

DATE: June 15, 2009

TULARE COUNTY WORKFORCE INVESTMENT BOARD (TCWIB)

WORKFORCE INVESTMENT ACT TITLE I ACTIVITIES

SUBJECT:

**Integrated Reporting and
Program Accountability**

TCWIB DIRECTIVE

TCWIBD-09-02

TO: TCWIB Service Providers
TCWIB Staff

SUBJECT: INTEGRATED REPORTING AND PROGRAM ACCOUNTABILITY

EXECUTIVE SUMMARY

Purpose:

The purpose of this directive is to provide the guidelines for job seeker data reporting and program accountability for the Tulare County Workforce Investment Board operations and One Stop contractors scheduled to begin operations July 1, 2009. Specifically, this directive addresses:

- Data element reporting across the three integrated programs: Wagner-Peyser (WPA), including the Veterans' programs, the Workforce Investment (WIA), and Trade Adjustment Assistance (TAA)

The paperwork retention requirements for the purpose of data element validation

- The definition of program accountability with an integrated customer pool across the specified programs
- The automated system options available to the Local Workforce Investment Area for data collection and, the requirements, if any, associated with each option

Scope:

This directive applies to the Tulare County Workforce Investment Board which has agreed to work in concert with the State in defining and evaluating options for integrated service delivery across the Department of Labor's three major workforce programs: WPA, including Veterans' programs, WIA, and TAA.

Effective Date:

This directive is effective July 1, 2009 or upon date of receipt if received prior.

REFERENCES:

- Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) 17-05, Common Measures Policy for the Employment and Training Administration (ETA) Performance Accountability System and Related Performance Issues, February 17, 2006
- Training and Employment Notice 19-07, Program Year 2006/Fiscal Year 2007 Performance Reporting and Data Validation, December 11, 2007
- WIA Management Information and Reporting System, Office of Management and Budget 1205-0420, Expiration Date February 28, 2009

- Labor Exchange Reporting System, Office of Management and Budget 1205-0240, Expiration Date February 28, 2009

Trade Act Participant Report (TAPR), Office of Management and Budget 1205-0392, Expiration Date January 31, 2009

TCWIB-IMPOSED REQUIREMENTS:

Tulare County Workforce Investment Board additional local requirements are noted in bold and underlined.

FILING INSTRUCTIONS:

Retain this directive until superseded.

BACKGROUND:

In early 2007, leadership from the Employment Development Department (EDD), the California Workforce Investment Board, and the Labor and Workforce Agency came together for the purpose of considering the development of an integrated service delivery model for California’s Workforce System and its One-Stop Career Centers. This group agreed that continued economic and fiscal pressures, coupled with higher demands for service and program accountability required a fundamental change in the California workforce services delivery system. With this objective in mind, an ambitious planning effort was launched which included representatives from 12 Local Workforce Investment Areas, the California Workforce Association, and various stakeholder groups. The Tulare County Workforce Investment Board has chosen to implement these congruently with the State.

The guidelines in this directive are intended to support the general program framework agreed to by the State-local partnership for integrated service delivery and to provide maximum flexibility while still supporting compliance with DOL data collection and reporting requirements.

POLICY AND PROCEDURES:

Tulare Workforce Investment Board and One Stop operators will report a single customer record for all customers receiving one or more services funded by the following programs:

| WAGNER-PEYSER ACT & ASSOCIATED PROGRAMS | WORKFORCE INVESTMENT ACT | TRADE ADJUSTMENT ASSISTANCE |
|--|---------------------------------|---------------------------------------|
| Labor Exchange | Adult | Trade Adjustment Assistance |
| Veterans | Dislocated Worker | Alternate Trade Adjustment Assistance |
| Migrant Seasonal Farm Workers | National Emergency Grants | |

Data Element Reporting and Documentation Requirements

Attachment 1 lists the data elements that must be collected on all customers entering a One-Stop Career Center or affiliated site for career development or job placement assistance. Attachment 2 details the additional data collection, reporting requirements, and supporting documentation for a Career Center customer who receives staff assisted core, intensive or training services, including training funded by the TAA program.

Attachment 3 diagrams the general customer flow and the associated data collection requirements. Core services that entail significant staff assistance require enrollment of the customer and the additional applicable data collection detailed in Attachment 2. Significant staff assistance is defined based on the nature of the service not the amount of time involved. Services that assist the customer in deciding on appropriate next steps in the search for employment or related services, including assessment of an individual's immediate employability and barriers to employment, are significant staff assisted services. Initial assessment or job placement assistance is a significant staff-assisted service and requires program enrollment and the collection of the applicable data detailed in Attachment 2. Since it is expected that all learning lab customers will receive an initial assessment, the data in Attachment 2 required for the Adult Customer Group should be collected on all customers.

