**Workforce 3One**

**Transcript of Webinar**

**WIOA Performance Accountability Reporting Requirements**

**Overview of Data Layout and Templates**

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*Transcript by*

*Noble Transcription Services*

*Murrieta, CA*

ERIC BELLINO: So to kick things off I'm going to turn it over to Karen Staha, who's going to go over today's moderators. Karen?

KAREN STAHA: Thank you very much, Eric. Welcome everybody to today's webinar. We are here to go over the "Workforce Innovation and Opportunity Act Performance Accountability Reporting Requirements: An Overview of the Data Layout and the Template."

The Workforce Innovation and Opportunity Act passed in 2014 placed a great emphasis on performance accountability, the emphasis on transparency and accountability for the investments made in serving individuals who have come to the workforce and education systems, to the one stops if you will.

And Section 116 of the Workforce Innovation and Opportunity Act is focused specifically on all the performance accountability provisions. And it gave us a unique opportunity to work – I'm with the Department of Labor and we've been working with our colleagues at the Department of Education to implement these provisions. The Section 116 has six core programs implementing these performance accountability provisions. Those programs include the Title I youth adult and dislocated worker program, the Wagner-Peyser employment service, programs for adult education, and programs for vocational rehabilitation.

And the webinar today is going over the requirements that we have proposed that states and grantees would have to comply with to meet the reporting requirements in the statutes, specifically for the annual template and for Title I programs who provide training, the eligible training provider template. And so without any further description because you'll get a flavor of what we're going to do, I will just say it's been a unique – as I mentioned, a unique opportunity.

It's been a good opportunity to understand our education programs better and really see how we can help the workforce system and education system work together to serve people better and help minimize the reporting burden where feasible, so that every program is reporting on the same performance indicators, so we can see the outcomes, and so one person isn't having to report on one set of indicators and another program reports on something else. So these six core programs are reporting on the same core indicators.

Joining me today is Cheryl Keenan who is the director of the Division of Adult Education and Literacy, and Mark Snyderman who is the acting chief for the Data Collection and Analysis Unit. They both work at the U.S. Department of Education. At this point I'm going to turn it over to Cheryl. Thank you. Oh, excuse me, Mark. Mark is going to take us forward.

MARK SNYDERMAN: Thanks, Karen. If you'll notice page three is the introduction from the assistant secretaries. The introduction represents the joint statement of the three assistant secretaries.

As noted in the statement, and I won't read it verbatim, but the performance accountability information collection represents a collaborative effort among the Department of Labor's Employment and Training Administration, the Department of Education's Office of Career, Technical and Adult Education, and the Rehabilitation Services Administration. This included developing report templates, data specifications, the data layout, and common definitions and data elements.

As you can imagine it's been a daunting task and had many complications. Fortunately we enjoyed strong cooperation among the three agencies which has made it much easier, and has truly been a joint effort. I believe Cheryl, you're going to introduce today's presenters.

CHERYL KEENAN: Yes. Thank you, Mark. Hello, everybody. I hope you're having a good afternoon. Today's presenters are Luke Murren, who is with the Employment and Training Administration; Jay LeMaster, who's with the Office of Career, Technical and Adult Education; and Steve Zwillinger, who is with the Office of Special Education and Rehab Services Administration.

So I think that you will find the slides very informative. And I'm wishing you a good webinar. Take it away, Luke.

LUKE MURREN: Thanks, Cheryl. So the next portion that I'm going to go over in today's presentation is actually looking at the different components of the information collection request, or ICR for short, and how those different components kind of interact with each other. And as we go through, we'll actually bring up an example of the documents and do a very quick kind of brush through overview of each document.

So before we get started, just one quick caveat we want to note on this page, is that we want to invite anyone who has feedback or questions to feel free to type that into the chat box with the acknowledgement that we very likely will not be able to either, A, respond to all the questions because of the nature of the ICR still being posted for public comment, and also the fact that depending on the amount of comments we may not be able to get to all that. But we still want everyone to provide that feedback and we will absolutely look at every single piece of feedback that comes in.

On the next piece, again just kind of looking at what is an ICR. I think most of the folks on the call today are probably familiar. I know both Department of Labor and Department of Education, as part of the Paperwork Reduction Act, does information collection request often. So this is one and the same of that same mold.

