to compute outcomes for the three employment-related WIOA primary indicators of performance. This arrangement enables the state to combine CDHE's own vetting process for educational institutions with the vetting required for the ETP list, thus eliminating an additional level of duplication.

D. Implementation of performance standards for initial or continued eligibility of ETPs

Although WIOA requires states to collect training program results for the WIOA primary indicators of performance for both initial and continued eligibility, it does not require that they set minimum standards for those results for either type of eligibility. In its guidance, however, DOL recommends that states do this, and that for continued eligibility, they "must take into account…the performance of providers of training services on the performance accountability measures described in WIOA Section 116," among other factors.

Factors states must consider when establishing ETP criteria for continued eligibility

- Training program performance
- Access to training services throughout the state, including rural areas
- Information reported to state agencies on training programs other than those used by Title I programs
- Relevance of training programs to in-demand industry sectors and occupations
- State licensure requirements and licensing status of training providers
- Training program quality
- Providers' abilities to offer industry-recognized and postsecondary credentials
- Ability of providers to offer training for employed people and people with barriers to employment, including those with disabilities
- Timeliness and accuracy of provider performance reports
- Other factors determined by the governor

As of the time of the site visits, seven states had set minimum performance standards for ETP programs for either initial or continued eligibility. However, one of these states was not yet enforcing its standards because it had not established a system to collect the data needed to accurately assess whether programs were meeting them.

Another two states were planning to set standards at some point in the future but needed better baseline data before they could do so. One of these two states had even gained approval from its governing body to institute standards for continued eligibility but changed its decision due to the paucity of data it had to determine appropriate levels. Respondents there stated they would instead set standards in a few years. At least two other states were considering setting performance standards in the future but also did not feel they had sufficient baseline data to set them yet.

WIOA also allows local WDBs to set criteria, including performance standards, for initial or continued eligibility that are higher than their state's standards. Among the study's 22 local areas in multi-area states, however, only two set additional criteria beyond ensuring that the programs met the state's requirements and were for occupations in demand in the local area. In one of these two local areas, key criteria were program cost and performance results, and any programs that were comparatively expensive or performed below their standards are to be discussed at a WDB performance review committee meeting. In the other area, the local WDB set a minimum standard for employment in the second quarter after exit at 50 percent for program completers, which was an indicator for which the state did not have a standard. When programs fall below that mark, the WDB's workforce services committee removes them from the local list.

In contrast, respondents from three states reported that they had not set minimum performance standards for their ETP list and were not planning to do so. State workforce agency staff from one of these states explained they decided not to set standards because they believed those levels would be "pretty much random levels or metrics." They instead preferred to allow people to make their own "informed" choices about what level of performance they would accept in a training program based on the performance results presented on the state's ETP website. "We really grappled with that. And we presented it to the state board for input and they had nothing to offer. So our proposal was, rather than...pick pretty much random levels or metrics, we're going to let informed choice be what matters. So we're not setting any thresholds."

– State workforce agency staff member

V. Using data for decision-making under WIOA

WIOA is aligned with a larger federal move toward data-driven and evidence-based policy-making (DOL 2018). As covered in previous chapters, this focus is evident in the legislation's approach to accountability—in adding new and joint indicators of performance; in the new elements in the PIRL—designed to report more data about system customers; and in the eligibility requirements for eligible training providers, which include submission of performance outcomes for participants and other students. This chapter addresses two additional aspects of WIOA's data-driven orientation: (1) expanded uses of LMI and (2) the requirement for states to conduct evaluations with WIOA funds.

A. Preparing and using LMI under WIOA

Under WIOA, as under WIA, state LMI units produce labor market surveys and data for the Bureau of Labor Statistics. They also receive funding to develop labor market products and services to support state workforce systems in making program, policy, and funding decisions.[52] The main difference between the two Acts in terms of LMI is that WIOA is somewhat more specific about the purposes for which LMI must be used.[53] These purposes include informing state and regional plans, populating the SAM used to set and adjust performance targets, and informing in-demand occupations to support eligibility determinations of ETPs.[54] Under WIOA, the use of LMI—specifically, providing information on in-demand industry sectors and occupations—is also considered a key career service that must be made available to customers of the public workforce system as well as a required Youth Program element.[55] This chapter describes state and local area perspectives, challenges, and promising practices related to LMI use under WIOA.

1. State and local perspectives on LMI under WIOA

> *"[W]e have really taken a stronger approach to developing and referencing and utilizing our own labor market information and putting it out there in the community."*
>
> – Local WDB staff member

Titles I and III respondents from states and local areas largely reported that their approach to LMI systems and data improvement had not changed from WIA to WIOA. Respondents from most states (11 of 14) and local areas and offices reported improved LMI systems and information. They noted, however, that these changes were generally due to a focus on continuous improvement, improved technical capacities for states and local areas, or new proprietary LMI products, rather than to WIOA.

a. **Use of LMI has improved but usually not because of WIOA.** Respondents from most states (11 of 14) and nine local areas reported having multiple means for accessing and analyzing LMI. Some of

