EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION WIA Performance Reporting System
	CORRESPONDENCE SYMBOL OCTA/OWS
	DATE November 19, 2001

TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 14-00, CHANGE 1

TO: ALL STATE WORKFORCE LIAISONS ALL STATE WORKFORCE AGENCIES ALL STATE WORKER ADJUSTMENT LIAISONS ALL STATE ONE-STOP CENTER SYSTEM LEADS

FROM: EMILY STOVER DeROCCO Assistant Secretary

SUBJECT: Guidance on the Workforce Investment Act (WIA) Management Information and Reporting System

**1.** <u>**Purpose.**</u> To provide revisions and clarification to technical guidance previously issued to states for reporting participant data required under Title 1B of the Workforce Investment Act. Additionally, to notify states that in accordance with the Paperwork Reduction Act, OMB has granted a 90 day extension to this reporting packet to allow for the collection of data on the quarterly and annual reports, and the WIASRD. This action extends the reporting packet to January 31, 2002.

**2.** <u>**References.**</u> Workforce Investment Act of 1998 (WIA), section 136; WIA Final Rules, 20 CFR part 666; Training and Employment Guidance Letter (TEGL) No. 14-00; OMB Circular No. A-94 Revised, Guidelines and Discount Rates for Benefit-Cost Analysis of Federal Programs; OMB Notice of Action 1205-0420, September 26, 2001.

**3.** <u>Background.</u> In TEGL No. 14-00, the Department issued technical guidance to states for use in reporting participation and outcome information. This change outlines additions and clarifies information given in TEGL 14-00.

RESCISSIONS	EXPIRATION DATE
	Continuing

# 4. Changes to the WIA Standardized Record Data (WIASRD).

#### A. Item 114. Recently Separated Veteran

< A veteran who applied for participation under WIA Title 1B within **48** months after discharge or release from active U.S. military, naval, or air service.

Note: The WIASRD, Item 114, mistakenly stated veterans must apply within a 12 month period of time. PL 105-220 Subtitle A-Workforce Investment Definitions, Section 101, 49(B) states the correct definition of a recently separated veteran.

### B. Item 308. Displaced Homemaker (Statewide (15%) Activities)

< This item is also required for Dislocated Workers who received Core, Intensive and Training services.

Note: After discussion with state and Federal staff, a decision was made that Displaced Homemakers could be considered under Dislocated Workers.

#### C. Item 622. Other Reasons for Exit

< Reservists called to active duty who choose not to return to WIA. When an entry is made in this item, the individual's outcome is excluded from performance.

# D. Item 627. Attainment of Goal #1

< Code 3 = Set, but attainment pending. This code should not be used after exit. When the youth exits, this field should be marked with a A1" or A2" for all goals that have been set.

#### 5. Changes to the WIA Quarterly Report.

**A**. For consistency with the Annual Report, the first item on the Quarterly Summary Report (ETA 9090), **Total New Registrants** has been changed to read **Total Participants**. This reflects the number of new WIA registrants who received WIA-funded services in the program year and carry-in from the previous year. For PY 2000, total participants include both individuals who registered during the program year and carry-in from JTPA. For adults and dislocated workers, individuals who receive core services (other than informational and self-service activities), intensive services or training services must be registered. All youth who receive youth activities must be registered.

**B.** At the request of state staff, Table A has been further defined to add the specific dates (month and year) for the quarters to be reported (see attached for PY 2001 table).

**C.** The number of quarters has been added to the actual reporting form (ETA 9090) on the web-based system allowing states to know the required number of quarters. These numbers may be changed to allow more quarters to be reported, but not less.

**D.** In accordance with OMB guidance, new fields have been added to collect information on response rates and sample sizes for both participant and employer surveys.

**E.** The reporting form now prohibits a state from entering a value different than the outcome obtained from dividing the numerator by the denominator (automatically calculates performance).

**F.** Additional edit checks (attached) have been added to the on-line reporting form for data validation purposes. One of these, a Asoft@edit check, is attached as a Table of Extreme Values that will be helpful to both state and regional staff to identify, through these edit checks, extreme outliers by identifying them on a Apop-up@screen.