The only difference being, at least from our perspective, is like the moderators mentioned earlier, this is a lot more collaborative across departments and across agencies than we have done in the past. So that's made it a little bit more unique to actually do. But other than that it just kind of follows the same routine that a normal ICR would.

And with that being said, the first piece of this ICR is the supporting statement. So again the supporting statement, we'll bring that up here shortly, the supporting statement is basically – has numerous pieces to it including the scope of the project, the benefits of the collection, and of course some burden estimates with that collection as well.

So we invite everyone to look at that document. And if there are any comments there, that is absolutely part of this overall package which we will be looking to possibly revise in the next release.

So it looks like we have up here just quickly, this is the supporting statement. For anyone who has not yet been able to get in and look at this, again this is just kind of like I mentioned the scope of the project, the benefits, some of the burden associated with the collection of this project.

The next document we're going to look at as part of the package is the participant individual record layout or what we're calling PIRL. So what exactly is the PIRL? And again I believe that a lot of folks on the phone are familiar with the collection of individual record data, specifically the data elements definitions and the instructions behind each of those things that describe characteristics, activities or outcomes of WIOA participants.

So as you can see we'll work on bringing it up, but basically the PIRL does represent the joint elements that are common across the three agencies that were mentioned earlier. So I just want to make it clear to folks that these are not all of the variables that will be included. The three departments – I'm sorry, the three agencies across the two departments will be releasing subsequent guidance or subsequent – an ICR, actually – that will provide those agency specific variables as well.

So I just want to make clear with everyone, this document is representing the 60 or so variables and definitions that all three of the federal government offices will be using in tandem and will share as part of the definitions and as part of the reporting templates, which actually gets into the next document, which is the state reporting template.

So now that we have – and again the three main pieces here, the individual record layout and the reporting template and the specifications which we'll get to, are all very cyclical in how they work with each other. So we have the individual record. We know what we're collecting. And now the next portion we're going to go over is what does the report look like.

So when we have the reporting template, we're talking about the common – so we have these common elements that we've already collected, and now we're talking about we aggregate them in a way that we can present to stakeholders, we can present to Congress, we can present to our internal purposes. So the reporting template that we have out there for proposal is basically how the report should look, what elements should be included, and basically those were driven by WIOA itself.

So we're looking for comments specifically here of does the report flow; is it useful to you; does it make sense; is there anything that we're missing on here? So any of that information is the kind of feedback that we'd be looking for on this particular report. One thing I'll mention here for Title I folks specifically is that if you can see at the top there, row two, this report will also function as the local area report.

So in essence the state report and local area report will be identical, it's just that the local area report will be identified in the upper left corner, and then all of the data in that report will be filtered obviously only for that particular local area. So if anyone looking for a separate local report, there is no separate document. This one document serves both purposes.

So moving on to the next template – and again, this is another Title I requirement – is the eligible training provider report. So on this template you'll see that the law specified is very similar information in terms of what information is required. But same type thing here as before. We're looking for common in terms of is this useful, does it flow well, does it look OK, will you get what you need from this, or is there something missing.

And if there is something missing, when you comment please don't just mention it doesn't work, what does work, what are you missing, what specific variables would be helpful could you combine something together, things like that. So obviously the law mentions that the states will provide linkages to the Department of Labor to have this ETP to meet the provision of the law, but again the provision also specifies using a standard report, at least a template, and that's what this attempts to do.

So the last piece I'm going to go over before I turn it over to the next presenter is again the third piece on this kind of circular puzzle, and that's the specifications. So at this point we have the individual records and we know the definition. We have the report templates, we know what the reports look like, but how do you build those reports, how do those calculations work.

So the third piece that we have is work on the data element specifications. And those are exactly like I just mentioned, those are the calculations to construct the report templates that we just put out there. So we tried to put in what we'd call a plain language version of the definition and also a pseudo code version of the definition that uses the definitions of the PIRL to create those calculations.

So you can see you have a report number, you have an identifier, and you have what exactly is, at least in terms of plain text, what does this mean, what is this the count of, and then the last column there is your techno specifications, or like I said, the pseudo-code (sic) using the PIRL definitions.