[52] TEGL 22-00; WIOA and WIA use different terms to refer to LMI: WIA called LMI "employment statistics," while WIOA in Title III Section 305(e) labels it "workforce and labor market information."
[53] WIOA sec. 101(d)(5)(C), sec. 101(d)(11), sec. 107(d)(2)(B), sec. 134 (a)(3)(A)(viii)(III), sec. 154(c)(2) and (3), sec. 171(c)(3)(B)(i); and 20 CFR Parts § 652.300-303, § 679.130(e)(3), and § 679.130(k).
[54] State and regional planning is discussed in this study's report on governance and planning under WIOA. The SAM is discussed in Chapter II and ETPs in Chapter IV of this report.
[55] Sec. 134 (c)(2)(A)(iv)(I)(aa) "career services, which shall be available to individuals who are adults or dislocated workers through the one-stop delivery system and shall, at a minimum, include— […] (aa) provision of information on in-demand industry sectors and occupations." WIOA Sec. 129(c)(2)(M) "services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services;"

these were state created (for example, state LMI web portals) and others were proprietary. In a few cases, Titles I and III respondents said that states had made new or additional LMI tools available since the passage of WIOA but not necessarily because of the legislation. For example, Texas launched a new LMI website, texaslmi.com, to improve accessibility and usability. In addition, a few local WDBs reported purchasing subscriptions to proprietary online LMI tools since WIOA's passage to use in combination with state tools.

b. **Local areas' use of LMI has not changed much under WIOA, but connections to state or local experts has grown over time.** Titles I and III respondents from 12 local areas described a relatively stable use of LMI over time, as well as strong relationships with state or local LMI experts that had, in some cases, grown stronger in the WIOA era. Staff from one local WDB described their participation in a statewide group of data users since WIOA's passage: "[Participating in the state data group] has been really a game changer for us because it's provided us an opportunity to really grow expert in data. We've always…been a resource for the community when it comes to LMI…the level in which we provide that information now has drastically increased." Two other WDB respondents explained that their use of LMI under WIOA had grown; they had begun calling their state's LMI office to request reports. Four others noted they had begun occasionally calling on local experts to create or interpret LMI. Title I staff from one local area reported that their state had made a big investment in LMI since WIOA went into effect, hiring labor market analysts to assist every WDB in the state.

c. **Use of LMI by WIOA Titles II and IV has expanded somewhat under WIOA.** Although Titles I and III programs did not report much change in the way they used LMI from WIA to WIOA, Title II (and, to a lesser extent, Title IV) partners in six states described an increased use of LMI under WIOA, due to the Act's increasing emphasis on certification and employment outcomes for these partners. One local Title II respondent described looking at LMI "more than ever now. Because it used to not be so important to us in our world but now it is." One locally based Title III manager explained that the state was taking more time to train Titles II and IV staff on using LMI in outreach to employers, alluding to the new performance indicator on effectiveness in serving employers, for which all six WIOA core programs are jointly held accountable under WIOA.

> *"[W]e've got our [state] business intelligence department coming down and they're going to be training some of the partners on how to receive labor market information from their department, opening up a door because so many of our partners touch employers and they need that information."*
>
> – Local Title III manager

d. **Local areas are using LMI to assess approved ETP programs.** WIOA requires that training funded by the Title I programs be for in-demand occupations.[56] (This was also true under WIA.) LMI is what determines what occupations are in demand. Several local areas described using LMI to assess eligibility for training programs and providers, but these respondents did not indicate that this use of LMI was unique to WIOA.

> *"The thing we bring to the table is our labor market information. And so, I always like to say, we have some really great information. It's not the whole story, but it's a necessary part of the story, relative to what programs they [training providers] are putting funds to and expanding, or starting, or ending."*
>
> – Local Title I/III manager

[56] WIOA Sec. 122(b)(1)(D).

2. WIOA's emphasis on using LMI in service delivery

> *"There is a large push…to increase…the [LMI] knowledge base of the career counselors, how to access that and make that part of their daily [activities] when you're sitting down with a customer."*
>
> – Local Title I supervisor

Under WIOA, LMI must be made available to customers of the public workforce system, as part of career services.[57] Many staff from WDBs and service providers reported using LMI when counseling job seekers, but this was only occasionally because of WIOA. Respondents from three local areas suggested that WIOA made a difference to their use of LMI with job seeker and employer customers. For example, Title I respondents from one local area described meeting with all WIOA Title I staff to review potential enrollments and reviewing the in-demand occupation list generated with LMI if a person expressed a need for or interest in a particular training program. Another local Title I staff person reported becoming more focused on assisting customers in earning training certifications, and that LMI was a key tool to help customers see what jobs were in demand and what certifications were necessary to obtain those jobs. A local Title I supervisor indicated that he had become more focused on building staff capacity for using LMI with customers. State workforce agency staff in another state reported that their LMI team "has done a great job under WIOA of recognizing that we are working with people with barriers to employment, making sure information is easily accessible and that it's easy to understand."

3. Reported challenges and approaches to preparing and using LMI

The challenges associated with preparing and using LMI under WIOA that state and local respondents reported were not new and had been commonly reported under WIA.[58] Consequently, state and local approaches to dealing with these challenges were also not new but were typically a continuation of efforts launched under WIA.

a. **Local-level LMI was sometimes inaccurate.** Multiple respondents stated that LMI was at times inaccurate at the local level. That is, staff had observed local demand for occupations that were not listed as in demand according to the LMI. Staff from two local areas and one state, in the face of concerns about the accuracy of LMI, developed individualized processes to assess whether training programs met the requirement to provide training for in-demand occupations.

b. **LMI is not always relevant or available in a user-friendly format.** Respondents from five local areas reported that LMI was not particularly relevant in their areas; their economies were so dominated by one particular industry that most job seekers were only interested in finding a job in that industry. Other respondents stated that without sufficient training, many staff members have difficulty understanding how to use their state's LMI website to find the data needed to effectively assist their job seeker customers. As one local Title III manager stated, "It matters how much exposure and experience that the staff has as to the [labor market] information they can find." With that in mind, this area has included discussions of LMI at staff meetings to support case managers in using LMI to inform their work with customers.