The data elements detailed in Attachment 2 are typically collected through an Application Form. It has been standard business practice to require the customer to sign the Application Form attesting to the accuracy of the data on the Form. Because, as reflected in the requirements specified in Attachment 2 we are establishing a "paperless" customer flow, **TCWIB is not required to retain a signed hard copy of the customer's Application or support documentation. However the TCWIB has chosen to retain images of these documents through transition to a paperless status. Hard copy will be kept until a scanning process is chosen and implemented. Upon selection the TCWIB Executive Director will inform those impacted of the method and process required.**

Veterans Services

It is expected that veterans will be subject to the same customer flow as all customers entering the One-Stop or an affiliated site for skill development and job placement services. Veterans should receive priority of service and it is expected that, when appropriate, the learning lab customer flow will provide for the referral of a veteran to a Veterans Workforce Specialist (VWS) or a Veterans Employment Services Specialist (VESS) for staff-assisted intensive or training services. The data reporting requirements for Veterans served by a VESS and VWS are the same as those for all adult customers and should be done through the agreed upon Management Information System (MIS) option for the TCWIB. The VESS and VWS staff will receive a special JTA Grant Code to facilitate the reporting of customers served by a VESS or VWS.

Veterans being served by a VESS or VWS under the Services to Veterans - Vocational Rehabilitation and Employment (VR&E) Program (Title 38 Code of Federal Regulations Chapter 31) outside the One-Stop Career Center system are beyond the scope of this directive. These customers, their services, and related case notes must continue to be reported in the Program Activity Support System (PASS).

If the VR&E customer receives services directly through the One-Stop Career Center system, the customer must be enrolled for services in accordance with the full requirements of this Directive. Unemployment Insurance (UI) Claimants with an Instruction to Report to a local One-Stop Career Center.

One Stop Staff must identify those clients who have entered the One-Stop Career Center with a notice to report to the Center in order to retain their UI benefits. These customers should be subject to the same customer flow and data reporting requirements as any other customer with one exception. Staff must enter the Activity Calendar and Event System (ACES) and, using the customer's social security number and name, record that the individual is receiving assistance from the One-Stop Center as required. Failure to do this reporting will jeopardize the individual's UI benefits.

Program Accountability

The TCWIB is subject to the Adult Common Measures, including Entered Employment, Employment Retention, and Average Earnings. Attachment 4 provides a summary of the Common Measures definitions. The Common Measures are defined by the Department of Labor (DOL) in Training and Employment Guidance Letter (TEGL) 17-05 (February 10, 2006). All staff should review this TEGL in detail to understand the specifics of the Common Measures.

For Program Year 2008-09, for the purpose of official program accountability, the State will negotiate separate performance goals for each program with the Department of Labor and with each Local Learning Lab. Also, for the purpose of evaluation, integrated program goals will be defined and monitored. The following guidelines will govern outcome measurement in the learning labs:

- Inclusion of All Customers in the Common Measures Calculations

A job seeker is included in the accountability measures at the point the job seeker has been determined eligible and receives a service funded by a participating program within a One-Stop Career Center, affiliated site, or remotely through electronic technologies. All adult customers are eligible for the WPA program thus all individuals that receive the benefit of WPA services are subject to WPA accountability. All customers 18 years of age and older who receive an initial assessment will also be reported under the WIA Adult program. The only exception, a customer determined to be a dislocated worker and whose direct services are all reported under the Dislocated Worker Program will be reported as a WPA customer and under the Dislocated Worker Program. If a customer receives services reported under both the Adult and Dislocated Worker programs, the customer will be attributed to both programs. Adults or Dislocated Workers that receive training funded by TAA will be reported as both Adults or Dislocated Workers and recipients of TAA services.

- Point of Exit

The customer is exited from all enrolled programs when 90 days has elapsed since the last enrolled service estimated completion date. All services must be reported through the MIS designated as the official system for the local partnership and reported to the State in accordance with Job Training Automation (JTA) system reporting requirements. Please refer to the section titled MIS Requirements below.

If a customer does not receive a service for 90-days and a documented gap in service has not been recorded through the MIS, the customer is automatically exited from the program on the 91st day. The 91st day is calculated based on the JTA Enrollment Form Est/End Date for the last reported service. The exit date for the customer is the last date of service. The exit quarter is the calendar quarter containing the last date of service. The table below provides two examples.

| CUSTOMER | SERVICE BEGIN DATE | EST/END DATE | 91 st DAY | EXIT/EXIT QUARTER |
|----------|--------------------|-------------------|----------------------|---|
| A | June 1, 2008 | June 30, 2008 | September 29, 2008 | June 30, 2008/April – June 2008 |
| B | February 12, 2008 | February 15, 2008 | May 9, 2008 | February 15, 2008/January – March, 2008 |

ACTION:

Bring this directive to the attention of all Tulare County Workforce Investment Board staff and One-Stop Operators.