So before I move on, the last point I wanted to make here, so we have the different specifications, and I eluded to this earlier, but the three agencies, voc rehab, adult education, and employment and training, will use this a little bit differently. And the only reason this will be different is just in the way it's incorporated into our additional report.

For example, RSA is going to incorporate these data elements into their 911 reporting; OCTAE going to include these in their NRS implementation guidelines for aggregate reporting; and ETA as I mentioned will be using these in conjunction with additional agency specific variables to compile other reports for other ETA funded programs.

And with all that being said, I'm going to turn it over to Steve a while who's going to talk about actually making comments.

STEVEN ZWILLINGER: Thank you, Luke. Luke's given you a great deal of information about what these documents are and what the overall package is like. We'd like to ask you right now in a dynamic poll if you anticipate making comments on this ICR. And you can see on your screen right now how people are responding to this.

So far more than half of you don't know if you're going to respond, which is perfectly fine of course because we welcome comments. We think that all comments are useful. And it seems as if by the time we finish at least 100 of you will be planning on submitting comments, which is more work for us, but it's good work for us because it makes things better. And that's why we do this and things are going to work well.

MR. BELLINO: As this poll's finishing up I'd like to remind you that all the resources that Luke discussed will be available through the file share window on the bottom right hand corner in this webinar room, and will also be available for download from Workforce3one from the page you registered at.

MR. ZWILLINGER: While that poll is finishing up, let me move ahead a little bit to make five points about comments and how they're welcomed by us. Comments are very useful to us. They help us to hone what we're doing so that it serves your purposes and our purposes.

Now there's a caution I have to make, that if a commenter makes a comment on something which is included in the statute, we don't have any option to do anything with that. If the statute says we have to have information X, we have to collect information X. And if somebody would submit a comment saying, I don't think you should collect that, we can't do very much with that comment except to say, well, I'm sorry but the statute requires us to do that.

If you do have an issue that you wish to communicate to us, please communicate it carefully. Because what may be obvious to you isn't always obvious to us. So if you say it, please say it clearly and unambiguously so that we know exactly what it is you're saying.

Ideally if you have a comment in the nature of you don't like something perhaps, or you think something is ill-considered, please don't leave the comment at I don't like it or I don't want it. Please tell us why or why not, how it might be made better. Just saying that you don't like something, if that's the case, doesn't offer us sufficient information to be able to act upon it in an informed fashion.

And the fifth point I wanted to make about the general parameters for comments, is that we seek comment on everything in the ICR, all the documents Luke mentioned, the natural inferences and conclusions which come out of those documents. And in addition there are special topics for which we have specifically requested comments. So you have the opportunity as you know to help shape federal policy and federal data collection so that these activities work well for you, for us, and the programs, and the individuals we serve of course.

Now we encourage you to go to the regulations.gov website which provides an easy to use method for making comments. Now at the end of this PowerPoint you'll see at the end there is a hyperlink to the spot in the regulations.gov website where you can comment directly on them.

If you don't use the hyperlink from the PowerPoint, and if you go to regulations.gov, and you find the page that shows on the slide right now, it asks you to put in a search term to find what's called the docket that you're looking for. In this case it's called ETA-2015-0007. So you have the choice of a hyperlink or putting in the search term, ETA-2015-0007.

There are six tips for comments that we'd like to make to you. We seek comments firstly on whether or not the number and type of documents in the ICR are appropriate; secondly, a proposed use of collected information. And comments are coming in; we appreciate that. While I'm speaking there are other people looking at the comments, and we'll be able to have an informed discussion in a few minutes.

Back to the tips that we're seeking comments in three – the third are is the general amount of burden associated with this information collection request.

The fourth area is on the proposed definitions in the collection. And that includes your support, or your disagreement, or your suggested modifications or corrections for how this package can be more perfect, and how the information can be more succinct, or more useful, or more valuable.

The fifth area is on the suggested methods and use of the participant individual record layout, the PIRL. Let us know what's useful, where improvements could be made. And if you have questions or concerns about something, again please be sure to include specific suggestions or solutions. Again saying that you don't care for something doesn't allow us to react in a meaningful fashion.

And lastly in support of how to modify the purpose, the scope or the benefit of the collection. I didn't say opposition to the collection because we're required by statute to have a collection of this data. So either it's good or it can be made better. Please let us know what you think.