[57] Sec. 134 (c)(2)(A)(iv)(I)(aa) "career services, which shall be available to individuals who are adults or dislocated workers through the one-stop delivery system and shall, at a minimum, include— […] (aa) provision of information on in-demand industry sectors and occupations."

[58] See Berk et al. (2012, pp. 34–35) for a discussion of some of the limitations of "real-time" LMI, a subset of LMI. See also Dunham 2004.

B. Conducting evaluations under WIOA

> **WIOA evaluation requirement**
>
> *"States must use funds reserved by the Governor for statewide activities to conduct evaluations of activities under the WIOA Title I core programs in order to promote continuous improvement, research and test innovative services and strategies, and achieve high levels of performance outcomes."*
>
> (WIOA 682.220)

Under WIOA, states are newly obligated to reserve set-aside funds to evaluate Title I core programs. Part of the legislation's push toward data-driven decision making, these evaluations aim to support improved program services and outcomes (Chocolaad and Wandner 2017). According to DOL (2018), the increased emphasis on evaluation also "aligns with an expanding movement in the U.S. toward evidence-based policy" (p. 1). The legislation makes several requirements about these evaluations, including that they:

- "Be coordinated and designed in conjunction with State and Local WDBs and with State agencies responsible for the administration of all core programs;
- When appropriate, include analysis of customer feedback and outcome and process measures in the statewide workforce development system; and
- Use designs that employ the most rigorous analytical and statistical methods that are reasonably feasible, such as the use of control groups." (WIOA 682.220)

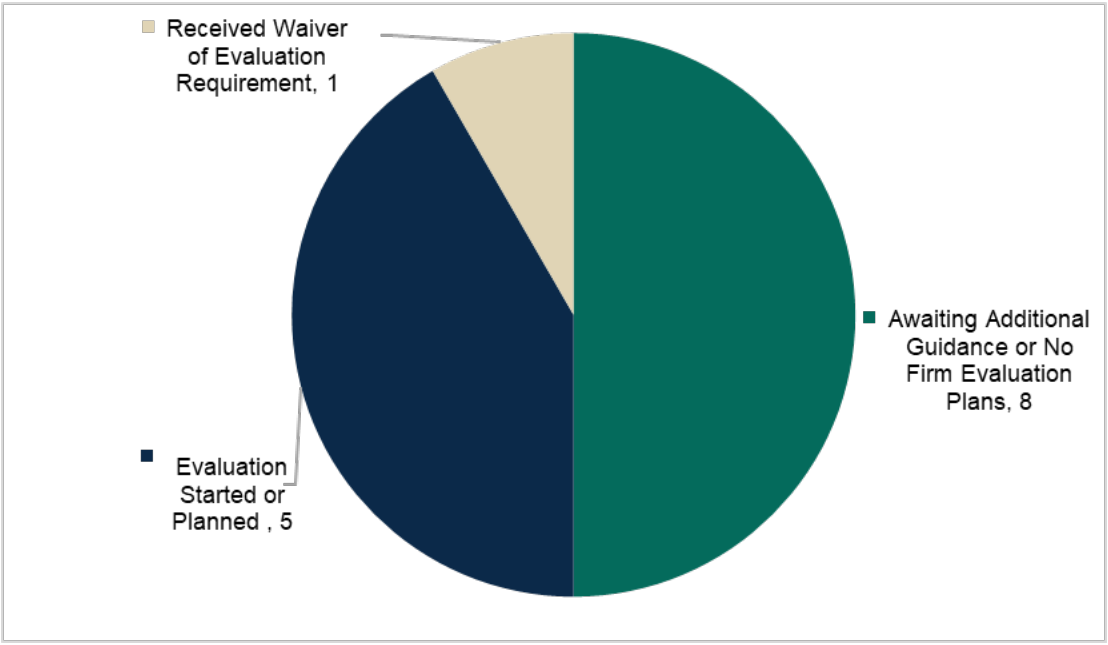
Additionally, states must make public the results of the evaluations they conduct.

1. Perceptions of WIOA's influence on state evaluation efforts

> *I feel like we just need to understand what exactly we're evaluating, and I'm sure that we would be able to do it. But since we don't have any guidance around that…it was [not] clear what we needed to be doing…What are we evaluating? We just don't really know."*
>
> – State adult and dislocated worker program staff member

Overall, states tended to be in the preliminary stages of meeting WIOA's evaluation requirement. However, there was some variation, with a few states beginning to conduct evaluations and others not yet making plans. Of the states included in the study, five had started evaluations that, according to those states, met WIOA's requirement or had clear plans to do so; eight were awaiting additional guidance from DOL or had not made or described evaluation plans; and one had received a waiver of the requirement to conduct evaluations (Exhibit V.1).

Exhibit V.1. State progress implementing WIOA's evaluation requirement



Source: State-level interviews conducted during site visits to 14 states in 2018 and 2019.

Note: Interviews with two states did not include discussions on WIOA's evaluation requirement.