INQUIRIES:

Please direct inquiries about this directive to the Tulare County Workforce Investment Board Administration office, at (559) 713-5200.

Adam Peck
Executive Director

AP: BC: DS

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INITIAL DATA COLLECTION REQUIREMENTS – ALL CUSTOMERS
(Customers receiving self-service and information and intensive or training services)

These items are self-reported by the client. The items in **bold** must be validated when the customer completes a staff-assisted service. Please refer to Attachment 2.

- Name
- Social Security Number
- Address
- County of Residence
- **Date of Birth**
- Disability status
- Race/Ethnicity
- Gender
- Highest Grade Completed
- **Veterans Status**
- Employment Status
- Farm Worker

| Data Collection Requirements for Clients Receiving Staff Assisted Services (Initial Assessment, Intensive or Training Services) | | |
|--|----------------------|---|
| | Customer Group | Requirement |
| Data Element (Job Training Automation system data field)^{1/} Section 1, Data Elements Requiring Verification | | |
| Age | Adults ^{2/} | <p>Customers receiving services under the Workforce Investment Act (WIA) Adult or Dislocated Worker program must be 18 years of age or older. This data element must be verified. Staff must view the verifying document and record the document type, date, and their name. These data will be reported to the State through the Job Training Automation (JTA) System. Certification by a staff person constitutes a legally binding statement that is subject to audit. For a list of acceptable documentation, please refer to WIA Data Element Verification.</p> |
| Right-to-Work in the United States | Adults | <p>The California Unemployment Insurance Code Section 9601.5 requires that an individual receiving employment and training services in California have a legal right to work in the United States. Staff must view the verifying document and record the document type, date, and their name. These data will be reported to the State through the JTA System. Certification by a staff person constitutes a legally binding statement that is subject to audit. For a list of acceptable documentation for validation, please refer to WIA Data Element Verification and for more detail Workforce Investment Act Directive WIAD04-18 WIA Title I Eligibility Technical Assistance Guide, page 18.</p> |

| Data Element (Job Training Automation system data field) ^{1/} | Customer Group | Requirement |
|--|----------------|--|
| Selective Service | Adult males | Section 189(h) of the WIA requires that a determination of selective service registration status be made prior to enrollment in WIA Title I-B funded programs. Staff must view the verifying document and record the document type, date, and their name. These data will be reported to the State through the JTA System. Certification by a staff person constitutes a legally binding statement that is subject to audit. For a list of acceptable documentation for validation, please refer to WIA Data Element Verification and for more detail WIAD04-18 WA Title I Eligibility Technical Assistance Guide, page 18. |
| Veterans Status | Adults | In 2002 the <i>Jobs for Veterans Act</i> was revised to improve employment, training, and placement services furnished to veterans. Section 2(a) of the Act amended 38 U.S.C. 4215(a) by mandating priority of service for veterans (and some spouses) "who otherwise meet the eligibility requirements for participation" in the U.S. Department of Labor (DOL) programs. If the customer states they are a veteran they are entitled to priority of service and veteran's status must be confirmed through a Department of Defense Form 214 (DD-214) or other confirming document from the Department of Defense or Veterans Affairs. The applicable document must be viewed by the staff person and the staff person must record the document viewed, the date, and their name. For a list of acceptable documentation for validation, please refer to WIA Data Element Verification and for more detail WIAD04-18 WIA Title I Eligibility Technical Assistance Guide, page 20. |

| Data Element (Job Training Automation system data field) ^{1/} | Customer Group | Requirement |
|---|----------------|--|
| Nondiscrimination and Equal Opportunity Notification | Adult | Customers must be notified of nondiscrimination and equal opportunity grievance and complaint procedure required under the WIA Title I and Wagner-Peyser programs. The requirements are delineated in Workforce Investment Act Directive WIAD03-12 (April 14, 2004) and Workforce Services Directive WSD07-6 (January 16, 2008). Maintenance of a hardcopy notification form is not required. Staff must make an MIS case note indicating that this notification did occur, the date of notification, and their name. |
| Low Income Status | Adults | If the local area declares that funds are not limited [WIA Section 134(d)(4)(E), Title 20 Code of Federal Regulations 663.600] these three data fields may be reported solely based on the statement of the customer. If the local board has declared that funds are limited and therefore there is a priority of service for recipients of aid, verification of these data elements is required. Staff must view the verifying document and record the document type, date, and their name. These data will be reported to the State through the JTA System. Certification by a staff person constitutes a legally binding statement that is subject to audit. For more detail on what documentation constitutes proper validation of these elements please refer to WIAD04-18 WIA Title I Eligibility Technical Assistance Guide, page 20. |
| Temporary Assistance to Needy Families (TANF)/California Work Opportunities and Responsibilities to Kids (CalWORKs) recipient | | |