And Jay, can I turn this over to you now?

JAY LEMASTER: Yes. Thank you. Thank you, very much. This is Jay LeMaster from the Adult Education Program at the U.S. Department of Education. And we have another poll question for everybody on the line. And before you answer, I just want to explain what we mean by this question.

And it really is, can your state data system submit one report for all the core programs? Can it generate one report for the core programs? And really otherwise in other words, how integrated – at what point do you think the core programs at the state level, the systems would be integrated enough to be able to generate one report from one system. It's not about submitting one report to the federal office by assembling different reports from different programs. This is really about data integration at the state level.

So do you think you'll be ready in 2017? We'll go ahead and put up the poll here and start to take your answers. And we'll give you a few seconds here to respond. Can we make that window a little bit larger? There we go. OK.

All right. Looks like we have a lot of work to do. And it looks like a lot of people really don't know. Most people just don't know the answer to this question but this is very helpful. OK. So to follow up this question, for those of you that said you would not be ready by 2017 with an integrated system, what year do you think you'll be ready by? Is it 2018, 2020, 2025? Those are the three choices we have. So if you said no to 2017, not if you said don't know and not if you said yes, this is only for those people who said no, when do you think you'll be ready by? Or you could just click no vote.

OK. Looks like most people are saying 2020 and beyond. So long way off. All right. Well, that was very helpful. Thank you. And just to close out this part of the webinar, the resources we have up there for you on the screen are links to the performance accountability information collection request at regulations.gov.

And there you see the link on your screen. And over in the lower right hand corner in the file share box you can pull up this PowerPoint presentation. You'll be able to click right on that link and pull up the information collection request, as also going to the employment training administration performance website there at the bottom of the screen.

OK. At this point we'd really like to encourage you to enter your questions in the chat room there on the lower left hand side of your screen. We're actually going through your questions as we speak and taking note of those.

And we're I believe going to be trying to address some of them in this webinar. Before we address those questions, let me just quickly review with you the contact information for the presenters in today's webinar. There you have Luke Murren from Department of Labor, myself from education, Jay LeMaster and Steve Zwillinger from education as well. The three of us are very happy to talk with you about this webinar and help you with any questions you may have, if we can.

OK. I'm going to I think turn this back over to Karen or to Luke to see if we're just going to start to answer some questions here that we've received.

MR. MURREN: Thanks Jay. Yeah. We're getting feedback coming in hot and heavy, which is what we want. So we appreciate everybody doing that. One thing that we did see a question came in, I think it's a good one we can specify here. Again some of the more specific questions we probably will not unfortunately be able to get to today, being that the ICR is still open for public comment. So we just have to be careful with that. But some of the more broad sweeping questions we should be able to get to.

So there was one question that pertained to is it possible to direct us or direct you all to what exactly is statutorily required. The short answer is, probably not. Unfortunately when we didn't break that out in terms of what is absolutely required and what's not.

However what I will say is, everything – maybe not everything, but I'll say mostly everything in the three main pieces that I keep talking about that go together, were statutorily required. The reporting template, WIOA specifically pointed out these are the aggregated items that you need to break these six core indicators out by. So in order to do that, that's where we put our heads together and we said, well, what data and specific data elements do we need to collect that?

So what I don't want is that to deter anyone from saying, well, if this is all statutorily required then why am I commenting? And that's not at all what we want. Because even though we're required by law to collect certain items and report them a certain way, that doesn't mean that the way we currently are suggesting how to do it works best for everyone.

So for example, if we're talking about variable X, and we know we need to collect that, but we have in there valid values of one equals yes, zero equals no. And if you think it's more valuable to have that as a date field, or you think that's more valuable instead of yes and no, we could break it out into five different ways if that provides us better information. Those are the kind of specific comments on that particular – on the data elements that really we're looking to get.

So I just want to make a point that, yes, most of this collection is statutorily required. I don't want to speak for the other agencies, but I believe a lot of more of the non-required elements will come later in our agency-specific ICRs that again will be coming in the next coming weeks or months.

MS. KEENAN: Yeah. This is Cheryl, and I'll just add to what Luke has to say and urge folks to look in the statute in Section 116, and you can see exactly what language the statute contains. And that's probably the best way for you to determine what is statutorily required.