State respondents expressed needing additional guidance from DOL about the evaluation requirement. One state simply wanted to confirm that the evaluation methods it was considering would meet the WIOA requirement while others were unsure even how to begin. At least two states noted they would have conducted evaluations similar to those required under WIOA even without the legislation.

> *We already had plans for a lot of this [evaluation work]. Honestly, we would've done a lot of that work if [WIOA] hadn't passed."*
>
> – State adult and dislocated worker program staff member

Of the states that were further along with their evaluation plans, the legislation's recommendation to include customer feedback and use rigorous analytical methods were both evident.[59] One state planned to conduct intensive qualitative research, including 200 in-person interviews with WIOA customers, 100 case file reviews, and focus groups with counselors. Another planned to conduct quasi-experimental analyses.

State agency staff and university contractors were the most common evaluators that states were using or planning to use. Four states used or planned to use state agency staff to do evaluation work, though constraints on staff capacity were noted. Two states used or planned to use state university contractors. One respondent explained that as a government entity, setting up contracting relationships with a university was easier than doing so with a private evaluation firm. Only one respondent reported asking local areas to come up with their own evaluation plans. However, this state was not satisfied with the plans the local areas had produced and decided to engage professional evaluation services instead.

[59] Research on states' evaluation capacity conducted in 2016 found that states most commonly used descriptive, qualitative, and relational/correlational methods to evaluate workforce programs, whereas experimental studies were least common (Chocolaad and Wandner 2017).

2. Challenges to conducting evaluations under WIOA

> *"There's very little guidance in law and regulation. It's a paragraph, if that…Which is nice because of flexibility, but we're a little worried that they may come back and be like, 'Well, that's not enough…'"*
>
> – State adult and dislocated worker program staff member

Study respondents highlighted challenges with evaluation and evaluation capacity. These reported challenges included inadequate resources ranging from staff time and skill level to evaluation-specific funding. A handful of state Title I respondents were also either unaware of WIOA's evaluation requirement or wanted additional guidance about it from DOL. A 2016 study by the National Association of State Workforce Agencies found very similar results.[60]

a. **Some states lacked clarity about, or awareness of, the evaluation requirement.** Respondents from six states were either unaware of WIOA's evaluation requirement or felt they needed more clarity before they could implement it correctly. For example, a respondent from one state said the state was unsure exactly what it was supposed to be evaluating, especially because the state had recently completed its own system-wide evaluation. The respondent, stating the legislation did not provide enough detail, struggled to access clear guidance from DOL. This same state also thought it was confusing that WIOA's evaluation requirement only applies to Title I when the legislation otherwise emphasizes coordination across titles.

> *"The biggest barrier with the…research for us is how are we going to pay for these future projects."*
>
> – State adult and dislocated worker program staff member

b. **Some states lacked staff and financial resources to conduct rigorous evaluations.** Respondents from at least four states that had begun to plan for an evaluation noted that they did not have enough staff time to adequately conduct the required evaluations without shortchanging other work, lacked sufficient financial resources to conduct a high-quality evaluation, or that their staff lacked evaluation know-how. For example, a respondent from one state emphasized the quality and knowledge of his evaluation team but also said that the team's capacity is limited. A respondent from another state added that the state has been so busy implementing other WIOA requirements that they are waiting until "things stabilize a little bit" to tackle evaluation work. A respondent from one state said that the costs associated with conducting evaluations could also be a challenge. She explained that although they have an excellent data and research team, conducting the rigorous research required by WIOA is expensive. She also noted the trade-offs inherent in spending on evaluation, saying, "It could be spent on our customers, our youth. And it's just a challenge."

[60] Although the study uncovered a high demand for evaluation across states, it also found that "evidence-building capacity varies tremendously by state," with fewer than half feeling they had sufficient capacity to conduct evaluations (Chocolaad and Wandner 2017, p. 8)

VI. Looking ahead

WIOA strengthens the public workforce system's emphasis on performance accountability by developing a shared set of primary performance indicators and data reporting elements across its six core programs. It also supports a greater emphasis on data-driven decision making by strengthening performance reporting by ETP programs, requiring broader use of LMI, and rigorously evaluating Title I core programs.

This report explored the experiences of a relatively small sample of 14 states and 28 local areas in implementing WIOA's performance accountability and other data-driven activities as of early 2019. While the responses and information for the site visits are not necessarily generalizable nationally, the report provides detailed information about efforts states and local areas undertook to implement various changes under WIOA and ideas and impressions of individuals engaged in that effort. In this chapter, we identify some of the broader takeaways from our discussions of these changes and suggest where additional guidance and technical assistance might support further progress in the workforce system. Future efforts could build on DOL-issued guidance and technical assistance provided since the time of the site visits. (See Appendix A for a list of DOL guidance and associated technical assistance.)

WIOA's establishment of the common performance indicators across the six core programs—including programs administered by federal agencies other than DOL—is groundbreaking for the public workforce system. The findings and observations in this report suggest several areas for workforce system stakeholders to consider as they continue their efforts to implement WIOA's vision and requirements. These include:

1. Developing a stronger understanding of the credential attainment and MSG indicators

Study respondents at both the state and local levels across all six core programs reported numerous challenges and concerns related to the implementation of WIOA's primary indicators. In particular, as noted above, respondents from five states and nineteen local areas reported confusion about what credentials are acceptable, when those credentials can be earned, and which participants to include when calculating that indicator. Similarly, respondents from seven states and fifteen local areas reported not fully understanding how to correctly assess and document measurable skill gains.

