**WorkforceGPS**

**Transcript of Webinar**

**Tracking TAACCCT Employment Outcomes: Alternative Strategies**

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BRIAN KEATING: Without any further ado, I'm going to turn things over to our moderator today. Welcome, everybody, to the "Tracking TAACCCT Employment Outcomes: Alternative Strategies" webinar. And to kick things off I'm going to turn things over to Cheryl Martin, program coordinator. Cheryl.

CHERYL MARTIN: Hi. Thanks, Brian. I'm Cheryl Martin. I'm the program manager for the TAACCCT grants, and judging by a lot of the names that I'm seeing pop up there in the introductions, I know a lot of you but not necessarily all of you. So anyway, thank you all for joining us today. I hope we have an interesting conversation for you.

I wanted to start with a couple of things. We always sort of start with this slide when we're doing technical assistance to tell you where we are on the map of all the places that are offering technical assistance to TAACCCT grantees.

So the people that are talking today are a combination of myself from the U.S. Department of Labor, Employment and Training Administration and also a couple of our TAACCCT grantees who we're delighted to have with us today and I'll be introducing in a moment. There are many other players that offer us technical assistance, all listed on that slide. We all try to work together as closely as we can, but that's where we are today is in that DOL box plus some TAACCCT grantees.

We also would like to use this opportunity to encourage folks to sign up for the TAACCCT Weekly Digest. This is a relatively new in the last month at least, maybe couple weeks, way to receive information about what's new about TAACCCT on the WorkforceGPS website.

You already had to register for WorkforceGPS to get onto this webinar. So you know where you are there, but if you go there and you log in and you go under my memberships and notifications, there's a community here called TAACCCT Learning Network. And if you check the little box to the right, that means that once a week on a Tuesday you'll get a little digest of the things that have been newly posted to the website. Just one example is the revised TAACCCT guide for reporting documentation that we're going to be talking about today.

And so, for instance, if you weren't on this webinar and you wanted to know about that, you would be receiving information about that that way. Of course we also send information out about this kind of thing through the newsletter and all of that. So there are really multiple ways for us to communicate with you, and however, this website, that allows allows you to comment on blogs or ask questions on the website, if you are a member of that community.

Today I will be speaking for a little bit, and then I'm going to be turning it over to Adria Harris and Maria Andrade who are, as I mentioned, TAACCCT grantees. And they're going to be giving us examples of how they track employment outcomes that they gather – ways that they gather information other than wage record data.

So for anybody who was not the earlier webinar that we did on this tracking TAACCCT employment outcomes, we did one about a month ago that was on using wage record data to track TAACCCT employment outcomes. And this is a follow-up saying, well, what if you can't use wage record data? Then what do you do? And so we actually have two parts of that agenda today.

So first of all, I'm going to start this webinar by responding to the question that we got on the last webinar – many questions, actually, about can we use survey data or not. And I think there's been a lot of confusion about that, and we have some clarification on that today which I think that most of you are going to be happy to hear. And I'm sure you'll let me know if you're not happy to hear that.

So I'm going to talk a little bit about that, some revisions that we've made to the Source Documentation Toolkit, and then I'm going to turn it over to Adria and Maria. After they speak, we're going to go to questions that would be addressed to Adria or Maria, and then after that we'll come back and take any questions that you have about what I've said here at the beginning. And we actually have 90 minutes for this webinar today, a little bit more than the usual amount in case there are questions that people want to ask about that.

So let me begin with answering this question about can we use survey data or not. I want to start with some background on that. First of all – and actually, let me mention a couple of other things too. So down below the slides here there's a box to the lower right that's called file share, and in that box there are actually eight different handouts for this webinar today. That's a lot more than we usually have.

The first one is a TEGL that I'll be referring to, and some of them are from Adria and Maria. The ones that are labeled WISE or SELA are related to them. The presentation is there in the middle of it, if you want to download that, and then the very last one – and you may have to slide that slider bar down on the right-hand side of the file share box to see all of the different handouts.

At the very bottom there's one called TAACCCT TA guide for reporting, and that is what I'm going to be referring to right now. And so that may be something that you will want to click on, and then once you've clicked on something, the system will allow you to download it. You can click on everything and download it all, if you want as well.

So I wanted to give a little bit of background about what I'm about to say here in terms of this clarification of this policy. In the original version of the Source Documentation Toolkit, there was a statement on page two that said something to the effect of, the attached table is not meant to be exhaustive. Grantee organizational policies and procedures may also identify other appropriate sources.

So some people looked at that and said, fine. I'm going to identify my appropriate sources and do some alternatives because I cannot get ahold of wage record data. Other people looked at the table and said, the only thing that I can use, it looks like, according to this, is paystubs or employer verification, unless I have self-employment and their self-attestation is acceptable. So what we found is that grantees were using a number of interpretations of that document. Maybe some of the FPOs were also using a number of interpretations of that document, and we just had a general lack of clarity.