| Data Element (Job Training Automation system data field) ^{1/} | Customer Group | Requirement |
|--|--------------------|--|
| Dislocated Worker/Displaced Homemaker/Date of dislocation | Dislocated Workers | If the customer is going to be served with Dislocated Worker funding staff must view a validating document and record the document viewed. For a list of acceptable documentation for verification, please refer to WIA Data Element Verification and for more detail WIAD04-18 WIA Title I Eligibility Technical Assistance Guide, page 22. |
| Section 2, Reportable, the customer provides this information | | The following fields are subject only to reporting in the MIS and are based on the statement by the customer (self-attestation). No data validation is required. Each of these data elements must be reported as specified in the Job Training Automation System Client Forms Handbook. |
| Limited English Proficiency | Adults | Self-Attestation |
| Single Parent | Adults | Self-Attestation |
| Unemployment Insurance Status | Adults | Self-Attestation |
| Homeless | Adults | Self-Attestation |
| Offender | Adults | Self-Attestation |
| Rapid Response | Dislocated Worker | Self-Attestation |

| Data Element (Job Training Automation system data field) ^{1/} | Customer Group | Requirement |
|--|----------------|--|
| Section 3, Reportable Trade Adjustment Assistance (TAA) Data Elements | TAA | The following data are collected on the JTA TAA Screen or reported to the JTA system via the TAA Load File Layout available through the JTA Customer Help Desk. These data elements are required for annual reporting of the Trade Act Participant Report (TAPR). [Office of Management and Budget 1205-0392, Expiration Date January 1, 2009] |
| Qualifying Separation Date | TAA | |
| Employment Development Department Office Number | TAA | |
| Date of TAA Application | TAA | |
| Petition Number | TAA | |

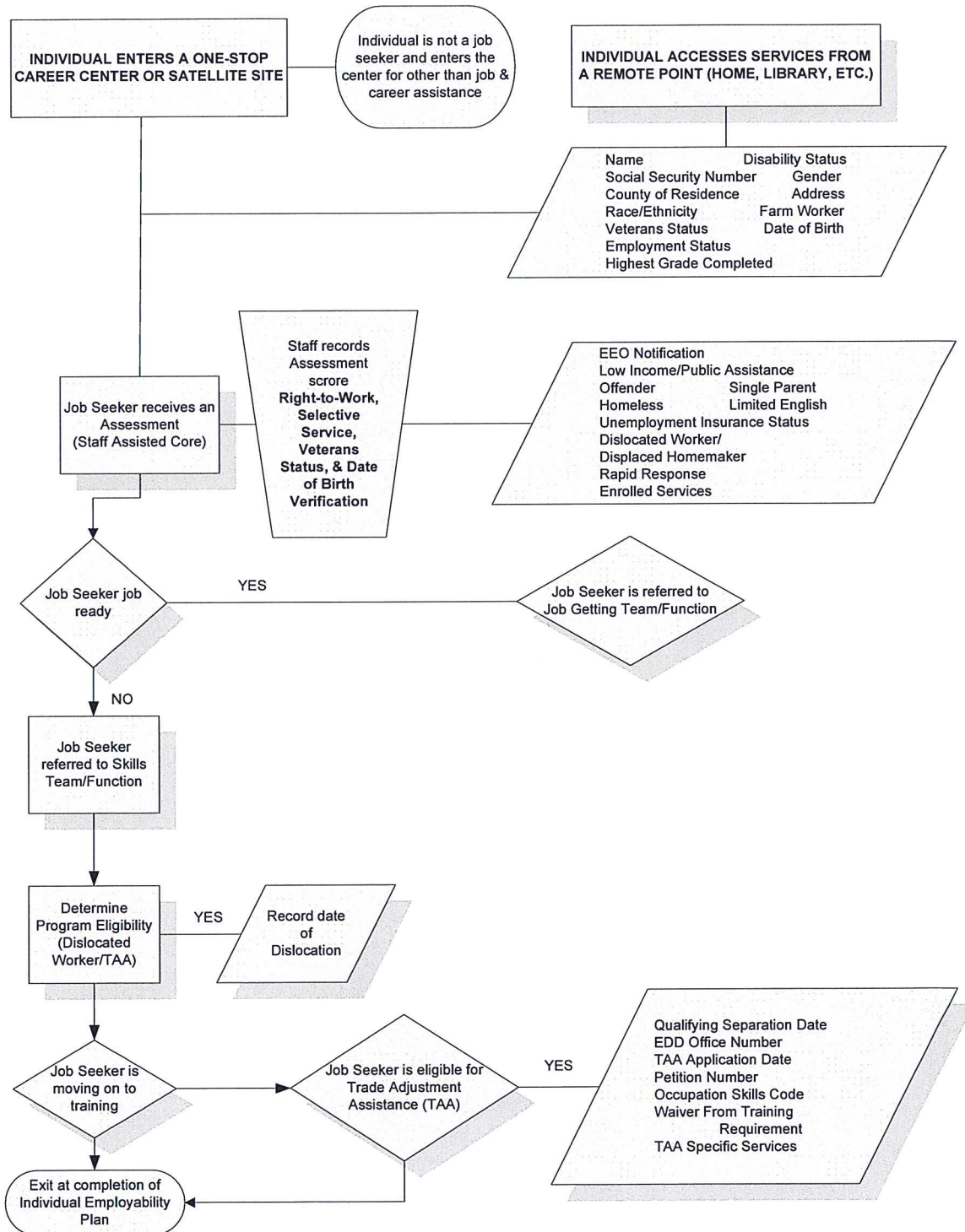
| Data Element (Job Training Automation system data field) ^{1/} | Customer Group | Requirement |
|--|----------------|-------------|
| Travel While in Training | TAA | |
| Subsistence Paid while in Training | TAA | |
| Occupation Skills Code | TAA | |
| Received Remedial Training | TAA | |
| Basic Trade Readjustment Allowance (TRA) | TAA | |
| Additional TRA | TAA | |
| Remedial TRA | TAA | |
| Waiver from the Training Requirement | TAA | |