Since the completion of the study's site visits, ETA has provided states and local areas with technical assistance on the credential attainment indicator, including (among other activities) establishing a peer learning cohort and a decision tree tool. These TA efforts, as well as continued guidance and technical support addressing the credential attainment and MSG indicators, may help states and local areas develop a stronger understanding of these indicators and how to implement them.

2. Continued support in adapting the federal level SAM for negotiations with local WDBs.

Respondents from 6 (of 11) multi-area states reported that they had experienced challenges in developing a SAM for use in negotiating performance standards with local boards. DOL has demonstrated a commitment to providing clarification on this aspect of the performance management system by holding a WIOA performance peer learning group webinar in October 2019 that educated states on various approaches for developing local-level SAMs. Hosting additional events related to this topic and disseminating material from such sessions afterward could be helpful to states.

DOL also provided additional guidance on this topic in TEGL 11-19, issued on February 6, 2020. TEGL 11-19 further delineated the process for negotiating levels of performance and provided specifications on adjusted levels of performance and the SAM.

3. Developing a stronger understanding of the importance, legality, and best practices for collecting and reporting on new PIRL data elements related to disability.

Respondents from more than one-third of states (five) raised concerns about the burden created by having to report on the large number of data elements in the PIRL, as well as the value and legality (due to privacy protections) of some of the new PIRL fields. In particular, respondents from three of these states raised concerns about the large number of new disability-related fields and questioned the appropriateness of collecting such data.

Since completion of this study's site visits, DOL's Office of Disability Employment Policy has begun providing technical assistance to states and local WDBs related to the new disability-related data elements on the PIRL, including an online data visualization tool that includes easy to understand definitions and descriptions of the data.[61] Continued provision of this kind of assistance by DOL might help states and local boards better understand the importance and appropriateness of reporting data on these fields.

4. Leveraging effective strategies and best practices for sharing data across different systems.

Despite numerous efforts to share data on co-enrolled participants across WIOA core programs, respondents from more than three-quarters of study states (11) reported being unable to do so. In particular, they reported challenges in sharing data between the DOL-administered core programs (the Titles I and III programs) and the Titles II and IV core programs administered by ED due to a variety of impediments, including the lack of a unique identifier, statutory privacy restrictions, and widely differing data systems.

To overcome these data-sharing challenges, these states might benefit from learning more about strategies and best practices for enabling data sharing across different systems**.** Following the completion of the study's data collection, DOL provided technical assistance to states on sharing data on co-enrolled participants at two-day, in-person performance trainings held in Dallas and Chicago in late April and May 2019, and also sponsored a technical assistance learning cohort on co-enrollment. States might benefit from additional technical assistance on data sharing.

5. Leveraging effective strategies and best practices for collaborating with state or national higher education agencies to access performance data.

Respondents from ten states indicated that it had been difficult to obtain performance data from ETP providers about their programs. They described multiple impediments to obtaining performance data from ETP providers, such as restrictions related to the Federal Education Rights and Privacy Act (FERPA) that prevented providers from sharing the data or lack of provider capacity to collect and/or share the data.

DOL's additional guidance on this topic can be found in TEGL 8-19, issued on January 2, 2020; TEGL 8-19 identified actions that states can take to obtain performance data from training providers.

[61] See http://drivedisabilityemployment.org/wioareporting.

State workforce agencies may also benefit from opportunities to learn about best practices for collaborating with state or national higher education agencies to access performance data. Although DOL provided detailed guidance on how state workforce agencies can share unemployment compensation wage data with educational and training providers in TEGL 7-16, states may appreciate opportunities to learn about how to best collaborate with their education counterparts. For example, states that have successfully worked with their education counterparts to help ETPs collect SSNs from all students, and states that have successfully established agreements with national higher education agencies, could provide valuable insights to other states.

6. Developing a stronger understanding of WIOA's evaluation requirements

Respondents from at least four states cited a variety of challenges in meeting the evaluation requirements, including lack of staff time to devote to conducting evaluations, limited resources to invest in evaluation efforts, and a lack of understanding of how to conduct high-quality evaluation. Respondents from eight states reported that they were waiting for additional guidance or had made no plans for conducting any evaluations.

Ongoing efforts to offer technical assistance, guidance, and tools related to conducting evaluations might help states in meeting WIOA's evaluation requirements. Since completion of the study's site visits, DOL has created the Evaluation Peer Learning Cohort, comprised of cross-agency representatives from multiple states, and the Evaluation and Research Hub community of practice on WorkforceGPS;[62] DOL has also provided multiple webinars on how to conduct successful evaluations.

[62] See: https://evalhub.workforcegps.org/about.