Also, I think perhaps some grantees were perhaps using a variety of methods to collect data for their third-party evaluation and perhaps a different set of methods for performance. So anyway, a lot of different things may have been going on out there. In any case, I totally get that historically we haven't been as clear as might have been helpful around this issue.

So since that first wage record data webinar about a month ago when we got a lot of questions on this issue and when I promised we'd have a clear answer on this webinar, we've dug deeper on this one so that we could answer the question more clearly for you. So here's the clear answer, and I think most of you will be happy to hear this.

There is guidance in a TEGL, which stands for Training and Employment Guidance Letter. It's an official kind of an advisory that the Employment and Training Administration puts out on various things. So there was a TEGL named 17-05, and at the top of the file share box is a copy of that TEGL. And that was issued, oh, a long time ago about how to collect data for – how to report on data for the Workforce Investment Act and what can be used when wage record data is not available. So we have decided to clarify that TAACCCT, that our guidance for you around what to do if you can't get wage record data for TAACCCT is that we're going to be consistent with TEGL 17-05, and I'll tell you a little bit more about what that means on the slides here.

Specifically, that means that the – and on this slide right here in front of you, that there are some allowable sources that are now specified in our revised Source Documentation Toolkit. And the version – and that includes – besides paystubs and employer verification, it includes case management notes, automated database systems, One-Stop operating systems' administrative records, surveys or participants, and contacts with employers.

So what we've done in the document that is called the Source Documentation Toolkit is added language that is to that effect, and if you pull down that document called – I guess here it's called handout. TAACCCT TA guide for reporting is what you'll see on the file share screen. If after this call or during this call or whatever you pull that down, you will see that we have revised that as of today's date, June 30, and the revised sections are shaded in gray just so that you know what has changed in here.

A lot has not changed. One of the changes that we made is we got rid of stuff that only related to round one because of course you all are rounds two, three, and four. We added a paragraph on page one, which is basically language that comes from that TEGL 17-05, and then in the table under B.8, B.9, and B.10 we added some forms of acceptable documentation, the same thing that you see right here on this slide, paystubs, employer verification, case management notes, et cetera.

So that we hope will make it more clear that, yes. You can use survey data. You can use some of these other things as well, and let's see. So here's also a link to that TEGL. You can look it up that way by clicking on that link, or you can download it from that file share.

A couple of things to note. We are still looking for people to use wage record data, where it's possible to. That is still considered the best way to get information about employment records, but as this language from TEGL 17-05 says, "For grantees that do not have access to wage records, supplemental sources of data will be permitted," it says, "as an interim means of reporting on the earnings measure."

If you get access to wage record data next year, great. Use that, and we are still looking for you to work together with your state to get that, but I know that a number of you have just been having real challenges with that. Another thing about this is that if you are using any of these alternative approaches, your methods must be documented and are subject to audit, as always with these things.

So just a couple of overview items on this and then if you have further questions about this, you can put them into the question box and I will look at those and we will try to get to as many of them as we can today after Maria and Adria talk. And if we can't get to them today, we will figure out a way to answer them for the future, possibly in the next performance reporting webinar or some other venue that makes sense.

So couple of important things to note. Wage records should still be the primary source, if possible. Supplemental sources of information can be used in combination with or in addition to wage record data. And whatever you do, document it very thoroughly to show I got this information from here. This is how I got it from there. This is the survey that we used. This is who it went to. All of that stuff should be very thoroughly documented so that anybody who comes in either for an audit or for a monitoring visit would be able to go in and look and see how you got your numbers. OK. So like I said, we will address more questions about that later, if that would be useful.

We're going to change directions a little bit, and we're going to talk to two – or we're going to hear from two people, two of our grantees who have been using some other ways of collecting data in addition or instead of wage record data already. And so we're going to hear from them how they do that, and once both Adria and Maria have spoken, we'll take any questions that might be relevant to them.

So let me introduce Adria Harris. She is the project manager for TAACCCT at Renton Technical College with a program called the Washington Integrated Sector Employment or WISE. So, Adria?

ADRIA HARRIS: Yes. Hi. Thank you. Like Cheryl said, my name is Adria Harris. I'm the WISE grant manager at Renton Technical College, and WISE stands for Washington Integrated Sector Employment. And Renton Technical College is located about 15 miles southeast of Seattle, Washington in Renton, Washington.

The WISE grant at Renton Technical College is part of an eight-college consortium led by Centralia College in Centralia, Washington. Renton Technical College WISE grant is focused on educating and training individuals for employment in high-wage, high-demand construction-related careers.

So today I'm going to talk about student surveys that we administer to students to determine wage and employment data. The primary way that we obtain employment and wage data is through a contracted agreement with the Washington State Employment Security Department or ESD. The Washington State Employment Security Department provides information on unemployment insurance, wage, and employment data.