OK. There's a question up here, one of the first questions that we got was on slide eight. And it's a question about OCTAE incorporating the PIRL elements into the NRS. The question is, does that mean that OCTAE will in fact begin to capture customer level records like Title I and III and IV do?

So at this point in time the states do collect customer-level data in the state MIS systems. And that is a requirement in the AFLA program. States will continue to collect individual record data based on the definitions that are in the PIRL. And we will continue to collect aggregate level data at the federal level.

There are some follow-up questions related to the statistical adjustment model that is also required in Section 116. And all I can say on that is that is not a part of this information collection request, but the departments have been working very hard on developing the statistical adjustment model, and that we will be holding consultations in the future and be able to share information with you about that at a later time.

MR. MURREN: Please give us a couple minutes for reviewing the questions that were submitted and trying to sort through how we're going to answer all these questions. Thanks. OK. So again we're getting a lot of good feedback in. And it's a great thing, but it's also an avalanche of info here. So excuse while we get through it.

But another question we see came in was looking or asking about if there would be one organization responsible for evaluating state data. The answer to that is not necessarily. The idea is that the data at this point would still come to the agency specific to that data collection or that state. So in other words, there will not be "one entity" – quote-unquote, to kind of rule them all – and overlook and oversee program evaluation for all of WIOA, at least at this point. I mean, we will still collaboratively here continue our partnership and working together to make that all work.

And like Cheryl just mentioned, I'll get into sanctions here. I know that that's not a part of this ICR, but I know that we just closed the NPRM – notice of proposed rulemaking – and we got a lot of comments there. And as you noticed, one of the proposals for sanctions was that the performance would be looked at across the three agencies.

And that would be used to determine a state that was subject to sanctions. So in that regard, yes, all three agencies will play a part in the overall performance of a state. However there will not be one particular entity that does that. We will continue to work together in that – (inaudible).

MR. ZWILLINGER: One of the questions that's come in is "How will the individual programs collect the information contained within the PIRL? I'm Steve Zwillinger. I'm from Rehabilitation Services Administration. And the voc rehab data, that is the common data for the voc rehab programs, will be collected through what's called the RSA 911.

We have a master data collection that we use for individual records. And all of the elements from the PIRL, all of the data elements that are required by the new law are being added to the 911. An earlier version of the 911 went out for comment. It included I'm guessing 95 percent of the elements that were required. And the other ones will be added as we move to finalize the 911. So for VR, there is not going to be a separate PIRL data collection. Those will all be included within the existing 911.

MR. MURREN: And I could touch on from an ETA standpoint, and actually this is another question that came in that just like Steve was saying is – you mentioned that the PIRL is not necessarily complete and that this is only a portion of the overall record layout. And that is true.

The follow-up to that was of course, well, when is it going to be complete? So I can only speak for ETA on that regard. I know that we are nearing wrapping up the individual record layout that will encompass the additional elements for ETA standpoint, and for again various programs that will look very similar to this ICR as a matter of fact. It will include a reporting template, specifications for the report, and the individual record layout, of course which will encompass all of the elements here.

So that should be wrapping up in the next couple weeks. And we actually anticipate posting that to regulation.gov just like this one hopefully within September sometime. So that will also be out there for comment as well.

MR. LEMASTER: This is Jay over at adult education. We see a question here that says, "When is the deadline for these comments? The deadline for comments on this proposed information collection request is September 21st. So next month. It's a 60-day time window that we have for submitting public comments on the information collection request. And we're just going through more questions here to see what we can answer.

MR. MURREN: So another question that just came in was involving the measurable skills gain. And the question was, "How can we collect this in a meaningful way and minimize collection burden?" And I think in my opinion that's a perfect question that we are asking you all to comment on. As the folks who will be doing the data collection and will be using this to evaluate your own programs, I think that obviously in this ICR we have put out our proposal.

And if that proposal seems overly burdensome or it seems like the data collection just simply wouldn't work for you, then that's exactly the feedback we want to know. So in other words, I'm kind of turning that question back to you all and saying that's exactly the info we are actually looking to hear from you at this point.

A question came in I assume from a VR agency about when and where can I get the data elements for the RSA 911. On regulations.gov we posted the RSA 911 where we solicited comments on it. I believe it is still there. It is the version from which we solicited comments.