### 6. <u>Clarifications of Required Narrative Portions and Definitions on the WIA Annual</u> <u>Report.</u>

A. In TEGL 14-00, the Department stressed the importance of submitting an Annual Report which would emulate the private sector=s AReport to Stockholders@. Section 136(d)(2)(C) of the Act requires states to address in their Annual Reports the Acost of workforce investment activities relative to the effect of the activities on the performance of participants.@

During the Reporting Training offered to state and regional personnel throughout the country, the Performance Team presented a simple, one-page WIA Financial Statement (attachment H) as an example for use when submitting the Annual Report. This financial statement was well received by all state/regional staff and contains two parts discussing the Operating Results and Cost-Effectiveness Analysis (COEA). While there are many methods of showing this requirement, Attachment H gives one example of how to prepare a COEA. Though this WIA Financial Statement as shown in Attachment H is not a requirement at this time, it is an excellent way of showing the financial posture of WIA operations in your state and would meet the requirement of the law for this area.

**B.** The definition of underemployed means an individual who is working part time but desires full time employment, or who is working in employment not commensurate with the individual=s demonstrated level of educational attainment.

**C.** The definition of an out-of-school youth is: **A**all youth except those who are attending any school and have not received a secondary school diploma or its recognized equivalent and except those who are attending post-secondary school and are not basic skills deficient.@

**D.** Utilization of 15% funds for Statewide Activities: If the activities funded with State 15% reserve funds involve the enrollment of individuals eligible for title 1B services, (i.e., adult, dislocated workers, or youth activities), at the state or local level, the outcomes are included in the performance measurements. If the activities are not supporting services for eligible adults, dislocated workers or youth, the outcomes are excluded in the negotiated performance measurements. Examples of such exceptions are:

1) the state is conducting a statewide activity that does not involve direct services (e.g., research or evaluation),

2) the activity is structured to provide services that are highly specialized, such as a pilot or demonstration activity for which the state establishes separate, or its own specific, goals not typically addressed in the adult, dislocated worker or youth activities (e.g., the activities support incumbent worker training authorized under Section 134(a)(3)(A)(iv)(I), or a project for chemically dependent TANF recipients).

7. <u>Changes to Performance Outcome Verification Requirements</u>. States are required to establish basic standard operating procedures for data collection and handling to ensure the quality and integrity of the data over time. At a minimum, states must address Adata verification<sup>®</sup> and Adata validation<sup>®</sup> in the established procedures to ensure that the resulting database and reports are certifiably accurate. Federal Regional Offices have been instructed on procedures for data validation and of their requirement to become thoroughly familiar with data collection efforts states must have in place. Regional staff are prepared to assist states as necessary. At a minimum, states must have standard operating procedures in place for data collection. Performance data submitted on the quarterly and annual reports must be verified and validated at the state level.

AData verification@involves checking the accuracy of all or a sample of the computerized records against the original paperwork or other source(s). Although the goal of data entry is to achieve 100% correct entries, it is rarely accomplished due to recording or keying errors. The Adata verification@process is the verification of the accuracy of all or a sample of keyed entries by their comparison with the original source(s) to identify and correct errors.

AData validation, on the other hand, involves checking the reasonableness of all or a sample of the data entered into the computerized data base. Although data may be correctly transcribed from the forms, the data may not be accurate or logical because of recording errors. For

example, entering a date of exit from WIA-funded services for a participant that is before his or

her date of registration raises doubt about the accuracy of such entries, regardless of whether or not they were properly transcribed from the paperwork or forms.

Examples of procedures for data collection and handling to ensure that the resulting database is accurate include:

- < checking the accuracy of the computerized records against the original source, usually hard copies of records;
- < performing logical checks of the data (although data may be correctly transcribed from the original forms, the data may not be accurate because of misprints, typographical errors and other mistakes);
- < random call-backs to participants or contacting other sources to verify the accuracy of information collected; and
- < having a trained staff member evaluate data collection efforts by randomly observing interviews and other data collection methods.

**8.** <u>Action Required</u>. Recipients should distribute this guidance letter to all officials within the state who need such information to report participant data.

**9.** <u>Inquiries</u>. Questions concerning this issuance may be directed to the appropriate Regional Office.

**10.** <u>Attachments</u>. Revised Workforce Investment Act (WIA) Performance Reporting System Packet consisting of the following: (Attachments A-D not included):

E. WIA Standardized Record Data (WIASRD).

F. Revised Instructions and Form for the WIA Quarterly Summary Report (ETA 9090) (dated October 1, 2001).

G. Revised Instructions and Form for the WIA Title 1B Annual Report (ETA 9091) (dated October 1, 2001).

H. WIA Financial Statement and Guidance on Cost-Effectiveness Analysis (COEA) (dated October 1, 2001).

I. PY 2001 ETA 9090 Table A (October 1, 2001).