So there are three reasons why, as a TAACCCT round four grantee (sic) we decided to administer student employment surveys as a backup to our ESD data, all of which have to do with our previous experience as a state with TAACCCT grants.

In October 2011 Washington State was awarded a round one TAACCCT grant, and during that first year of the grant we were really unsure if we would ever be able to get a contract with the Washington State Employment Security Department to get the wage information. So as a backup we started to administer student surveys. We did end up establishing an agreement with ESD in the second year of that TAACCCT round one grant, but we continued to survey students and administer a self-survey for employment and wage data.

The second reason why we use student surveys is that we discovered that ESD data can be inaccurate or incomplete. So it doesn't track if students move out of state to get employment. So in the construction industry there's a huge boom of job opportunities in Oregon and Idaho and Alaska and California.

So many of the students that we train at our college move on to employment out of state, and so our ESD does not track the wage data for students or individuals who find work out of state. Also, if a student ends up opening up their own business, it can take up to a year for students for ESD to report that data of their self-employment. So it's a really good idea for us to get student survey information because we can contact the student directly and get information from them about where they are employed.

The third reason why we decided to do student surveys is because the ESD reports only how much an individual makes but not necessarily where a student is working. So, for example, ESD will report that a student is working in food services but the student is actually working as an HVAC technician for a food service company.

And so because our WISE grant program supports construction-related programs at our college, we want to know if a student is working as an HVAC technician because that is part of a training program that we're working that we offer at Renton Technical College. So we want to see if the training program actually led them to a job in that field. So those are the three main reasons why we started to use student surveys as a backup.

So now, I'm going to talk a little bit about the surveys that we administer to students. So we have five contact points with students where we administer the student survey. The first time is at intake. So we facilitate an intake and orientation workshop, and at that time students complete FERPA paperwork and EOO forms and they also complete the participant employment information form.

This form should be available in the file share box. The form is pretty simple, and I'll take a couple minutes to go over the form. We simply ask students the name of their current employer or their work place, the job title and the occupation, the hours worked weekly, and their hourly wage. We ask for the employer's street address, if that student knows the street address, and the starting date that the student is with their current employer.

We also ask if the job that the student is working in is related to the same as their program of study, and then we ask for a signature from students. We have 100 percent completion rate with this form because we are in a workshop setting, and we actually take students line by line through the document. So all of the students fill out this form, and if they are not working, then we ask them to simply put not applicable on the form.

The second time that we administer the employment self-survey is at completion with exit. So we give students what's called the student exit questionnaire, and this is also available in the file share box. And we administer this form when students have completed their program and are going to exit the college. We administer it one on one or in small groups, and this form we actually get a few pieces of information.

We get student information like their name, their current phone number and e-mail, their program completion date, if they obtained a degree or certificate, and the name of the program of study. We then go on to ask students for employment status. So we ask them if they're currently employed. If their new or existing job is in the same field as their educational program that they completed, we ask if they saw any pay increase, more hours, or benefits after completing their educational program.

We ask the name of the company they're working at, their start date, position, hours per week, and hourly salary. And then we go on to ask if they're planning to continue their education either at a four-year college or at a less-than-four-year program. So we have made some adjustments to this form just recently, and so we're also going to be asking students a satisfaction survey – their review of the services they received from the WISE grant.

We use the same student exit questionnaire with three-month and six-month follow-ups with students. So we will call or e-mail students at least three times, and if we don't get a response after three attempts, we stop trying to contact the student and we rely solely on our ESD data that we get from the Employment Security Department.

I attribute one of the reasons why we've had such success with getting responses from students on these forms is the relationships that we have built with the students. We will have met with students at least five times in a workshop setting before their completion and exit from the college, and in many cases we will meet with students on a one-on-one basis several more times before they exit the college.

So I really think that the relationships that we have built with students has attributed to our ability to get information about employment and wage data from students. Well, this actually concludes my portion of this presentation, and I will look forward to answering questions after Maria has completed her presentation. Thank you.

MS. MARTIN: Great. Thank you, Adria. I appreciate you being on the call.

I'm going to turn now to Maria Andrade, who is the project coordinator for our TAACCCT grant at Delgado Community College. Maria.

MARIA ANDRADE: Greetings, everyone. Yes. My name is Maria Andrade. I'm the project coordinator for Delgado's Scale-Up SELA program. We are a single-institution grantee, and we received our grant back in 2014. And I will be sharing with you today a few of our tools that aid us in obtaining employment verification.

Orientation and one-on-one assessment are elements of our overall case management approach where we present the students with two consent forms, the authorization to disclose information and the student's authorization for employer verification. The authorization to disclose information form provides us with the student's consent to share information with third-party entities.

We made sure this form included the student's acknowledgement and understanding of FERPA. It clearly outlines who would be disclosing information, the type of information, and what's the purpose, which is all grant-related and information that's needed for the grant. We also mention in the form our third-party evaluator, our One-Stop centers, and community-based organizations. This helps us be able to reach out to other case managers and retrieve information on the student.