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Appendix A:

List of technical assistance products and activities related to the performance accountability system for WIOA Title I core programs

Date	Technical Assistance Type	Technical Assistance Title	Topic	Hyperlink
2/6/2019	ETA Webinar	WIOA Joint Data Validation Overview	Data Validation	https://www.workforcegps.org/events/2019/01/14/16/46/WIOA-Joint-Data-Validation-Overview
2/19/2019	Virtual Meeting	Peer Learning Group Call, PIRL Data Element	PIRL	
3/15/2019	Resource	Understanding Reportable Individuals and Participants for Performance: A Guide to Reporting Services	Performance Indicators	https://ion.workforcegps.org/resources/2017/02/22/07/41/Understanding-Reportable-Individuals-and-Participants-for-Performance-A-Guide-to-Reporting-Services
3/19/2019	Virtual Meeting	Peer Learning Group Call, State Data Validation	Data Validation	
3/21/2019	Webinar	Co-enrollment Cohort Update Webinar	Performance Reporting	https://www.workforcegps.org/events/2018/06/21/15/09/WIOA-Co-Enrollment-Cohort-Lessons-Learned
3/25/2019	TEGL	TEGL 14-18: Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor (DOL)	Performance Reporting	https://wdr.doleta.gov/directives/corr_doc.cfm?docn=7611
4/16/2019	Virtual Meeting	Peer Learning Group Call, Supplemental Wage Data	Performance Reporting	§ https://www.workforcegps.org/events/2019/03/25/12/25/WIOA-Performance-Peer-Learning-Group-Supplemental-Wage-Information
5/21/2019	Virtual Meeting	Peer Learning Group Call, Participant, Reportable Individual, and Service Data	Performance Reporting	https://www.workforcegps.org/events/2019/04/29/14/23/WIOA-Performance-Peer-Learning-Group-Participant-Reportable-Individual-and-Service-Data
7/23/2019	ETA Webinar	Maximizing WIOA and non-WIOA Performance Data	Performance Integration and data analysis	https://www.workforcegps.org/events/2019/06/25/16/01/Maximizing-WIOA-and-non-WIOA-Performance-Data
9/12/2019	ETA Webinar	WIOA Annual Statewide Performance Narrative: An Overview	Performance Reporting	https://www.workforcegps.org/events/2019/07/29/17/55/The-WIOA-Annual-Statewide-Performance-Report-Narrative-An-Overview
9/24/2019	ETA Webinar	Peer Learning Group Call, Performance Assessment Tools	Performance	https://performancereporting.workforcegps.org/sitecore/content/global/events/2019/08/01/19/07/WIOA-Performance-Peer-Learning-Group-Performance-Assessment-Tools

Date	Technical Assistance Type	Technical Assistance Title	Topic	Hyperlink
10/22/2019	ETA Webinar	Peer Learning Group Call, Local Area Statistical Adjustment Model	Statistical Adjustment Model	https://performancereporting.workforcegps.org/sitecore/content/global/events/2019/10/08/11/54/WIOA-Performance-Peer-Learning-Group-Local-Area-Statistical-Adjustment-Model
11/19/2019	ETA Webinar	WIOA Performance Peer Learning Group: Quarterly Report Analysis	Performance Reporting	https://performancereporting.workforcegps.org/sitecore/content/global/events/2019/11/05/12/54/WIOA-Performance-Peer-Learning-Group-Quarterly-Report-Analysis
1/24/2020	Virtual Meeting	Peer Learning Group Call, WIOA Effectiveness in Serving Employers Measure	Performance Indicators	https://www.workforcegps.org/events/2020/01/13/17/40/WIOA-Performance-Peer-Learning-Group-Effectiveness-in-Serving-Employers
1/30/2020	Virtual Meeting	Eligible Training Provider Webex	ETP	(not recorded)
2/3/2020	TEGL	TEGL 10-19: Technical Assistance regarding the Submission Deadline for the Unified and Combined State Plans under the Workforce Innovation and Opportunity Act (WIOA) for Program Years (PYs) 2020-2023 and Other Related Requirements	Performance Reporting	https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=5326
2/6/2020	TEGL	TEGL 11-19: Negotiations and Sanctions Guidance for the Workforce Innovation and Opportunity Act (WIOA) Core Programs	Performance Reporting	https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3430
2/11/2020	Virtual Meeting	Performance Assessment Call	Performance Statistical Adjustment Model	(regional calls not recorded)
3/6/2020	Webcast	Negotiations and Sanctions Webcast Recording Session	Negotiations	https://performancereporting.workforcegps.org/events/2020/04/17/18/32/WIOA-Titles-I-and-III-Negotiations-and-Sanctions-Question-and-Answer-Session

Date	Technical Assistance Type	Technical Assistance Title	Topic	Hyperlink
3/23/2020	TEN	TEN 19-19: Announcing the Approval of the Non-Material Revision to the Department of Labor (DOL)-only Performance Accountability, Information, and Reporting System Information Collection Request	Performance Reporting	https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=4061
3/24/2020	Virtual Meeting	Peer Learning Group Call: Program Year 2018 Annual Report Data Infographics	Performance Reporting	https://www.workforcegps.org/events/2020/03/09/20/00/WIOA-Performance-Peer-Learning-Group-Program-Year-2018-Annual-Report-Data-Infographics
4/18/2020	ETA Webinar	Data Integrity Technical Assistance Tool: Quarterly Report Analysis for WIOA Titles I and III	Data Integrity	https://performancereporting.workforcegps.org/sitecore/content/global/events/2020/07/21/16/39/Data-Integrity-Technical-Assistance-Tool-Quarterly-Report-Analysis-for-Titles-I-and-III
4/18/2020	ETA Webinar	Data Integrity Technical Assistance Tool: Quarterly Report Analysis for WIOA Titles I and III	Data Integrity	https://performancereporting.workforcegps.org/sitecore/content/global/events/2020/07/21/16/39/Data-Integrity-Technical-Assistance-Tool-Quarterly-Report-Analysis-for-Titles-I-and-III
4/28/2020	ETA Webinar	WIOA Titles I and III Negotiations and Sanctions: Question and Answer Session	Negotiations	https://performancereporting.workforcegps.org/events/2020/04/17/18/32/WIOA-Titles-I-and-III-Negotiations-and-Sanctions-Question-and-Answer-Session
4/29/2020	ETA Webinar	WIOA Performance 101 Series: Part I - An Introduction To Performance Accountability	Performance Reporting	https://www.workforcegps.org/events/2020/04/06/17/44/WIOA-Performance-101-Series-Part-I-An-Introduction-To-Performance-Accountability
5/21/2020	TEN	TEN 24-19: Eligible Training Provider Reporting and Data Publication	Performance Reporting	https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7291
5/26/2020	Virtual Meeting	Peer Learning Group Call: Training Related Employment	Performance Reporting	https://www.workforcegps.org/events/2020/05/11/14/28/WIOA-Performance-Peer-Learning-Group-Training-Related-Employment
6/8/2020	TEN	TEN 25-19: Understanding Postsecondary Credentials in the Public Workforce System	Performance Reporting	https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=5953