And it is likely that it will be modified in part based upon the comments that we received. But it does reflect what I would personally estimate to be about 95 or 96 percent of what the final completed RSA 911 will look like. But it should be on regulations.gov and I would think that you'd be able to search for it under RSA 911, and that should bring it up.

MR. ZWILLINGER: And if not let us know and we'll check into it.

MR. MURREN: So I have another question I'll jump in on specifically referring to the effectiveness of serving employers. And the question was, "Where the data element for that is a part of this individual record layout? The short answer to that is yes, we have it in here. And again the proposal at this point if you look in the specifications document for the report, that will show you kind of by row and by column how everything on the report is calculated.

And one of the columns that we have is the effectiveness of employers. And so if you look in that document, you should be able to find the information there, and make comments if that definition works for you, or if it's not enough, or if you need more information, whatever. So again I'll turn it back and ask you all for your comment on the current way that that measure is being defined.

We also got an earlier question in whether or not the reports should be submitted by each core partner or each agency as I have been saying, or whether it should be one data submission. That's a little bit more of a complicated question. I believe that it is the vision of many that – and arguably the intent under WIOA itself, that the three core partners, the three agencies we've been mentioning would be able to at a state level submit one combined file or one combined report.

However, it's our thinking, our assumptions that for the initial report that that would not be possible. And that actually gets to the question that Jay was asking earlier regarding when do states think they could submit a report – what I'll call a joint report or one file for all the core programs or all the core agencies.

So I think that the short answer is that's the goal, that's the vision we'd like to have. However we understand that that may not be feasible. So we'll be providing additional guidance on how exactly that process will work. But it's very possible that in the first few submissions of this report that it would come three separate reports, one from each core agency.

MS. KEENAN: We have another question here about adult education. And the question is, "Will adult education program have to collect every item in the PIRL?" So at this point in time I want to remind folks that we collect aggregate data and we will continue to collect that data annually.

And it will be based on the elements in the PIRL, but we will issue program specific guidance which will translate to you in tables the items and the definitions from the PIRL. But we will issue our program specific guidance in the form of NRS guidance after this ICR, which will translate for you the items that are in the PIRL.

So I just wanted to remind you that we collect aggregate information annually, and that we will be issuing guidance that will translate some of these requirements in the PIRL into NRS terms for adult education programs.

MR. MURREN: So we had a follow-up question to an earlier one where I was mentioning about the same entity reviewing and analyzing the reports. And the follow up was, "Why are the reporting templates the same if they're not being evaluated by the same entity?"

Two answers there. One, WIOA says that they will be the same. So that's the short and dirty answer is that we are required to have a common reporting template across all core programs. But the second answer is, the more programmatic answer, is that even though it's not the same one entity again, it's almost I guess it's one entity in the respect that it's the three agencies partnering together to review all the data and how in ETA, ETA's state performance could impact RSA data in terms of subject to a sanction, at least how it's proposed.

So again the short answer is basically just the law required, and I think I'll speak for all of us and I think we all agree that having that ease of comparability across agencies is something that we really desired. And that's why the report is identical for all three core programs.

MR. ZWILLINGER: Let me add to that, if I may. One of the questions that comes up all the time is how well do programs work. And if you compare apples and oranges, you can't compare how well programs work. But if we're able to compare apples to apples, then we get a much better sense for what's going on.

Now even though the consumers may be different and the mechanisms may be different, it gives us the beginning of a way to understand how things work in an apples-to-apples fashion. And from a federal policy perspective it is very useful. When you have different data sets for different programs, it makes federal policy very difficult.

MR. MURREN: All right, everybody. So unless any of my colleagues at adult education have anything else, I think we're going to try to wrap up a few minutes early here. We're getting inundated with comments, which again is great.

So we have that avalanche coming in. We're also experiencing a little bit of technical difficulties here. As you can see the screen isn't changing as much as we'd like and we're not getting – the comments are coming in staggered. So between those two things, again unless my adult ed colleagues have anything else to say, I want to say thank you very much for joining us today, and hope you all have a good rest of your day.

MR. ZWILLINGER: Yeah. Thank you very much.

MR. MURREN: Just one quick plug. There is another session. We'll be going over the same material tomorrow, 2:00. Thank you. Back to you, Eric.

(END)