The next form is the student's authorization for employer verification, our second consent form, and this gives us consent to contact the student's past and present employers. What's unique about this form is that we have designed it to include the date range of the grant, which allows us to obtain information at any point in time during the student's participation in the program. And this becomes important to us for when the student has exited the college and has entered reporting quarters and we're trying to verify employment and the student is not present.

The last form, the third form I would like to share with you is the employer verification form, which is submitted directly to the employer. If the student has not provided us with a stub or other form of verification and we have the consent form on file, we then use this form and send it to the employer. We may send the employer the consent form also so that the employer can be comfortable with disclosing the information. And I just want to mention that we secure 50 percent of our employment verification using this form. And all three forms are kept in the student's file along with case notes documenting the interaction.

And our last line of defense in obtaining information is the supplemental tool that we use called the Work Number by Equifax. This is an online employment verification database that companies subscribe to. We have found that very useful. All you have to do is enter the student's Social Security number, and if it's in the information that's in their database, it pulls up the student's employment history. Some of the advantages of it is that it is valid employer verification, and companies outsource this HR function to Equifax. So it is valid, and it's real-time.

Multiple verifications can be captured for multiple quarters, which makes it very, very easy, and it also – the verification includes all of the required information for reporting. So you get really a full package when you pull – when you use this tool. The service does cater the Social Service agencies, and, again, it's really, really easy to use.

Some of the cons is that it is a fee-based service. You have to apply and then complete an on-site inspection. And another downside of it is that not all employers subscribe to this service, especially smaller businesses, and you will end up getting some incomplete student work history.

So not every employer that the student has worked will be listed on there. We use this as a last resort. Maybe about 20 or 30 percent of the time it works out for us when we are trying to verify our non-incumbents for our income. Then it's useful because, although it does not tell us a wage gain, but if they have changed employers and they're making more money, it does reflect on there.

So those are basically the tools that we use, and I'll be happy to answer any questions that you may have. Thank you.

MS. MARTIN: OK. Thank you, Adria. If people have questions for Maria or Adria, please put them into the chat over on the left. I'm going to start with one question for Adria, and actually, I think this one goes for both of you. So the question was – and I know that you addressed this a little bit, but we'll just go back to it.

The question was, "We have a difficult time reaching the students after the exit the program of study. What are some of the strategies you would recommend to reengage with students who have exited the college?" So I'm going to turn first to Adria and ask you to respond to that and then, Maria, if you have anything to add to that, we can go there.

MS. HARRIS: Sure. So I think that what works for us is that we have built strong relationships with the students. So as I mentioned, they will have been in a workshop with us at least five times during the duration of their program, and we also meet with students individually. But in addition to that, we have really good relationships with the instructors and so a lot of times the instructors will know where students are working and then they will help us to access the student to get that information.

So again, I think the relationships that we built have been very useful for us in collecting this type of data.

MS. MARTIN: It sounds a little bit like a puzzle piece that some – when you do a jigsaw puzzle, some pieces are easy and you put them in a whole bunch at once, and then others you just have to hunt down one at a time. Is that what I'm hearing, Adria?

MS. HARRIS: Yes. I would say that's very accurate, and yeah.

MS. MARTIN: Unfortunately.

MS. HARRIS: Yeah.

MS. MARTIN: Yeah. OK. Maria, do you have anything to add on that, how to find people after they've exited?

MS. ANDRADE: Well, we begin engagement with students from the very beginning. Again, with a case management approach, we interact with the students at the beginning with an orientation. So all the students are orientated. Then we have career navigators that are kind of like a counselor to that student that assist them throughout their training, and they sit down with them and have a one-on-one assessment.

And then they assess academic and career goals and then that navigator maps out a service plan to obtain those goals and they keep constant contact with the student during training and then after. And once the student completes the training, they work with our career developer who offers soft skills, resume and job placement assistance.

So that constant communication and connection helps us be able to really have a relationship with that student and then gather all the information that we need for reporting. So it's a real team effort that we have here and also with our instructors, we bring them in and communicate openly about the success of the student and that has helped us with making sure we don't lose them.

MS. MARTIN: OK. Great. So sounds like a lot of it is communicating from the very beginning how important it's going to be to have this follow-up information and then relationships, relationships, relationships, huh?

MS. ANDRADE: Yes.

MS. MARTIN: Kind of like the realtors would say location, location, location. So OK. So I don't see any other questions. Oh, wait. I see one here that says, "About how many student participants are in each of your programs?" So, Adria, about how many student participants do you have?

MS. HARRIS: We have about 223.

MS. MARTIN: OK. And for you, Maria? How many do you have?

MS. ANDRADE: We have about 260.

MS. MARTIN: OK. OK. So up above 200 for each of you. I know that there are other grantees who have probably closer to in the thousands. So this kind of – they have a much bigger puzzle to put together. It's like a jigsaw puzzle that has 223 pieces versus the 1,000-piece size. So I know that that could present some challenges.