Date	Technical Assistance Type	Technical Assistance Title	Topic	Hyperlink
6/10/2020	ETA Webinar	WIOA Performance 101 Series - Part II, Resources and Their Use	Performance Reporting	https://www.workforcegps.org/events/2020/04/15/20/08/WIOA-Performance-101-Series-Part-II-Performance-Accountability-Resources-and-Their-Use-A-Guide
6/16/2020	Resource	PIRL Reporting Online Resource	PIRL	https://performancereporting.workforcegps.org/resources/2019/10/01/13/32/PIRL-Reporting-Online-Resourcehttps://performancereporting.workforcegps.org/resources/2019/10/01/13/32/PIRL-Reporting-Online-Resource
6/18/2020	Webinar	Data Integrity Technical Assistance Tool: Quarterly Report Analysis for WIOA Titles I and III	Data Integrity	https://performancereporting.workforcegps.org/sitecore/content/global/events/2020/07/21/16/39/Data-Integrity-Technical-Assistance-Tool-Quarterly-Report-Analysis-for-Titles-I-and-III
6/19/2020	TEGL	TEGL 23-19: Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs.	Performance Reporting	https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=9155
6/23/2020	Resource	Credential Attainment Resource	Credential Attainment	https://performancereporting.workforcegps.org/resources/2017/12/18/18/43/Credential-Attainment-Resource-Page
6/25/2020	ETA Webinar	Introduction: Credential Attainment Decision Tree Tool and Credential Attainment Cohort Capstone	Credential Attainment	https://performancereporting.workforcegps.org/sitecore/content/global/events/2020/05/26/16/42/Introduction-Credential-Attainment-Decision-Tree-Tool-and-Credential-Attainment-Cohort-Capstone
7/1/2020	Virtual Meetings	National Association of Workforce Boards Workshop Presentation on Performance	Performance Reporting	(not recorded)
7/29/2020	ETA Webinar	Overview: Validating Required Performance Data Submitted by DOL Grantees	Data Validation	https://www.workforcegps.org/events/2020/06/25/14/53/Overview-Validating-Required-Performance-Data-Submitted-by-DOL-Grantees
8/18/2020	Webinar	Quarterly Results Analysis: Data Integrity Technical Assistance Tool	Data Validation	https://www.workforcegps.org/events/2019/11/05/12/54/WIOA-Performance-Peer-Learning-Group-Quarterly-Report-Analysis
9/15/2020	Virtual Meeting	Peer learning Group Call: PY 2019 Quarterly Report Analysis (Q4) Review	QRA	https://www.workforcegps.org/events/2019/11/05/12/54/WIOA-Performance-Peer-Learning-Group-Quarterly-Report-Analysis

Date	Technical Assistance Type	Technical Assistance Title	Topic	Hyperlink
10/15/2020	ETA Webinar	Refresher: Title I and III Annual Statewide Performance Report Narrative	Performance Reporting	https://www.workforcegps.org/events/2020/09/29/17/50/Refresher-Title-I-and-III-Annual-Statewide-Performance-Report-Narrative
10/29/2020	TEGL	TEGL 04-20: Guidance on Integrating Services for Trade-Affected Workers under the Trade Adjustment Assistance Program (TAA Program) with the Workforce Innovation and Opportunity Act (WIOA) Title I Dislocated Worker (DW) Program	Performance Reporting and integration	https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=6273
11/13/2020	ETA Webinar	Eligible Training Provider (ETP) Webinar Series Part 1: Eligibility and TEGL 08-19	ETP	https://www.workforcegps.org/events/2020/10/23/12/02/Eligible-Training-Provider-amp-35-40-ETP-41-Webinar-Series-Part-1-Eligibility-and-TEGL-08-19
1/11 - 1/18/2019	Virtual Meeting	Review of Measurable Skill Gains Data Series (Regional Meetings)	Performance Indicators	(not recorded)
1/22/2019 - 8/27/2019	Virtual Meetings	WIOA Performance Accountability Workgroup Call	Performance Reporting	(not recorded)
1/29 - 5/21/2019	Virtual/In-Person Meeting	Data Max Cohort (Virtual and In-Person Sessions)	Performance Integration and data analysis	https://performancereporting.workforcegps.org/announcements/2018/11/15/16/49/Maximizing_WIOA_and_non_WIOA_Performance_Data_Cohort
10/8/2019 - 6/25/2020	Virtual Meetings	Credential Attainment Cohort Virtual Meetings	Credential Attainment Indicator	https://performancereporting.workforcegps.org/resources/2020/06/25/13/53/Performance-Reporting-Cohorts
2/13 - 3/4/2020	Regional Meetings	Negotiations Tool Overview	Negotiations	(not recorded)
2/26 - 2/27/2020	In-person meeting	Credential Attainment Cohort In-person Meeting	Credential Attainment	(not recorded)
4/22 - 4/25/2019	In-person meeting	National Performance Spring Training (Chicago, IL)	Performance Reporting	https://performancereporting.workforcegps.org/resources/2019/10/03/20/25/WIOA_2019_Performance_Accountability_Training