| Data Element (Job Training Automation system data field) ^{1/} | Customer Group | Requirement |
|--|----------------------|--|
| Job Search Allowance Paid | TAA | |
| Relocation Allowance Paid | TAA | |
| Enrollment in another Federal Program | TAA | |
| Section 4, All Employment & Training Services Received | All Customers | <p>Report in accordance with the JTA reporting requirements all employment and training services received. [Workforce Services Draft Directive WSD-6, January 11, 2008] These services are reported on the JTA Enrollment Form(s) by funding stream supporting the service. All services (Core, Intensive, and Training) must be reported.</p> <p>The referenced Draft Directive is under revision to incorporate changes made to support integrated serve delivery. A final JTA Client Forms Handbook directive will be issued prior to July 1, 2008.</p> |

^{1/}The field references refer to the Application unless otherwise indicated

^{2/}The Adult customer group reference to individuals 18 years of age or older receiving significant staff assisted services regardless of the funding stream supporting those services.

CUSTOMER DATA FLOW



Data collection groups are additive – additional data elements are collected at each phase – previously collected data moves with the client.

COMMON MEASURES

ATTACHMENT 4

ADULT MEASURES

Entered Employment

*Of those who are not employed
at the date of participation:*

of adult participants who are employed
in the first quarter after the exit quarter

of adult participants who exit during the
quarter

Employment Retention

*Of those who are employed in the
first quarter after the exit quarter:*

of adult participants who are employed in
both the second and third quarters
after the exit quarter

of adult participants who exit during the
quarter

Average Earnings

*Of those adult participants who are employed in
the first, second, and third quarters after the exit
quarter:*

Total earnings in the second plus the total
earnings in the third quarters after the exit
quarter

of adult participants who exit during the
quarter

YOUTH MEASURES

Placement in Employment or Education

*Of those who are not in post-secondary education
or employment (including the military) at the date
of participation:*

of youth participants who are in
employment (including the military) or
enrolled in post-secondary education and/or
advanced training/occupational skills
training in the first quarter after the exit
quarter

of youth participants who exit during the
quarter

Attainment of a Degree or Certificate

*Of those enrolled in education (at the date of
participation or at any point during the program):*

of youth participants who attain a diploma,
GED, or certificate by the end of the third
quarter after the exit quarter

of youth participants who exit during the
quarter

Literacy and Numeracy Gains

*Of those out-of-school youth who are basic skills
deficient:*

of youth participants who increase one or
more educational functioning levels

of youth participants who have completed a
year in the program (i.e., one year from the
date of first youth program service) plus the #
of youth participants who exit before
completing a year in the youth program