MS. ANDRADE: Yes. May I add, for our grant we have to impact 1100 students –

MS. MARTIN: Oh, OK. OK.

MS. ANDRADE: – because of the grant. The number that I'm saying is just right now at this point, but it's a monumental task to try to get all those students.

MS. MARTIN: OK. So we're getting in a couple more questions for you all, which is good. So one of them says, "Some of our students are only in contact with our college for a two-day certificate course. So really there's not a lot of chance to build a lasting relationship with them. How can we obtain wage information from these students who just come and go so quickly?" Any thoughts on that, either Adria or Maria?

MS. HARRIS: Well, I would ask if they – could they give a participant information form right – or employment information form right there? Have them fill out some intake paperwork in that workshop or whatever it is. Have them fill out some paperwork there about their employment.

MS. MARTIN: And then also the forms that you would use to allow for follow-up as well; right?

MS. HARRIS: Yeah. I would just let them know that I would be contacting in three months, in six months, in nine months to follow up so that they have a heads up to expect that down the road.

MS. MARTIN: OK. All right. Thanks. Anything else to add on that?

OK. Another question that sounds like it's for the two of you, "With the employer-based verification, do some employers still refuse to provide information, even if you have a student-signed authorization form?" What has been your experience with that, Maria or Adria?

MS. ANDRADE: We have – our career developer works real closely with employers. So the job placement referrals that we offer to students ends up being very successful because we end up placing them ourselves. So we already have a relationship with the employer. But if it's a case where the student found employment on their own and it's not – we don't know them, that's when we have gotten some pushback on that, but for the most part they've been responsive.

Once we introduce ourselves and they know that the student has received training from our college recently and we explain that, then that ends up working out. And then a Work Number ends up being kind of like a catch all. If it's a big company that already subscribes to this, we don't even need to engage the employer. We just go to the Work Number and get the information we need.

MS. MARTIN: OK. Thank you. Anything to add on that, Adria?

MS. HARRIS: No, because we don't actually reach out to the employers directly.

MS. MARTIN: Got it. OK. OK. All right. Well, I think, as far as I can tell – sometimes it's hard to sort through everybody's questions that are coming in. But as far as I can tell, those are the questions that seem to be addressed to Maria and Adria. So thank you so much to both of you for sharing today. I hope that what you've shared is useful to the folks who have joined us on the call.

If you do have any additional questions for Maria or Adria, feel free to put them into the chat there. You might put their names at the beginning of the question. That might help, and I can go back to those later after I respond to the questions that are about the part that I was talking about because it doesn't look like there's a lot. It looks like we've got plenty of time here today to address the questions.

So we're going to go to a couple of poll questions right now related to what I mentioned to you, and then I will be back in a moment with some responses to some of the questions that people have typed into the chat. So for right now, if you could just look at the poll questions and respond to those, we'll be right back.

MR. KEATING: All right. Great. Thanks, Cheryl. And so many of you have already discovered the poll question that we have up on your screen. So you see that up now. Basically, we're asking does the information presented about the revised Source Documentation Toolkit seem like new information to you? And your answers are yes, sort of, and no.

So again, many of you went ahead and chimed right into that chat giving us your feedback, but if you haven't already done so, go ahead and make sure you vote now. Again, click the radio button on your screen that is the best choice for your response.

And looks like many of you have voted. So thanks for that. OK. Looks like the yays have it. About 48 of you said yes. 25 or so said no, and a couple of you said – I'm sorry. 25 or so said sort of, and just a couple of you said no. So thanks for that.

Got one more poll for you that we're going to bring up here in a moment. We definitely want to give you a chance to give us your feedback. Also, the chat is available to you. So feel free to keep asking questions or making comments using that chat button – chat feature on your screen, on the left-hand side of your screen.

Also, this is a good opportunity to let you know that all the handouts are still available. Feel free to download those using that file share window, and we'll go ahead and those will be available throughout today's webinar as well as using the resources page. They are posted or they will be posted as well as a webinar recording and a written transcript, which will be posted in about two business days. So early next week at this point will be available for you.

All right. And then we've got one more poll question for you that's up on your screen now. Looks like many of you have already discovered that as well. So want to invite you to answer that now. The question again is will the clarification to the Source Documentation Toolkit be helpful to you? Your choices are very much, somewhat, not helpful, or maybe you're not sure yet. So if you haven't already voted, go ahead and click the radio button again on your screen for that.

All right. Thanks to everybody who's voting in that. Great. Great. Great. All right. Looks like again the very muches have won the day for this second polling question, and about 60 of you said very much. 14 or so said somewhat. Nobody's voted that it's not helpful. So thanks for that feedback. That's good to know, and a couple of you are not sure yet. About a half a dozen voted to not be sure. So thanks for your feedback on that as well.