Date	Technical Assistance Type	Technical Assistance Title	Topic	Hyperlink
5/28 - 5/31/2019	In-person meeting	National Performance Spring Training (Dallas, TX)	Performance Reporting	https://performancereporting.workforcegps.org/resources/2019/10/03/20/25/WIOA_2019_Performance_Accountability_Training

Appendix B:

WIOA implementation study sites

Exhibit B.1. WIOA Implementation Study: Site visit states, regions, and local areas

	State/Region	1	2	3	4	5	6	State workforce agency	Local workforce area	Local workforce board	American Job Center
1	New Jersey	✓						NJ Department of Labor and Workforce Development	Gloucester County	Gloucester County Workforce Development Board	Gloucester One-Stop Career Center
									Middlesex County	Middlesex County Workforce Development Board	New Brunswick One-Stop Career Center
2	Vermont		✓					Vermont Department of Labor	Single workforce area	Single workforce area	Burlington Career Resource Center
											Morrisville Career Resource Center
3	Pennsylvania		✓					Pennsylvania Department of Labor & Industry	Chester County	Chester County Workforce Development Board	PA CareerLink® Chester County
									Southern Alleghenies	Southern Alleghenies Workforce Development Board	PA CareerLink® Cambria County
4	Virginia			✓				Virginia Employment Commission	Hampton Roads	Hampton Roads Workforce Development Board	Virginia Career Works—Norfolk Center
									South Central	South Central Workforce Development Board	Virginia Career Works—South Boston
5	Florida			✓				Florida Department of Economic Opportunity	North Florida	CareerSource North Florida	Madison office
									Central Florida	CareerSource Central Florida	Orlando office
6	South Carolina				✓			South Carolina Department of Employment and Workforce	Pee Dee	Pee Dee Workforce Development Board	SC Works Pee Dee
									South Coast	Trident Workforce Development Board	SC Works Trident
7	Colorado				✓			Colorado Department of Labor & Employment	Weld County	Weld County Workforce Development Board	Employment Services of Weld County
									Pikes Peak	Pikes Peak Workforce Development Board	Pikes Peak Workforce Center
8	Oklahoma				✓			Oklahoma Office of Workforce Development	South Central	South Central Oklahoma Workforce Board	Lawton Workforce Center
									Southern	Southern Workforce Board	McAlester Workforce Center

	State/Region	1	2	3	4	5	6	State workforce agency	Local workforce area	Local workforce board	American Job Center
9	Texas				✓			Texas Workforce Commission	Heart of Texas	Workforce Solutions for the Heart of Texas	McLennan County Workforce Solutions Center
									Capital Area	Workforce Solutions Capital Area	North Center
10	Utah					✓		Utah Department of Workforce Services	Single workforce area	Single workforce area	Price Center
											Provo Center
11	Indiana					✓		Indiana Department of Workforce Development	Central	Region 5 Workforce Development Board	WorkOne Greenfield
									Marion County	Employ Indy	WorkOne Indy
12	Wisconsin						✓	Wisconsin Department of Workforce Development	South Central	Workforce Development Board of South Central Wisconsin	Dane County Job Center (Madison)
									West Central	Workforce Development Board of West Central Wisconsin	Eau Claire County Job Center
13	Idaho						✓	Idaho Department of Labor	Single workforce area	Single workforce area	Boise
											Caldwell
14	Washington						✓	Washington State Employment Security Department	Vancouver	WorkSource Southwest Washington	WorkSource Vancouver
									Spokane	Spokane Workforce Council	WorkSource Spokane
15	Massachusetts (pilot)	✓						Department of Career Services	North Shore	MassHire-North Shore Workforce Board	MassHire North Shore Career Center—Salem
									Lowell	MassHire-Greater Lowell Workforce Board	MassHire Lowell Career Center
16	Mississippi (pilot)			✓				Department of Employment Security	Twin Districts	Twin Districts Local Workforce Development Board	Hattiesburg Job Center
									Southcentral Mississippi Works	Southcentral Mississippi Works Local Workforce Development Board	Madison Job Center
17	Ohio (pilot)					✓		Department of Jobs and Family Services	Area 20	South Central Ohio Workforce Partnership	OhioMeansJobs Fairfield County
									Area 11	Workforce Development Board of Central Ohio	OhioMeansJobs Columbus—Franklin County
18	California (pilot)						✓	Employment Development Department	San Joaquin County	San Joaquin County WorkNet	Stockton WorkNet Center
									Contra Costa County	Workforce Development Board of Contra Costa County	Concord American Job Center

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