All right. Just a reminder, we are recording today. We've got plenty of time to address your questions or comments. So please do type those in, as a few of you are doing. So feel free to type those in now using the chat window, if you haven't already done so. We'll address as many as we can. And also just a reminder that we are recording today, and that recording and a written transcript will be available in about two business days, so not including the July 4th holiday on Monday. Should be early next week at this point. And all right. Great. I think we're going to go ahead and return to the questions. So thanks, everyone, for answering those questions. And again, the chat window is open, if you'd like to keep asking your questions. But, Cheryl, I'm going to turn things back to you to kind of address a few more that came in while we took a break.

MS. MARTIN: OK. I'm going to go with the first question that came in, and now we're back to talking about questions that relate to the revisions to the Source Documentation Toolkit, the last item in the file share window that I started talking about at the beginning of this webinar. So these questions go back to that.

The first question is, "Can you please give clarity on the use of self-attestation as proof of employment for incumbent workers and whether it can be used for non-incumbents that enter employment?" So incumbent workers would be those who you're just looking for the wage increase data, and the non-incumbent would be did they enter employment.

As far as our read of it is is that the TEGL doesn't make any distinction between those sources of data being acceptable for incumbent versus non-incumbent. So I think that our read of that TEGL is that you could use those sources that are mentioned in there for both incumbent and non-incumbent.

Second question is, "Is the student survey, in essence, a self-attestation of employment?" And the answer to that question is, yes. It is. That's essentially what a survey is. I'm – if I checking off a box, I'm saying that I accomplished something. So that is a form of self-attestation there, but I'm going to talk – I'm going to say that, yes. In the context of the next question, which is about sort of a hierarchy of what we would consider acceptable.

So the next question is when receiving employment information from various sources for one participant. Now, this is interesting because it's about what if I have multiple different sources of information for one participant? And we're going to call that participant "Susie." So I have various sources of information about employment for Susie, and the question is, "Is there a hierarchy of what you would consider acceptable for DOL reporting? For example, if Susie reports that she has a job, self-attestation, but then it's not present in any UI data that I do have access to and the employer doesn't verify that employment, do you accept the participant's self-attestation?"

I think in that kind of a situation where you are able to triangulate data, in other words, double check it kind of like a reporter, verify everything with at least two sources, if you're getting conflicting information and the information that you're getting from the UI data or from employer verification is different than what you're getting from the person, then I would not accept the participant's self-attestation in that case. So you're going to have to make some judgment calls on that, but again, that's why you need to be documenting this.

And that also relates to the general message of TEGL 17-05, which is the best place to get information is from places like wage record data, but if you can't, then you go to other sources. And so in general, I think you're going to need to look at it and say, what's the most reliable source that I have available to me? And if you don't have wage record data available, document that and what you tried to get it and what you're still trying to do to get it and then go on with life and try to find some other ways of getting the information and start with what can be considered the most reliable.

And here's where I think your third-party evaluators could be useful to you, if you have questions about that. You could say, in the world of research, what would be considered the most reliable way of gathering this data? And then you can document that you had the conversation with them, and you can document what you all came up with as your sort of hierarchy of how you're going to do this. And then do the best that you can. So that's what we're asking for there.

I'm going to go on another little pause here. I don't have any more poll questions for you during this pause, but if you'll just give me a moment, I need a minute to look at questions. I can't talk and think about new questions at the same time. So we're going to go on silent here for just a minute or go back to Brian, and we'll be back with you in a moment.

MR. KEATING: Sure thing. And while we're taking a pause here, I want to just take a moment, now that we're addressing questions, you'll notice that the file share window has moved to the bottom left-hand corner of your screen. Again, hopefully you see all those files coming up in that window. However, depending on the size of your screen, you may need to go ahead and use the scroll bar on the right-hand side of that.

All right. And we're going to actually bring up a – kind of a poll, an on-the-spot poll here. So just a moment while we create that. Also, just to finish the thought here, if you haven't already downloaded the slides or the other handouts that are available, you can do that in the file share window right on this screen. So go ahead and click the file name.

Again, if you can use control-all or control and select multiple or however you do that on your computer and then you can select one at a time or do more than one, and then once you've selected the files you want to download, you can go ahead and click download files and then we'll go ahead and those will be available. It will show up in your internet browser in a new tab or a new window. You may need to disable temporarily your pop-up blocker, if you have one installed on your internet browser or on your computer. And at that point, it should be pretty obvious how to download it directly to your desktop or wherever you download files to.

All right. And as you noticed, we did put up another polling question. We're interested if you will – if you are registered for the TAACCCT e-mail digest, and we're getting responses here. It looks like not everybody is. So thanks for letting us know if you are or not. So again, if you haven't voted, that polling window should be right up on your screen. Just click yes or no. Click the radio button, and that will give us a better sense of how many of you are currently registered to receive those TAACCCT e-mail digests that we talked about earlier.

All right. Getting real-time feedback here. It looks like 35 of you are. 24 do not. All right. Great. All right. We're going to go ahead and go back to questions. I'll turn things back to Cheryl.

MS. MARTIN: OK. So for those of you who are not registered for the TAACCCT Learning Network – Scott, help me out here. My mind is in another place. Anyway, if you're not registered for those, please you can even do it during this call. If we have a pause, you can go onto where you are on WorkforceGPS and just check that little box, and then you'll get those Tuesday e-mails.

OK. So another question that we got is – sorry. I am losing track of what I said I was going to do here. I got one question or comment, and I'll just acknowledge this. It said, "The new information revisions are somewhat helpful, but it's a little too late."

And I totally understand that. I get that some of you are so far down the road that it would be too late to go back and catch people now doing that, and I understand that. We did try to respond now to the questions that we were getting now about this and to make it hopefully work better for at least some of you going forward.

Another question that we got is, "Is the student survey sufficient as documentation?" I guess I would go back to what I said earlier, which is, well, it depends on what else you've tried. If you have documented that you tried to move mountains to get your UI – you don't have to quite move mountains.

Maybe some smaller hills – to get your UI wage record data, and you've tried a number of different things and this is the best source of information that you have, you've talked with your third-party evaluator and tried to figure out the most creative and best ways that you can do things. You've listened to this webinar and you've tried all the things that the people on this webinar suggested. Then – and that's what you have. Then document that that's what you have, and that's what you have.

I'm going to go to another question now that says, "We do have an agreement to receive UI data. However, there are gaps in that data such as self-employment, employed out of state. There's an employer delay in reporting. They might be federal employees like a postal worker. Should we be pursuing all participants who completed and exited as insurance to fall back on just in case their UI data doesn't come through?" I would say yes. This also depends on how close you are to another state.

Where we live here in the District of Columbia, Maryland, Virginia area, we always know that people can get jobs in any of those three areas, whereas if you're in the middle of a large state, then it's less likely that people are going to be going out of state. But anyway, people always end up moving out of state, some people. So yes, I think it would be a good idea to be pursuing all participants who completed and exited because you don't know if their UI data doesn't come through.

The other thing that we talked about internally amongst ourselves was the concept that, for those of you who get UI data as aggregate, you may have to give some thought to how you group the information that you send over to get your aggregate data back from; right?

So, for instance, one perhaps simple way of thinking about it is you might want to send over all of the, if you have a way of knowing this, folks who live in your state or for any reason you have reason to believe that some people are still in state, send that over as a group because if you're getting back aggregate, you don't know which – you don't know if Susie is in the group that's employed or not employed when you get it back.

So think that through in terms of – somebody was talking to us about this that you can think through how you send over your clusters of information so that when you get it back, you're getting back the information in a way that's useful to you.

And that might be something that you could talk to your third-party evaluator about in terms of what the best way would be to do that because hopefully you have been talking about this with them all along because they have need to access similar information and perhaps even – I'm guessing even more information than what you're turning in to us for reporting, that you would be gathering, even more information than that.

OK. Going to go on another little pause here and read a couple more questions.

MR. KEATING: All right. Great. Thanks, Cheryl. And it's not too late to ask your questions. And, Kathleen, you must be reading my mind. We saw your comment about where do you find the button to click to receive the weekly updates. And you should be able to just log in your WorkforceGPS account, and then you should find a button to be able to do that. And I believe there's a screenshot in the slides.

Let's see if I can find that quickly here just to give you a sense of where to go do that. You actually have to log into your WorkforceGPS account. So there's no specific link we can send you to, but if you log in your account, hopefully it's somewhat obvious where to go do that. And also just want to remind you that we do have a screenshot. So let's – let me quickly go over this while we address any other questions that have come in.

So when you log in and you're brought to your membership notification page, you'll notice there's a tab here under my memberships and notifications, and you should be signed up for the TAACCCT Learning Network community. There's a little button that you need to check to actually receive those weekly digests. So hopefully you've done that. If not, you should be able to log right in to WorkforceGPS.

By the way, that's the website that you logged into to attend today's webinar. So you should already be all signed up for that. If you go back to your account page, you should be able to just click the memberships notification tab, and then make sure that, one, you're signed up for the TAACCCT Learning Network community but also you've checked this little box to receive the weekly digest updates. And then obviously, check your spam folder if you don't think you're getting those.

And if you have any problems, there's also a help page on WorkforceGPS. If you needed it, we can work with you as well. Feel free to explore the new website. It's been out for a few months now, but I know it's slightly different than the tool we were using before. So feel free to investigate, and let us know if you need help. We'd be happy to walk you through it, but here's the visual that we shared with you earlier.

All right. And I think we're going to go back to answer some more questions. So, Cheryl, I'll turn things back to you.

MS. MARTIN: OK. Thanks. So I have one more – actually, I have two more questions. So somebody asked, "What information will you be looking to see in case management notes as proof of employment and retention?" So I can't tell you the answer to that question because I'm not the FPO that comes out and visits your site. I think this goes back to do the best that you can.

Use the highest, the most rigorous method of getting this information that you can, and then if you can't get that information for some of them, you can say, this is what I've got and document that for this person this is what you had. You're documenting a conversation. You're documenting whatever it is that you can get. I don't know. FPOs are FPOs. They're all their own people but – and they – and their regions – well, anyway, if I was an FPO and I came out on a site visit and all I saw were case notes, this person said they're employed, this person said they're employed, that person said they're employed, and I didn't see any effort made to get any other more rigorous kind of information, that would be a problem for me.

If I saw a lot of information that was more rigorous ways and a few of them here or there that were filled in that way, then I – that would be a different situation. So I'm going to leave it at that and just say you got to try to be rigorous and do your best and document what you've done.

Another question. "There is resistance from employers and participants in sharing paycheck stubs, HR records, and other documents that may be perceived as personal information. Since this seems to create hostility between the institution and the employer participant and this new guidance states that surveys are OK, should we be pursuing this additional documentation at all?"

Well, I guess I would say that we just heard from two speakers who told us that they have found ways to create good relationships with both their participants and their employers. And so I think that there are ways to pursue this information that don't have to create hostility. You need to get that information at the beginning from people.

And the other thing I would say, that from employers you don't necessarily have to have them e-mail or whatever, send you a document that's a confidential document. If you have an employer, it's just like if you call them for a reference and say, can you confirm that this person worked for you between these dates and that dates? And they'll say, yes, that matches my records; that's adequate.

So if you're talking to the employer themselves, you just need them to confirm or not confirm the employment of the person. Of course if you've got a wage record issue there, then you can ask the employer about the wages and so forth. If the individuals are not wanting to provide that information, then document that. The individual declined to provide this information. If you've got most of your participants and employers declining to provide this information, then I'd say you've got a different kind of an issue there. If that happens on a scattered basis, then that's kind of like life. That would be my take on that.

OK. We have a question that is really more of a Kristen question about reporting. So I'm going to – the person who sent in that question about not entering employment after – since we have time, I'm going to ask Kristen if you could take on the question that's number 16 down here in our internal list. It's a pretty – or Scott, one of you. The question is, "Students that don't enter employment after completing the program, instead they further their education through an articulated agreement, how do you report those students? Also, would you need to verify this as well?"

MR. KEATING: All right. And, Kristen, we've unmuted your line, if you want to chime in.

MS. : OK. If they've exited the college, then you would report those students in B.7 as furthering their education. And all you would need to do there is you would probably have to – in that case that would not be a wage record issue at all. So this would be some kind of a survey or self-attestation. That would be up to your institution to determine how you are gathering that information.

MS. MARTIN: OK. Thank you. I am not seeing other questions that came in from people about this – about these issues right now. I realize that people may have questions as you sort through this, as you talk to other people who weren't able to be on the webinar today, as you talk with your third-party evaluators, and so forth. So if you have additional questions about this, obviously, please do send them in to TAACCCT@dol.gov.

I did want to say that we just let the FPOs know about this policy change within the last week or this policy verification within the last week. And so not all of the FPOs make it onto the calls or the e-mails that we send out immediately, and that week they may have been out on a site visit or something like that. So if it sounds like your FPO is not quite aware of this yet, just give them a chance to catch up with life.

We will be sending out this Source Document Toolkit revised version. We will be sending it out via all the normal channels. We'll send it out to the TAACCCT point of contact and signatory that are in the official records that we have. We will put it in our next newsletter. We'll be posting it on the website and sending it out as part of the TLN updates that come out on Tuesdays. We will send it out to the newsletter list, the people who get the newsletter, and that kind of thing. So we'll be extending that broadly to everybody, but you are the first to hear. So that is one of the things that I hope is useful to you about coming onto this webinar.

If there are other questions that we see that come up today, we will consider answering them either in the next performance reporting webinar, if they're that kind of question, or in some other venue. So I think that for now I'm going to turn it back over to Brian after saying thank you to Maria and to Adria very much. Appreciate that you were on the call today, and thank you all for joining us today. I think there are probably about 100 of you on the call today, on the webinar.

And our next webinar is going to be the performance reporting Q and A that will be July 27. Yeah. Let's go there. July 27, that's our monthly performance reporting Q and A session, and if you have questions that you want to have answered – they can be about anything, not just about what we talked about today, if you haven't been on that call before – send them to us at the TAACCCT mailbox by July 22, and we will do our best to address those in the July 27 webinar. Often we also have a little special section of that webinar that is on a certain topic.

So if there are a lot of questions about what we talked about today, we might address them then, for instance.

So I'm going to turn it back to you, Brian, and thank you much – thank you very much, everybody, for participating.

MR. KEATING: All right. Great.

(END)